Volume 3
Comment Responses and Reprinted Letters

Abbreviations and Acronyms

Reader note: *Refer to the list below for abbreviations or acronyms that may have been used in this chapter.*

ACEC ~ area of critical environmental concern
ADC ~ animal damage control
AML ~ appropriate management level
AMP ~ allotment management plan
AMR ~ appropriate management response
APHIS ~ Agricultural Plant and Animal Health Inspection Service
ARA ~ Andrews Resource Area
ATV ~ all-terrain vehicle
AUM ~ animal unit month
BA ~ biological assessment
BIA ~ Bureau of Indian Affairs
BLM ~ Bureau of Land Management
BMP ~ best management practice
BO ~ biological opinion
BOM ~ Bureau of Mines
BOR ~ Bureau of Reclamation
BPA ~ Bonneville Power Administration
CERCLIS ~ comprehensive environmental response, Compensation and Liability Information System
CEQ ~ Council on Environmental Quality
CFR ~ "Code of Federal Regulations"
CLCAS ~ "Canada Lynx Conservation Assessment and Strategy"
CRMP ~ "Cultural Resources Management Plan"
CWA ~ "Clean Water Act"
DLCD ~ Department of Land Conservation and Development
DOD ~ Department of Defense
DOE ~ Department of Energy
DOGAMI ~ Oregon Department of Geology and
Mineral Industries
DOI ~ Department of the Interior
DPC ~ desired plant community
DRFC ~ desired range of future conditions
EA ~ environmental assessment
EIS ~ environmental impact statement
EPA ~ Environmental Protection Agency
ER ~ entrenchment ratio
ERMA ~ extensive recreation management area ERU ~ ecological reporting unit
ESA ~ "Endangered Species Act"
ESI ~ ecological site inventory
E/EIS ~ "Eastside Environmental Impact Statement"
FAA ~ Federal Aviation Administration
FERC ~ Federal Energy Regulatory Commission
FLPMA ~ "Federal Land Policy and Management Act"
FMP ~ fire management plan
FWFMP ~ "Federal Wildland Fire Management Policy"
GIS ~ geographic information system
GMA ~ geographic management area
GTR ~ green tree replacement
HA ~ herd area
HMA ~ herd management area
HMP ~ habitat management plan
HUC ~ hydrologic unit code
ICBEMP ~ Interior Columbia Basin Ecosystem Management Project
IMP ~ "Interim Management Policy"
IMPLWR ~ "Interim Management Policy for Land under Wilderness Review"
INFISH ~ "Inland Native Fish Strategy"
JRA ~ Jordan Resource Area
KGRA ~ known geothermic resource area
LCDC ~ Land Conservation and Development Commission
LGMP ~ "Leslie Gulch ACEC Management Plan"
MFP ~ management framework plan
MOU ~ memorandum of understanding
MRA ~ Malheur Resource Area
NCA ~ national conservation area
NEPA ~ "National Environmental Policy Act"
NHOT ~ National Historic Oregon Trail
NHPA ~ "National Historic Preservation Act"
NL ~ no leasing
NOAA ~ National Oceanographic and Atmospheric Administration
NPS ~ National Park Service
NPSP ~ nonpoint source pollution
NRCS ~ Natural Resources Conservation Service
NRHP ~ National Register of Historic Places
NSO ~ no surface occupancy
NWSR ~ national wild and scenic river
NWSRA ~ "National Wild and Scenic River Act"
NWSRS ~ National Wild and Scenic River System
OAR ~ "Oregon Administrative Rules"
OBSMP ~ "Oregon's Bighorn Sheep Management Plan"
ODA ~ Oregon Department of Agriculture
ODEQ ~ Oregon Department of Environmental Quality
ODF ~ Oregon Department of Forestry
ODFW ~ Oregon Department of Fish and Wildlife
ODOT ~ Oregon Department of Transportation
ODPR ~ Oregon Department of Parks and Recreation
ODSL ~ Oregon Division of State Lands
OHV ~ off-highway vehicle
ONA ~ outstanding natural area
ONHP ~ Oregon Natural Heritage Program
ONHTMP ~ "Vale District Oregon National Historic Trail Management Plan"
ORS ~ "Oregon Revised Statute"
ORV ~ outstandingly remarkable value
OWFEIS ~ "Oregon Wilderness Final Environmental Impact Statement"
OWS ~ occupancy with stipulations
PFC ~ proper functioning condition
PILT ~ payments in lieu of taxes
PNC ~ potential natural community
PP&L ~ Pacific Power and Light
PSEORMP/FEIS ~ "Proposed Southeastern Oregon Resource Management Plan/ Final Environmental Impact Statement"
PRIA ~ "Public Rangelands Improvement Act"
PUC ~ Public Utilities Commission
RAIDS ~ riparian aquatic information data system
RAWS ~ remote automated weather station
RCA ~ riparian conservation area
RMO ~ riparian management objective
RMP ~ resource management plan
RNA ~ research natural area
ROD ~ record of decision
ROS ~ recreation opportunity spectrum
RPS ~ rangeland program summary
RS ~ "Revised Statutes"
R&PP ~ recreation and public purpose
SCORP ~ Oregon's "Statewide Comprehensive Outdoor Recreation Plan"
SEORAC ~ Southeastern Oregon Resource Advisory Council
SEORMP ~ "Southeastern Oregon Resource Management Plan"
SHPO ~ State Historic Preservation Office
SMA ~ special management area
SMCMPA ~ Steens Mountain Cooperative Management and Protective Area
SRMA ~ special recreation management area
SRP ~ special recreation permit
S&G's ~ "Standards of Rangeland Health and Guidelines for Livestock Grazing Management"
TGA ~ "The Taylor Grazing Act"
TMDL ~ total maximum daily load
TNC ~ The Nature Conservancy
TNR ~ temporary nonrenewable grazing
T&E ~ threatened and endangered
USDA ~ U.S. Department of Agriculture
USDI ~ U.S. Department of the Interior
USFS ~ U.S. Forest Service
USFWS ~ U.S. Fish and Wildlife Service
USGS ~ U.S. Geological Survey
VRM ~ visual resource management
WAFWA ~ Western Association of Fish and Wildlife Agencies
WFSA ~ wildland fire situation analysis
WRCS ~ "Western Regional Corridor Study"
WSA ~ wilderness study area
WSRO ~ "Wilderness Study Report, Oregon"
WQMP ~ "Water Quality Management Plan"
WQRP ~ water quality restoration plan

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Comment Responses

Introduction

In October 1998, the Bureau of Land Management (BLM) opened a 120-day comment period to allow public evaluation of the Draft Southeastern Oregon Resource Management Plan/Environmental Impact Statement (SEORMP/EIS). At the request of BLM, all public comments were received in writing—266 letters through conventional and electronic mail, 14 of which were received after the deadline, but were included in the content analysis. A team of staff, most of whom were not involved with the Draft SEORMP/EIS, consolidated the comments from the 266 letters received into a "Summary of Public Comments" report. The purpose of this analysis was to objectively identify and display the nature and extent of the public input received on the draft plan. The report summarized opinions and supporting reasons contained in the public input and how they differed according to other variables that may be important, such as respondent's affiliation, place of residence, or other factors. This report was made available upon request in April, 1999.

The SEORMP Interdisciplinary Team used the "Summary of Public Comments" report as a template to respond to substantive comments. Comments on like issues were summarized and paraphrased by the team; however, each specialist also read each letter to better define the context surrounding the comments. All letters received are displayed following the agency's response to specific comments, and have been assigned an identification number in the upper right hand corner. These identification numbers also appear in each section of the comment analysis to indicate where the comments came from. Each section also identifies opinion or preference comments that are important but that do not lend themselves to a specific response. These opinions were considered, however, while preparing the PSEORMP/FEIS. Numbers of comments are presented in both Inputs (I) and Signatures (S): for example; if three people signed one letter the tally would be I=1 and S=3. Each comment and response is also numbered for easy reference. Some letters were official positions of governments, groups, companies, or organizations who represented a large constituency. A summary of public comments, as well as changes made to the plan as a result of those comments, is included in the beginning of Chapter 3.

Comments Regarding Andrews Resource Area

In October 2000, the "Steens Mountain Cooperative Management and Protective Act" (H.R. 4828) was signed by President Clinton. This legislation created far different management for the Andrews Resource Area (ARA) than the Draft SEORMP/EIS had analyzed. Therefore, it was determined that the ARA should be extracted from the PSEORMP/FEIS.

All of the letters commenting on the Draft SEORMP/EIS are published; however, since the ARA has been removed from the plan, the comments specific to the ARA do not have a written response. Some comments are inclusive of ARA, or allude to all three resource areas, and have been responded to. ***All comments regarding ARA will be carried forward to the scoping process for the "Steens Mountains/Andrews Resource Area Resource Management Plan."***

Comment Responses

Plan Format

No.	I	S	
1	1	1	**Comment:** Table of Contents and body of report are not properly marked with section number. **Response:** This has been corrected in the final plan.

Opinions or Preferences

1	1	Suggest that goals on Page 3-1 be included in Purpose and Need section.
1	1	A chapter for each resource would make the document easier to read.
1	1	Page headings should include the topic discussed on that page.

LETTER NUMBER: 004, 240, 241

Alternatives in General

No.	I	S	
2	146	155	**Comment:** Commentors favor strengthened Alternative D that more greatly restricts or excludes livestock grazing. *Reasons:* *because livestock should be excluded from riparian areas* *because livestock should be excluded from fish and wildlife habitat;* *because livestock should be excluded from national wild and scenic rivers(NWSR's);* *because livestock should be excluded from grazing allotments in fair and poor condition;* *because livestock should be excluded from wilderness study areas (WSA's);* *and because livestock should be excluded from areas of critical environmental concern (ACEC's).* **Response:** Alternative D2 was added to the analysis to cover most of the recommended exclusion areas. Alternative D2 does not include livestock exclusion from allotments in fair to poor condition or from WSA's because we felt this would move Alternative D2 too close Alternative E. When livestock are found to cause degradation of resource conditions in WSA's, rangelands in poor or fair condition or anywhere else, management is changed to correct and reverse the degradation which could include exclusion.
3			**Comment:**
	57	62	• Commentors said that BLM should reject Alternative C. *Reasons:* *fails to reduce grazing when damage occurs;* *Does not protect sensitive fish and wildlife habitat and habitat diversity;* *fails to designate enough NWSR miles;* *fails to stop grazing on Donner und Blitzen and Owyhee NWSR's;*

does not adequately reduce livestock grazing on Steens Mountain;
does not protect riparian;
allows to much off-highway vehicle (OHV) use;
relies on adaptive management;
fails to change current conditions and management practices enough even though public lands are not adequately protected/restored;
fails to stop livestock grazing when scientists recommend otherwise;
fails to describe activities allowed in Steens National Conservation Area (NCA);
because it puts livestock industry over public concerns and land health;
fails to stop grazing in WSA's;
fails to consider ecosystem-based management principles;
fails to discontinue grazing in ACEC's;
needs stronger standards and guidelines and monitoring;
high desert lands are too fragile;
fails to reduce suppression of wildfire;
seriously degrades ecosystem;
increases spread of weeds through OHV use; and
alternative is too similar to Alternatives A and B; Southeastern Oregon Resource Advisory Council (SEORAC) could not choose; prefers to address individually and failed to reach a consensus.

31 32 • Commentors favor Alternative D.

Reasons:
allows for livestock grazing reductions;
adds NWSR's;
adds ACEC's and research natural areas (RNA's);
emphasizes low impact recreation;
deemphasizes fire suppression;
better for stream/riparian which need protection;
more closely embraces ecosystem-based management;
restores/closes recreation sites;
helps land to recover from past degradation;
less alteration of vegetation;
best compromise between livestock industry and other resources;
better for nongame wildlife;
better for hunting, fishing, and other publics;
better protects scenic values; and
reduce grazing on Alvord Desert and Steens Mountain.

3 3 • Reject Alternative A.

Reasons:
does not adequately protect public land resources;
is not a realistic alternative; and
outside law on the "Endangered Species Act" (ESA) and "Wilderness Act."

	2	2	• Reject Alternative B. *Reasons:* *does not adequately protect public land resources; and* *allows too much livestock grazing.*
	1	1	• Support Alternative E. *Reasons:* *opposes abuses of public land resources.*
	1	1	• Reject Alternative E. *Reasons:* *Is not a realistic alternative;* *too little intervention can damage environment;* *too unresponsive to the need of land;* *too unresponsive to the needs of public;* *some livestock grazing is good; and* *does not allow prescribed burns.*
	1	1	• Support Alternative A. *Reasons:* *supports liberty and welfare of country.*
	5	5	• Alternatives are inadequate. *Reasons:* *not enough range of alternatives;* *will lead to demise of southeastern Oregon desert lands;* *needs to explore severe cuts in grazing;* *Alternative A has no counter balance; and* *need restoration before Alternative D can be implemented.* **Response:** Commentors liked or disliked the specific alternatives for various reasons. Alternative D2 was added and Alternative E was made more realistic to provide greater variety of potential management direction toward limiting commodity uses. The Proposed RMP represents a mix of the alternatives that prescribes public land management in a manner that best meets the needs of the greatest number of public land users.
4	22	23	**Comment:** Manage the land for everyone, not just ranchers. **Response:** The Proposed RMP is primarily a mix of Alternatives C and D. Ranchers would have benefitted most from selection of Alternative A.
5	2	2	**Comment:** Need increased monitoring and enforcement of livestock grazing on Steens Mountain. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
6	3	8	**Comment:** BLM does not evaluate a reasonable range of alternatives. **Response:** See comment response 2.

7	1	1	**Comment:** Protect resources by increasing monitoring. **Response:** Monitoring is an important step in the Bureau's cyclical process of public land management as identified in the Implementation Through Adaptive Management section of Chapter 3. Staff time dedicated to monitoring must be balanced with time committed to planning, to implementation, and to evaluation/assessment in order that public land management objectives can be met.
8 1	1		**Comment:** Management goals of BLM should parallel Oregon Division of State Lands (ODSL) goals. **Responce:** The BLM and ODSL have separate laws governing how they are to manage the lands under their respective administrations.
9 1	1		**Comment:** Grazing impacts were not fully identified/analyzed. **Response:** The format of Chapter 4 impacts analysis to each resource value in the draft and this final document was chosen to identify consequences of implementing individual actions proposed in each alternative as well as consequences of implementing all actions in each alternative. As a result, grazing impacts are not addressed in only one portion of the document but would be found throughout all sections of Chapter 4. Cumulative impacts of implementing all actions proposed within one alternative are identified in a Conclusion section at the end of analysis of each alternative and also in a Summary of Impacts section at the end of each resource section. Additionally, general effects of implementing various intensities and seasons of grazing are identified in Appendix R (Effects of Intensity and Season of Grazing). Similarly, Appendix F (Wildlife Habitat Descriptions and Considerations) identifies some of the consequences of grazing management practices on wildlife habitat.
101	1		**Comment:** Page 3-9: description of alternatives lacks sufficient detail. **Response:** This section introduces the body of Chapter 3 which describes all alternative in detail.

Opinions or Preferences

1	1	Support Alternative C.
1	1	Support Alternative B.
1	1	Support between Alternatives B and C.
6	6	Supports adaptive management.

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

Miscellaneous Comments

This section is subdivided into Plan in General, Personal Responses, Ecological and Natural Values, Military and Nonmilitary Aircraft, and Other.

No.	I	S	Plan in General
11	2	2	**Comment:** Plan should be written with long-term outlook. **Response:** This land use plan is expected to guide the management of the public land within the planning area for the next 20 years, assuming relative consistency in the environmental laws being passed by Congress.
12	1	6	**Comment:** BLM does not assess the cumulative effects on resources of maintaining existing grazing levels. **Response:** The format for analysis of grazing impacts, as all impacts, is identified in comment response 9. Cumulative impacts were strengthened in the final document.
13	1	6	**Comment:** The plan fails to appropriately evaluate reasonably foreseeable adverse effects. **Response:** Chapter 4 identifies the expected adverse effects from the prescribed management actions.
14	1	6	**Comment:** The plan fails to describe the 6.3 million acres of planning area. **Response:** Chapter 2 describes the present environment and the various environmental conditions within the planning area. Also, refer to Comments Regarding Andrews Resource Area on page 1.
15	1	6	**Comment:** The plan fails to discuss the major causes of degradation. Response: Adverse impacts as described in Chapter 4 are the major causes of degradation.
16	1	6	**Comment:** The plan provides no monitoring data to support any of its assertions. *Reasons:* *monitoring is not a funding priority; and* *managers do not know how to put monitoring plan together.* **Response:** Summaries and interpretation of monitoring data are provided throughout the document to identify condition and trend of various resources. Additional data provided through scheduled monitoring would be used in the adaptive management process described in Chapter 3 to implement appropriate resource management on a site-specific basis within GMA's.
17	1	2	**Comment:** A comparison document should be developed to show changes from current status to the Draft SEORMP/EIS. **Response:** Chapter 2 describes the existing situation and Alternative B, which is the current status of management for the planning area, is compared to the other alternatives in Chapters 3 and 4.

18	1	1	**Comment:** Page 3-74: Monitoring approach fails to reflect a strategy for evaluating the objectives on the whole planning area; does not ensure consistent evaluation, is not predictable or systematic, has no clearly defined reporting mechanisms. **Response:** Appendix W (Monitoring) has been added to the plan which better reflects the monitoring approach following plan implementation.
19	1	1	**Comment:** The final plan should include a statement explaining people's concerns during scoping. **Response:** Chapter 1 of the Draft SEORMP/EIS and the PSEORMP/FEIS discuss public participation and the various scoping issues the BLM was asked to address by the public.
20	1	1	**Comment:** The document does not address positive livestock management already implemented. **Response:** Although successful management may not be described by allotment, there are condition and trend tables at various locations in the document that indicate the favorable conditions and positive responses to management that is currently occurring over most of the planning area.
21	1	1	**Comment:** The plan should be an adjustment of existing, successful programs. **Response:** People have different opinions of success. The Proposed RMP of the PSEORMP/FEIS presents management actions aimed at meeting natural resource and societal needs. Building upon successful management is the intent of adaptive management as additional information becomes available as identified in Chapter 3.
22	1	1	**Comment:** The BLM needs to show they are meeting legal mandates. **Response:** Laws governing public land management are the basis of the management proposals in this plan. The BLM believes the plan is consistent with the legal mandates directing the agency.
23	1	1	**Comment:** There was a lack of clear-cut proposals in the plan. **Response:** Although the Draft SEORMP/EIS lacks specificity in some areas, site-specific activity plans do currently exist across the planning area. Part of adaptive management is to assure that the existing and future activity plans are consistent with the SEORMP. The variability of the resource values across the planning area makes it almost impossible to prescribe site-specific management actions for all locations in one planning document.
24	1	1	**Comment:** It would be useful to have the following definitions in the document: *sensitive resources, acceptable limits, caves, desirable introduced plant species.* **Response:** Definitions for *caves* and *limits of acceptable change* have been added to the Glossary.
25	1	1	**Comment:** There is offered only a limited ability to choose between alternatives.

Response: Since publication of the draft, Alternative D2 has been added and Alternative E has been made more realistic which has improved the range of the alternatives. Also, management actions can be chosen from more than one alternative and were combined to formulate the Proposed RMP.

26 1 1 **Comment:** It is difficult to follow the draft when reference material is mentioned but not included in the document.

Response: The BLM uses technical manuals and other forms of guidance in prescribing and implementing management actions. The reference material is available by request, but is too expansive to incorporate into the document.

27 1 1 **Comment:** Objectives must be quantifiable, measurable, and reasonable.

Response: There are approved quantifiable methodologies for measuring the success of meeting the objectives of this plan. The various monitoring methodologies are available upon request.

28 1 1 **Comment:** Objects to reliance of Interior Columbia Basin Ecosystem Management Project (ICEBMP) scientific assessments.

Response: NEPA regulations require incorporation of significant new information bearing on the proposed action or its impacts, and the intent of the adaptive management process is to rely on the best scientific information available. The 1996 "Integrated Scientific Assessment for Ecosystem Management in the Interior Columbia Basin" (ICBEMP ISA) used existing science documentation, as well as new information, to meet the needs identified. Therefore, even though the ICBEMP Final EIS plan is not final, the background science is valid and must be used in new planning and analysis efforts.

29 1 1 **Comment:** Object to reliance on policies which are not law.

Response: Policies are developed as interpretation of what the BLM needs to do to be compliant with the laws.

30 1 1 **Comment:** There was a failure to include information from Idaho Watersheds Project during scoping.

Response: Appendix A (Scoping Comments) has been amended to include additional scoping comments. Some of the scoping comments were not included in the lists in Appendix A, but we tried to include all pertinent comments in the body of the document.

31 1 1 **Comment:** Request a supplemental plan that better characterizes the environment and has a new range of alternatives.

Response: Current condition and trend and PFC information have been added to Appendix E, Allotment Summaries, to better describe the existing environment. Alternative D2 has also been added and Alternative E amended to expand the range of possible management prescriptions. Additional information concerning the landscape that may become available during subsequent subbasin reviews or GMA assessments will be incorporated into the landscape or activity level plans.

32 1 1 **Comment:** The Environmental Protection Agency (EPA) assigned a rating of EC-2 to the draft plan.

Reasons:

lack of clarity in management direction;

absence of monitoring strategy to evaluate plan effectiveness;

lack of road management element; and

further discussion needed on western juniper management and nonnative plant use.

Response: Management actions and associated monitoring methodologies for specific watersheds or allotments would be tailored for each particular area and aimed at the resource needs for each area. The scope of the SEORMP does not allow for this level of specificity. Appendix O (Best Management Practices) has over two pages of road management criteria that covers the various design and maintenance needs of our road system. Western juniper management and nonnative plant use is also described in the Woodland and Rangeland Vegetation sections of Chapter 3.

33 1 1 **Comment:** Difficult to assess if the implementation of one resource objective is compatible with implementation of another.

Reasons:

separate discussion of Rangeland Vegetation and Rangeland/Grazing Use;

statements about bighorn sheep in the wild horse objectives.

Response: The SEORMP is designed so that all the objectives can be met. Still, there would be instances when implementing management to help meet one objective may have adverse impacts in meeting another. It is impossible to meet all the objectives on every acre of public land so the BLM strives to combine the public's desires with the site potential of the land to come up with the best mix of management actions to meet the greatest number of objectives.

34 1 1 **Comment:** Cumulative impacts of any proposed action should be developed.

Response: We have strengthened the cumulative impact analysis in the document.

35 1 1 **Comment:** There is no analysis of the management situation in the document.

Response: The analysis of the management situation is the total collection of information to be analyzed. It represents a planning process step, and was never intended to be published, in its entirety, within plan/EIS documents. Pertinent analysis of the management situation information is summarized in Chapter 2, with the impacts of management actions for each alternative in Chapter 3 analyzed in Chapter 4. Alternative B displays the current management situation.

36 1 1 **Comment:** Specific goals and objectives should be set forth in section 1.

Response: The objectives for each program appear within the first few pages of the document. The goals of the SEORMP and the Desired Range of Future Conditions for the programs appear within the first few pages of Chapter 3.

37	1	1	**Comment:** The plan should discuss the legal authority and implications of tiering to a draft EIS. **Response:** Federal regulations at 40 CFR 1502.20 encourage tiering to other EIS documents to eliminate repetitive discussions of the same issues. The SEORMP/EIS incorporates the science in ICBEMP as required by NEPA implementation regulations and analyzes the actions to the extent that the RMP can stand alone should ICBEMP Final EIS not become final before this plan is final. ICBEMP is expected to bring the new science information into existing land use plans through regional guidance that will automatically amend those land use plans that have not yet incorporated the information. Current planning efforts that are already incorporating the science, such as the SEORMP, should require less "reconciliation" effort to bring the plan into compliance with final regional guidance.
38	1	1	**Comment:** The specific philosophies for ICBEMP Final EIS should be enumerated in the plan. *Reasons:* *to allow for complete disclosure and knowing review and comments.* **Response:** The specific philosophies of ICBEMP Final EIS were available for public review for the draft. Those comments were instrumental in the resulting draft that is presently out for review, and the final will also receive public review. Also see comment response 37.
39			**Comment:** This comment was a duplicate and deleted.
40	1	1	**Comment:** Plan fails to comply with "National Environmental Policy Act" (NEPA), "Federal Land Policy and Management Act" (FLPMA), "Public Rangelands Improvement Act" (PRIA), and Draft Eastside EIS. **Response:** This plan is in compliance with NEPA, FLPMA, and PRIA as stated in Chapter 1, page 17 of the Draft SEORMP/EIS. The plan is consistent with ICBEMP ISA and will be in conformance with the ICBEMP Final EIS, as the ICBEMP Final EIS ROD automatically amends all land use plans within the ICBEMP Final EIS area. Further, the SEORMP was prepared by an interdisciplinary team and reviewed by the State office staff.
41	1	1	**Comment:** Better scoping and outreach would lead to a more accurate analysis of stakeholders (including the final plan). **Response:** There have been numerous public meetings along with the comment periods for the draft and final documents. The Draft SEORMP was mailed to approximately 525 individuals, groups, government offices, and others. BLM received about 300 comment letters on the Draft SEORMP. BLM believes that there was ample opportunity for people to participate in the process. Refer to Chapter 5, Public Involvement.

Opinions or Preferences

4	10	The document is vague, wordy, repetitious, and gives no clear guidance or direction.
4	5	One cannot know possible impacts without more detail and analysis.
2	7	The plan fails to describe how the agency will manage the land to achieve the stated objectives.

2	3	A full analysis of specific goals, objectives, strategies and actions must be done.
2	2	The plan should be adopted as proposed.
2	2	Plan needs to be more proactive.
2	2	The way the information was presented made it difficult to bring the pieces together.
1	6	The plan does not adequately describe the affected environment.
1	2	It is impossible to determine if goals or objectives can be reasonable met.
1	2	BLM bureaucrats, politicians, or special interest groups should not be the judge of acceptable impacts.
1	1	Scoping illustrates the lack of public knowledge about the condition of public land and how the BLM protects the land.
1	1	The stated purpose of the document is too broad.
1	1	Oregon Department of Fish and Wildlife (ODFW) should be listed with the agencies providing comments on the scoping process.
1	1	Plan gives false and misleading information.
1	1	The respondent's specific scoping comment letter is not in Appendix.
1	1	Table of Contents and body of the report are not properly marked with section number.
2	2	A more thorough review of current literature is needed.
1	1	The public should be given opportunity to analyze actions and meet halfway.
1	1	The goals for planning purposes should be restated as management on the basis of "multiple use and sustained yield."
1	1	Show a more detailed description of the landscape prior to the "Taylor Grazing Act" (TGA).

Personal Response

Opinions or Preferences

20	22	BLM needs to protect the lands and resources for future generations.
8	8	I commend BLM for the detailed and thoughtful analysis.
4	4	Southeast Oregon is beautiful and unique.
3	6	We encourage BLM to consider private landowners, cattle ranches, and Harney County when finalizing the plan.
1	6	We commend the BLM for recognition of Steens Mountain as a place of significant value to the American public.
1	6	We support BLM in its efforts to manage Steens Mountain for it wilderness and recreational values.
1	2	We appreciate the outstanding maps that accompanied the document.
1	1	Respondent feels he is active in public land concerns and his comments should be considered in the plan.
1	1	Respondent included 2 letters indicating his concern for public resource lands.
1	1	Have found the Burns District Office to be helpful and responsive.
1	1	Great efforts were made to identify stakeholders in building this plan.
1	1	Thank you for the opportunity to participate in the review of the Draft SEORMP/EIS.

	1	1	Thanks for the high level of public service you and your staff provide.
	1	1	The BLM needs to do a better job of showing good things done since the TGA.
	1	1	For clarification: the comment letter is from "Oregon Chapter of the Wildlife Society."
	1	1	I compliment you for the courage to recognize the impacts of cattle as well as other resource uses.
	1	1	Appreciates the discussion of "Catlow Conservation Agreement."

Ecological and Natural Values

42	1	6	**Comment:** There are no numerical, objective standards for management of rangeland, fire, soils, and other resources. **Response:** The numerical standards for meeting the objectives for these programs are included in the specific monitoring methodologies. Also see comment response 23.
43	1	1	**Comment:** *Desirable* vegetation is opinion: use *ecological condition*. Response: Though attainment of late or potential natural community (PNC) vegetation communities was often the primary vegetation management objective in previous planning documents, that objective is occasionally not consistent with providing desired values and products to our publics today and in the future. This land use planning document recognizes the values of some early- and mid-seral vegetation communities in providing some wildlife habitats, in making available livestock forage within nonnative seedings, and for other values. It also recognizes the consequences of natural disturbances and state and transition models of vegetation succession which hold vegetation communities at less that PNC. Management, even where desired conditions are less than PNC, would be consistent with attainment of 1997 "Standards of Rangeland Health and Guidelines for Livestock Grazing Management" (S&G's). In most instances, the desired range of future conditions (DRFC's) identified in this planning document are synonymous with past objectives to attain late to PNC vegetation communities.
44	1	1	**Comment:** Use of *landscape level* is ambiguous. **Response:** Managing at the landscape level is intended to portray broad-scale opportunities. Some objectives would not be met in localized areas if land use decisions are based on impacts at the landscape level. Although somewhat ambiguous, the term reflects a relatively large management unit when compared to mid- and fine-scale management units.
45	1	1	**Comment:** ACEC designations do not always protect natural values of sites. **Response:** It is the intent of ACEC designation to provide management for relevant and important values identified for the specific area. Protection would be provided for natural values where they are identified as relevant and important values.

46	1	1	**Comment:** Must balance short-term economics against long-term ecology. *Reasons:* *mankind survival is dependant on healthy ecosystems; and* *protect Oregon's deserts from degradation.* **Response:** The SEORMP examines a range of alternatives from an emphasis on maximizing sustainable levels of commodity output to maximizing ecological functions. The preferred alternative attempts to strike an appropriate balance based on the expected social, economic, and ecological outcomes.
47	2	2	**Comment:** Continue multiple use in WSA's. **Response:** Resource uses and human activities would continue to be allowed in WSA's in accordance and compliance with the agency's IMPLWR, while protecting wilderness values until Congress acts on the wilderness issue.

Opinions and Preferences

2	2	Efforts to protect natural resources now will result in lands with higher values later.
1	1	WSA's, NWSR's, ACEC's, all limit flexibility.
1	1	Inventories are needed to validate current watershed level, ecologically based management.
1	1	Knowledge of ecology in an area should be more important than short-term politics.
13	13	Manage the land for natural ecosystem function.
2	2	Continue multiple use in WSA's.
2	2	Against any additional special management areas (SMA's).
1	1	Watershed management need the cooperation of all entities in the watershed.

Military and Non-military Aircraft

48	5	8	Comment: Aircraft should be allowed to land inside the Steens Mountain Recreation Lands during the whole year; restrictions on aircraft should be removed from the plan. *Reasons:* *aircraft use would be for commercial and management purposes;* *discriminates against a particular motorized vehicle;* *discriminates against certain members of the public;* *adversely affects local, county, and state business;* *promotes the use of more environmentally detrimental methods;* *discriminates against physically challenged;* *reduces options for dispersed recreation;* *makes search and rescue, fire operations, etc., more difficult to do;* *BLM has no means of enforcement;* *BLM would lose revenue; and* *there would be less public land monitoring.* **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.

49			**Comment:**
	1	6	• BLM has failed to characterize, describe and quantify the increases in military flights over Oregon public lands since the last planning process.
	1	6	• BLM has failed to ensure that characteristics of SMA's are not being degraded by military activities.
	1	6	• BLM has failed to minimize negative effects of military activities.
	1	6	• People who use public land are often annoyed by loud noises from military aircraft.
	1	6	• Concerned about pollution and health risks from military training activities.
	1	6	• BLM must prepare an adequate assessment of impacts by military training activities.
			Response: BLM has no authority to control military flights over public land—this is outside the scope of this document.
50	1	2	**Comment:** A suggested stipulation of use by authorized holders of a SRP within the Steens Mountain SRMA would be that aircraft landing during all times of the year would meet the current non-impairment criteria for wilderness study areas (WSAs), whether on WSA's or not, in the SRMA.
			Response: *Refer to Comments Regarding Andrews Resource Area on page 6.*
51	1	2	**Comment:** When the Steens Mountain Loop Road is open, landings or low-level flights would be avoided in heavy use or key scenic areas.
			Response: Refer to Comments Regarding Andrews Resource Area on page 1.

Other

52	5	5	**Comment:** Protect land for wildness and low impact recreation.
			Response: Assessment of public land for wilderness values is beyond the scope of this plan. The agency's wilderness designation recommendations in Oregon are in its "Wilderness Study Report" (1991). Under the Proposed RMP and other alternatives, the majority of the planning area remains available for low impact types of recreation activities.
53	1	1	**Comment:** It is not right to say that funding would be basically the same across all alternatives.
			Reasons:
			some alternatives have greater potential for generating funds; and
			funding for monitoring under adaptive management is highest priority.
			Response: Although a portion of receipts for commercial activities on public land are included in budgets or funding, these amount are insignificant in the total budgets.

Opinions or Preferences

	1	2	The document could be harmful and ruin family business.
	1	1	New commercial development should be restricted.

LETTER NUMBER: 004, 007, 008, 009, 010, 015, 016, 017, 018, 019, 023, 026, 030, 035, 064, 065, 069, 071, 072, 075, 080, 083, 088, 093, 094, 099, 100, 105, 107, 109, 110, 254, 255, 256, 257, 258, 259, 260, 262, 264, 265, 267, 270, 273, 122, 131, 134, 135, 148, 151, 152, 153, 157, 163, 167, 168, 189, 193, 214, 180, 182,

184, 186, 200, 206, 214, 235, 141, 142, 158, 166, 217, 218, 220, 222, 223, 225, 226, 228, 231, 232, 236, 238, 239, 240, 241

Air Resources

Other related comments may be found under FIRE.

No.	I	S	
54	1	1	**Comment:** More data are needed to support the conclusions that dust emissions do not result in deteriorated air quality and that no long-term cumulative impacts to air quality will occur under all alternatives. **Response:** Limited data are available on air quality for this planning process due to the fact that the entire planning area is in a Class 2 air shed and no air quality monitoring stations are operating within the planning area. Management actions taken to reduce potential impacts to air quality include: (1) identifying absolute maximum tonnage of fuel that could be burned annually yet limits particulate emissions; (2) implementation of the "Interim Air Quality Policy on Wildland and Prescribed Fires" (issued April 23, 1998); (3) plan for and conduct prescribed burns with favorable atmospheric transport and dispersion conditions that are approved through the Oregon Department of Forestry (ODF) prior to ignition; (4) proper management of soil and vegetative management resources with regards to fire rehabilitation, livestock grazing, mining, and OHV activities that would reduce wind-blown particulate matter; and (5) requiring and implementing best management practices.
55	1	1	**Comment:** Revise plan to incorporate the direction contained in EPA's interim air quality policy on wildland and prescribed fire. **Response:** The PSEORMP/FIES now states that the EPA's "Interim Air Quality Policy on Wildland and Prescribed Fire" (issued April 23, 1998) would be followed.

LETTER NUMBER: 004, 273

Energy and Minerals

No.	I	S	
56	3	3	**Comment:** Close entire area to mining use. **Response:** An objective of the plan is to make mineral resources available for exploration and development while protecting other resources to the extent possible. Lands are recommended for withdrawal only when less restrictive measures would not protect other resource values.
57	2	3	**Comment:** Mineral leases should not conflict with resource values, especially SMA's. **Response:** Due to the nature of mineral leasing activities, conflicts with other resource values nearly always occur. Most conflicts can be resolved through the imposition of operating restrictions; however, if the resource values are very high, and/or conflicts cannot be resolved, the area could be closed to leasing.
58	1	1	**Comment:** Need more flexibility concerning small and low-impact minerals such as sand and gravel for road maintenance.

Response: The plan provides for substantial opportunities and flexibility for the development of saleable mineral materials for road maintenance.

59 1 1 **Comment:** Alternative C excessively restricts geothermal and rock pits.

Response: Restrictions imposed on geothermal and rock pit operations under Alternative C are not considered to be excessive. For geothermal operations, restrictions would only be imposed in areas with other significant resource values (such as endangered animal habitat, sensitive plants, outstanding scenery) in order to protect them, and would involve less than 1% of the lands identified as high potential for that resource. Restrictions imposed on rock pits do not affect existing operations, identified potential sources of new material, or most rock deposits located near concentrated populations (such as Vale and Ontario) or in close proximity to existing roads.

60 1 1 **Comment:** Protect WSA's that might be dropped in the future from mineral use.

Response: WSA's that might be congressionally dropped in the future would only be protected from mineral use if they were included in some other SMA (such as ACEC/RNA). All other WSA acreage released from study status would become potentially available for all forms of mineral use.

61 1 1 **Comment:** ACEC/RNA's should be withdrawn from mineral entry.

Reasons:

degrades values for which originally protected.

Response: ACEC's are withdrawn only if the values for which they are designated cannot be protected with less restrictive measures. Refer to PSEORMP/FEIS Table 3-12 for ACEC/RNA recommended withdrawals.

62 1 1 **Comment:** Page 2-3: should read: report will be available in 1999.

Response: No publication date for the report has been established, as stated in the PSEORMP/FEIS.

63 1 1 **Comment:** Page 2-8: U.S. Geological Survey (USGS) reference should be (USGS 1994, 1996).

Response: The reference has been corrected in the final plan to include the 1996 report.

64 1 1 **Comment:** Section needs to be added regarding potential geologic hazards in area.

Response: While it is acknowledged that certain geologic hazards, particularly earthquakes and naturally occurring (not mining-related) geochemical contamination (such as mercury, arsenic and uranium) are a potential safety and environmental hazard, they are not expected to significantly affect the human environment, given the small, somewhat scattered population base. Therefore, geologic hazards will not be discussed in the final document.

65 1 1 **Comment:** What does site-specific analysis for mineral withdrawal entail?

Response: Site-specific analysis entails an evaluation of lands being proposed for withdrawal from mineral location. It involves an interdisciplinary team of resource specialists (range management, botany, archaeology, recreation and wilderness, geology and minerals, soils and hydrology, lands and realty, etc.), whose purpose is to determine if the resources contained are of sufficient sensitivity and/or value to warrant protection from mining. Data collection may involve consultation with other Federal agencies (such as USGS or U.S. Fish and Wildlife Service [USFWS]), State agencies (such as ODFW, Oregon Department of Geology and Mineral Industries [DOGAMI], or State Historic Preservation Officer [SHPO]), various conservation groups (such as Sierra Club, Native Plant Society, or Wilderness Society), or private individuals. Lands recommended for withdrawal may be identified in a planning document, such as this plan, through public concerns, or the result of field studies that identify new areas containing sensitive resource values the BLM wants to preserve and protect; however, all withdrawal proposals must conform to an approved land use plan.

66 1 1 **Comment:** What science backs up the mineral leasing buffer zones chosen for Borax Lake under Alternatives C and D?

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

Opinions or Preferences

3 3 Support no-surface-occupancy (NSO) stipulations in Alternative D.

Reasons:

Federal mining laws are antiquated.

2 3 Support buffer at Borax Lake.

2 2 Energy and minerals should be developed.

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

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

Fire

No.	I	S	
67	9	9	**Comment:** Prescribed fire should be used.

Reasons:

to improve range condition;

to return vegetation complexity.

Response: The Proposed RMP of the PSEORMP/FEIS recognizes fire as a critical natural process and allows resource managers the ability to use prescribed fire in those areas where prescribed burning is the correct tool for meeting objectives. The plan allows for burning of up to 50,000 acres of rangelands and 300 acres of timbered lands per year.

68 8 8 **Comment:** Fire suppression should be deemphasized.

Response: Historically, BLM policy required that all wildfires be fully suppressed. Under current policy, which is reflected in this planning document, all wildland fires must receive an appropriate management response (AMR), which under given circumstances may be less than a full-

suppression response. The appropriate response taken would be based on preplanned analysis consistent with public and fire fighter safety concerns, land management objectives, and criteria set forth in Appendix M (Wildland Fire Appropriate Management Response) of this plan. Fire suppression actions would be planned and executed to minimize suppression costs and resource loss, consistent with land management objectives including the threat to life, resources, and property.

69	3	3	**Comment:** Suppress fire when unnatural conditions exist or on degraded land. **Response:** Lands identified in Appendix M (Wildland Fire Appropriate Management Response) as Category A lands are full suppression areas that contain "degraded land"; suppression of fire under "unnatural conditions" would fall under AMR as described in comment response 67.
70	2	2	**Comment:** Suppress fire in WSA's. **Response:** The AMR or suppression response in WSA's would be determined through the same process as any fire occurring in Category B lands, which may or may not, dependent on conditions, require full suppression actions. Suppression actions occurring within WSA's would avoid unnecessary impairment of an areas suitability for designation as wilderness in accordance with IMPLWR.
71	2	2	**Comment:** BLM must clearly define and provide rationale for terms such as *health, productivity, catastrophic,* and *restoration*. **Response:** Refer to the Glossary for these clarifications.
72	2	2	**Comment:** BLM must consider alternatives to fire which include reductions in grazing. **Response:** Through the planning process, a range of alternatives for grazing were analyzed.
73	2	2	**Comment:** Rehabilitation of burns may use nonnative species. **Response:** Rehabilitation using nonnative species with emphasis in areas dominated by exotic annuals and where risk of seeding failure is high when using natives was analyzed in all alternatives except Alternative D. Use of desirable nonnatives was added to Best Management Practices, Appendix O.
74	1	1	**Comment:** Rehabilitation of burns may use nonnative species only if justified. **Response:** See comment response 73.
75	1	1	**Comment:** Rest burns for 5 years from grazing. **Response:** Current Bureau policy is a minimum of two growing seasons or until health and vigor are restored, which may actually require 5 years.
76	1	1	**Comment:** Quaking aspen will not regain dominance after 5 years. **Response:** Quaking aspen return intervals presented are assumptions used for analysis purposes. Site-specific return intervals may vary greatly and in some instances, these species may not recover following fire within the long term.

77 1 1 **Comment:** Manage grazing to limit catastrophic fire.

Response: Fire analysis in Chapter 4 discusses the relationship between grazing and the amount of fine fuels. Increased fine fuels may lead to wildland fire spread and the possibility of catastrophic fire.

78 1 1 **Comment:** Unclear burning objectives between Air Resources limit (page 3-10, 4-3) and Rangeland Vegetation (page 4-16).

Response: Air Resources limits are maximum acres/ tonnage that could be burned annually due to PM10 emissions while the Rangeland Vegetation section referred to is the analysis of Alternative A, which analyzed the anticipated total treatment over the life of the plan—those treatment acres cannot, and do not, exceed the maximum allowable acres burned.

79 1 1 **Comment:** Coordinate burns with ODFW.

Response: The BLM continually coordinates with ODFW on specific projects including prescribed fire and would continue to do so in the future.

80 1 1 **Comment:** Conduct site-specific analysis on vegetation communities to protect natural ecosystems.

Response: See comment response 105.

81 1 1 **Comment:** Burns should not be conducted on lands in poor condition and land vulnerable to exotic plant species invasion.

Response: The decision to burn an area is done through the interdisciplinary team process and in most instances areas identified for prescribed fire are capable of natural regeneration. Prescribed burns that are used to reduce hazardous fuels, such as cheatgrass, would need rehabilitation to be successful at meeting resource and fire objectives—the rehabilitation need is identified through the interdisciplinary team during the project planning phase.

82 1 1 **Comment:** Objective 2 (page 3-15) should clarify *natural* vs. *prescribed* ignitions and *maintain* vs. *restore* natural ecosystems.

Response: The plan does not allow for the use of prescribed "natural" fire which is a fire that is of natural origin and allowed to burn for resource values. Prescribed ignitions, as identified in the Glossary, are ignited by management actions to meet specific objectives—an approved burn plan must be in place prior to ignition. To maintain an ecosystem is to keep it in same condition or current condition and to restore an ecosystem is to take deliberate, proactive measures to reestablish the natural ecosystem (see Glossary).

83 1 1 **Comment:** BLM should post burn bond for site rehabilitation.

Response: Buying out permittees and posting burn bonds are out of the scope and current authority of this planning document. For prescribed burns, any site restoration needs are identified and funding approved prior to the burn occurring. In wildfire situations rehabilitation is done through the emergency fire rehabilitation process and/or the fire rehabilitation planning process. All claims of reimbursement for loss of private property is done through the Federal Tort Claim process.

84	1	1	**Comment:** Need site-specific analysis on vegetative communities for prescribed fire. **Response:** Site-specific analysis would be done through the interdisciplinary team process at the activity plan level and through adaptive management.
85	1	1	**Comment:** Lands which are vulnerable/susceptible to cheatgrass should be classified as zones of primary suppression. **Response:** Criteria outlined in Appendix M (Wildland Fire Appropriate Management Response) identifies annual grasslands, which includes cheatgrass, as Category A lands that require a full suppression response to any unplanned ignition. Prescribed fire use within Category A lands is very limited; however, hazardous fuels reduction adjacent to rural urban interface, for instance, would fit into prescribed fire use in these lands.
86	1	1	**Comment:** Clearly specify site restoration techniques established for proposed burns or purposeful disturbance of vegetation. **Response:** Prior to prescribed fire and following wildfire, an interdisciplinary team would identify the rehabilitation techniques, such as seeding with drills, aerially, or other methods, of a burned area on a site-specific basis. This plan cannot consider all scenarios, but would determine what is appropriate on a case-by-case basis.
87	1	1	**Comment:** BLM should provide economic analysis for prescribed fire actions under each alternative, including ground condition assessment, assessment of the visual environment, and assess worst-case scenarios. **Response:** An economic analysis is not required with the use of prescribed fire unless the burn project is done for economic reasons. However, each proposed prescribed fire project requires the development and approval of a site-specific burn plan prior to implementation and a projected cost assessment is a required portion of each plan. After a project is completed an actual cost worksheet is completed and filed.

Opinions or Preferences

2	7	Support appropriate management response on all wildfire.
1	1	Fire can be more destructive than livestock grazing.

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

Forest and Woodlands

No.	I	S	
88			**Comments:**
	3	3	• Support a zero cut on Federal lands except to retain forest health.
	1	1	• Manage timber stands through timber harvest.
	1	1	• Do not cut old growth.
	1	1	• Only recreational and noncommercial cutting should be allowed.
	1	1	• All of the 5,877 acres of forest need to be available for management.
	1	1	• If forest stands and old growth are not treated, mortality will result from stressed condition.

	1	1	• Another way to present the alternatives: Forest acres would be managed to maintain forest health and other characteristics. **Response:** Discussion and analysis of the merits of various harvest and management options are found under each alternative in Chapters 3 and 4 for Forest and Woodlands. Final determination for timber management within the framework of multiple use and the context of forest health is found in the Proposed RMP of the PSEORMP/FEIS.
89	1	1	**Comment:** Deer and elk do not contribute to the decline in quaking aspen regeneration. **Response:** The statement that deer and elk contribute to the decline of quaking aspen has been modified to state that they may in certain areas contribute to such decline.
90	1	1	**Comment:** Page 4-21: 80,000 acres of western juniper control is not "slight"; it represents 23% of the amount of western juniper in the planning area. **Response:** While the summary states that 25% of western juniper would be treated in Alternative B, it is anticipated that this figure represents less than would be necessary to actually control or have a real effect on the western juniper expansion that is currently occurring. The over-all effect on western juniper therefore is anticipated to be slight.
91	1	1	**Comment:** Acreage figures for prescribed burning are not specific enough. **Response:** Chapter 3, Forest and Woodlands, text was changed to add acre figures for Malheur Resource Area (MRA) proposed western juniper treatment over the life of the plan.
92	1	1	**Comment:** Remove western juniper from quaking aspen and riparian. **Response:** Priority for western juniper treatments in Alternatives C, D, D2, and the Proposed RMP of the PSEORMP/FEIS include riparian/ wetlands and quaking aspen stands.
93	3	3	**Comments:** • Quaking aspen should be better managed for health. • Protect meadows, mountain mahogany, and quaking aspen for bird study. • Quaking aspen is important for onsite and ecosystem processes and needs protected (suckers are especially vulnerable to livestock). **Response:** Quaking aspen has been recognized as a valuable resource for which management attention would be directed. All alternatives propose management which would promote quaking aspen health and provide for reestablishment where necessary. Also see comment response 99.
94	1	1	**Comment:** Identify the amount of acres managed for different attributes. **Response:** The amount of acres to be specifically managed for different attributes is not known at present. Evaluations of GMA's to be conducted as part of the adaptive management process would determine through interdisciplinary team review and coordination with affected interests the amount of acres for specific management.

95 1 1

Comment: Cannot comment to timber volumes without adequate data.

Response: Because of the small acreage of timber land and no comprehensive timber program in the planning area, a more complete set of data is not available at this time.

96 1 1

Comment: Utilize existing roads when possible for timber harvest rather than constructing new road systems.

Response: The BLM agrees and would take every opportunity to utilize existing roads when possible and would adjust or close roads that do not meet the resource objectives of the PSEORMP/FEIS. A BMP has been added to Appendix O under the Road Management Practices section to address this concern.

97 1 1

Comment: Page 4-15: Assumption that 10% of western juniper would remain untreated does not match with Alternative B (80,000 acres) and is inconsistent with page-377 of the appendix (50% western juniper cover).

Response: The 10% of western juniper not treated is described as having old growth characteristics. More than the 10% of old growth would remain untreated in Alternative B. Page-377 of the appendix refers to the mosaics within the actual acres treated; it is not anticipated that any control method would result in complete removal of western juniper from an area.

98 1 1

Comment: Page 2-20: There is no citation for decline in quaking aspen in planning area.

Response: Studies and file summaries for Vale District indicate a continuing decline of quaking aspen in certain areas in the planning area. A paragraph was also added to the text of Chapter 2 citing studies that have shown regional declines in quaking aspen.

99 2 2

Comment: Mountain mahogany is important and needs to be emphasized and protected from grazing, road construction, and other disturbance.

Response: Although mountain mahogany is relatively rare throughout the planning area, viable stands can be found in the Oregon Canyon/Trout Creek Mountains, the Castle Rock area, and on scattered parcels in Federal ownership near Mahogany Mountain. Overall, management in all alternatives is anticipated to result in continued viable populations. Specific proposed ACEC's and their management are anticipated to have a beneficial impact on maintenance of stands of mountain mahogany. In addition, the Mahogany Ridge ACEC/RNA in MRA has been enlarged in the Proposed RMP, providing additional protection and research options for important sites of this species. The proposed Castle Rock ACEC also contains healthy stands of mountain mahogany.

100 1 1

Comment: Remove Foresty Objective 2 from plan.

Reason:

management goals are not achievable.

Response: Because a high priority has been assigned to western juniper and quaking aspen management within the range of DRFC's for the planning area, management would strive to achieve progress toward meeting these objectives.

101	1	1	**Comment:** Evaluate ecological impacts of removing western juniper on plant and animal communities. **Response:** Site-specific evaluations would be conducted during preparation of GMA activity plans by interdisciplinary teams of specialists to evaluate the ecological impacts of removing western juniper on plant and animal communities on both a site-specific basis and within the respective GMA. Overall impacts are analyzed in Rangeland Vegetation and Wildlife and Wildlife Habitat sections of Chapter 4.
102	1	1	**Comment:** Map and define old growth western juniper woodlands. **Response:** Mapping of old growth western juniper is done as ecological site inventories (ESI's) are completed for the resource areas; such inventories would be available as ESI is completed for MRA and Jordan Resource Area (JRA). A definition of old growth western juniper has been added to the Forest and Woodlands section of Chapter 2.

Opinions or Preferences

5	5	Recommend low priority for western juniper treatments; control with wildfire.
4	6	Western juniper control is necessary to preserve our lands.
1	1	An accurate inventory of western juniper acres less than 40 years of age has not been made.
1	1	The number of acres needing treatment in the next 20 years may be larger.
1	1	Select Alternative D because western juniper management must only be used to protect natural diversity.
1	1	The Nature Conservancy has included in its "Columbia Plateau Plan" of critical biodiversity sites: Steens/Alvord; Oregon Canyon Mountains; Owyhee Canyonlands; Succor Creek; Crooked Creek; Saddle Butte; Dry Creek; Alkali Gulch; Harper; Cottonwood Mountain; and Castle Rock.
1	1	Consider local economy in decision making process.

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

Rangeland Vegetation

No.	I	S	
103	5	15	**Comment:** Control of weeds is paramount for watershed protection and needs to be addressed in more detail. **Response:** Specific detail of management practices implemented to control the introduction or spread of weeds in cooperation with the State, counties, other Federal agencies and private parties is included in the "Vale District Five-Year Integrated Weed Control Plan" (1987). No range of alternatives for various levels of implementing weed control actions was developed in this plan since the presence or dominance of weeds is not consistent with meeting any management objective. Chapter 4 identifies the consequences of distributing seed and providing sites conducive to the establishment of weeds as a result of implementing various levels of actions identified in the alternatives.
104	4	4	**Comment:** Shrublands and grassland rehabilitation should use natives to benefit natural values and not livestock forage.

Response: As stated in comment response 351, NEPA requires that a range of alternatives be analyzed. A range of emphasis on the use of native seedings versus nonnative seeding to revegetate at-risk and depleted landscapes was analyzed through the alternatives. Benefits of using native seed and of using nonnative seed were presented.

105 2 7 **Comment:** Plan does not adequately describe the condition of the rangeland; use ESI.

Response: Though more detailed ESI data collection is planned for the near future within MRA and JRA, vegetation data from the Ironside ESI and the Southern Malheur Modified Soil-Vegetation Inventory were used to describe vegetation resources within Vale District. Implementation of site-specific evaluation/assessment and activity planning would be based on the best available information for the site.

106 2 2 **Comment:** Maintain nonnative seeding for purposes originally intended.

Response: Many of the seedings of nonnative grasses in Vale District occurred during the Vale Project , an 11-year rangeland rehabilitation program initiated in 1963. Objectives for other nonnative seedings in the planning area have not differed much from many of the following vegetation management objectives stated for the Vale Project:

1) to correct erosion and accompanying downstream sediment, and prevent further soil loss;

2) to increase the forage supply for wildlife and livestock;

3) to stabilize the livestock industry at the present or an increased level of production;

4) to facilitate fire control by replacing high hazard cheatgrass and sagebrush with low hazard perennial grasses and improving detection and suppression facilities; and

5) to prevent encroachment and spread of noxious and poisonous weeds.

The long-term goals stated in Desired Range of Future Conditions section of Chapter 3 differ little from these earlier objectives in stating, "Rangeland vegetation includes a mosaic of multiple-aged shrubs, forbs, and native and desirable nonnative perennial grasses." Analysis in Chapter 4 identifies the benefits of seeding some nonnative grass species in sites of limited effective precipitation and in areas dominated by competitive annual and weedy species. Management objectives for nonnative seedings in this land use planning document continue to recognize the benefits of establishing and maintaining diverse vegetation communities which meet public desires for resource values and goods.

107 2 2 **Comment:** Support efforts to return BLM lands to a series of naturally and fully functional ecosystems.

Response: As stated in comment response 106, the Bureau has managed public lands with objectives which go beyond providing sources of food, fiber, and minerals even prior to passage of the FLPMA. With ever increasing populations adjacent to BLM-administered lands, public demands for reestablishment and maintenance of functional ecosystems which provide values and benefits beyond the traditional commodity values would continue to increase.

108 1 6 **Comment:** The statement "manage big sagebrush habitat to emphasize plant and animal community health at the landscape level" fails to inform how the land will be managed.

Response: The expanded narrative of the draft Chapter 3 Rangeland Vegetation section better defined this statement from Table 3-1. Within the PSEORMP/FEIS, Appendix F (Wildlife Habitat Descriptions and Considerations) has been referenced in both Table 3-1 and the expanded narrative. This appendix defines management criteria for sites which have the potential to support vegetation communities which include a sagebrush component.

109 1 6 **Comment:** The plan should describe management activities, where they will be carried out, the acreage treated, and what would occur if the objectives are not met.

Response: Within this land use planning document, the Bureau recognizes that our knowledge of ecological processes, our information concerning site-specific resource conditions, and the public's requests for values from public lands would continue to shift through time. As a result, this planning document was formulated to define criteria under which public lands in the planning area would be managed. Adaptive management, a process presented in Chapter 3, would be utilized to develop, implement, monitor, and evaluate site-specific activity plans within GMA's which describe detailed management activities, where they would be carried out, the acreage treated, and possible consequences of not meeting management objectives.

110 1 6 **Comment:** Plan should describe the costs and outcome of the Vale Project.

Response: Evaluation of the Vale Project is beyond the scope of this land use planning document. Two independent evaluations of the Vale Project have been published since completion of that rangeland rehabilitation program in Vale District. In 1977 the USFS released Resource Bulletin PNW-70 authored by Harold F. Heady and James Bartolome. A second evaluation edited by Harold Heady was released by the U.S. Forest Service (USFS) as Resource Bulletin PNW-RB-157 in 1988.

111 1 6 **Comment:** Plan should be more specific on acreage to be planted with nonnative species.

Response: As stated in comment response 109, site-specific planning would be completed within activity plans within GMA's. This land use planning document describes criteria which would be used to determine specific treatments which would be utilized to meet management objectives when resource problems or project proposals are identified.

112 1 1 **Comment:** Page 2-10: Disagree that annuals are indicators of lost soil productivity.

Reasons:

productivity remains in many areas, but perennial seed sources are absent.

Response: The commentor is correct in that presence of annuals does not denote lost soil productivity. In the draft, the valid statement reads, "The effects of lost soil productivity persist in some areas in the form of early-

seral stage plant communities (annuals)." However, in the PSEORMP/ FEIS this sentence was removed from the Soil section in Chapter 2.

113 1 1

Comment: Page 2-10: Microbiotic crust function is portrayed as overly significant.

Response: A limited description of microbiotic crusts and their function in the ecosystem states in the draft and final documents, "Microbiotic crusts consist of lichens, mosses, green algae, fungi, cyanobacteria, and bacteria growing on or just below the soil surface in a thin layer. Found in open spaces between larger plants, these crusts play a role in fixing nitrogen, filtering water, retaining soil moisture, and controlling soil erosion. Limited data exist on the extent, distribution, and role of microbiotic crusts. Most studies of microbiotic crusts have been conducted in the southern Great Basin and Colorado Plateau. Extrapolation of these data to the planning area should be made with caution."

The section containing microbiotic crusts in Chapter 2 has been rewritten to incorporate comments received on this subject. BLM believes that the term "play a role in" implies that there are both pros and cons and the full spectrum between. Microbiotic crusts location and distribution would be identified to the extent possible during the proposed Order III soil survey and ESI for Vale District, Malheur County starting in 2002. Information on microbiotic crusts acquired from proposed soil surveys for Malheur County and from pertinent existing studies would be used during the evaluation of GMA's.

114 1 1

Comment: Areas of microbiotic crusts need to be included in baseline surface disturbance maps.

Response: The section containing microbiotic crusts in Chapter 2, Affected Environment, and Appendix R (Effects of Intensity and Season of Grazing) have been rewritten to incorporate comments received on this subject. Microbiotic crusts location and distribution would be mapped during the proposed Order III Soil Survey and ESI for Vale District, Malheur County, starting in 2002. Information on microbiotic crusts acquired from proposed soil surveys for Malheur County and from pertinent existing studies would be used during the evaluation of GMA's and other activity plans.

115 1 1

Comment: Cryptogamic crusts in uplands must be healthy, monitored, and improved.

Response: The benefits of maintaining healthy microbiotic crust are identified in the Soils section of Chapter 2 and Appendix R (Effects of Intensity and Season of Grazing) of the draft and final documents. Also see comment response 113.

116 1 1

Comment: Page 2-42: Incorrect to advocate shrub overstory.

Reasons:

nature continually fragments the monoculture;

diversity and edge support more wildlife; and

seedings were implemented for livestock forage.

Response: The benefits of maintaining diverse vegetation composition, including a shrub component, within the potential for the landscape is

identified in a number of locations throughout the document. The commentor is correct in stating, "nature continually fragments the monoculture," though active management actions to enhance timeframes and meet public desires is appropriate. The Desired Range of Future Conditions section of Chapter 3 is consistent with identifying the benefits that diversity and edge provide when desired vegetation communities and wildlife habitats are described. The past and present objectives for implementing many of the existing seedings are identified in comment response 106 and within the draft and final documents.

117 1 1 **Comment:** DRFC's are vaguely defined.

Response: DRFC's are general, long-term goal statements and as such may appear vague. Actions identified in Table 3-1 and the expanded narrative of Chapter 3 provides additional criteria which would be utilized to define site-specific outcomes desired within more localized GMA's and at specific locations based on the presence of resource values.

118 1 1 **Comment:** Page 2-12: Map and table showing rangeland conditions and trend by ecological site is needed.

Response: A number of commentors requested additional information concerning rangeland condition and trend. In response, these data have been included in Appendix E (Allotment Summaries).

119 1 1 **Comment:** Page 3-68: Believes that managing fair or poor nonnative seedings would not improve structural and species diversity.

Reasons:

because they have been invaded by sagebrush.

Response: The presence of sagebrush in seedings, as comment response 116 identifies, verifies nature's continual fragmention of the monoculture and as such improves structural and species diversity within the potential of the site. Chapter 4 analysis in the document also identifies the benefits of implementing actions to improve the health and vigor of poor- to fair-condition nonnative seedings as well as the benefits of establishing native grasses and forbs within existing nonnative seedings to meet management objectives.

120 1 1 **Comment:** Page 3-69: At-risk annuals should be converted to perennials instead of protecting using firebreaks.

Response: The comment is consistent with action number 3 to meet the Rangeland Vegetation Objective 1 of Table 3-1 which proposes active management to convert vegetation communities dominated by annual species to result in a greater dominance by desirable perennial species. Even with active management to convert these communities and restrictions on activities which preclude the natural establishment of desired perennials, the occurrence of frequent fire would reduce the competitive ability of perennials to establish and eventually dominate the site. As a result the combined actions of active management to establish desirable perennial species, protection from impacting activities, and protection from frequent occurrence of fire through the establishment of vegetation fire breaks are required to result in the eventual dominance by desirable perennial species.

121 1 1

Comment: Reseeding burns with 75/25% nonnative to native species does not result in monoculture of nonnatives (page 4-16–4-18).

Response: The range of alternatives for seeding native and nonnative species identified a percent of acreage which would receive a native seed mix and a percent of acreage which would receive a nonnative seed mix in the assumptions prior to analysis of impacts to Rangeland Vegetation in Chapter 4. The analysis that follows in Alternative A states that where nonnatives are seeded, monocultures would dominate when viewed at a fine scale. This analysis remains valid and consistent with the theme of Alternative A.

122 1 1

Comment: Reseeding with sagebrush damages ecosystem when cover gets above 15%.

Reasons:

outcompetes desirables; and

it is a direct attack on commodity producers.

Response: The benefits of sagebrush presence within vegetation communities where potential is present is identified within a number of sections of the analysis in Chapter 4 and within a number of appendices, including Appendix F (Wildlife Habitat Descriptions and Considerations). The comment is correct in stating that dense stands of sagebrush have the potential to out-compete other desirable components of the vegetation community, though the belief that competition always occurs above 15% within the numerous species assemblages, including a variety of sagebrush species and subspecies, may not be accurate. Management actions identified in the Proposed RMP include the consideration of the diverse vegetation resources BLM is charged with managing.

123 1 1

Comment: Explain how "Northwest Area Noxious Weed Control EIS" is consistent with goals of plan.

Response: Reference to the 1987 "Northwest Area Noxious Weed Control EIS" and the consistency between that NEPA document and this land use plan has been added to Chapter 2 of the PSEORMP/FIES.

124 1 1

Comment: Discussion related to using "desirable" nonnative plant species should include: what species would be used, what species would be replaced, how is the strategy consistent with "Invasive Species Executive Order" of February 1999, what are the impacts on plant and animal communities, and are nonnatives necessary to meet grazing objectives.

Response: The intent of the cited Executive order is, "...to prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause." The order goes on to define invasive species as, "alien (not native) species whose introduction does or is likely to cause economic or environmental harm or harm to human health." Though specific seed mixes would be determined at the time a site-specific proposal is assembled to meet specific objectives, criteria for future management stated in the document and the term "desirable nonnative species" would preclude the intentional seeding of invasive species. Rationale for use of desirable nonnative species instead of using native species is presented in Chapter 3 management actions and analyzed in Chapter 4.

125 1 1 **Comment:** Use crested wheatgrass for rehabilitation when natives are unlikely to be successful.

Response: Within the proposed actions of each alternative in the statement, "Seedings would be implemented with appropriate mixes of adapted perennial species. Species mixes would be determined on a site-specific basis dependent on the probability of successful establishment and risks associated with seeding failure." The theme of each alternative and Chapter 4 analysis define the level of risk acceptable in use of native species where climatic conditions or levels of competition with invasive weeds and annual may not be conducive to seedling establishment.

126 1 1 **Comment:** Sagebrush protection in seedings is not a relevant issue so more management flexibility needs to be put in the plan.

Response: The commentor is referred to the revised Appendix F (Wildlife Habitat Descriptions and Considerations) and Chapter 4 analysis for discussions of the benefits of maintaining a sagebrush in vegetation communities where potential is present.

127 1 1 **Comment:** Objective 1: The emphasis should be on ecological condition relating to site-specific and broader goals and objectives.

Response: See comment response 392.

128 1 1 **Comment:** Objective 2: There is nothing wrong with the biological health of seedings; also, the biodiversity emphasis or protecting sagebrush is not backed by science.

Response: Though many seedings within the planning area support acceptable levels of structural diversity, a number are either dominated by only one seeded species or even worse, are in poor health. Management direction provided in Chapter 3 states, "Nonnative seedings in poor or fair condition would be managed to restore production and vigor, as well as to improve structural and species diversity consistent with other management objectives. Nonnative seedings in good or excellent condition would be managed to maintain seeding health, improve structural and species diversity, and ensure continued forage production."

129 1 1 **Comment:** Objective 3: Doing a site-specific plan following a major disturbance should dictate where to seed with nonnative plants.

Reasons:

to benefit mosaic vegetation patterns to benefit multiple objectives.

Response: The comment is consistent with adaptive management direction provided in the draft document (Chapter 3) and the development of site-specific actions based on analysis of available information and criteria established in the SEORMP.

130 1 1 **Comment:** The primary source of soil organic matter in the high desert is associated with healthy grass and forb root growth and mass, not plant litter.

Response: The comment is correct in stating that growth and die-back of root is a major contributor of organic matter to the soil profile, in addition to the development of soil structure. But litter, especially in the formation of a duff layer and the A horizon, contributed significantly to the soil profile. Also, there are benefits provided by interception of raindrop

impact provided by vegetation litter on the soil surface, maintaining desirable rates of infiltration as described in the analysis of impacts to vegetation and soil resources in Chapter 4. Refer to the rewritten Soil section in Chapter 2 which reflects your concern.

131 1 1

Comment: Increased bare ground occurs in older sagebrush stands along with reduced vigor in grasses and forbs under the canopy.

Response: The comment is correct in identifying that competition for soil moisture in the upper profile occurs between sagebrush and herbaceous species. Since available moisture is most often the limiting factor to plant growth in vegetation communities within the planning area, where sagebrush root growth begins to fully occupy upper soil profile, herbaceous species are often excluded. Within many of our Wyoming big sagebrush/bunchgrass vegetation communities, healthy native herbaceous perennials are able to compete well, excluding the dominance of sagebrush. Also see comment response 122.

132 1 1

Comment: It is not beneficial to have large, continuous areas in these decadent condition.

Response: The description of the existing environment for vegetation resources (Chapter 2) identifies 10% of the planning area supporting sagebrush/annual grassland communities and 4% of the planning area supporting annual grassland. Some other vegetation communities possessing less desirable traits, as identified in Table 4-1, are also included in 18 broad vegetation groups in Table 2-4. These vegetation communities are not consistent with the DRFC's identified in Chapter 3. Management actions in every alternative of Chapter 3 are identified to convert these undesirable vegetation communities to more productive and diverse communities.

133 1 1

Comment: The plan does not include young western juniper so flexibility and management language needs to be included in the preferred alternative.

Response: A number of management actions to control the dominance of western juniper within sagebrush/grassland vegetation communities are identified in Chapter 3, including the use of prescribed fire and mechanical treatments. Opportunities for use of fire can be most effective within western juniper stands with a dominance of seedling and juvenile trees while mechanical treatments may be necessary to reduce dominance of more closed stands of mature trees.

134 1 1

Comment: Concerning DRFC and monitoring and the use of proper functioning condition (PFC), land monitoring should consider characteristics directly influenced by the land use.

Response: The format used within the expanded narrative portion of Chapter 3 of the draft document was to state the management objective followed by a rationale for that objective. A summarized monitoring section followed, to identify those resource attributes potentially impacted and authorized activities which would be monitored to determine when management objectives are met. Since any given data or information collected may be utilized to monitor progress toward meeting a number of objectives, a monitoring table was developed and incorporated in the final document (see Appendix W).

135 1 1 **Comment:** Natural factors should also be monitored (such as natural disturbance factors and natural conditions).

Response: Natural factors such as climate and fire, are monitored as identified in comment response 134.

136 1 1 **Comment:** Seeding of sagebrush is the most controversial and damaging to our ecosystem of any range management practice.

Response: Though a dominance by sagebrush species may reduce productivity and benefits that the public desires from public lands, the benefits of maintaining a sagebrush component where potential is present are identified in comment response 116, 122, 126, and 131. Additional benefits of maintaining an acceptable sagebrush component in rangeland vegetation communities where potential is present is the additional competition imposed on deep-rooted weed species, competition not provided by perennial grasses and forbs.

137 1 1 **Comment:** Sagebrush has always been and should always be considered a weed.

Reasons:.

outcompetes desirables; and

competes for water.

Response: See comment response 116, 122, 126, 131, and 136.

138 1 1 **Comment:** To obtain desirable herbaceous species and animal representation, sagebrush cover should be managed at 12 to 15%.

Response: The commentor is referred to narrative and tables in Appendix F (Wildlife Habitat Descriptions and Considerations) of the PSEORMP/FEIS.

139 1 1 **Comment:** An overabundance of big sagebrush destroys the herbaceous understory.

Response: See comment response 116, 122, 126, 131, and 136.

140 1 1 **Comment:** Intentional seeding of sagebrush should be curtailed immediately.

Response: See comment response 116, 122, 126, 131, and 136, and 187.

141 1 1 **Comment:** Limiting use of nonnatives in Alternative C would increase spread of noxious weeds and nondesirable animals.

Response: Benefits of seeding some nonnative species in areas where risk of failure when seeding native species is identified in the analysis of alternatives in Chapter 4. One must weigh the potential benefits of better meeting management objectives when seeding desirable native species against the risk of seeding failure on a site-specific basis due to limited effective soil moisture or high competition with annual species as identified in Chapter 4.

142 1 1 **Comment:** Native grasses are expensive and difficult to establish in low precipitation areas.

Response: Native grass seed is significantly more expensive to obtain and is usually less available as compared to nonnative species, especially crested wheatgrass. The benefits of seeding native species and maintaining greater native diversity and structure are identified in comment response 104 and 107. The benefits of seeding nonnative species are identified in comment response 125.

143 1 1 **Comment:** Standing bunchgrasses in low precipitation take years to return to the soil.

Response: The comment is correct for these xeric communities. Also see comment response 130.

144 1 1 **Comment:** Less western juniper control and greater restrictions on grazing may take the land farther from resource objectives.

Response: One assumes this comment is in reference to actions identified in Alternative D. The reader is referred to the analysis of implementing this alternative and many of the less desirable consequences identified.

145 1 1 **Comment:** Page 4-73: There needs to be identification of levels of management for seral conditions.

Response: See comment response 392.

146 1 1 **Comment:** Need to address whether or not western juniper invasion will continue at the same rate with current livestock use level.

Response: Analysis of maintaining current livestock management practices on the potential to meet woodland management objectives is identified in the Alternative B analysis of Chapter 4 (page 4-35 of the draft).

147 1 1 **Comment:** Page 3-16: Stating the BLM will "maintain or restore natural values while providing for forage production" is neither a standard or directive.

Response: The comment refers to a summary statement of actions proposed in Table 3-1. Page 3-68 provided an expanded narrative of vegetation management actions proposed.

148 1 1 **Comment:** Suggest that vegetation management criteria be expanded to clarify FLPMA requirements.

Response: FLPMA does not address vegetation management directly, though does indirectly in section 102, declaration of policy which identifies public land management based on multiple use and sustained yield as well as management in a manner that would protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, would preserve and protect certain public lands in their natural condition; that would provide food and habitat for fish and wildlife and domestic animals; and that would provide outdoor recreation and human occupancy and use. Management direction provided in the Rangeland Vegetation section of Chapter 3 as well as management direction in a number of other sections including Forest and Woodlands, Special Status Plant Species, Areas of Critical Environmental Concern, Wildlife and Wildlife Habitats, and Wild

and Scenic Rivers provide guidance for management of vegetation resources.

149 1 1

Comment: Biodiversity and restoration of native perennials should not be at the cost of achieving FLPMA multiple use goals.

Response: Management for diversity of native vegetation and animal species is entirely consistent with section 102 of FLPMA as paraphrased in comment response 148.

150 1 1

Comment: Address what is being done to restore lands in the Vale Project; and how new nonnative seedings differ so that they are less destructive.

Response: See comment response 110 for a citation to a summary of the outcome of the Vale Project. Vegetation management direction provided in proposed actions of the SEORMP identify future management options for vegetation communities which have resulted following treatments of the Vale Project and other past vegetation management actions and natural consequences. The proposed actions, especially those in Alternatives C and D, emphasize the benefits of restoring diversity and structure to existing nonnative seedings and of including criteria in planning for new nonnative seeding where the risk of seeding natives is not acceptable. Also see comment response 187.

151 1 1

Comment: Would like to see a distinction in status between *desirable introduced plant species and perennial native plant species.*

Response: Perennial native species are limited to those species and in some cases varieties which occur within the ecological site being seeded. Desirable nonnative species, primarily crested wheatgrass and other species from outside the region, are not native to the ecological site being seeded. Desirable nonnative species are adapted to climatic and edaphic conditions and are determined to best meet management objectives while limiting risk associated with possible seeding failure as identified in analysis of consequences.

152 1 1

Comment: Maintain, restore, protect Owyhee Mountain meadows and stands of mountain mahogany and quaking aspen.

Reasons:

critical for certain species of birds.

Response: Though the Owyhee Mountains are within the Owyhee Resource Area of Idaho, outside the planning area, this land use planning document includes management objectives and actions to maintain, restore, and protect quaking aspen and mountain shrub communities where potential is present within the portion of Vale District covered by this plan. Also see comment response 93.

153 1 1

Comment: Alternative B: improving ecological condition and increasing forage production are not compatible.

Response: Alternative B is management under current planning documents. Within the 1983 "Southern Malheur Grazing Management Program Environmental Impact Statement," all alternatives analyzed identified an increase in late condition range concurrent with an analyzed increase in forage production. Also see comment response 147.

154 1 1 **Comment:** Protect Steens Mountain vegetation.

Reasons:

so that unique plants do not need listed.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

155 1 1 **Comment:** Plan is not specific enough in identifying which woody species need to be reduced to meet DRFC.

Response: The Desired Range of Future Conditions section of Chapter 3 of the draft states, "Rangeland vegetation includes a mosaic of multiple-aged shrubs, forbs, and native and desirable nonnative perennial grasses. Shrub overstories are present in a variety of spatial arrangements and scales across the landscape level, including some large contiguous blocks, islands, and corridors. Shrub overstories are present in predominantly mature, late structural status. Plant communities not meeting DRFC's show upward trends in condition and structural diversity. Desirable plants continue to improve in health and vigor. New infestations of noxious weeds are not common across the landscape, and existing large infestations are declining. Populations and habitat of rare plant species are stable or continue to improve in vigor and distribution. Western juniper dominance is limited to rock outcrops, ridges, mesas, or other sites where wildfire frequency is limited by site productivity. Western juniper generally occurs in low densities in association with vigorous shrub, grass, and forb species, consistent with site potential. Historic western western juniper sites retain old growth characteristics. Quaking aspen communities occupy their historic range and are stable or improving in vigor." Proposed actions within the Rangeland Vegetation section of Chapter 3 go on to state desired cover values and locations of big sagebrush within native rangeland and nonnative seedings.

156 1 1 **Comment:** Do not burn low sagebrush.

Reasons:

critical for pronghorn antelope and sage grouse.

Response: Management objectives to provide appropriate habitat for pronghorn antelope and sage grouse would be met with implementation of any prescribed fire proposed, including those in low sagebrush vegetation communities. Though site-specific analysis of potential impacts to all resource values would be completed prior to individual project implementation in fulfillment of NEPA requirements, the intent of proposed prescribed burning was primarily to control western juniper dominance and maintain diversity and structure in big sagebrush (primarily mountain big sagebrush) communities. Assumptions pertaining to control of woody species, for analysis purposes in Chapter 4, were revised somewhat in the final document to identify that:

• Approximately 10% of the 166,000 acres of western juniper woodlands—those stands dominated by trees with old growth characteristics—would remain untreated. An assumption of Alternatives A, C, D, D2, and Proposed RMP in the Air Resources section states that an estimated 75 % of western juniper communities within the planning unit would be treated with prescribed fire, thus as much as 132,500 acres of juniper dominated woodlands may be burned with prescribed fire over the life of the plan. The combination of wildfire and prescribed fire would retain a minimum of

16,600 acres of stands dominated by trees with old growth characteristics. It is recognized that some acreage within diverse vegetation communities in addition to the estimated 16,600 acres dominated by trees with old growth characteristics would retain western juniper occurrence in low density in association with vigorous shrub, grass, and forb species, consistent with site potential. Areas of western juniper occurrence include acreage in the following vegetation communities identified in Chapter 2; western juniper/big sagebrush, western juniper/low sagebrush, big sagebrush/perennial grassland, mountain big sagebrush/grassland, quaking aspen, and mountain shrub.

• Fire return intervals in sagebrush/grassland communities vary between 25 and 100 or more years. Mountain big sagebrush communities would tend toward the lower end of that range, while Wyoming big sagebrush communities would tend toward the upper end of that range. The average fire return interval, when considering prescribed fire combined with wildfire, would not be less than 75 years within the 3,250,000 acres of sagebrush/grassland communities identified.

157 1 1 **Comment:** Wyoming big sagebrush must be managed to meet the needs of sage grouse.

Response: Management Objective 2 within the Rangeland Vegetation section of Chapter 3 of the draft and final document is, "Manage big sagebrush cover in seedings and on native rangeland to meet the life history requirements of sagebrush-dependent wildlife." With the increasing interest in meeting the habitat needs of sage grouse, Appendix F (Wildlife Habitat Descriptions and Considerations) was revised in the final to provide additional guidance for management of big sagebrush communities and management actions of Proposed RMP within the final include, "Management would strive for about 70% or more of the total potential sagebrush habitat to achieve DRFC's in each resource area over the long term. Native range and most seedings would be managed to meet the requirements of a host of wildlife. Management would be to maintain or establish diversity, mosaics, and connectivity of sagebrush between GMA's at middle and fine scales. The obligation to provide sagebrush cover for its various wildlife habitat values would be met in most areas. The overall goal of this alternative would be to emphasize plant and animal community health at landscape levels. To achieve DRFC's, management would include a variety of methods to increase or decrease big sagebrush overstory. Quantifications of shrub occurrence are described in Appendix F (Wildlife Habitat Descriptions and Considerations)."

158 1 1 **Comment:** The acreage of proposed sagebrush control is not included in rangeland vegetation section.

Response: Estimates and constraints on the potential acreage of sagebrush treatment are stated throughout the document since determination of site-specific acreage can not be identified at this mid-scale level of planning. While all management objectives would be met while implementing proposed sagebrush control actions, especially Rangeland Vegetation Objective 2 identified in comment response 157, a stated assumption for analysis purposes of this document with implementation of Proposed RMP is, "Through the life of the plan, no more than 123,500 acres of western juniper woodland fuel type and no more than 250,000 acres of sagebrush/grassland fuel types would be burned using prescribed fire." Additionally, assumptions common to all alternatives within the Rangeland Vegetation

analysis include, "Experience shows that 40 to 60% of prescribed burn treatment areas are "black acres," creating a mosaic pattern of islands and stringers and maintain some structure (connectivity) and the desired diversity. Wildfire accomplishes this at a lesser extent." Proposed actions of the Air Resources section of Chapter 3, Proposed RMP, state, "Use prescribed burning to treat rangeland areas to 30,000 acres per year and forested areas to 300 acres per year or the equivalent of 556,000 tons of fuel per year." Assumptions under Air Resources, Chapter 4, state that, "For analysis purposes, it is assumed that during the life of the plan, an estimated 75% of western juniper communities within the planning unit would be treated with prescribed fire, but 7,000 acres would not be exceeded in any year. Along with this, an estimated 50% of sagebrush/grass communities would be subject to prescribed fire (black acres) while not exceeding 15,000 acres in any year. There are 300 acres, or the equivalent of 9,600 tons, of forested fuels within MRA that could be prescribe burned annually; however, forested acres in ARA and JRA are limited. These are estimated maximum acreages for smoke emissions predictions, and are neither ceilings or targets."

159 1 1

Comment: Page 3-71: Alternative C: Explain what happens on the remaining 30% of sagebrush habitat.

Response: Proposed actions of Alternative C on page 3-71 of the draft referenced Appendix O (Best Management Practices) to describe acceptable wildlife habitat characteristics within sites capable of supporting big sagebrush. Within the final document, these criteria were all moved to Appendix F (Wildlife Habitat Descriptions and Considerations). Appendix F (Wildlife Habitat Descriptions and Considerations) identifies a rationale for management of a range, less than 100% of the surface area of potential big sagebrush vegetation communities to provide habitat for sagebrush-dependent wildlife species. Reasonable management goals were developed that are measurable, attainable, and based on professional judgment with consideration of past disturbances which have altered vegetation communities and future natural disturbances, including wildfire, which would reduce sagebrush cover for a period of time. As a result, 30% or less of the potential sagebrush habitat may be dominated by grassland at any time through the life of the plan.

160 1 1

Comment: Page 4-140: para 2: Meadows are not rare on Steens Mountain.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

161 1 1

Comment: Appendix F, Page 315: This section needs to include salt desert shrub, streamside riparian, meadows, wetlands, mountain brush, quaking aspen, subalpine, and natural grasslands.

Response: Appendix F was modified to address this concern.

162 1 1

Comment: Page 3-16: Objective 1, Alternative C: Proposal is unreasonable. Where man-made seedings are in good to excellent condition, there is no need to improve them.

Reasons:

leave well enough alone; and

continue to make use of seedings to improve surrounding native vegetation.

Response: It is assumed the comment is in reference to the Rangeland Vegetation proposed action number 2, "Implement actions to diversify structure and composition of nonnative seedings. Provide for and maintain forage production consistent with other resource objectives." Also see comment response 116, 119, 126, 128, 136, and 187.

163	1	1	**Comment:** Soil maps need to be completed as part of the baseline data (page 2-10). **Response:** See comment response 114.

Opinions or Preferences

	2	7	OHV, off-trail hiking, and livestock and pack animals are major causes of weed introduction and soil disturbance.
	2	2	Advocate strong protection for native perennial grasslands. *Reasons:* *supports page 3-69;* *prevent further degradation; and* *restore vegetative complexity.*
	1	1	Agree with emphasizing vegetation management that targets watershed and diversity and not PNC.
	1	1	Page 3-78: Change should to must regarding noxious weeds.
	1	1	Page 4-42: Weed establishment may, change to will.
	1	1	Page 378: Need to be more specific.
	1	1	There is no evidence that crested wheatgrass will dominate existing native plants.
	1	1	Under Alternative C, the at risk rangeland is an important issue and aggressive greenbelt establishment protects community health at the landscape level.
	1	1	The loss of ground cover plants associated with late-seral western juniper is the most visible issue of concern.
	1	1	We support the concept of DRFC based on site potential.
	1	1	Reseeding burns with nonnatives can increase species diversity.
	1	1	Support maintaining shrub cover and structural diversity.
	1	1	Support Objective 4 and 5 under Rangeland Vegetation.
	1	1	Alternative C does not provide adequate protection of upland shrub for wildlife; Alternative D is better.
	1	1	Do not support chemical control of native vegetation.

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

Special Status Plants

No.	I	S	
164	4	4	**Comment:** Management actions and plant needs need to be fully understood and monitored before implementation. **Response:** Within a framework of multiple use, it is not always possible to fully understand needs of each component of biological systems before

commodity uses are made of the resources. Ongoing monitoring helps determine species needs, and adaptive management would help accommodate those needs as they are identified.

165 2 2

Comment: Rare plant sites should not be grazed.

Response: In many situations, grazing does not directly or indirectly impact rare plants. Monitoring continues to help identify conflicts which may often be resolved through changes in grazing timing and intensity, as well as with no grazing.

166 1 1

Comment: Restore Malheur wire lettuce.

Response: Malheur wire lettuce is not found within the area encompassed by the SEORMP; it is found in the Three Rivers Resource Area, Burns BLM.

167 1 1

Comment: Leslie Gulch should receive management attention to protect remarkable plant sites.

Response: Leslie Gulch is an ACEC with a recent management plan. The area is currently receiving management attention for the relevant and important values found within the ACEC, of which special status plants are part.

168 1 1

Comment: Arrange plant names alphabetically by common name.

Response: Plant names have been arranged alphabetically by common name in Appendix C.

169 1 1

Comment: Protect rare plants through ACEC/RNA designations.

Response: Of the ACEC's being considered for designation, 10 have special status (rare) plant species as at least one of the relevant and important values for which the area would receive special management attention. By policy, BLM also focuses management attention on rare plants outside ACEC's.

170 1 1

Comment: Page 2-20: Questions BLM's authority to "create" special lists.

Response: By policy and guidance of BLM's 6840 Manual, BLM is directed to create and maintain lists of special status species. The Oregon and Washington "BLM Special Status Species List" was most recently published by the Oregon State Office in January, 2000.

171 1 1

Comment: Need to survey at least 75% of likely habitat within next 5 years.

Response: BLM's inventories and monitoring are dependent on available staff and funding. Much inventory has been conducted in likely habitat for a number of special status species, with the continuing goal of surveying additional habitat in future years.

172 1 1

Comment: Concern that the document incorrectly states that species proposed for listing are treated the same as listed species.

Response: Text in Chapter 1, Program Planing Criteria, has been changed to show that BLM conferences with USFWS on proposed species. BLM

6840 Manual (l988) states that "Species proposed for listing as T/E and proposed critical habitat shall be managed with the same level of protection provided for T/E species except that formal consultations are not required."

Opinions or Preferences

2	2	Support Alternative C but increase monitoring.
2	2	Support Alternative D.

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

Wildlife

No.	I	S	
173	6	6	**Comment:** BLM must provide more information on wildlife; especially their economic values, and by species regardless of profile, etc. In achieving ecosystem approach to land management, obtaining baseline data on wildlife species must be a BLM priority. **Response:** In response to Draft SEORMP/EIS comments, BLM clarified, corrected, and edited parts of the existing environment. The narratives and tables contained in Chapter 2 present a reasonable profile of the species of wildlife that occupy the planning area and the important habitat components and relationships BLM needs to incorporate into activity planning. Economic values for wildlife in both the draft and final are described in general terms using game and nongame species labels. Also see comment response 209. BLM relies upon an extensive library of scientific literature from a variety of sources including the science reports from the ICBEMP. These sources are used for context in assessing specific proposed actions. Listing all of the references would be impractical and Council on Environmental Quality (CEQ) regulations do not require RMP's to be encyclopedic documents. BLM acknowledges that for many species of wildlife, particularly nongame, there are limited data available in the scientific literature regarding specific habitat requirements. Furthermore, surveys documenting their absence or presence within the planning area are limited. Until more specific data are derived from surveys and scientific literature, BLM has determined that: (1) general vegetative health reflected in plant reproductive success, reasonable utilization levels, and the presence of structural complexity are prudent management criteria appropriate for a land use plan; and (2) habitat relationships indicated in "Wildlife in Managed Rangelands, The Relationship of Terrestrial Vertebrates to Plant Communities and Structural Conditions" are a sound basis for guiding general management practices at the land use plan scale.
174	3	3	**Comment:** Suggest adding certain species to Table 2-15 per information collected by Oregon Breeding Bird Atlas Project. **Response:** Data provided as a result of the Oregon Breeding Bird Atlas Project were incorporated into Chapter 2 PSEORMP/FEIS tables.

175 2 2 **Comment:** BLM needs to address AUM allocations for wildlife under each alternative.

Response: As stated in the Draft SEORMP/EIS, there is no reallocation of wildlife forage proposed in the SEORMP. Adjustments necessary to meet wildlife and livestock forage needs would be addressed concurrently with rangeland evaluations at the GMA level regardless of the alternative. Also refer to the Appendix F (Wildlife Habitat Descriptions and Considerations) and Chapter 2 narratives about forage demand and how it was derived.

During public scoping and in the course of writing the Draft SEORMP/EIS, BLM asked ODFW if there were any specific forage demand problems needing immediate resolution, and none were identified.

176 1 3 **Comment:** Elk are not native to Steens Mountain and they should be reduced or removed.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

177 1 3 **Comment:** Beavers have damaged creeks.

Response: Because beaver harvest willow and other woody species, sporadic population increases certainly influence watersheds and riparian condition. However, BLM believes it is erroneous to conclude that the primary influence beavers have on streams is negative. Beavers provide an important long-term, positive influence on stream ecology and watershed processes.

178 1 3 **Comment:** Deer populations have declined. There are a number of other factors that effect wildlife populations in general that BLM did not discuss adequately in the Draft SEORMP/EIS.

Response: BLM agrees with the comment that there are a variety of factors in addition to habitat conditions that influence wildlife populations such as disease, predation, parasites, weather, accidents, population cycles, and so on. Chapter 2 was edited to acknowledge that point.

However, the SEORMP is primarily a land- and habitat-based document. It was assumed in the Draft SEORMP/EIS that there are other physical and biological mechanisms at work limiting wildlife but they are matters peripheral to the land use allocation process which the plan is intended to address. Recognizing that there are other influences that affect wildlife, BLM would continue as a land managing agency to focus primary attention on habitat-related matters that are within the span of influence. Where disease or other cyclic factors may be temporarily limiting wildlife numbers, BLM recognizes that population recovery and resilience is very dependent upon quality habitat components (forage, cover, structure, security, and water) being available for wildlife to use.

179 2 4 **Comment:** Mountain lions are increasing and devastate big game and cattle. BLM should include management objectives for predators.

Response: As the primary animal population and species managers of wildlife in the State, it is the role of ODFW to consider animal damage control for the purpose of managing wildlife, not the BLM. This is BLM policy and it is covered in a national master memorandum of understanding

with game departments and the U.S. Department of Agriculture-Animal and Plant Health Inspection Service (USDA-APHIS) throughout the western states. Animal damage control actions have already been analyzed in the 1996 "John Day Animal Damage Control EA" which is tiered to a completed environmental impact statement written by USDA-APHIS.

Vale District has an approved "Kit Fox Habitat Management Plan" which was written primarily to trigger an annual dialog with USDA-APHIS regarding avoidance of traps and toxicants in kit fox habitat. Also see comment/response 178.

180 1 1

Comment: The habitat needs of recreationally significant species are not adequately addressed in Alternative C.

Response: The Draft SEORMP/EIS analyzed a range of alternatives which addressed variations in emphasis on game and nongame wildlife. BLM received comments indicating that there was not enough emphasis placed on either class of wildlife.

The preferred alternative in the Draft SEORMP/EIS and the Proposed RMP of the PSEORMP/FEIS promote a balanced game and nongame emphasis, to the extent that it is practical, and indicates wildlife habitat conservation measures would be pursued over the life of the plan regardless of the game or nongame label.

Chapter 2 narratives and tables and Appendix F (Wildlife Habitat Descriptions and Considerations) information provide a reasonably balanced picture of game and nongame wildlife values that were identified as areas of concern by the public during scoping. The Draft SEORMP/EIS and PSEORMP/FEIS information on wildlife reveals which habitat issues are important for management of healthy rangelands that support wildlife. Any of the species and issues specifically described in the PSEORMP/FEIS or referenced in the "Wildlife in Managed Rangelands" (1984) may be included in assessments and prescriptive management.

181 1 1

Comment: Calculations of wildlife AUM's in the Draft SEORMP/EIS differ from the "Three Rivers RMP"; livestock AUM's are higher than they should be; further explain calculations.

Response: Competitive forage demand figures for big game were adjusted in the PSEORMP/FEIS so they are consistent with the "Three Rivers RMP" as suggested by the ODFW. Refer also to Appendix F (Wildlife Habitat Descriptions and Considerations) for an explanation of the calculation method.

182 1 1

Comment:

- Wildlife will move to private lands that are grazed if grazing is eliminated.
- Grazing use destroys wildlife habitat.
- Grazing use is vital to the survival of wildlife.

Response: Two prevalent opinions voiced during the scoping, public meetings, and public comment periods were that either all wildlife suffer from the effects of public land grazing or that grazing is needed in order to sustain wildlife habitat health. Most professional land managing agency

biologists experienced in assessing rangelands would agree that these views tend to overstate or understate the consequences of grazing use on wildlife habitat. Stocking levels, class of livestock, seasons of use, water distributions, landform character, pasture size, herding practices, and other factors in combination determine the extent to which grazing has impacts on wildlife (such as trampling, defoliation, alteration of plant structure, social avoidance, and so on). Impacts of grazing are best determined at the activity plan level for a specific area, they can only be addressed in general ways within the PSEORMP/FEIS.

BLM acknowledges that grazing use influences the distribution of wildlife on private and public lands. Elk use in response to livestock grazing illustrates how variable and context sensitive the interactions of wildlife and livestock really are. For instance, elk tend to: (1) exhibit social intolerance to the presence of cattle on summer range; (2) prefer to winter on lands that are periodically grazed due to forage conditioning; and (3) tend to occupy rested pastures in the summer and fall. The relationships are complex.

The Draft SEORMP/EIS reference to elk preferring areas periodically grazed by livestock is based on documented elk behavior on winter ranges reported by game departments in Oregon and Montana.

Chapter 2 and Appendix F (Wildlife Habitat Descriptions and Considerations) were edited to clarify BLM biologist views about the relationship between grazing use and wildlife in multiple use settings.

183 1 1 **Comment:** Manage the planning area as a wildlife reserve.

Response: According to the FLPMA, wildlife habitat on public land is to be managed in a matrix of multiple uses under the principles of sustained yield of resources. Because of this legislative foundation, managing the public land as a wildlife preserve on a broad-scale basis, as it seems to have been suggested, is not a lawful option for BLM to consider.

This is not to imply that wildlife values should not be protected, emphasized, and even maximized in certain areas, which are each examples of appropriate multiple use goals. It simply means that on most of the public land where commodity-oriented activities are authorized, the wildlife habitat values would often be less than optimal for wildlife.

184 1 1 **Comment:** Hungarian partridge populations are vulnerable to late-spring early-fall grazing; desert partridge are vulnerable to cattle foraging intensity.

Response: See comment response 182.

185 1 1 **Comment:** Page 2-54: Sage grouse discussion lacks effects of hunting and predators and environmental factors.

Response: See comment response 178 and 179.

186 1 1 **Comment:** Page 3-26: The objective to manage with equal emphasis on game and nongame species communities is unattainable because it is

impossible to manage equally for all species. The plan fails to address the habitat requirements of individual species.

Response: BLM agrees that it is not possible to manage for all species of wildlife on the same piece of land at the same time. The Draft SEORMP/EIS does not propose this form of management. BLM also agrees that many common management actions result in both positive and negative impacts to wildlife depending upon the species, habitat requirements, and seasons of use.

BLM contends that it is indeed possible to give reasonable consideration to communities of wildlife by using current research findings about individual species requirements (including the ICBEMP science reports) and the habitat relationships data provided in Thomas et al. (1984) when analyzing and prescribing management. These are in fact the assumptions, directions, and intent identified for wildlife and special status species objectives in Proposed RMP, D2, C, and D Alternatives of the Draft SEORMP/EIS and PSEORMP/FEIS.

The Draft SEORMP/EIS Chapter 3, Special Status Species, expanded narrative states: "Individual species requirements would be included in management prescriptions, but not to an extent that overemphasizes the value of any one habitat." BLM has assumed from the beginning that managing for community health requires some fundamental understanding of the requirements of individual species (such as the components of wildlife communities) in order to arrive at the proper prescriptive management. Chapter 2 tables and narratives in the Draft SEORMP/EIS and PSEORMP/FEIS both describe many specific habitat needs for wildlife and their habitats within the planning area and reference is made to the library of information available in other scientific literature. Also see comment response 173.

187 1 1

Comment: Page 3-70: Several commenters were opposed to managing big sagebrush in seeding for the benefit of wildlife because it would reduce forage capability. It was also asserted that the rationale for this management is groundless and that sagebrush is a weed.

Response: It is acknowledged that the plan goals for shrub cover values important to wildlife (see Appendix F) may reduce some forage production capability for livestock. Moreover, as a goal it would be a departure from BLM's historic management philosophy that seedings would be completely retreated on a periodic basis to reduce shrub cover and enhance livestock forage production.

Although under Alternative C and the Proposed RMP certain seedings may indeed be retreated partially or completely for forage production reasons, consideration would be given to the criteria for wildlife indicated in Appendix F (Wildlife Habitat Descriptions and Considerations). Rangeland health standards and cumulative losses of shrublands throughout the west have resulted in the need to take a slightly different approach to sagebrush management than what may have been considered appropriate in the past. This would be especially important for sage grouse and other wildlife dependent upon sagebrush that are suffering population declines throughout much of their range.

BLM would continue to substantially use seedings for spring livestock forage and deferment of grazing use on native range during the critical growing season. Nevertheless, the Draft SEORMP/EIS Figure 2-1 on page 2-42 indicates why sagebrush is so important to wildlife at the broad community level whether it is native or seeded rangeland.

From a wildlife habitat viewpoint, BLM disagrees with the opinion of some that the value of sagebrush was overemphasized in the Draft SEORMP/EIS or that wildlife do not use sagebrush habitats. On the contrary, sagebrush and its importance to wildlife is well supported by a wide array of technical literature and the personal field observations of biologists that have worked in eastern Oregon for decades. Also see comment response 150.

188 1 1 **Comment:** Map WLDF-1: Object to designating elk winter range in Spring Mountain Allotment.

Response: Tables of big game numbers, management objectives, and distributions were provided by the ODFW to indicate roughly how many big game are present, what the overall population trends are, and reasonable long-term distributions. Current numbers are best estimates and management objectives were set using administrative processes determined appropriate by the State of Oregon, not the BLM. Mapped distributions are approximate and subject to variations because of population fluctuations, drought, severe winter weather, and conditions on adjoining private lands.

Big game data presented are appropriate for the land use planning process and they are included because the Desired Range of Future Conditions narrative indicates BLM would provide habitat for "big game populations at near state wildlife agency objectives."

189 1 1 **Comment:** BLM has little information on nongame species population status and requirement.

Response: See comment response 173, 180, and 186.

190 1 1 **Comment:** Habitat evaluations were not conducted as part of plan.

Response: General habitat values, relationships, and objectives for wildlife are disclosed in the plan. Specific habitat evaluations and their consistency with the PSEORMP/FEIS in relation to forage, cover, structure, security, and water are left to be addressed in the rangeland assessment process within GMA's. Also see comment response 191.

191 1 1 **Comment:** The Draft SEORMP/EIS provided no evaluation of mechanistic/community relationships within the planning area.

Response: The comment was not accompanied with an explanation as to what mechanistic/community relationships were intended to mean or an example of how it might be defined and applied in BLM management. Chapter 2 narratives and tables describe fundamental wildlife habitat elements and Appendix F (Wildlife Habitat Descriptions and Considerations) indicates the habitat descriptions and considerations that are of importance to wildlife.

BLM plans to rely substantially on the principles and habitat relationships set out in Thomas et al. (1984) and science reports from the ICBEMP Final EIS. Although there would likely be changes in information for some species based on research, BLM believes that there are a number of fundamental wildlife habitat principles that pertain to wildlife communities and landscapes contained in "Wildlife in Managed Rangelands" 1984 that would continue to be of value for wildlife habitat management well into the foreseeable future.

192 1 1

Comment: OHV use significantly impacts native wildlife species by habitat fragmentation, erosion, and weed dispersal.

Response: BLM recognizes that OHV use can adversely affect wildlife through direct habitat loss and/or disturbances to security. The page 2-44 Draft SEORMP/EIS narrative on habitat security was meant to generically address any sort of disturbance during breeding or wintering regardless of the source. The Habitat Security section of Chapter 2 and the narrative in Appendix F (Wildlife Habitat Descriptions and Considerations) were both edited to be more explicit in the PSEORMP/FEIS.

The degree of OHV impacts affecting wildlife does not warrant special designations for wildlife protection at this time. Some asserted that protection for wildlife is needed immediately although no specific geographic areas needing protection were provided. BLM acknowledges that the trend towards increased recreational use of public land is likely to lead to conflicts in seasonal OHV use that would need to be resolved at a future date. The SEORMP foresees that OHV use resulting in these kinds of impacts would be mitigated through emergency closures, seasonal restrictions and rehabilitation.

193 1 1

Comment: The plan fails to address impacts on arid low elevation sites which are least resilient, contain essential habitat for a diverse assemblage of reptiles and songbirds, and near rare plant sites.

Response: BLM agrees that arid low elevation wildlife habitats are particularly vulnerable and less resilient to the effects of land uses. However, the S&G's provide the administrative mechanisms necessary to prevent or mitigate adverse effects of grazing use in any rangeland regardless of elevation. The SEORMP prescribes management consistent with soils, site potential, and so on.

194 1 1

Comment: Need complete inventory of herpetofauna and migratory songbirds in the salt desert shrub and Wyoming sagebrush habitats which are being degraded by OHV use.

Response: See comment response 173 and 186.

195 1 1

Comment: BLM must recognize importance of late seral or PNC habitats and manage accordingly.

Response: BLM agrees that there are high quality wildlife habitat features associated with PNC and late seral conditions that need to be protected through objectives in grazing allotment management plans. However, desirable wildlife habitat does not always equate to the highest ecological condition possible and other lower seral stages may be quite adequate to meet wildlife needs. Chapter 2 and Appendix F (Wildlife Habitat Descriptions and Considerations) were edited in the PSEORMP/FEIS to clarify

some aspects of rangeland ecological conditions and wildlife habitats that were implied but not clearly stated in the draft.

An objective to manage for PNC or late conditions for wildlife needs to be tempered. For instance, according to the definitions used in BLM range condition surveys or ESI, shrub cover values at PNC can be very limited. Seral stage objectives for wildlife would best be determined at the fine scale within activity plans.

196 1 1 **Comment:** The plan must specify management actions that will be taken for bats, there are 7 BLM sensitive species in the Owyhee ecosystem.

Response: BLM objectives for riparian areas, upland habitats, and special status species habitats would be sufficient to address management for bats in activity plans. Also see comment response 173.

197 1 1 **Comment:** Plan fails to analyze effects by watershed, fails to present sufficient data and analysis of wildlife, biodiversity, and special status species to consider and analyze consequences of management actions.

Response: The SEORMP proposes to address management for wildlife within GMA's in the context of range health evaluations.

198 1 1 **Comment:** The plan fails to recognize importance of dispersal and migration corridors, and how its actions fragment or connect habitat.

Response: Attaining healthy and connected habitats at most fine and mid scales as proposed in Alternative C and the Proposed RMP would provide habitat capable of providing corridors, dispersal areas, and so on.

199 1 1 **Comment**: BLM should develop up-to-date biodiversity information on potential impacts as part of NEPA, including key ecosystem indicator species, critical habitats, and biodiversity objectives and management strategies.

Response: Key species of wildlife would be identified within GMA's to assist in analyzing conditions and prescribing appropriate management. For instance, as stated in Chapter 2 and 3 of the Draft SEORMP/EIS and PSEORMP/FEIS, sage grouse are a good proxy for evaluating habitat health in big sagebrush types. As sage grouse habitat needs are met, a wide range of other species would also have adequate forage, cover, structure, and so on. Also see comment response 186 and 191.

200 1 1 **Comment:** Loss of sagebrush cover has a negative impact on a variety of wildlife species, including mule deer, songbirds, sage grouse, and reptiles.

Response: Sagebrush habitat values are addressed substantially in the Draft SEORMP/EIS and PSEORMP/FEIS. Also see comment response 173, 180, 186, 187, and 191.

201 1 1 **Comment:** BLM needs measurable herbaceous cover standards in order to protect sage grouse nesting habitat. A stubble height of at least 9 inches on grasses and forbs should be specified where grazing use overlaps with nesting habitat.

Response: The best available science (Western Association of Fish and Wildlife Agencies "Guidelines for Management of Sage Grouse Populations and Habitats") indicates there is little direct experimental evidence linking grazing practices to sage grouse population levels, but that grass height and cover affect sage grouse site selection and success. Thus, indirect evidence suggests that excessive grazing by livestock and wild herbivores in breeding habitat may have negative impacts on sage grouse populations.

Excessive grazing use associated with negative effects on sage grouse nesting success is inconsistent with the S&G's and would therefore be grounds for livestock grazing adjustments whether sage grouse are present or not.

Until there is a better common understanding and agreement between BLM and agencies such as ODFW regarding utilization protocols in sage grouse nesting habitat, stubble height is viewed as one of several acceptable ways to monitor grass cover conditions in nesting habitat. It is not the only way: for instance, a correlation of residual cover measurements (in nesting habitat) with commonly used utilization classes would likely permit BLM to address herbaceous cover concerns adequately. This correlation has yet to be determined. Also refer to Appendix F (Wildlife Habitat Descriptions and Considerations) under the Grazing Use Considerations for Upland Habitats section.

202 1 1 **Comment:** BLM should coordinate with ODFW regarding game management.

Response: BLM coordination with ODFW has been as open and frequent as possible during the Draft SEORMP/EIS formulation. This working relationship would continue following issuance of the records of decision in all substantive matters related to wildlife management.

203 1 1 **Comment:** Page 4-21– 4-23: The level of western juniper and sagebrush control would not meet wildlife needs under Alternative C as numerous species would be affected.

Response: Appendix F (Wildlife Habitat Descriptions and Considerations) describes habitat characteristics that would be attained in most western juniper and sagebrush control areas.

204 1 1 **Comment:** Page 4-80: The analysis that impacts would occur where western juniper is "normally patchy, rare, or absent" is inaccurate.

Response: The analysis indicates that impacts to wildlife habitat where western juniper is currently present would be limited where the site potential indicates the treatment is in a rangeland type and not western juniper woodland type.

205 1 1 **Comment:** Page 3-90: Modify monitoring statement for bighorns to all species of wildlife and wild horses.

Response: The monitoring statement at this location in the document is specific to meeting management objectives for bighorn populations and habitat. Monitoring to meet other objectives identifies similar data needs for other wildlife, wild horses, and livestock.

206	1	1	**Comment:** Delete "Wildlife Habitat Protection" BMP's because they are not relevant to soil and water protection. **Response:** Reference to wildlife habitat was removed from the BMP's in the final document. Much of the information was moved to Appendix F (Wildlife Habitat Descriptions and Considerations).
207	1	1	**Comment:** Amend wildlife objective to manage for wildlife/livestock predators. **Response:** Predator control actions are the province of the state and USDA-APHIS-WS, not the BLM.
208	1	1	**Comment:** Object to reliance on the 1997 "Oregon Bighorn Management Plan." **Response:** BLM routinely incorporates the content of existing state management plans into land management prescriptions and will continue to do so in the future. The only caveat to the acknowledgment of state plans is that they need to conform to general principles of multiple use management. The bighorn plan meets this criteria.
209	1	1	**Comment:** Hunters and anglers should not be classified with grazing as consumptive users. **Response:** USFWS classifies hunting and fishing as consumptive wildlife uses because once an animal is harvested it is no longer available to others. This contrasts with a nonconsumtive wildlife use, such as wildlife observation, which does not prevent others from also seeing and enjoying wildlife. The analysis emphasizes commodities (game species) in Alternative A and more natural values (game and nongame) in Alternatives B, C, D, D2, and Proposed RMP.

Opinions or Preferences

2	2	Protect Oregon's high desert for wildlife.
1	1	Support Alternative D.
1	1	Support Alternative C (with equal emphasis to improving habitat for all wildlife).
1	1	Put wildlife habitat first over cattle.
1	1	Page 4-66– 4-97: Impact analysis is inaccurate and inadequate in this section.
1	1	Page 4-23– 4-36: Alternative D: At these levels of brush control, wildlife needs may be met if constraints protecting key habitats are followed.
1	1	Page 4-81; para 5: Agree that wild horses pose impacts on wildlife water.

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

Special Status Animals (Terrestrial)

No.	I	S	
210	4	10	**Comment:** Remove domestic sheep from or near bighorn range. The level of detail shown for bighorn sheep in the Draft SEORMP/EIS is needed for other species in the plan.

Response: Bighorn management guidelines in the SEORMP would conform to existing national BLM policy which is the product of a collaborative effort that included wool-growers, state fish and game agencies, and BLM staff. This policy, which was described in the Draft SEORMP/EIS in Chapter 4 assumptions, was moved to Chapter 2 in the PSEORMP/FEIS under the bighorn narrative section.

The separate bighorn sheep objective and level of management detail about bighorns in the Draft SEORMP/EIS was warranted primarily because there was enough specific information available for BLM to do so and a need to amend existing habitat management plans for bighorn was expressed by the ODFW. Vale District was preparing to revise an existing habitat management plan and write an environmental assessment (EA) on bighorn management for Malheur County in 1995 but chose to delay that effort and incorporate the content of the EA within the this plan. This choice for delay and incorporation was made by agreement with the planning area's district manager and the regional supervisor of the ODFW.

211	4	4	**Comment:** Inventory, protect, and expand plan discussion of all fauna including mollusks, aquatic and terrestrial insects, bats, and other species, regardless of profile. **Response:** See comment response 173 which applies to wildlife with or without special status.
212	3	8	**Comment:** Page 2-55: Map WLDF-2 shows domestic sheep range overlapping bighorn range contrary to narrative. **Response:** Bighorn distributions and relationships to domestic sheep grazing were edited to correct some errors in the Draft SEORMP/EIS.
213	2	2	**Comment:** Page 319: Add six species of bats to the list (on file in Burns District Office). **Response:** Species were added as suggested.
214	1	6	**Comment:** The plan fails to meet agency and ESA objectives for special status animals. Section 7 of ESA requires BLM to consult on the actions of the plan. **Response:** The special status species Planning Criteria (Draft SEORMP/EIS page 1-13) and objectives and narratives explicitly address special status species and BLM responsibility regarding ESA. BLM has been preparing a draft biological opinion (BA) for all Federally listed and proposed species concurrently with the Draft SEORMP/EIS. The final BA for listed species would be forwarded to the USFWS when the PSEORMP/FEIS is released.
215	1	6	**Comment:** Alternative C fails to provide adequate attention to specific requirements of individual species. **Response:** See comment response 173, 180, 186, and 191.
216	1	6	**Comment:** Increased military activity will cause stress to wildlife; especially sage grouse and bighorn sheep. **Response:** Military activities and their consequences are beyond the scope of the SEORMP. Also see comment response 49.

217	1	6	**Comment:** Appendix N: Fails to analyze or disclose what "adequate cover and height" is. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
218	1	6	**Comment:** Appendix N: Fails to analyze or disclose what any of those broad parameters mean along the river. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
219	1	1	**Comment:** Consider adding Virginia's warbler to the special status species list; Mahogany Ridge has potential habitat. *Reasons:* *is declining in limited range.* **Response:** BLM periodically revises the Oregon/Washington special status species lists to determine if they accurately reflect species presence and threats. At the next update, the Bureau would consider the merits of this proposal.
220	1	1	**Comment:** Special status species in allotments should receive allotment management plan (AMP) priority. **Response:** Special status species will receive attention within allotment management plans (AMP's). The presence of special status species is one consideration when determining the order in which AMP's would be revised or initiated.
221			**Comment:** Delineate critical habitats for threatened and endangered species and remove/restore grazing as necessary. **Response**: BLM actions within habitats of listed species are covered under "Section 7" consultation procedures of the ESA. Under current recovery plans, there is no critical habitat (as defined under ESA) within the planning area.
222	1	1	**Comment:** Grazing privileges lost, retired, etc., should have AUM's held for watershed protection and wildlife habitat. **Response:** This land use plan, consistent with FLPMA, provides by tracts or areas for the use of the public lands. Once a given tract or area (allotment) is allocated for livestock grazing, adjustments to that use can be implemented to ensure that established objectives would be met, though the use can not be eliminated without a land use plan amendment. Possible adjustments to livestock grazing use which may be implemented to meet objectives are identified in the management actions of Chapter 3.
223	1	1	**Comment:** BLM should retain ownership of all range improvements. **Response:** Rangeland improvement ownership is beyond the scope of this land use planning document. Regulation at 43 CFR 4120.3-2 in part states:

1) Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipelines where authorization is granted after August 21, 1995 shall be in the name of the United States.

2) The United States shall have title to nonstructural range improvements such as seeding, spraying, and chaining.

3) Range improvement work performed by a cooperator or permittee on the public lands administered by BLM does not confer the exclusive right to use the improvement or the land affected by the range improvement work.

2	1	1	**Comment:** ODFW suggests additional assessment of the proposed actions and their impacts on sage grouse in final plan. **Response:** The Draft SEORMP/EIS and PSEORMP/FEIS place substantial emphasis on sage grouse and their habitat requirements.
225	1	1	**Comment:** ODFW suggests new lek inventories to assess impacts of management actions on sage grouse. **Response:** BLM and ODFW jointly fund lek surveys each year to the extent that budgets allow. Both agencies intend to continue refining lek inventory data and other sage grouse habitat information.
226	1	1	**Comment:** ODFW position on domestic sheep grazing permits is misinterpreted in Alternative D (page 4-95). *Reasons:* *supports retiring domestic sheep grazing or trailing permits within bighorn range and endorses BLM's 1998 "Revised Guidelines for Domestic Sheep."* **Response:** PSEORMP/FEIS Chapter 4 analysis was changed to reflect BLM's misinterpretation in the Draft SEORMP/EIS. ODFW would support the retirement of domestic sheep permits (in principle) and as considered under Alternatives D and D2. However, during scoping and in their statewide bighorn plan ODFW has not actively promoted the need to eliminate any particular sheep grazing permit at the present time.
227	1	1	**Comment:** Bighorn sheep ranges on Map WLDF-2 are inadequate for ARA; sheep have moved. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
228	1	1	**Comment:** Table 3-1: Less emphasis should be placed on landscape level evaluation and more on monitoring of conditions and management of ecological conditions of specific habitats. **Response:** Resolving issues of wildlife habitat quality and quantity need to be addressed at multiple scales. This includes some context for what is happening at the broad scale (ICBEMP), mid scale (resource areas and GMA's), and fine scale (grazing allotment pastures). BLM agrees that ecological conditions are a part of the evaluations process.
229	1	1	**Comment:** Table 2-15: Lists the Northern bald eagle as a documented breeder in the ARA. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.

230 1 1 **Comment:** Refer to Comments Regarding Andrews Resource Area on page 1.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

231 1 1 **Comment:** The plan should address the restoration of extirpated species.

Response: The SEORMP does not preclude the possibility of restoring a species that is no longer present (extirpated) within the planning area. However, no specific proposals are analyzed in this plan. As such, a future proposal to reintroduce a species such as the sharp-tailed grouse (extirpated within the planning area but surviving elsewhere) would require a separate EIS.

232 1 1 **Comment:** Page 2-53: Plan fails to acknowledge that eagle use in ARA is associated with Malheur Refuge.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

233 1 1 **Comment:** Page 4-84: This information should be contrasted with Alternatives D and E.

Response: The A, C, D, D2, E, and Proposed RMP Alternatives (in the draft and final plans) analyses were written in comparison to the existing situation (Alternative B) so a contrast with current management would be provided. This is CEQ guidance.

234 1 1 **Comment:** Bald eagles and peregrine falcons: historic and current nest sites should be addressed.

Response: The best current information and context for both species within the planning area is shown in Chapter 2.

235 1 1 **Comment:** The document should indicate that most breeding white-faced ibises are associated with the Malheur Refuge with occasional breeding on private land.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

236 1 1 **Comment:** Oregon State status is not shown for special status animals.

Response: The table of special status species was edited to reflect Oregon State status.

237 1 1 **Comment:**

- Some questioned BLM's authority to establish its own sensitive species lists.
- Another comment suggested there is no such thing as a Federal candidate species.

Response: By policy, the Oregon/Washington BLM State Director may establish a special status species list of plants and animals. The purpose for doing so is to help prioritize survey expenditures and to make sure that actions affecting them do not contribute towards the need for Federal listing under ESA. The USFWS has the regulatory authority to define and designate a species as a Federal candidate for potential listing under ESA.

238 1 1 **Comment:** The BLM made no attempt to apply coarse-filter approaches for assessing likelihood of retaining viable, well-distributed populations of native species.

Response: Appendix F (Wildlife Habitat Descriptions and Considerations) and the upland management objective for wildlife describe a mid- and fine-scale objective in big sagebrush habitats that would be expected to lead to well distributed populations of game and nongame wildlife over 70% or more of each resource area.

239 1 1 **Comment:** BLM included no baseline data on most special status species and no effort appears to have been made for the SEORMP process.

Response: As budgets have permitted, BLM has acquired a considerable library of information on the locations of a number of special status species wildlife. In particular, a great deal of emphasis has been placed on finding the locations of sage grouse leks. The Special Status Species Animals narrative of Chapter 2 was revised to show which species have had surveys over the last few decades.

240 4 4 **Comment:** Several comments were received expressing concern about rangeland management and sage grouse especially regarding fire, cheatgrass presence, and other land treatments.

Response: As the management indicator species for Wyoming, mountain, and Great Basin sagebrush habitats, BLM reexamined current scientific literature and consulted directly with several technical experts to make sure the foundation for sage grouse was generally sound. Chapter 2 narratives and the criteria identified in Appendix F (Wildlife Habitat Descriptions and Considerations) as modified in the PSEORMP/FEIS, more accurately address the majority of management issues pertaining to this species.

The Draft SEORMP/EIS indicated that nesting needs for sage grouse would be met in sagebrush canopy coverages of 5 to 15%. Although the draft was partially correct in what was shown in Appendix F, current research and the draft Western Association of Fish and Wildlife Agencies (WAFWA) management guidelines indicate that nesting is associated with sagebrush canopy cover values in the 15 to 25% range. Appendix F (Wildlife Habitat Descriptions and Considerations) was modified accordingly.

The Draft SEORMP/EIS indicated that introducing fire into sagebrush habitat with outcomes that leave a mosaic habitat pattern would result in benefits to sage grouse by diversifying structure and enhancing herbaceous plant availability. Although this may be true in brood rearing habitats of sage grouse, research conducted in Idaho on nesting habitat similar to that found in the SEORMP indicates that fire in dry Wyoming sagebrush types results in decreased nesting success due to the loss of shrub cover used for nesting. Given the concern over sage grouse population declines throughout the west, BLM cannot ignore these findings and their implications to fire and its impacts. Chapter 4 environmental impact narratives and conclusions were changed to show adverse impacts to sage grouse in Wyoming sagebrush habitats.

Opinions or Preferences

2 7 Improving Alternative D could reduce chances of sage grouse being listed as endangered.

Reasons:

habitat has declined over several decades.

1	1	Support Alternative C; but increase monitoring.
1	1	Commentor is contact for Oregon Breeding Bird Atlas Project.
1	1	Do not drill any new water wells.
1	1	Grazing should not conflict with endangered species. *Reasons:* *public should not pay/subsidize private operators; and* *fencing accommodates ranching industry and falls short of protecting fish habitat.*
1	1	Objective 2: Intensive management is critical to bighorn sheep management.
1	1	Cattle grazing benefits bighorn sheep.
1	1	Alternative D must be adopted to protect special status animals

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

Special Status Animals (Aquatic)

No.	I	S	
241	1	1	**Comment:** The preferred alternative fails to recognize loss of connectivity between redband trout populations and does not provide necessary management action. **Response:** While headwater areas generally provide the best spawning habitat and refuge during drought, isolation of redband trout populations is not nearly as extensive as it is for less thermally tolerant fish such as bull trout. During years of adequate stream flow, redbands would have access to drainages not physically blocked by barriers. Proposed management actions would provide protections for riparian and aquatic habitat in both headwater and lower-elevation streams.
242	1	1	**Comment:** Page 2-40: Redband trout habitat was inventoried in the Steens Mountains; include this data. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
243	1	1	**Comment:** Monitoring should be detailed for special status species and used with adaptive management. **Response:** BLM monitors populations of special status aquatic species, such as bull trout, Lahontan cutthroat trout, Columbia spotted frogs, and redband trout, as budgetary and personnel constraints allow. Much of the monitoring that occurs is in cooperation with ODFW, tribal biologists, universities, or other public and private agencies. Any population declines that are linked to habitat degradation would trigger prompt changes in management. During the GMA evaluation process, any additional monitoring needs for special status species would be identified. For streams with Federally listed fishes, all habitats are managed in concurrence with terms and conditions of biological opinions (BO's) issued by USFWS. Land uses that occur in these habitats are regulated as to duration, timing, and intensity so that adverse impacts to listed species are minimized and restoration and enhancement of riparian vegetation is possible.

244 1 1 **Comment:** Page 2-53: Discussion of Catlow tui chub should include information about "Catlow Redband Trout and Catlow Tui Chub Conservation Agreement and Strategy."

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

245 1 1 **Comment:** Riparian Aquatic Information Data System (RAIDS) database should be reviewed for redband trout.

Response: Table D-2 has been reviewed and updated to Table D5-1, and shows BLM's currently available information on redband trout.

246 1 1 **Comment:** Table D-2: Oregon Canyon and Ten Mile Creek have hybridized Lahontan/hatchery trout. Line Canyon has Lahontan trout.

Response: Table D5-1 has been reviewed and updated.

247 1 1 **Comment:** Page 2-42: All springs do not have unique assemblages of invertebrates.

Response: The SEORMP states, "Springs can be a source of unique, often endemic assemblages of invertebrates." The presence of unique invertebrates in every spring was not inferred.

LETTER NUMBER: 017, 069, 075, 080, 107,109, 110, 157, 180, 185, 210, 213, 218, 222, 223, 226, 232, 235, 241, 254, 266

Water/Riparian

Other riparian comments are found under the GRAZING and WILD AND SCENIC RIVER categories. Comments here are subdivided into BLM Monitoring and Studies, Riparian Management, Other Riparian Area Comments, and Plan Specific Comments.

Monitoring and Studies

No.	I	S	
248	3	3	**Comment:** Appendix D, Table D-3 is old data and should be replaced with trend plot data and 1998 PFC data in the final. *Reasons:* *old data indicates problems with riparian areas and new data indicates improvement* *communication with BLM indicates this is a correct observation; and* *include newest data in preferred alternative.* **Response:** The status of streams and riparian PFC, trend, and condition has been updated in Appendix D5 (Riparian Trends for Stream Segments), Table D5-1 which includes data gathered from 1996 through the 1999 field seasons. Existing riparian PFC, trend, and condition has been incorporated into the allotment summaries while the remaining unknown status of riparian areas would be gathered based on GMA's as described in the PSEORMP/FEIS to address and evaluate critical resources. A map showing riparian areas, fish-bearing streams, and water quality 303(d) listed streams has been incorporated into the final plan. Additional information on water resources and riparian/wetlands would be addressed when GMA's are evaluated and additional site-specific data are obtained. This information would be available to the public and reported in SEORMP updates on a yearly basis.

249 2 2 **Comment:** Document status of riparian and stream habitat where it is still unknown.

Reasons:

information is critical and tied to allotment summaries.

Response: See comment response 248.

250 1 1 **Comment:** Appendix N: 3 inch stubble height is too short because most wildlife and riparian shrubs would be damaged at this level of use.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

251 1 1 **Comment:** Include fish presence and fish habitat in PFC determination.

Reasons:

not enough emphasis on vegetation.

Response: The PFC procedure is an assessment of physical and biological factors for stream and riparian conditions. Information from this assessment is used to identify limiting factors on both functioning and nonfunctioning stream segments. This information is then available to the fisheries biologist to supplement existing fish data. However, PFC is not intended to be a comprehensive assessment of instream fish habitat parameters. BLM, as well as ODFW, use stream habitat survey methods to evaluate fish presence and habitat.

252 1 1 **Comment:** Implement improved riparian plans using the plans BLM already has instead of waiting another 5 years to complete a different schedule of studies.

Reasons:

studies/documents are expensive and should be implemented; and

allotments containing poor, fair, unknown should receive immediate consideration.

Response: One of the objectives of the SEORMP is to address riparian management with the most up-to-date information, criteria, and methodology available. This information would be incorporated into prioritized GMA evaluations. BLM would address management required to restore riparian problem areas identified during this process and to maintain riparian areas that are currently in proper condition. GMA's contain riparian areas that currently range from nonfunctioning to proper functioning conditions.

253 1 1 **Comment:** Page 2-37–2-39: Trend change is ambiguous.

Response: The section on page 2-37 was rewritten to reflect your concern. Because specific site-guides for determining potential natural communities (PNC's) have not been developed for riparian/wetland areas in southeastern Oregon. BLM is currently using existing data collected at various riparian/wetland areas to assist in projecting site potential. Much of this information is derived from existing riparian exclosures that have been in place since the 1970's and 1980's. Specialist and interdisciplinary teams have evaluated vegetation composition in many of these areas to aid in determining site potential of riparian species in geographically associated streams. Additional information for determining riparian site potentials has been gleaned from established streamside monitoring and study sites in allotments and pastures where livestock grazing practices were adjusted to

meet objectives developed for riparian/wetland restoration. The above explanation was incorporated into Chapter 2 of the final.

254 1 1 **Comment:** Include map of water quality limited streams in final plan.

Response: See comment response 248.

255 1 1 **Comment:** Wrong statement that groundwater studies are unavailable. A detailed analysis of the extent of aquifers should be completed to protect them from contamination. The interaction of water resources in not properly linked to issues such as, riparian/wetland areas; forest and woodlands management; energy and minerals; special management areas; fire management; recreation management; and fish and wildlife.

Response: BLM believess water resources have been adequately addressed for the SEORMP. Detailed analysis of local aquifers and other information on water resources would be addressed to the extent possible when GMA plans are prepared and additional site-specific data are obtained or available.

256 1 1 **Comment:** Groundwater studies are necessary to protect resources and determine trends in water quality in planning area.

Response: See comment response 255.

257 1 1 **Comment:** Explain presence of hazardous materials or incidents of groundwater/surface water contamination in planning area; these areas and wells should be mapped.

Response: There are no hazardous material sites or incidents of groundwater/surface water contamination occurring on public land in the planning area. The following former dump sites are currently on the "Federal Facilities Hazardous Waste Compliance Docket" (these sites are also listed on the Comprehensive Environmental Response, Compensation and Liability Act Information System [CERCLIS]): Lytle Boulevard dump site (OR1141190073); Slides dump site (OR7141190077); and Vale City dump site (OR6141190078). Preliminary assessments of these three dump sites were completed and submitted to the EPA in 1992. An EPA determination of no further remedial action was received for these sites. Please refer to the Hazardous Materials section in Chapter 2 for further information pertaining to your concern.

258 1 1 **Comment:** In defining lentic and lotic systems there should be quantification of level of function needed for each parameter to define minimum or optimum function of a system.

Response: Quantification of site-specific riparian/wetland area parameters would be addressed as warranted when PFC assessments are completed and any existing problems identified. The PFC process is to subjectively assess stream and riparian systems and identify any problems associated with current conditions. Over a stream channel's entire length, an individual stream system would possess many changes such as elevation, soil series, stream gradients, vegetation types, and large woody debris content. Any stream or vegetation problems identified by the PFC assessments would be addressed when conducting evaluations for GMA plans. Monitoring, studies, and/or adjustments to current management practices would be implemented to remedy current undesired conditions.

259 1 1 **Comment:** Flood hazard mapping, stream gauging records, and other surface hydrology data are necessary to appropriately manage land.

Response: Flood hazard mapping has been completed only for residential areas and farmlands that make up less than 5% of the entire planning area. Mapping flood hazards on public lands within the 4.6 million acres of the planning area is beyond the scope of the SEORMP.

Although stream gaging records are very useful, these are sparse and scattered throughout the planning area. Most active gages are located on outlets of reservoirs with flow controlled by irrigation districts and do not interact with the largest percentage of the land base on public land. Only two stations are currently active in the planning area, one at Rome on the Owyhee River (8,000 square miles), and one on the Malheur River (3,900 square miles). Many stations were established in the first half of the century but were discontinued. Chapter 2 has been updated to present a better representation of past and current stations. Existing surface water flow and chemistry information from these stations would be used during the site-specific evaluation process of GMA plans.

Opinions or Preferences

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

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

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

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

1 1 Riparian condition is good with almost all trend positive in ARA.

Riparian Management

260 1 6 **Comment:** Urge BLM to include specific directives in the final plan to achieve water quality standards.

Reasons:

graze in riparian only if it meets state standard for water quality, and minimize fencing.

Response: BLM believes that Objectives 1 and 2 of the Water Resources and Riparian/Wetland Areas sections have addressed management directives designed for protection and enhancement of critical riparian/wetland habitats and water quality. Although many of the phrases in Alternatives A, C, D, and D2 on Table 3-1are the same for Water Resource and Riparian/Wetland Areas directives, the main differences in management of water quality within these alternatives are derived from the overall emphasis of each alternative. This difference in each alternative is the contrast between commodity emphasis and the level of natural resource protection. Chapter 3 narrative section further explains the intent of each alternative. Streams and water bodies not meeting State water quality standards and/or PFC would be managed to attain an upward trend in the composition and structure of key riparian/wetland vegetation and desired physical characteristics of the stream channel. Uses and activities within the riparian conservation area (RCA) and contributing upland watershed areas that adversely affect water quality and/or lead to stream channel or riparian/wetland resource degradation would be adjusted, restricted, or limited if water quality and PFC cannot be attained or maintained with existing management. Management options would focus on uses and activities that allow for the protection and maintenance of RCA's and upland watersheds

and measurable progress toward the attainment of water quality standards and PFC, within the stream and/or RCA's. Also see comment response 248.

261 1 1 **Comment:** Need additional discussion about the effects of the prescribed burning program on riparian area.

Reasons:

there have been serious adverse impacts to woody riparian species on Donner und Blitzen River due to burns; willows are needed for fish and macro invertebrates, and songbirds;

these burns were not proactive as the plans says; and

burning in riparian areas is contrary to the constraints in the "Steens AMP Environmental Analysis" that aimed to improve woody riparian cover.

Response: BLM believes that water resources and riparian/wetland areas have been adequately addressed for prescribed burning program on riparian area impacts within the SEORMP. Please refer to Chapter 4 for impacts from wildfire, suppression tactics, and requirements for prescribed fire in relation to riparian/wetland areas. Additional information on water resources and riparian/wetlands would be addressed when GMA plans are prepared and additional site-specific data is obtained for desired prescribed fire precriptions. Also, refer to Comments Regarding Andrews Resource Area on page 1.

262 1 1 **Comment:** Determine which streams in allotments are water quality limited and bring into compliance.

Response: A list of water quality limited streams was presented in Table 2-10 of the draft. Until rangeland health standards and allotment evaluations are completed by interdisciplinary teams, a determination of actual sources impacting water quality cannot be fully appraised. For allotments that have evaluated grazing BMP's and have existing riparian conditions improving , BLM believes that it is complying with the intent to meet State water quality standards and is moving toward the delisting of these streams from the 303(d) list. Until TMDL's are established by the State of Oregon, BLM would incorporate its water quality restoration plan requirements into GMA's conducted on a priority basis to address water quality. As TMDL's are established for river basins by the State of Oregon, BLM would adjust or implement monitoring and management practices as needed to comply with approved State water quality management plans.

263 1 1 **Comment:** Strengthen Alternative C.

Reasons:

Objective 1 to focus on meeting water quality standard; and

bjective 2 management actions should only be allowed if they improve conditions or conditions remain neutral.

Response: See comment response 260.

264 1 1 **Comment:** Eliminate grazing from all water quality limited streams.

Response: Management objectives for riparian/wetland areas would be met through the adaptive management process, interdisciplinary team evaluations, and criteria provided in the SEORMP. Alternative D2 was developed to address exclusion of livestock grazing from sensitive areas

and riparian areas that are in nonfunctioning and functioning-at-risk with downward trends for restoring natural conditions in sensitive areas. All alternatives within the SEORMP address uses and activities within RCA's and contributing upland watershed areas that adversely affect water quality and/or lead to stream channel or riparian/wetland resource degradation. These uses, including livestock gazing, would be adjusted, restricted, or limited if water quality and PFC cannot be attained or maintained with existing management. Management options would focus on uses and activities that allow for the protection and maintenance of RCA's and upland watersheds and measurable progress toward the attainment of water quality standards and PFC, within the stream and/or RCA's.

265 1 1 **Comment:** Remove livestock when they degrade stream habitat.

Response: See comment response 264.

266 1 1 **Comment:** Riparian vegetation should be a larger part of riparian management program.

Reasons:

need riparian vegetation for neotropical migrant song birds.

Response: The riparian section in Chapter 2 focuses mainly on the physical portion of riparian area management. Please refer to the updated Riparian and Wetland Definitions, Processes, Functions, and Patterns section of Chapter 2, Water Resources and Riparian/Wetland Areas, and especially the Riparian Habitat and Wetlands section of Chapter 2 Wildlife and Wildlife Habitat which expand the biological portion in the final plan.

267 1 1 **Comment:** Page 3-23: Narrow the definition to limited "portions" of affected streams.

Response: Beneficial uses are defined by basin and/or stream and not segment. Water quality impaired streams are listed by water bodies, such as reservoirs, streams, and stream segments on the 303(d) list. Therefore, the objective is correctly written as stated and segments would only apply when they affect that beneficial use for which the stream was designated.

Opinions or Preferences

1 6 Livestock are the cause for almost all the 35 water quality limited streams.

1 6 Stating that BLM will "design treatments to enhance resource values and maintain commodity production by emphasizing treatments in riparian/wetland . . . " and "consider uses and activities occurring in surface waters and their entire associated watershed . . . " are neither standards or directives.

1 1 Page 3-82: Drop PFC; it is too subjective.

1 1 Adopt Alternative D to recover riparian areas from grazing.

1 1 Resource management objectives are invalid and subjective.

1 1 Must manage for PNC; can not rely on riparian conservation area approach.

1 1 Agree with factoring site potential.

1 1 Riparian habitats should be top priority because they are critical for habitat and restoration.

Other Riparian Area Comments

268	1	1	**Comment:** Page 2-42: Riparian areas may not always have trees, shrubs, etc. **Response:** The sections on page 2-42 and Appendix F (Wildlife Habitat Descriptions and Considerations) were rewritten to better reflect your concern.
269	1	1	**Comment:** Page 2-37: Use caution when comparing reference streams to target streams, and use other factors. **Response:** See comment response 253.

Opinion or Preferences

	1	1	Grazing is the cause of all water quality problems.
	1	1	Special designations are not needed because riparian areas conditions are improving.

Plan-Specific Comments

270	1	1	**Comment:** Plan fails to state how it will protect water quality in grazed watershed. **Response:** See comment response 260 and 264.
271	1	1	**Comment:** Plan fails to link water resources to the other categories, such as riparian areas/wetlands, forest and woodlands, energy and minerals, special management areas, fire management, recreation, and fish and wildlife. **Response:** BLM believes that water resources and riparian/wetland areas have been adequately addressed in respect to coordination with other resources within the SEORMP. Additional information on water resources and riparian/wetlands will be addressed when GMA plans are prepared and additional site-specific data is obtained.
272	1	1	**Comment:** BLM must analyze removal of developments from sites with erodible soils, steep terrain, or where land condition is deteriorating. **Response:** As BLM evaluates GMA's through the interdisciplinary process, site-specific analysis would be conducted on developments and other existing management projects for possible deteriorating conditions. When surface disturbance from existing projects is identified, restoration or abandonment procedures would be enacted to rectify problem areas.
273	1	1	**Comment:** Throughout the discussion in Appendix D, the BLM avoids even the mention of livestock, speaking of "human activities that alter the area's capability." **Response:** The term "human activities" includes all authorized actions, such as mining, forest harvesting, livestock grazing, and recreation use.
274	1	1	**Comment:** BLM's use of riparian management objectives (RMO's) is also invalid and incomprehensible. The reader has no understanding of what is really being stated, and what action would be taken by BLM. **Response:** The RMO section of Appendix O (Best Management Practices) has been revised to better represent current direction under the 1996

"Inland Native Fish Strategy" (INFISH) and the intent of objectives and goals associated with the concepts of ICBEMP.

275 1 1

Comment: Concerning Water Resources and Riparian/Wetland Areas (Table 3-1) under Objective 1, paragraph 2, it is wrong to say "management actions will restore water quality etc." because science in not available to accurately say how much we can affect water quality in any one site-specific area.

Response: The management directive under Water Resources and Riparian/Wetland Areas in Table 3-1 that contained the statement "management actions will restore water quality etc." was incomplete and should have read "management activities would be implemented with the intent to restore water quality"as stated in the narrative under the Detailed Description of Management Directives on page 3-79. Table 3-1 reflects this change in the PSEORMP/FIES.

276 1 1

Comment: The reference to Oregon Department of Environmental Quality (ODEQ) water quality is premature because of the legal basis of a water quality management plan (WQMP) functioning as a total maximum daily load (TMDL) has not been fully determined.

Response: BLM agrees. Chapter 3 and Appendix D have been adjusted to reflect these changes. WQMP in themselves would not function as a TMDL. ODEQ is responsible for developing a TMDL and implementing through a State approved water quality management plan. Once a TMDL is established, BLM would develop or adjust existing WQRP's to address TMDL requirements.

277 1 1

Comment: Concerning DRFC and monitoring, including relating to the use of PFC, land use monitoring should primarily consider those characteristics directly influenced by the land use. Natural factors should also be monitored, especially natural disturbance factors and natural conditions.

Response: BLM agrees. Natural disturbance and conditions are an integral part of monitoring and the PFC assessment process and would be considered when evaluations of GMA's are conducted in the future.

278 1 1

Comment: Riparian management prescriptions in general are likely to need additional adjustments. Fencing of riparian areas is costly and not always effective. Pastures with riparian areas need to be managed by monitoring the utilization and condition of the riparian area rather than the utilization and condition of an upland, or crested wheatgrass seeding.

Response: Although fencing is an option in all alternatives, only Alternative A emphasis extensive use of fencing as a management tool. Alternatives C, D, and D2 emphasizes the use of management by adjustments in livestock use patterns, such as changes in seasons of use. Upland utilization and condition are an integral part of the overall watershed approach to management of riparian/wetland areas. Monitoring information from both riparian/wetland areas and uplands are utilized to aid in determining the correct grazing system requirements to fit the affected landscape.

279 1 1

Comment: For water quality, Alternatives A–D do not differ in treatment of streams with water quality limited streams (page 3-23). Alternatives A–D also allow activities to occur where water quality standards are not being met, so long as the uses allow progress toward attainment of water quality standards (page 3-23). Alternative D adds " at the same or greater rate than if the use or activity were absent." This is not any different than the

standard in Alternatives A–C. If uses would slow the rate of progress, then the uses would be contributing to lack of attainment of water quality standards, in dereliction of the BLM's obligations under the "Clean Water Act."

Response: Although many of the phrases in Alternatives A, C, and D on Table 3-1are the same for Water Resources and Riparian/Wetland Areas directives, the main differences in management of water quality within these alternatives occur from the overall emphasis of each alternative. The difference in each alternative is the contrast between commodity emphasis and the level of natural resource protection. An additional alternative, Alternative D2, has been developed to address total exclusion areas from livestock grazing and mining operations. This alternative would analyze the impacts both negative and positive from these actions. The wording of "allowing progress toward the attainment of these standards" does not imply that BLM would allow affected streams to progress at a rate that would not bring standards into compliance within a reasonable time frame. BLM also recognizes once management adjustments are implemented, obtaining State compliance may take many years to meet standards for water quality such as temperature.

280 1 1 **Comment:** Standard 2: Watershed Function-Riparian/Wetland Areas: This states that riparian/wetland areas must be in properly functioning condition appropriate to soil, climate, and landform. As above, this is not a standard. It is an objective. However, it is meaningless since we do not know what is the properly functioning condition appropriate to every combination of soils, climate, and landforms in the planning area. If the authors of the draft already know, then they are remiss in not presenting the information.

Response: Standards for Watershed Function-Riparian/Wetland Areas have been determined by the 1977 S&G's. Through the PFC process an interdisciplinary team subjectively assesses streams and vegetation on each area's individual characteristics including soils, climate, and landform. Over a stream channel's entire length, changes in elevation, soil series, stream gradients, and vegetation types would occur. Each stream and stream segment is usually unique unto itself and can not be lumped into a "cookbook" approach to determine physical and biological makeup. Quantification of site-specific riparian/wetland area parameters would be addressed as warranted when PFC assessments are completed and any existing problems identified. The PFC process is to subjectively assess stream and riparian systems and identify any problems associated with current conditions. Any stream or vegetation problems identified by the PFC assessments would be addressed when conducting GMA evaluations. Monitoring, studies, and/or adjustments to current management practices would be implemented to remedy current undesired conditions.

281 1 1 **Comment:** On page 3-23 of the SEORMP, in its detailed discussion of the alternatives, the BLM says of Alternative C, regarding Water Resources and Riparian/Wetland Areas, "Where state water quality standards are not being met due to management on BLM-administered land, management activities and uses could occur in its associated watershed if they allow progress toward the attainment of State water quality standards." Again, this is inadequate. The BLM is obliged under INFISH to go beyond "allow[ing] progress toward the attainment of . . . standards;" instead, the BLM is directed to "not retard attainment" of these standards. The distinction between "allow progress" and "shall not retard" is significant. There are many management activities that allow progress toward attainment of water quality standards over time, but these same activities may

actually delay the attainment of standards when compared with alternative methods, such as removing livestock from riparian areas. Clearly, the BLM is obliged to maximize the speed with which water quality standards are met.

Response: The only stream within the planning area subject to INFISH directives is the North Fork Malheur River. "Section 7" consultation has been completed with the USFWS on this segment and a biological opinion rendered. Management adjustments to livestock grazing in this segment on public land have been implemented in accordance with the BO directives.

282 1 1

Comment: In the preferred Alternative C the BLM recommends an approach, which would "allow progress toward the attainment of State water quality standards." While this approach could benefit streams, "allowing" progress does not insure that progress would in fact happen. Progress would only be as rapid or nonexistent as managers choose. Since current management practices seem to leave so many streams noncompliant, we feel stronger wording is require to insure progress toward and eventual achievement of state standards. Managing for a measurable "upward trend towards attainment" of standards allow for minor incremental changes to be considered satisfactory management. Commodity management has failed up to this point to have much positive effect on the plethora of noncompliant streams listed.

Response: BLM recognizes that the attainment of State water quality standards is one of the highest priorities when conducting future GMA evaluations. The wording of "allowing progress toward the attainment of these standards" does not imply that we would allow affected streams to progress at a rate that would not bring standards into compliance within a reasonable time frame. BLM also recognizes that once management adjustments are implemented, obtaining State compliance may take many years to meet standards for water quality such as temperature. BLM is currently working with ODEQ and the EPA by developing water quality management plans and establishing TMDL's to initiate reclamation of impaired streams and associated water quality through the implementation of the SEORMP and the evaluation of landforms in GMA's.

283 1 1

Comment: On page 2-31 the 1996 DEQ list of "water quality listed" waters is referred to as the "current" one. Since the 1998 one is now out, will the information be revised for the final decision? Somewhere it should be acknowledged that streams with no information on them are not listed; thus the statistics are weighted to appear better than they are.

Response: The 1998 list of 303(d) listed water quality limited streams has been added to the existing information contained in the SEORMP/EIS. Please refer to draft Chapter 2, page 2-31, under the Water Quality section for an acknowledgment of the streams with no information. This has been further presented in PSEORMP/FEIS Table D5-1 (Appendix D5) which portrays known streams with riparian areas, fish presence, and water quality information.

284 1 1

Comment: Alternative D would only allow activities and uses if they "allow progress . . . at the same or greater rate than if the use or activity were absent." It seems only obvious that to improve the quality of water in streams, activities and uses should be employed or allowed which will have the most beneficial effect rather than allowing improvement to be a remote possibility. The idea of uses and activities "promoting" improved

water quality seems to be the logical direction if the goal of such improvement is truly desired.

Response: BLM agrees. As addressed in the Draft RMP, Alternative D would bring impaired streams into compliance with water quality standards at an expected rate equal to or greater than Alternative C. Although Alternative D allows for a more rapid rate of recovery than Alternative C, Alternative D stresses the exclusion of livestock grazing and other uses and activities from entire pastures or areas over other prescriptions.

Numerous comments from the Draft SEORMP/EIS were received expressing concern over livestock grazing in riparian/wetland areas as a major contributor to water quality impairment. To address these concerns, Alternative D2 was developed and analyzed in the final document. This alternative would exclude livestock grazing in riparian/wetland areas in NWSR's and fish strongholds. Additional riparian/wetland areas would be excluded from grazing that have a PFC rating of functioning-at-risk with a downward trend or are nonfunctioning until evaluations indicate that these areas are receptive to grazing.

The Proposed RMP alternative allows for exclusion of pastures or areas as needed, but only when other prescriptions have been evaluated and determined not to be applicable to remedy the current or future desired conditions. The Proposed RMP alternative allows for improvement in existing conditions to be evaluated on a site-specific basis by an interdisciplinary team to determine which prescriptions would be applied. Total exclusion would still be an option in the Proposed RMP alternative. Also see comment response 259, 279, and 282.

285 1 1 **Comment:** Adopt Alternative D for Rangeland/Grazing Use because livestock grazing and other uses that affect streams would be allowed only if they would promote or have no effect on restoration of water quality. Alternative D clearly establishes a higher standard for maintenance of existing uses, and presumably it should lead to more rapid recovery of riparian habitats.

Response: See comment response 284.

286 1 1 **Comment:** The draft makes reference to the fact that (1) in many areas, natural or geologic erosion rates are too fast to develop distinct, deep soil horizons. We concur, but these areas and/or "soil types" should be specifically identified as to location, setting, or other appropriate means of identification.

Response: These soil types would be identified in evaluations of GMA's conducted on a priority basis. An Order III soil survey is proposed for Vale District, Malheur County, during 2002.

287 1 1 **Comment:** If BMP's are in need of "continual" refinement, then by definition, whatever exists at a moment in time must not be a "BMP" because if it is in need of refinement, and we object to such notion, because such position provides no stability to the applicant/permittee and place our permits in jeopardy at the whim of the authorizing officer if he/she made an instantaneous determination that already-implemented BMP's were for any reason or no reason in need of "refinement." Such open-ended noncommitment may lead to abuse of the process by the authorizing officer to which we would certainly object.

Response: "Continual refinement" and additional development of BMP's pertains to updating BMP's when new scientific information becomes available or adjustments made when current BMP direction does not meet established objectives and desired goals of the SEORMP. In addition, new information and adjustments for BMP's would be done through an interdisciplinary process, while allowing permittees and other applicants input for suggesting alternative solutions for resolution as stated in the last sentence of paragraph one of Appendix O (Best Management Practices). BLM has every intent to work with affected applicants/permittees for joint concurrence when developing new or adjusting existing BMP's, but final BMP direction would be decided by whether objectives and goals would be met by new proposals.

288 1 1 **Comment:** The RMP avoids discussion of livestock grazing as the primary factor in fecal coliform contamination, sedimentation, and other degradation of water. Why does the RMP fail to detail and describe impacts of livestock on public waters?

Response: See comment response 271.

289 1 1 **Comment:** The availability of water in much of the region covered by this plan is limited and may hamper additional developments that are water dependent.

Response: Please refer to the Water Rights section added under Water Resources and Riparian/Wetland Areas in Chapter 2 of the final plan.

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

Fish and Aquatic

No.	I	S	
290	1	6	**Comment:** The plan fails to assess impacts to fish habitat. **Response:** BLM believes that impacts to fish habitat, as a component of water resources and riparian/wetland areas, have been adequately addressed within the SEORMP/EIS. Further assessments of impacts to water resources, riparian/wetland areas, and instream fish habitat would be made when GMA plans are prepared and additional site-specific data are obtained.
291	1	6	**Comment:** The plan does not say what the BLM intends to do to prevent the demise of native fish populations. **Response:** The SEORMP provides a range of protections for aquatic habitats in general, and streams or wetlands with native fishes would receive higher priority for the application of restorative or enhancing habitat management actions, if deemed necessary. Alternative D2 in the PSEORMP/FEIS specifically addresses special status native fishes, proposing removal of livestock grazing from stream segments with habitat for Federal listed, proposed, or candidate fishes as well as for stronghold populations of redband trout.

292 1 1 **Comment:** Fish could benefit from multiyear livestock exclusion to allow reestablishment of streamside trees.

Response: Alternative D2 in the PSEORMP/FEIS specifically addresses permanent removal of livestock grazing from stream segments with habitat for Federally listed, proposed, or candidate fishes as well as for stronghold populations of redband trout. Multiyear livestock exclusion can be adopted under any alternative if this level of protection from grazing is necessary for resource improvement and recovery.

293 1 1 **Comment:** Lack of trend data in 77.1% of riparian seems to conflict with ESA.

Response: See comment response 248.

294 1 1 **Comment:** The fisheries discussion is inadequate for Blitzen Pasture.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

295 1 1 **Comment:** The effect of increasing turbidity due to livestock in streams and bank shearing is not described adequately.

Response: Sedimentation of aquatic ecosystems is a common outcome of many land management activities, including timber harvest, road building, mining, as well as grazing. Consequently, stress due to increased sedimentation is one of the most common causes of ecological dysfunction in lotic systems. The negative impacts of sediments on stream-dwelling organisms, including fishes, amphibians, invertebrates, and plants, are well documented, and involve gill abrasion, smothering of eggs, decreased photosynthesis, and burial of gravel or cobble habitats. A general discussion of turbidity appears in PSEORMP/FEIS Chapter 2, Water Resources and Riparian/Wetland Areas, Quality of Riparian Areas, and in Appendix D4 (Riparian Trend Analysis Worksheet).

296 1 1 **Comment:** Page 3-25: Oppose Fish and Aquatic Habitat objective because it gives priority to some uses over others.

Response: Fish and Aquatic Habitat objectives are consistent with FLPMA (1976), which allows multiple uses to occur on public lands as long as the lands are managed in a manner that would protect the quality of natural resources and not impair productivity. The objective also adheres to ODEQ State water quality standards for fish or other aquatic beneficial uses.

297 1 1 **Comment:** Page 2-25: Need map of fish-bearing streams and table of condition of fish habitat.

Response: A map showing fish-bearing streams and streams with Federally listed fish had been added to PSEORMP/FEIS, but a table of fish habitat condition has not been included. In general, quality of fish habitat can be correlated with riparian condition and trend. Site-specific information on fish habitat condition would be presented during the GMA evaluation process.

298 1 1 **Comment:** Page 4-60: Regarding 33 miles of fish habitat negatively impacted by wild horses; account for the miles in other alternatives and miles impacted by cattle.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

299 1 1 **Comment:** Plan fails to protect and enhance habitat for Great Basin redband trout.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

Opinion or Preference

1 1 Supports Alternative D for fish because of urgency of inventory, restoration, and monitoring.

1 1 Stronger wording of Alternative D is necessary for healthy fisheries.

LETTER NUMBER: 009, 075, 078, 107, 109 110, 180, 232, 235

Wild Horses

No.	I	S	
300	1	1	**Comment:** Remove or reduce wild horses; they are exotics. **Response:** The "Wild Free-Roaming Horse and Burro Act" (Public Law 92-195) states: "It is the policy of Congress that wild free-roaming horses and burros shall be protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found as an integral part of the Public Lands."
301	1	1	**Comment:** Page 4-98: ODFW does not support "adjusting" bighorn sheep populations to meet Wild Horse Alternatives A and C. **Response:** The comment references a potential consequence of implementing actions which were maximized with Alternative A. These actions were not included in Proposed RMP. With implementation of actions identified in Alternative C and Proposed RMP, where bighorn sheep range and wild horse HMA's overlap, each designation may constrain opportunities to maximize the other use.
302	1	1	**Comment:** Wild horse populations should be managed to cause the least adverse impacts to native species. **Response:** As stated in Chapter 2, "Consistent with the 'Wild Free-Roaming Horse and Burro Act' (Public Law 92-195) and to prevent resource overuse and maintain a thriving ecological balance, gathering takes place as a herd reaches the maximum number of the established range of appropriate management levels and/or monitoring data indicate that an excess of horses is present."
303	1	1	**Comment:** ODFW is opposed to adding Red Mountain North Pasture to Coyote Lake HMA. **Response:** As identified in Chapters 2, 3 and 4, wild horses have used Red Mountain North Pasture since passage of the Act in 1971 and have been periodically counted as part of Coyote Lakes HMA since establishment of the HMA. As a result, administrative correction is appropriate.
304	1	1	**Comment:** Do not increase allowable horse numbers in Coyote Lake HMA because of possible impacts to threatened kit fox.

Response: Kit fox are identified as a Bureau assessment species within Chapter 2 of the draft and final. Though not proposed in this land use planning document, any proposal to increase wild horse numbers in Coyote Lake HMA or any HMA would include consideration of potential impacts to any special status species, especially those listed as threatened or endangered under the ESA.

305 1 1 **Comment:** Pages 3-30: Alternatives A, D, and E do not meet requirements of stated objective.

Response: Chapter 4 analysis indicates that wild horse management objectives would marginally be met with implementation of Alternative A actions and would be met with implementation of Alternative D actions. The conclusion of Alternative E analysis in the draft document identified that actions would be in direct conflict with the "Wild Horse and Burro Act" of 1971. As a result, wild horse management actions proposed in Alternative E were revised in this final document to include management actions similar to those proposed in Alternative D.

306 1 1 **Comment:** Alternatives A and E do not meet requirements of the "Wild Horse and Burro Act."

Response: See comment response 305.

307 1 1 **Comment:** There is no difference between references to water development in Alternatives A and C; add statement in each case "to provide for water developments to assure a reliable water supply during drought years."

Response: The suggested addition to Wild Horse action 4 of Table 3-1 and the expanded narrative of Chapter 3 was incorporated in the final document.

308 1 1 **Comment:** Page 3-92, 94: Section raises concerns of legality and need for water during drought; also, monitoring should include age and sex distribution.

Response: See comment response 307 in reference to providing water for wild horses during drought. Collection of data to periodically identify age and sex distribution of wild horse herds was added to monitoring of Chapter 3 and Appendix W (Monitoring) in the PSEORMP/FEIS.

309 1 1 **Comment:** Page 4-100: Alternative B should say *no emphasis* as opposed to *less emphasis* placed on providing livestock forage over wild horse forage.

Response: Within current management direction (Alternative B), livestock grazing is an authorized use within HMA's. Thus, the analysis as stated, less emphasis is placed on providing livestock forage over wild horse forage, as compared to the analysis found in Alternative A, is correct.

310 1 1 **Comment:** Bighorn sheep and wild horse habitat competition should be better considered prior to the reintroduction of bighorn sheep into HMA's.

Response: The comment is correct and consistent with requirements of NEPA in stating that consequences of implementing an action would be analyzed prior to undertaking the action, whether proposed by BLM or any other entity.

311 1 1 **Comment:** Page 4-98: List how many AUM's are allocated to wild horses.

Response: Allocation of resources to wild horses in this document is quantified by identifying an acceptable range of appropriate management level (AML) within each HMA. As stated in Chapter 2, "appropriate management levels (AML's) within each HMA were established through previous land use plans to ensure public land resources, including wild horse habitat, are maintained in satisfactory, healthy condition, and unacceptable impacts to these resources are minimized."

Opinion or Preference

1 1 Document in general provides proper and effective management of horses.

1 1 We support Alternative D for wild horses.

LETTER NUMBER: 157, 180, 234, 241

Grazing

This section is subdivided into Comments Against Grazing/Adaptive Management; AUM Allocation Comments; Grazing Standards and Guidelines and Best Management Practices; Comments Supporting Grazing; Problems or Deficiencies of Plan Alternatives; Rationale, Objectives, Etc.; and Other Comments.

No. I S

312 41 51 **Comment:** Support specific, clear and sound standards and guidelines in lieu of adaptive management.

Reasons:

too vague, need clear grazing schedules;

BLM lacks proper monitoring to enforce;

allows ranchers to graze beyond permit limitation;

BLM unable to enforce because of peer community pressure;

flexibility in management allows continued resource degradation;

until grazing becomes less of a BLM mission;

only if BLM had a better track record of protecting natural resources;

leads to nonspecific proposed actions that are difficult or impossible to analyze;

timing, identification of management actions, description of proposed actions and proper analysis are missing;

ignores resource damage, BLM does not follow constraints that are a part of proposed action in NEPA documents; and

fails to provide meaningful available information on rangeland conditions and trends to provide adequate baseline for public review and implementing adaptive management; use geographic information systems to produce maps to monitor trend of ecological condition.

Response: The draft document, and this PSEORMP/FEIS, utilize a description of desired resource conditions and possible site-specific conditions which may be encountered throughout the life of the plan. Desired conditions are articulated in Chapter 3 of the draft as well as in a number of appendices. Livestock grazing actions identified in each alternative are those the Bureau would take, consistent with the theme of the alternative, to improve conditions which are found to be less than acceptable or to maintain desired conditions. A listing of site-specific

actions which would be implemented through the life of the plan, as requested by these commentors, would allow less opportunity to incorporate new information about site-specific resource conditions and response to management actions as well as changes in the desires of interested publics. The Bureau's ability to implement adaptive management is dependent on its ability to effectively monitor implemented actions and resulting resource changes. Comments identifying concern with the Bureau's need to increase monitoring are appropriate so long as information is utilized to implement appropriate change in site-specific management.

313 24 28 **Comment:** Public lands should not be managed for the economic benefit of the livestock industry at the expense of natural resources and values.

Reasons:

do not destroy unreplaceable areas for little value of livestock grazing;

threatened and endangered species need to be protected over cattle interests;

recreation is as important to regional economy as ranching;

do not need more grazing land for cattle;

land belongs to all the public;

charge fair market value for AUM's; and

stop "welfare" on the range.

Response: Actions proposed in Alternative C of the draft and Proposed RMP are consistent with these comments. The preferred alternative attempts to strike an appropriate balance based on the expected social, economic, and ecological outcomes disclosed in Chapter 4. The grazing fee is set by legislation and is beyond the scope of this land use planning document.

314 15 16 **Comment:** Eliminate grazing in riparian areas and wetlands.

Reasons:

to protect fish, habitat, and cover;

to restore riparian vegetation;

to restore lowered water table;

preserve for recreational use;

to reduce streambank erosion; and

to improve water quality.

Response: Alternative A proposed livestock exclusion or removal of other uses from RCA's when the use adversely affects water quality or riparian resources. This action would be implemented primarily with exclusion corridor fencing of streams. Analysis in Chapter 4 indicates the short-sighted benefits of wholesale exclusion fencing of streams including high costs of construction and maintenance, failure to appropriately manage watersheds contributing to failure of riparian systems to function properly, and additional livestock impacts adjacent to exclusion fences. Proposals presented in Alternative C of the draft document and also within Proposed RMP of this final, more fully identify the interconnection of watersheds with riparian communities and appropriate livestock management actions. Livestock management actions consistent with stated criteria to meet resource objectives more fully protect the values these commentors identify.

315 14 15 **Comment:** Eliminate grazing in the Steens Mountains.

Reasons:

inconsistent with wilderness and recreation values; and

to restore redband habitat.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

316 12 12 **Comment:** Reduce grazing in the planning area generally.

Response: Though full implementation of Alternative C or Proposed RMP may result in site-specific reductions in levels of authorized livestock use to meet management objectives, a wholesale reduction of grazing in the planning area is not justified in the absence of supporting rationale. Also see comment response 317.

317 9 9 **Comment:** Eliminate grazing in other sensitive, pristine, perennial grassland areas.

Response: Alternative D2 in the PSEORMP/FEIS removes major tracts of public land within the planning area from livestock management allotments and thus result in livestock reductions between Alternative E and the remaining alternatives. Alternative D2 was developed as a result of a significant number of comments received in a modified form letter identifying a desire to see a strengthened Alterative D with livestock grazing excluded from a variable list of SMA's, areas of specified resource conditions, or where specified resource values are present. Criteria for identifying tracts of public land not allocated to livestock grazing in Alternative D-2 are:

1) selected habitat of Mulford's milkvetch, a special status plant species which are vulnerable livestock impacts;

2) habitat of fish species listed under the ESA;

3) redband trout and Columbia spotted frog strongholds;

4) selected habitat of sagebrush-dependent species, utilizing sage grouse as an indicator species;

5) management corridors of three river segments congressionally designated as NWSR's under the 1986 Act and four addition river segments found administratively suitable for potential designation by Congress as NWSR's within Alternative C; and

6) selected ACEC's.

An additional proposal of Alternative D2 is to temporarily exclude livestock from pastures containing riparian vegetation communities which, due to livestock grazing, are functioning at-risk with a downward trend or are not properly functioning. This would continue until a condition of functioning-at-risk with an upward trend is attained and appropriate livestock management actions are implemented.

318 12 17 **Comment:** Eliminate grazing in the planning area.

Response: Analysis of the commentor's proposal was completed in Alternative E of the draft. The action of eliminating all grazing from the planning area was not chosen for incorporation in Proposed RMP.

319 6 6 **Comment:** Livestock improvements have degraded resources.

Response: Standard implementation features and procedures for rangeland improvements are presented in Appendix S (Standard Implementation Features and Procedures for Rangeland Improvements). When appropriate mitigation measures are implemented to address potential adverse impacts to resource values, the impacts of implementing rangeland projects can be minimized.

320 6 6 **Comment:** Eliminate grazing in Owyhee NWSR/Owyhee Canyonlands.

Response: Analysis of excluding all livestock grazing from the Owyhee NWSR corridor was considered as one action in Alternative D2 as identified in the response to 317. Reference to the areas from which livestock grazing is excluded as a result of the April 28, 2000 modified order of the United States District Court of the District of Oregon (Civil No. CV98-97-RE) pertaining to livestock management within areas of concern identified by the Bureau in the 1993 "Owyhee National Wild and Scenic River Plan" was included in Chapter 2 of the final. Removal of additional portions of the Owyhee NWSR corridor from allocation to livestock grazing is an action of Proposed RMP, analyzed in Chapter 4 of the final document.

321 6 6 **Comment:** Livestock grazing has degraded natural resources.

Reasons:

at expense of other values;

is well documented; and

biotic soil crusts are destroyed by cattle.

Response: Though various livestock management actions have the potential to impact other resource values as identified in Appendix R (Effects of Intensity and Season of Grazing) and in various portions of Chapter 4 analysis, adaptive management is designed to identify and resolve impacts to resource values (especially when those impacts are inconsistent with overall plan objectives).

322 5 10 **Comment:** Increase rangeland monitoring on grazing.

Response: The importance of monitoring as one portion of the adaptive management process is identified in the comment response 7.

323 5 5 **Comment:** Eliminate grazing in Donner und Blitzen NWSR.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

324 5 5 **Comment:** Eliminate grazing in SMA's.

Reasons:

incompatible with values and uses; and

too much resource damage.

Response: A number of criteria, including designation of some SMA's, were used to develop livestock management actions of Alternative D2 as identified in comment response 317. Analysis of the consequences of this action is identified in Chapter 4 of the final document.

325 5 5 **Comment:** Eliminate grazing in areas in poor and fair condition (degraded).

Response: Poor or fair ecological condition rangeland was one of a number of criteria considered, though not included, during the development of livestock management for Alternative D2, as identified in comment response 317. As identified in the analysis of Alternative E, many early condition rangelands have been found to improve little with the removal of livestock grazing. Where not held in an early ecological condition by inappropriate grazing practices, maintenance and improvement in resource conditions can be attained while continuing to allow appropriate livestock grazing.

326 5 5 **Comment:** Reduce grazing in riparian areas and wetlands.

Response: Benefits of controlling livestock management practices which impact riparian values are identified in the analysis of Chapter 4. Management of riparian areas and wetlands to meet PFC and to meet management objectives identified in Chapter 3 may result in site-specific reductions in livestock use of these areas or changes in other management activities as GMA's are evaluated.

327 4 4 **Comment:** Eliminate grazing in WSA's.

Response: Wilderness values associated with WSA's are managed in accordance with the BLM's IMPLWR so as not to impair suitability to be designated by Congress as a component of the national wilderness system. Management by the IMPLWR is in effect until Congress takes action on the wilderness designation issue. For those public lands which were being grazed by livestock or were part of an approved livestock grazing system at the time the FLPMA became law in 1976, then consequently became part of a WSA, the law recognizes use by livestock as a grandfathered activity of those public lands. Thus, eliminating livestock grazing on the single premise of public land being located within a WSA would not be in compliance with Federal law.

328 3 3 **Comment:** Eliminate grazing in Alvord Desert.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

329 3 3 **Comment:** Reduce grazing in SMA's (ACEC/RNA's, WSA's, NWSR's, etc.).

Response: Similar to comment response 316, full implementation of Alternative C or Proposed RMP may result in site-specific reductions in levels of authorized livestock use within SMA's to meet management objectives. A wholesale reduction of grazing in all ACEC/RNA's, WSA's, NWSR's, etc., is not justified in the absence of supporting rationale. Rationale for elimination of grazing from portions of the Owyhee NWSR corridor support those actions in the Proposed RMP.

330 2 2 **Comment:** Eliminate grazing where degradation is evident.

Response: See comment response 325. Wholesale removal of livestock grazing from areas degraded by historic practices, though not further impacted by current livestock management, is not justified.

331 2 2 **Comment:** Eliminate grazing in Pueblo Mountains.

Reason:

inconsistent with wilderness and recreation.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

332 1 1 **Comment:** Rest from grazing and allow Jordan Craters to recover.

Response: Jordan Craters was excluded from grazing prior to the development of the draft SEORMP and is not proposed to be available for grazing in any of the alternatives of the draft or final.

333 1 1 **Comment:** Rest from grazing and allow Diamond Craters to recover.

Response: Diamond Craters is outside the planning area, within the BLM Burns District, Three Rivers Resource Area, and thus its management is not addressed by this land use planning document.

334 1 1 **Comment:** Rest from grazing and allow Owyhee Canyonlands/Owyhee NWSR to recover.

Response: See comment response 320.

335 1 1 **Comment:** Rest from grazing and allow Trout Creek Mountains to recover.

Response: Analysis of excluding livestock grazing from portions of Trout Creek Mountains was considered as one action in Alternative D2 as identified in comment response 317. Though full implementation of Alternative C or Proposed RMP may result in site-specific reductions in levels of authorized livestock use of Trout Creek Mountains to meet management objectives, a wholesale reduction of grazing in the planning area is not justified in the absence of supporting rationale. Also, for those portions of the Trout Creek Mountains in the Burns District, refer to Comments Regarding Andrews Resource Area on page 1.

336 1 1 **Comment:** Rest from grazing and allow Hawk Mountain to recover.

Response: Hawk Mountain is outside the planning area, within the BLM Lakeview District, and thus it's management is not addressed by this land use planning document.

337 1 1 **Comment**: Rest from grazing and allow Castle Rock to recover.

Response: Analysis of excluding livestock grazing from Castle Rock was considered as one actions in Alternative D2 as identified in comment response 317. Though full implementation of Alternative C or Proposed RMP may result in site-specific reductions in levels of authorized livestock use of Castle Rock to meet management objectives, a wholesale reduction of grazing in the planning area was not justified.

338 1 1 **Comment:** Rest from grazing/allow Alvord Desert to recover.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

339 2 2 **Comment:** Buy out or retire grazing allotments.

Reasons:

because it is a better use of tax dollars.

Response: Federal opportunities to buy out or retire grazing allotments are beyond the scope of this plan.

Opinion or Preference

18 18 Livestock grazing has degraded ecological/natural values in general.

Reasons:

desert cattle are a small percentage of livestock industry.

1 1 Thanks for excluding cattle from Little Blitzen and Indian gorges.

1 1 Livestock grazing has degraded fish and fish habitat.

1 1 Livestock grazing has degraded special status plants and/or animals.

AUM Allocation Comments

340 2 2 **Comment:** Include the range of AUM's by alternative.

Reasons:

reader has no way of knowing the figure;

use 3- to 5-year average listed by resource area;

it is referred to numerous times in text but is absent;

reader needs to compare what is allocated to livestock, horses, and wildlife;

expand TNR discussion (page 4-105) by alternative; and

Page 4-107, para 10: Discuss how many AUM's by alternative.

Response: This land use planning document was formulated to present criteria by which public land resources would be managed, and as such, generally does not identify site-specific livestock management actions that would be implemented with the signing of a record of decision (ROD). Throughout the life of the plan, the adaptive management process, as identified in Chapter 3, would be implemented within GMA's and may result in site-specific reductions or increases in levels of authorized livestock use to meet management objectives. Within the conclusion statement of analysis of impacts to livestock grazing with implementation of each alternative in Chapter 4, an estimated change in levels of livestock use throughout the planning area with full implementation of that alternative has been provided. Additionally, the analysis included an allotment specific statement that, "Changes in permitted use within an individual allotment would depend on the array of resources affected by livestock use, management objectives, intensity of livestock management actions implemented by livestock operators, and opportunities to develop and implement livestock grazing use while sustaining resource values."

341 1 6 **Comment:** There is no discussion of cattle and sheep numbers, AUM's allocated, or how many livestock are currently grazing public land compared to the past.

Response: The current number of permittees within each resource area and authorized number of AUM's by resource area has been presented in Chapter 2. For allotment-specific information concerning active AUM's and suspended AUM's of livestock use, refer to Appendix E (Allotment Summaries).

342 1 1 **Comment:** Appendix E: Remove because document states that no reallocation will be made.

Response: Appendix E (Allotment Summaries) has been included in the document to provide an allotment-specific summary of the current situation and to reference actions proposed in various alternatives which may affect future management of livestock grazing in the allotment. With periodic updates through the life of the plan, allotment summaries would provide an overview of management within each resource area.

343 1 1 **Comment:** Fails to consider a range of alternatives for the amount of livestock that would be considered.

Reasons:

unclear how much grazing is planned; and

estimates are all within normal range of variation.

Response: See comment response 342. An increase in authorized levels of grazing is possible with implementation of Alternative A whereas all livestock grazing permits would be canceled with implementation of Alternative E. Other alternatives would result in intermediate changes in levels of livestock grazing.

344 1 1 **Comment:** Base allocations on poor years.

Response: Authorized levels of livestock grazing within each allotment are based on data which indicate that management objectives would be met. In years of below average effective soil moisture during the growing season, reductions in livestock use may be implemented to ensure that resource values are maintained.

344a **Comment:** With the series of changes being proposed in various Federal documents, different levels of livestock grazing change are identified. Within, Rangeland Reform a decreasing trend of 6% per decade on BLM is identified while the Draft Eastside EIS identifies a decline in cattle numbers grazing on public land by approximately 1% per year for the next 20 years, and the Draft SEORMP/EIS, page 4-109 (Alternative C analysis), identifies that permitted grazing use would remain constant or decrease as much as 10%. With the series of changes being proposed for grazing levels, we suggest that to avoid confusion that the cumulative and connected impacts of these various programs be reviewed and discussed in more detail.

Response: Projected change in levels of authorized livestock grazing use on public lands in the three tiered documents listed in the comment would result from actions necessary to meet management objectives. Rangeland Reform, a national effort by BLM and the USFS which proposed change in policy and regulation within the Federal rangeland management program; ICBEMP, a coordinated, scientifically sound, broad-scale, ecosystem-based management strategy for lands administered by BLM and the USFS across parts of Idaho, Oregon, Montana, and Washington; and this plan, a mid-scale land use planning document for two resource areas that share similar public land management objectives including those to sustaining upland and riparian health and function to provide products and values for current and future benefit. As a result, consequences of implementing actions identified in these three tiered documents are not cumulative but often impacts of the same actions. The similar, though numerically different,

impacts to authorized levels of livestock grazing identified in these three documents result form the difference in land unit cover by the document and the projected actions necessary to meet objectives. Efforts were made during the development of the SEORMP to ensure that the science used to develop ICBEMP Final EIS was also used when formulating management actions. Additionally, "Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands in Oregon and Washington," a product of Rangeland Reform, is included as a reprint in its entirety in this plan as Appendix Q.

The commentor also questioned the source of difference between the 0–10% reduction in permitted livestock use in the planning area identified on page 4-109 of the draft and consequences on page 4-153 identifying a reduction in livestock productive capacity in Harney County of 10,925 AUM's, representing 1.5% of the current level. The analysis in the draft document identifying a 0–10% reduction is found in the Rangeland/ Grazing Use section and is a comparison of projected levels of grazing use of BLM lands in the planning area with implementation of Alternative C versus current livestock grazing levels in the planning area. The analysis identifying 1.5% of current levels is found in the Human Uses and Values section and is a comparison of current livestock production capacity in Harney County including that capacity supported by BLM lands in Three Rivers Resource Area, Malheur National Forest, State lands, and private lands in Harney County in addition to capacity supported by BLM lands in ARA. Also, refer to Comments Regarding Andrews Resource Area on page 1.

Grazing Standards and Guidelines and Best Management Practices

345 5 5 **Comment:** Against cutting animal unit months (AUM's); not enough data.

Response: This plan in itself does not reduce AUM's of any operator nor as a whole across the planning area, though criteria are established for management of public lands within the planning area. A consequence of site-specific evaluation/assessment of monitoring data to determine whether these criteria are being met within a GMA or any specific location may result in a reduction or increase in authorized levels of livestock grazing as well as other changes to livestock management practices implemented.

346 1 6 **Comment:** Best management practices (BMP's) provide no objective numerical standards for most management activities.

Response: As stated in the draft plan's Appendix O, page 371, BMP's are designed to assist in achieving the objectives for maintaining or improving water quality, soils, watershed condition, etc. BMP's are based on site-specific conditions which allow for adjustments and refinement to meet landform and resource differences. These methods, measures, or practices, although not required to contain numerical criteria, may contain quantitative measures as needed. Most BMP's in Appendix O purposely do not contain finite values because of the multitude of differing site-specific situations.

347 1 6 **Comment:** BMP's contain no direction for grazing management, weed control, or other issues.

Response: Noxious weed management BMP's are listed in Appendix O. A reference to the 1997 "Northwest Area Noxious Weed Control EIS" has

been added to this section to help further define weed control within the planning area. Livestock grazing management practices are contained within Appendix S (Standard Implementation Features and Procedures for Rangeland Improvements). A reference to Appendix S, has been added to the BMP appendix to help direct readers to livestock grazing management practices. Also see comment response 346.

348 1 6

Comment: The section on S&G's in Appendix Q contains no clear standards or management direction to guide BLM in management.

Response: Appendix Q is a reprint of "Standards for Rangeland Health and Guidelines for Livestock Management for Public Lands in Oregon and Washington" developed in consultation with resource advisory councils, provincial advisory committees, tribes, and others in both states. It has been included in this land use planning document to clarify and better communicate to the reader the management direction of BLM-administered rangelands in the planning area as well as throughout Oregon and Washington.

349 1 6

Comment: S&G's are meaningless by the insistence that all landscape be managed with site heterogeneity in mind.

Response: See comment response 348.

349a 1 6

Comment: The SEORAC's "potential indicators" are not true indicators, only general characteristics of the landscape.

Response: See comment response 348.

350 1 1

Comment: Page 2-10: BMP's: Object to open-ended provision; BLM has confused "management actions" with guiding principles.

Response: BLM considers management actions to be activities such as mining and livestock grazing, whereas BMP's are guidelines associated with and applied to site-specific approved actions to reduce or eliminate existing or potential disturbances to resources within the watershed as stated in Appendix O (Best Management Practices).

351 1 1

Comment: Concerned about anti-grazing tone of Appendix D and plan in general.

Response: A range of alternatives was developed as required by NEPA, including Alternative D in which natural values are emphasized and providing for grazing use is subordinate. Analysis of Alternative D resulted in a limited number of actions from this alternative being included in Proposed RMP. Since Appendix D (Riparian/Wetland Areas) did not address grazing, BLM assumes that the commentor meant Alternative D and responded thusly.

352 26 28

Comment: Use specific standards and guidelines in lieu of adaptive management.

Response: Within this land use planning document, the Bureau recognizes that our knowledge of ecological processes, our information concerning site-specific resource conditions, and the public's requests for values from public lands would continue to shift through time. As a result, this planning document was formulated to define criteria under which public

lands in the planning area would be managed. Adaptive management, a process presented in Chapter 3, would be utilized to develop, implement, monitor, and evaluate site-specific activity plans within geographic management areas (GMA's) which describe detailed management activities—where they would be carried out, the acreage treated, and possible consequences of not meeting management objectives.

Opinions or Preferences

	2	2	Multiple use centers around grazing; open range is outdated and needs reform.
	2	2	Public may demand grazing be stopped if BLM cannot manage grazing on public land.
	2	2	The lands are arid and vulnerable to overgrazing.
	1	1	Don't subsidize marginal cattle producers.
	1	1	Coordination with regulations is important regarding involvement of livestock producers.
	1	1	Grazing and mining laws are archaic.
	1	1	Realizes that grazing on public land is a way of life for some people.
	1	1	Adopt clear standards and guidelines for management and budget for monitoring.
	1	1	Understands that BLM is committed to multiple use management, including grazing.
	1	1	Understands that grazing is complicated by mixtures of public and private lands.

Comments Supporting Grazing

353 1 1 **Comment:** Jackies Butte permittees should have a larger voice in this plan because they are permitted users.

Response: Public land resources are managed for public benefits today and in the future. As such, all interested publics are allowed to participate in land use planning.

354 1 1 **Comment:** More flexibility needs to be put in the plan relative to increased levels of grazing.

Response: The draft and final documents were formulated to provide criteria for management of public land resources and not develop prescriptive one-size-fits-all management actions. As such, flexibility is provided to develop activity plans which fit site-specific assemblages of resources and allow opportunities to use resources appropriately.

355 1 1 **Comment:** TNR grazing should become permanent in appropriate areas.

Reasons:

improves site productivity.

Response: As stated in regulation (43 CFR 4110.3-1), "Additional forage may be apportioned to qualified applicants for livestock grazing use consistent with multiple use objectives. Additional forage available on a sustained yield basis for livestock grazing use shall first be apportioned in satisfaction of suspended permitted use to the permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available."

356 1 1 **Comment:** Recommends not limiting use in riparian to just early use.

Response: The plan provides for any season of use within riparian communities so long as management objectives can be met. The SEORMP allows for an interdisciplinary team of specialists to design schedules that are appropriate to the needs of the existing landscape in relation to the climate, soils, and vegetation. Appendix R (Effects of Intensity and Season of Grazing) lists a number of reasons why riparian communities are less vulnerable to livestock impacts during spring than at other seasons.

357	1	1	**Comment:** Fencing off or taking grazing land away from ranchers would be a "taking" under a split-estate provision. **Response:** "Takings" issues are beyond the scope of this document. All grazing permits offered include the term, "This permit conveys no right, title or interest held by the United States in any lands or resources . . . " as consistent with the TGA and other law.

Opinion or Preference

6	7	Support adaptive management. *Reasons:* *with increased monitoring.*
5	5	Grazing should not be reduced. *Reasons:* *provides natural resource benefits;* *because it is in keeping with FLPMA, TGA, and multiple use;* *contributes to exotic weed invasions; and* *and identify timing of use.*
1	1	Allow limited livestock production as a historical recognition of the ranching lifestyle as long as it does not impact the ecological integrity of the land.
1	1	Grazing does not harm endangered plants. *Reasons:* *plants survived heavy grazing of the 1930's*
1	1	A lack of grazing, fire, exotic weeds, are a hazard to native plants.
1	1	Certain forage seedings assist in implementing adaptive management adjustments during climatic fluctuations.
1	1	Range condition has declined in only isolated areas under current management.

Problems or Deficiencies of Plan Alternatives, Rationale, Objectives, and Others

358	1	1	**Comment:** Appendix E lacks data. *Reasons:* *needs to address current upland and riparian health issues by pasture; and* *unable to determine conditions of allotments.* **Response:** A number of commentors requested additional information concerning rangeland upland condition and trend as well as riparian condition and trend. In response, these data have been included in Appendix E (Allotment Summaries).
359	1	1	**Comment:** Page xiii: Livestock objective should be rewritten to reflect highest and best use under the TGA and FLPMA.

Response: Section 1 of the TGA of 1934 begins with the statement, "That in order to promote the highest use of the public land, the Secretary of the Interior is authorized . . . to establish grazing districts . . . from any part of the public domain . . . which in his opinion are chiefly valuable for grazing and raising forage crops," though does not establish grazing use as that highest use. Section 102 of FLPMA includes policy for management based on multiple use and sustained yield as well as management in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide outdoor recreation and human occupancy and use. Neither act establishes grazing as the highest and best use of public lands.

360 1 1 **Comment:** Incorporate allotment implementation schedule into final.

Response: Based on comments received, a schedule for the evaluation, activity planning, and implementation of actions within GMA's, composed of groupings of allotments, was added to the adaptive management section of Chapter 3 in the final document.

361 1 1 **Comment:** Must analyze impacts of winter grazing on wildlife.

Response: Consequences of implementing intensities and seasons of grazing are described in Appendix R (Effects of Intensity and Season of Grazing). Additionally, consequences of implementing proposed grazing management actions are analyzed in Chapter 4.

362 1 1 **Comment:** Must present and analyze additional alternatives.

Response: In addition to the five alternatives proposed and analyzed in the draft document, Alternative D2 was developed for the final document based on public comment as described in comment response 317.

363 1 1 **Comment:** DRFC is a value judgement and should not be used.

Response: Public land resources can be managed for a large variety of public goods, services, and values in an endless number of combinations. The DRFC portrays the land, resource, social, and economic conditions that sustain long-term ecosystem health and integrity as well as support, within the capacity of the land, the economic and/or social needs of people, cultures, and communities, and provide sustainable and predictable levels of products and services.

364 1 1 **Comment:** Statements like "riparian areas are often affected by livestock" are biased and inaccurate.

Response: Literature and data support the conclusion that inappropriate management of livestock has the potential to negatively impact riparian resources as described in Chapter 4 analysis and in Appendix R (Effects of Intensity and Season of Grazing).

365 1 1 **Comment:** Page 2-10: Soil compaction may occur, but recovers by spring.

Response: As stated in text, the negative effects of soil compaction are remedied through extended time by natural processes which restore bulk

density and site productivity. The Soil section in Chapter 2 was rewritten to clarify this concern.

Opinion or Preference

1 1 Preferred alternative should specify need for exclusion from grazing.

Other Comments

366 2 2 **Comment:** Pipe water to upland troughs to protect riparian.

Response: Piping livestock water to troughs away from riparian communities is an action that would be implemented on a site-specific basis where benefits to resource values are justified in activity or project plans.

367 1 6 **Comment:** The plan does not reveal criteria or assessment for determining areas not suitable for livestock grazing.

Response: Livestock grazing is not authorized in areas not accessible to domestic animals or where negative impacts to resource values cannot be mitigated. Within the Rangeland/Grazing Use section of Chapter 2 of the final document, reference is made to 41,874 acres of public land within the planning area set apart from grazing allotments for the specific purpose of improving or maintaining resource values that cannot be protected through mitigation of livestock impacts, or because areas found were unsuitable for livestock grazing. Additionally, approximately 250 areas (encompassing an estimated 18,000 acres) within livestock grazing allotments, ranging from less than 1 acre to 5,000 acres, are excluded from livestock by past decisions or agreements. These exclusion areas protect resource values or facilities from livestock impacts. Examples of resource values and facilities which may require livestock exclusion for protection include, but are not limited to, identified riparian vegetation communities adjacent to streams, reservoirs, springs, and wetlands; developed water sources; special status plant or animal habitats; relevant and important values for which ACEC's are designated; outstandingly remarkable values (ORV's) for which NWSR's were designated; wilderness values; research and study plots; administrative sites; recreation sites; archaeological sites; and waste disposal sites.

368 1 6 **Comment:** The plan does not address impacts of livestock on plant community types or wildlife.

Response: Analysis in Chapter 4 identifies the impacts of implementing proposed livestock management actions identified in each alternative. Appendix R (Effects of Seasons and Intensities of Grazing) presents information on the consequence of livestock grazing on plant communities and wildlife habitat values. Refer to Chapter 2, Wildlife and Wildlife Habitat.

369 1 6 **Comment:** Appendix R: The section Effects of Intensity and Season of Grazing presents no standards that guide managers or inform public of actual management activities.

Response: The commentor is correct—proposed actions of the plan can be found in Chapter 3.

370 1 6 **Comment:** The loose description of adaptive management allows BLM status quo managing.

Response: Adaptive management works via a series of feedback loops that drive mid-course correction as additional information has been provided by site-specific monitoring, research, and a greater understanding of ecological processes. As such, adaptive management allows for additional progress toward meeting management objectives.

371 1 6 **Comment:** Western juniper reductions, burning, and spring development are only to increase forage for livestock.

Response: The Forest and Woodlands section of Chapter 2 identifies the recent increase of western juniper dominance in many mid-elevation shrub steppe vegetation communities. This increase in dominance has resulted from a change in natural disturbance regimes. Proposed western juniper reduction through burning and other means is an attempt to mimic natural disturbance regimes on the landscape and thus restore/maintain ecological processes. Springs are developed to collect and deliver water to troughs for domestic livestock, wild horses, and wildlife consumption. In addition to increasing the quality of water available for animal use, development may increase the quantity of usable water. With appropriate development, natural sources of water are protected from unacceptable impacts.

372 1 6 **Comment:** No scientific evidence is given that ecosystems will improved without livestock reduction.

Response: Discussions in Chapter 2, analysis in Chapter 4, and Appendix R (Effects of Intensity and Season of Grazing) provide citations which support the benefits of livestock reductions and other livestock management actions as appropriate to correct site-specific shortfalls in meeting resource objectives.

373 1 1 **Comment:** Appendix S: Object to conditioning any grazing permit with any nonlisted species.

Response: BLM manages habitat for a wide variety of wildlife species, including some that are managed as special status. As identified in the response to 359, FLPMA directs the agency to manage public lands based on "multiple use and sustained yield as well as management in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide outdoor recreation and human occupancy and use."

374 1 1 **Comment:** Unfair to require mitigation when SMA's are overlayed on permittee.

Response: Refer to the reference to the content of FLPMA in comment response 359.

375 1 1 **Comment:** Developed recreation BMP #2 is contrary to objectives.

Response: References to recreation experiences and public safety have been deleted from the appendix. These factors are indirect results of implementing the BMP's.

376 1 1 **Comment:** Page 3-94: "Conditions and trends of resources affected by livestock" is ambiguous.

Response: Many resource values present on public land potentially could be affected by site-specific livestock management actions. Those resource values negatively affected by implementation of livestock management actions would be monitored to provide data and information to support the adaptive management evaluation phase, to develop future management direction, and to implement appropriate livestock management.

377 1 1 **Comment:** Page 4-16: Bitterbrush return interval is wrong.

Response: Mountain mahogany and bitterbrush return intervals presented are assumptions used for analysis purposes. Site-specific return intervals may vary greatly and in some instances, these species may not recover following fire within the long term.

378 1 1 **Comment:** Page 4-16: "Reduced structure leads to increased erosion" is wrong.

Response: The analysis states, "Where multilayered communities are replaced by single-layered communities, soil erosion would tend to increase." This statement was made based on a number of factors which tend to reduce erosive forces, including the soil binding benefits and improved soil structure of multilayered vegetation communities which more fully occupy the soil profile with roots and improved microclimates which facilitate infiltration of precipitation. The Soil section in Chapter 2 was rewritten to clarify this concern.

379 1 1 **Comment:** Goal of livestock management should be to achieve PFC.

Response: Attainment of PFC within riparian communities is the minimum objective and is often followed by objectives to meet other resource objectives.

380 1 1 **Comment:** Eliminate grazing by July 15 or earlier in all riparian/wetland areas to meet resource objectives.

Response: Effects of various seasons and intensities of livestock grazing are presented in Appendix R (Effects of Intensity and Season of Grazing), including opportunities to implement various seasons of use so long as resource objectives continue to be met. Though spring use may be the most common season of use implemented to meet riparian objectives, attempts to implement a one-size-fits-all solution often creates undue constraints or cause unacceptable impacts to other resource values.

381 1 1 **Comment:** Streambank trampling damage should not exceed 5% of streambanks yearly, stability standards must be established at 80 to 90%.

Response: SEORMP was developed to provide management criteria determined necessary to meet landscape-level management objectives. Please refer to PSEORMP/FEIS Appendix D3, Riparian Management Objectives section. A streambank stability standard among other standards for rangeland streams and riparian/wetland areas is contained in the RMO section. As GMA's are evaluated, additional standards or restrictions may be incorporated as needed to restore or maintain desired conditions of these areas.

382 1 1 **Comment:** Establish 6 inch stubble height for vegetation at springs, seeps, and wet meadows.

Response: See comment response 381.

383 1 1 **Comment:** Establish 6 inch stubble height at end of growing season in riparian areas.

Response: See comment response 381.

384 1 1 **Comment:** Allow a maximum of 10% annual use of woody riparian vegetation.

Response: See comment response 381.

385 1 1 **Comment:** Allow a maximum of 30% annual forage use of key species.

Response: See comment response 381.

386 1 1 **Comment:** Plant physiologic needs must be considered when determining season of use and stocking levels.

Response: Plant physiology and ecology are issues discussed in Appendix R (Effects of Intensity and Season of Grazing).

387 1 1 **Comment:** Bluebunch wheatgrass, and other bunchgrasses, should not be grazed during critical growth phase.

Response: See comment response 386. Based on comments, Appendix R (Effects of Intensity and Season of Grazing) was revised to include additional citations of grazing impacts to vegetation resources.

388 1 1 **Comment:** Terms and conditions of grazing permits should include stocking rate, season-of-use, kind of livestock, deferment, rest, or other strategies that maintain good/excellent and improve poor/satisfactory vegetation communities and ecosystem function to achieve resource objectives.

Response: Terms and conditions of individual grazing permits are beyond the scope of this land use planning document. Grazing permits issued by the two resource areas include the terms and conditions identified by the commentor, many through the incorporation of allotment management plans or other activity plans.

389 1 1 **Comment:** Livestock operators should be accountable for failures to meet objectives.

Response: Grazing permits are "subject to (a) modification, suspension, or cancellation as required by land plans and applicable law; (b) annual review and to modification of terms and conditions as appropriate; and (c) the TGA as amended, FLPMA as amended, PRIA, and rules and regulations now or hereafter promulgated thereunder by the Secretary of the Interior."

390 1 1 **Comment:** TNR guidelines need to be established.

Response: Based on public comment, criteria for the timely processing of applications for nonrenewable grazing authorization during the current grazing year in excess of the number of AUM's or outside the period

identified in a current grazing permit were developed and included in Alternatives C and Proposed RMP of the final document.

391 1 1 **Comment:** Exclude livestock grazing on all areas determined to be unsuitable as per suitability analysis.

Response: See comment response 367.

392 1 1 **Comment:** Manage for late seral and PNC throughout the planning area.

Response: Though management for late seral and PNC has been a common management objective for public lands, it often fails to consider natural succession-disturbance regimes which historically provided diversity within the landscape. Additionally, objectives to attain late seral or PNC were based on Clements' 1916 theories of vegetation succession which have been found not to apply consistently within xeric vegetation communities. These somewhat outdated theories have been modified and replaced by theories of state and transition of vegetation succession within many of the shrub-steppe communities within the planning area. Refer to comment response 363 for a discussion of DRFC.

393 1 1 **Comment:** Page 4-19: Livestock optimization will return more organic matter to soil than naturally decaying vegetation.

Response: Though the rate of cycling of organic matter is increased by herbivore consumption of vegetation and sites of nutrient accumulation would be altered, the total amount of organic matter returned to the soil is not changed unless vegetation communities are altered in response to grazing.

394 1 1 **Comment:** Decreased grazing will increase fire acreage and frequency.

Response: Though frequency of ignitions may remain unchanged, the rate of spread and intensity of fires would be greater with increased loading of fine fuels resulting from lighter use by livestock. This would result in a greater acreage burned per year on average, also increasing the frequency of fire in some areas.

395 1 1 **Comment:** Page 4-27, para 6: Commentor takes issue with "natural succession improves the condition of vegetation communities."

Response: See comment response 392.

396 1 1 **Comment:** Exclusion of grazing decreases streambank stability and plant vigor.

Response: Literature citations in Appendix R (Effects of Intensity and Season of Grazing) are not consistent with this comment.

397 1 1 **Comment:** Proper grazing can enhance leaf area and vigor of plants which form soil and seedbeds.

Response: Appendix R (Effects of Intensity and Season of Grazing) identifies general criteria which can be used to develop site-specific livestock management actions which would be appropriate for a given mix and juxtaposition of resources.

398 1 1 **Comment:** Appendix N: Utilization levels, stubble height levels, season of use and other criteria should be consistent with type of year.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

399 1 1 **Comment:** Appendix N: Do not agree with mandatory rest.

Reasons:

not consistent with adaptive management; and

rest should be more prescriptive.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

400 1 1 **Comment:** Questions scientific proof that total exclusion of livestock would allow natural succession to improve conditions, including soil formation, and sedimentation.

Response: Though tempered by factors identified in comment response 392, theories of vegetation succession suggest removal of disturbance factors would allow for restoration of natural processes.

401 1 1 **Comment:** Recommend that forbs be included in seed mixes.

Reasons:

important in diets of a wide cadre of wildlife.

Response: The DRFC's stated in Chapter 3 is a mosaic of multiaged shrubs, forbs, and native and desirable nonnative perennial grasses. Appendix F (Wildlife Habitat Descriptions and Considerations) also identifies the benefits of including forbs in seed mixes.

402 1 1 **Comment:** Need to list a seed mix for range improvements.

Response: Site-specific seed mixes which fit climatic and edaphic conditions would be developed based on objectives, hazards, and risks associated with seeding failure as identified in Chapters 3 and 4.

403 1 1 **Comment:** Identify utilization levels keyed to survival of plant species least tolerant of grazing.

Response: Site-specific utilization levels would be established at the activity planning level based on the mixture and juxtaposition of resources present. Since measurement of all species is not practical, key species are monitored to assess grazing response.

404 1 1 **Comment:** The plan needs to address management at the permittee level.

Response: This land use plan is a mid-scale effort. As such, detail at the permittee level is not defined in this document. Allotment Summaries are provided in Appendix E (Allotment Summaries) to assist those interested in a specific allotment.

405 1 1 **Comment:** The plan should clarify that investments in crested wheatgrass seedings and other range improvements by BLM, permittees, and local government would be maintained.

Response: Maintenance of rangeland projects has been addressed in the expanded narrative section of Chapter 3, Rangeland/Grazing Use, and Appendix F (Wildlife Habitat Descriptions and Considerations).

406 1 1 **Comment:** The livestock management Program Planning Criteria should be expanded to include rights and responsibilities imposed by the TGA.

Response: See comment response 357 and 359.

407 1 1 **Comment:** AUM impacts should be clarified in Chapter 4, and described in more detail generally.

Response: Analysis of consequences resulting from potential change in levels of AUM's authorized has been presented in the Rangeland/Grazing Use section and the Human Uses and Values sections of Chapter 4.

408 1 1 **Comment:** The cumulative and connected impacts of livestock reduction programs should be reviewed and discussed in more detail.

Response: See comment response 407.

409 1 1 **Comment:** Adaptive management places more emphasis on NEPA than site-specific actions.

Response: The agency would continue to meet the requirements of NEPA with implementation of adaptive management. Analysis of general consequences of implementing actions identified in this plan would potentially reduce the complexity and in some cases the need for additional NEPA analysis prior to implementation of site-specific actions.

410 1 1 **Comment:** Livestock exclusion areas need to be listed in the final.

Response: Based on public comment, Appendix T (Areas Removed from Livestock Grazing) was added to the final plan, listing most areas from which livestock grazing has been removed by past decision/agreement or from which removal of livestock grazing has been proposed in one of the alternatives.

411 1 1 **Comment:** ODFW has vested interest in the acreage previously excluded from livestock by cooperative agreement or other management decisions.

Response: See comment response 407 and use PSEORMP/FEIS Appendix T (Areas Removed from Livestock Grazing) to identify proposed management of those areas of interest.

412 1 1 **Comment:** Clarify intent regarding ODFW cooperatively developed projects including a list of projects proposed for abandonment.

Response: See comment response 411. Additional projects which no longer meet management objectives may be identified for abandonment in the future. BLM would coordinate with ODFW concerning possible abandonment of water developments or exclusion fencing when ODFW's interests are identified.

413 1 1 **Comment:** A conservation approach to protecting public lands will not drive the small rancher out of business.

Response: As stated in the analysis of all alternatives, "Changes in permitted use within an individual allotment would depend on the array of resources affected by livestock use, management objectives, intensity of livestock management actions implemented by livestock operators, and opportunities to develop and implement livestock grazing use while sustaining resource values." In some instances where resource values

necessitate significant change to livestock management, available options may not maintain a viable livestock operation in some allotments.

414 1 1 **Comment:** Appendix N, page 360: The proposed use past mid-July unduly affects regrowth of vegetation.

Reasons:

researchers show little regrowth in south Steens Mountains in August.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

415 1 1 **Comment:** Appendices, page 377: Riparian, salt desert shrub, and other habitats should be added.

Response: The wildlife habitat section of BMP's was moved and incorporated in Appendix F (Wildlife Habitat Descriptions and Considerations). Wildlife habitat values within riparian, upland shrub, forested, western juniper and other vegetation types are identified in that appendix of the final document. Chapter 2, Wildlife and Wildlife Habitat, and Appendix F (Wildlife Habitat Descriptions and Considerations) have been modified to address these concerns.

416 1 1 **Comment:** Page 418: The trend was not up on Home Creek in Steens Pasture in 1998.

Reasons:

BLM ignored utilization standards allowing severe overgrazing.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

417 1 1 **Comment:** Page 422: Division fence is needed to improve Home Creek. The Stevens fence is not needed and poses a hazard to bighorns in the Catlow Rim area.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

418 1 1 **Comment:** Appendixes, page 360: Grazing use proposed by alternatives is vague and needs "intensity of use"; no livestock numbers are proposed in any alternative for Fish Creek-Big Indian Allotment nor the South Steens Allotment.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

419 1 1 **Comment:** Page 362: Stubble height will not meet needs of wildlife according to several professional biologists. Cover should be much greater and applies to Blitzen NWSR and Catlow streams.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

420 1 1 **Comment:** Page 366: The three-week period cited where wildlife cover would be inadequate is longer than stated, according to scientific literature.

Response: BLM believes that maximum growth of herbaceous vegetation can be expected along this riparian zone during this time period (mid

summer) and that wildlife cover would therefore be substantially restored three weeks after livestock are removed from the pasture. If monitoring data indicates that more time is needed to meet wildlife or some other resource objectives, then livestock use would be adjusted under the adaptive management process as necessary.

421 1 1 **Comment:** Chapter 2-13, para 7: "Impacts of historical grazing were concentrated at low elevation" ignores the extremely heavy grazing by sheep at high elevation on Steens Mountain (take this in account for vegetation and wildlife).

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

422 1 1 **Comment:** Need to list domestic sheep AUM's.

Response: Detail of kind and class of livestock which are authorized to graze at specific locations are not provided in the document, though allotment specific active AUM's and suspended AUM's by allotment are listed in Appendix E (Allotment Summaries).

423 1 1 **Comment:** Fence off areas that need protection.

Response: Exclusion fencing is an option that would remain available in all alternatives, as identified in Chapter 3 of the draft and final documents. Exclusion fencing would be emphasized in Alternative A, whereas increasing adjustments in planned livestock management within existing pastures would be emphasized more as one progresses toward Alternatives C, D, and D2.

424 1 1 **Comment:** Guidelines for temporary nonrenewable (TNR) grazing are not fully explained.

Response: Criteria for the authorization of TNR grazing authorizations and appropriate analysis have been added to the final document as a clarification of actions in Alternative C and carried into the Proposed RMP alternative.

Opinion or Preference

1 6 Environmental impacts of grazing are very inadequate.

1 6 Livestock grazing is the primary threat to natural and recreational values on Steens Mountain.

1 1 Appendix R: Incorrect opinion that "grazing in desert steppe communities is seldom necessary to meet objectives"; this is too generally applied.

1 1 Alternative E adequately addresses impacts of vegetation manipulation.

1 1 Risks from noxious weeds are greater as grazing disturbs ecosystem.

1 1 No TNR livestock grazing should be allowed.

1 1 Establish facilities such as salt licks in already degraded sites.

1 1 Crooked River Watershed has examples of recovering riparian areas (BLM should be commended).

1 1 Appendix N: There are new studies indicating that short, stiff-grass stubble filters sediments and forms streambanks better than taller grass.

1 1 Chimney Allotment: there is a letdown fence keeping cattle out of the nonuse area.

1 1 Support Alternative D for grazing.

1	1	Grazing should be done responsibly.
1	1	Grazing affects wildlife like noxious weeds affect the land; manage accordingly.
1	1	Page 367: Home Creek: BLM is reluctant to remove cattle damaging riparian once cows are in the pasture; bank damage has been severe in past.
1	1	Page 368: Alternatives C and D: Alternative B is preferred over Alternatives C and D for riparian recovery.
1	1	Page 423: Monitoring is critical for success of management actions regarding grazing; Home Creek needs 5 years rest for recovery, and cattle must always be off by June 15 for proper regrowth (earlier during drought years).
1	1	Deferment of grazing should always following burning, and was not done in Steens Mountains in 1997.
1	1	Page 367: Paragraph 6 should read as to what activities on private land might adversely impact land resource values.

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

Recreation

The recreation comments may be found under other categories such as SPECIAL DESIGNATIONS. Recreation is subdivided into Winter Use on Steens Mountain, Promote Naturalness, Recreation Facilities, Access/Roads/ Transportation, and Miscellaneous.

No.	I	S	
			Winter Use on Steens Mountain
425	4	4	**Comment:** Eliminate or severely restrict snowmobile use on Steens Mountain. There are other open areas nearby for this type of use. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
426	2	2	**Comment:** Analyze impacts of snowmobiles and helicopter skiing on wildlife. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
			Promote Naturalness
427	3	3	**Comment:** Encourage undeveloped types of recreation. **Response:** The Proposed RMP provides for a level of recreation facilities development to accomodate anticipated increased recreation use demands. While considerable emphasis is placed on providing for dispersed recreational opportunities, some developed facilities are provided for visitors in support of their enjoyment of resource values and in their pursuit of natural resource-dependent dispersed recreation activities. Under the Proposed RMP and other alternatives, most of the planning area remains available for undeveloped types of recreation activities.
428	1	1	**Comment:** Recreation should not interfere with natural ecosystems.

Response: Recreation use can disturb the natural environment. The specific impacts associated with each activity differ, but activities can potentially affect resources such as soil, water, and vegetation. The challenge is to balance public demand for recreation use while precluding substantial irreversible loss to resources. Through the life of the plan, measures such as SMA designation, OHV use designations, provision of visitor services and facilities in certain areas, and monitoring, compliance and enforcement of recreation use would manage this balance.

429 1 1

Comment: Exclude recreation use only after documented resource damage or after public input.

Response: While it is not desirable to exclude recreation use, it would be considered if other measures such as recreation activity and use limitations, educational efforts, or enforcement of regulations were not effective. Waiting until irreversible resource damage occurs is not acceptable; instead, monitoring of environmental and social conditions and acquiring information through public contact would determine needed management actions.

430 5 5

Comment: Protect public land for wildness and low-impact recreation.

Response: The value of primitive and unconfined recreation is provided for, in part, in the alternatives through special recreation management area (SRMA) designation in certain areas. Overall management objectives for these areas are to provide for and enhance opportunities for high-quality outdoor recreation experiences, environmental education, and scientific studies while maintaining the integrity of the area's natural systems and resources, cultural values, and meeting other management objectives. Also see comment response 427.

431 2 2

Comment: Snively Hot Springs recreation site should be day use only.

Response: Under the Proposed RMP and other alternatives, this recreation site would be included in a management plan tiered to this plan to be developed for the Owyhee Below the Dam SRMA. Interested persons would have ample opportunity to participate during the development of the SRMA plan, with uses at Snively Hot Springs being one of multiple issues for the plan to address. In the interim, the existing closure to camping activities at the recreation site would remain in place. Should the Owyhee study river below the dam be congressionally designated as a component of the NWSRS, this recreation site would also be addressed in a subsequent river management plan.

432 1 1

Comment: Do not allow major facilities development on the Owyhee River and Owyhee Reservoir.

Response: In compliance with the wild river classification of the NWSRA, no major facility development would occur within the boundaries of the three designated Owyhee NWSR's. Regarding any facility development on public lands located below the Owyhee Dam, refer to Chapter 3, sections Land and Realty, Recreation, Wild and Scenic Rivers, and Appendix U (Potential Recreation Sites, Trails, and Improvements of Existing Sites). Any facility development along this river segment would conform with existing policy and would protect significant resource values. Lands abutting Owyhee Reservoir are administered by the Bureau of Reclamation, and are beyond the scope of this plan.

433	1	1	**Comment:** "Authorized aircraft landing in the Steens Mountain Recreation Lands would occur on BLM-administered lands for winter activities only" is nonsensical. This action will cause much hardship in many different aspects of an outfitter/guide's life. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
434	1	1	**Comment:** For the Keeney Pass segment of the Oregon National Historic Trail, the SEORMP is contradictory on the width of the trail. **Response:** This error has been corrected in Chapter 3, Recreation and Areas of Critical Environmental Concern sections.
435	1	1	**Comment:** Remove the Alvord Hot Springs from the Steens Mountain Recreation Lands to help eliminate confusion between public and private lands. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.

Opinion or Preference

	1	1	Canada geese are harassed by boaters.

Recreation Facilities

436	4	9	**Comment:** The BLM should plan for increased recreation use on Steens Mountain. Use shuttle buses with interpretive information rather than more parking lots with restrooms. Future development should be consistent with local plans and zoning. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.

Opinion or Preference

	2	2	Support less developed facilities.
	1	1	Support new recreation site establishment.
	1	1	Opposed to resort at Fish Lake. The area's beauty and open space would be destroyed.

Access/Roads/Transportation

437	2	2	**Comment:** The RMP should not impact public access to Steens Mountain. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
438	1	1	**Comment:** Close Rooster Comb Road on Steens Mountain, leave two-track roads open. There is enough access already and the action would strengthen the wilderness experience. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
439	1	1	**Comment:** Keep the Steens Mountain Loop Road open. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
440	1	1	**Comment:** Allow helicopter access.

Response: Alternatives A, B, C, and the Proposed RMP allow for the landing of aircraft with some limitations.

441 1 1 **Comment:** Disallow helicopter use on Steens Mountain.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

442 1 1 **Comment:** Maintain roads for access.

Response: Except in Alternative E, most primary roads and recreation site access roads would be maintained to provide for public safety, prevent resource damage, and meet management objectives. This excludes some secondary roads and, in accordance with the IMPLWR, all vehicular ways in WSA's.

Miscellaneous

443 1 1 **Comment:** Do not allow livestock grazing at recreation sites.

Response: Livestock use would be excluded where conflicts between livestock grazing and visitor use of developed recreation facilities needs to be mitigated. The size of an excluded area would be determined during site-specific project design and development for both new and for existing sites.

444 1 1 **Comment:** Support SRMA for Succor Creek.

Response: The Proposed RMP includes a Succor Creek SRMA within the same area as under Alternatives A and D.

445 1 1 **Comment:** The SEORMP is heavily slanted toward the recreational uses on public lands. Visitor use numbers are false and misleading.

Response: This plan addresses recreation as an important activity within the planning area and offers many management actions for addressing short- and long-term demands and expectations for diverse outdoor recreation use opportunities and experiences. The collection of recreation use data is not a definitive science. It is virtually impossible to document all use on the planning area's large public land base. Chapter 3, Recreation, has been edited to reflect that use figures are estimates. BLM recognizes that differing estimated use figures could be derived, depending on sources of use data and methods of observation and documentation. Sources to assist in deriving visitation estimates included traffic counters, recreation site registers/rosters, WSA and NWSR patrol logs, the ODFW, and BLM staff observations. Factors affecting visitation, such as the extent of physical and seasonal accessibility, proximity of local and regional urban centers and their populations, and the natural attributes which the planning area offers for attracting various outdoor recreation activities were considered.

446 1 1 **Comment:** Explain whether SRMA's decrease off-road motorized vehicle uses.

Response: The establishment of a SRMA per se does not decrease off-road driving opportunities. Where resource values require protection from adverse impacts of OHV use, OHV use restrictions are addressed under the various alternatives. Examples include wilderness values of WSA's,

important and relevant values of existing and potential ACEC/RNA's, scenic values, and ORV's of certain suitable rivers.

447 1 1 **Comment:** The SEORMP should include a section on outfitter operation guidelines. Unlimited permitting (on Steens Mountain) will lead to too many outfitters.

Response: An SRP is the management tool used for administering commercial outfitter/guiding operations on public lands. Chapter 2, Recreation, has been edited to include additional information about SRP's. Except under Alternative E, SRP's would be issued. SRP permit stipulations tailored to address specific proposed activities and impacts to resources are included as conditions for a permit's issuance and compliance. Refer to Comments Regarding Andrews Resource Area on page 1.

448 1 1 **Comment:** WSA status is not mentioned under the Pueblo Mountain SRMA discussion.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

449 1 1 **Comment:** Create the next section of the Desert Trail from Highway 97 to Malheur National Forest over BLM lands in Three Rivers and Andrews RA's. Recognize the Desert Trail as a national recreation trail.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

450 1 1 **Comment:** Recreation does not contribute to the county tax base as much as livestock/agriculture.

Response: The commentor is correct. The county tax base is determined by the assessed value of private lands and improvements within the county. Public lands do not contribute to the county tax base. Instead, the BLM makes Payments-in-Lieu-of-Taxes to local county governments. Congress mandates these payments specifically because public lands do not contribute to the local tax base. Agriculture is a major contributor to the county tax base. Contribution to tax base was not a criterion used in this EIS for evaluating the alternatives. Tax base is often used as a criterion for evaluation in EA's and EIS's that evaluate specific land tenure adjustments.

451 1 1 **Comment:** Safety should be a consideration when determining development of new recreation areas. Fire-prone locations and other hazards make visitor rescues by local public agencies difficult and expensive.

Response: Issues such as fire safety and natural hazards would be addressed and mitigated as practical during a recreation site's design, development and maintenance, with public input requested to help identify and minimize adverse impacts to the safety of visitors as they participate in associated recreation activities. Unfortunately, short of prohibiting most dispersed recreation activities, associated natural hazards and personal risks taken when participating in such activities cannot preclude incidents which may result in occasional emergency rescue efforts. Public awareness/informational outreach efforts provided by BLM, private organizations, and other government agencies are venues for informing visitors of their personal responsibility to conduct their recreational pursuits in a safe manner.

452 1 1 **Comment:** With the absence of grazing under Alternative E, a 4% annual increase of recreation use is unrealistic.

Response: The BLM is unaware of any studies that suggest decreased grazing use—in the absence of other factors such as special designation, improved public access, recreation facilities, or notations on maps—influences the level recreation use. While it is possible that certain types of recreation use may increase to an unknown extent with the absence of livestock grazing, it is unknown to what extent recreation does not occur on BLM lands due to the presence of livestock grazing.

453 1 1 **Comment:** Recreation and livestock grazing are compatible because visitors like seeing cattle.

Response: The opportunity to pursue various dispersed recreation activities where livestock grazing occurs is substantial within the planning area under the Proposed RMP and all other alternatives except Alternative E.

454 1 1 **Comment:** Educate public land users to mitigate their negative impacts.

Response: BLM would continue its public outreach efforts to communicate responsible uses and safety while visiting public lands, and to provide appropriate literature and other venues to inform land users how they can lessen adverse impacts to public resources. The use of programs such as "Leave No Trace" and "Tread Lightly" is an element under all of the alternatives.

Opinion or Preference

1 1 Recreation use dollars offset commodity losses, and impacts are less.

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

Off-Highway Vehicles

No.	I	S	
455	7	7	**Comment:** Close all or most areas to OHV use. **Response:** The OHV management objective is to manage use to protect resource values, promote public safety, provide OHV use opportunities where appropriate, and minimize conflicts among various uses. BLM recognizes managed off-road motorized vehicle use as a recreational activity and as a use which supports certain other authorized activities on public lands.
456	6	12	**Comment:** OHV's should be restricted to designated roads and trails. **Response:** Under the Proposed RMP and other alternatives, the operation of motorized vehicles within portions of the planning area would be restricted to existing or designated roads and vehicular ways (trails). Emergency OHV closures may be implemented on additional sites threatened by unacceptable OHV impacts.
457	3	8	**Comment:** Do not allow organized OHV events. **Response:** By regulations within 43 CFR 8372 (Special Recreation Permits), BLM recognizes motor vehicle competitive events as a valid use

of public lands. Prior to any permit issuance, a proposed event must be in compliance with NEPA requirements.

458 2 7 **Comment:** Object to open OHV use designations. The designation is incompatible with BLM's emphasis on properly functioning ecosystems, and are problematical when riders must judge hard-to-identify resources.

Response: The OHV management objective is to manage OHV use to protect resource values, promote public safety, provide OHV use opportunities where appropriate, and minimize conflicts among various users. In specific locations where cross-country motorized vehicle travel would be incompatible with meeting other management objectives, motorized vehicle use would be limited to designated or existing roads and trails, or an area would be designated closed to motorized vehicle use. Under the Proposed RMP, slightly fewer acres are designated open than in the existing situation (see PSEORMP/FEIS Table 3-10).

459 2 2 **Comment:** Close OHV use in sites containing rare plants, erodible soils, and declining and unique plant and animal species.

Response: The SEORMP protects these types of resource values by restricting or closing OHV use in specific locations. Throughout the life of the plan, emergency OHV closures would be implemented should additional sites of conflict or resource concern become subject to or threatened by unacceptable OHV impacts.

460 2 2 **Comment:** Do not allow more acres open to OHV use.

Response: The OHV management objective is to manage OHV use to protect resource values, promote public safety, provide OHV use opportunities where appropriate, and minimize conflicts among various uses. To meet this objective, in locations where OHV use is incompatible with sensitive resource values or uses, motorized-vehicle travel would be limited seasonally and/or to designated or existing roads and trails, or closed to OHV use. Otherwise, the public lands would be designated open to OHV use.

461 2 2 **Comment:** Object to the amount of OHV use in the planning area.

Response: An interdisciplinary approach was conducted for developing OHV use designations. Guidelines used when determining OHV use included such factors as the theme of an alternative, existing or potential OHV conflicts which would impair or preclude meeting the numerous management objectives of an alternative, and resolving use and user conflicts. During the life of the plan there is provision for site-/area-specific emergency closure actions of OHV use should presently unforeseen conflicts arise which require restriction of motorized vehicle use to resolve conflict.

462 **Comment:** This number left blank.

463 1 6 **Comment:** No more than 1% of the planning area should be designated open.

Response: See comment response 460.

464 1 1 **Comment:** Close Alvord Desert to OHV use.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

465 1 1 **Comment:** Closing or limiting use on two-track routes should be based on biological need with public input, as per the NEPA.

Response: Historic and current use of two-track vehicular ways by the public and by landowners are factors considered when evaluating road closures or motorized vehicle use restrictions. The road closures and limitations described in this plan were determined through analysis of resource needs and with consideration of public input. Management of OHV's would comply with NEPA.

466 1 1 **Comment:** Threats from OHV recreation are serious; use should be controlled.

Response: The BLM actively manages OHV use through designations and monitoring of use. Limited and closed OHV use designations would apply where use is incompatible with sensitive resource values, other uses, or other management objectives. Emergency OHV closures can be implemented through the life of the plan should additional sites of resource concern become subject to or threatened by unacceptable OHV impacts.

467 1 1 **Comment:** OHV use in the Oregon Trail corridor does not damage the resource as much as hill climbing and other uses.

Response: Under the Proposed RMP, the OHV use designation of the Oregon Trail corridor is limited. Certain hill-climbing locations and roads would no longer be available to motorized vehicle use. With implementation of the SEORMP, appropriate measures would be taken in the area including signing, monitoring and enforcement of OHV use designations.

468 1 1 **Comment:** Concern about OHV use in Succor Creek and Anderson Crossing.

Response: Under the Proposed RMP, both of these locations are within SRMA boundaries, and the Anderson Crossing is also affected by the Owyhee NWSR and neighboring WSA's. To support the retention and protection of important resource values, motorized vehicle travel would be limited to designated routes.

469 1 1 **Comment:** NCA designation on Steens is too exclusionary for OHV users.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

470 1 1 **Comment:** Consider seasonal closures and trail designation in lieu of closures to OHV uses.

Response: Where needed to address management concerns, seasonal OHV use restrictions and limiting motorized vehicle use to designated routes are included under the Proposed RMP and other alternatives. The yearlong closed OHV use designation is prescribed where identified resource or use values require continuous protection from OHV uses.

471 1 1 **Comment:** Access to back country should be reasonable. Apply remedial management measures instead of closure; use partnerships and Oregon's ATV Accounts Allocation Committee funding.

Response: As a managing partner, funding from Oregon's ATV management program is available for BLM application and would be used as appropriate to address needs for OHV management. Under the Proposed RMP, where adequate to address management concerns, seasonal OHV use restrictions and motorized-vehicle use limited to designated or existing routes would be applied rather than closure to OHV use.

472 1 1

Comment: Tables 2-23 and 2-24 contradict each other.

Response: The two tables use differing criteria for determining acreage, so there can be no matching acreage figures. Specifically, motorized recreation opportunity classes are affected by corridors of influence associated with roads in the planning area. In Table 2-24, roads are included in open and limited OHV designations, but include opportunities outside of road corridors for nonmotorized recreation opportunities.

473 1 1

Comment: In Appendix H, Recreational Opoportunity Spectrum, challenge and risk opportunities are important, contrary to the statement under the Roaded Natural section.

Response: The roaded natural recreational opportunity spectrum (ROS) setting is predominately associated with the use of primary and secondary arterial roads. While off-road vehicle use may occur in this setting and perhaps with challenge and risk, the challenge and risk is, generally and for comparative purposes, considered not to be as important for an OHV recreational use opportunity as it is within a semiprimitive motorized ROS setting.

474 1 1

Comment: Resource values that need to be protected need to be listed on page xiii, objectives and OHV.

Response: The section referenced is a summary of the entire document; greater detail can be found within the body of the document.

475 1 1

Comment: Baseline data should include PM10 monitoring sites, especially in area of commercial, competitive, and other OHV activities.

Response: There are no indications that the anticipated level of activity from OHV use would violate any air quality standards. The ODEQ has no PM10 historical data due to the fact that no problem areas have been identified and no "protected areas" are located within the planning area. If necessary, to meet ODEQ dust nuisance rules, actions such as restricting public use would be implemented.

476 1 1

Comment: A cost model and a rehabilitation plan for cross-country land use would be helpful in the monitoring section.

Response: The development of cost models is beyond the scope of this document.

477 1 1

Comment: OHV's negatively impact vegetation.

Response: OHV impacts to vegetation are described in Chapter 4, Environmental Consequences. Limited and closed OHV use designations exist where OHV use would be incompatible with other uses or sensitive resource values. The yearlong closed OHV use designation is prescribed where identified resource values or other uses require complete protection from OHV uses.

478

Comment: No section analyzes the environmental consequences of the management practices to soil.

Response: Please refer to the Soil section in Chapter 2. Under all alternatives soils would be managed in accordance with BMP's in Appendix O and impacts addressed under specific resource activities as they pertain to surface disturbances in Chapter 4; therefore Chapters 3 and 4 do not contain a specific Soil section.

479 1 1

Comment: Clarify the meaning that less restricted OHV use will not impact resources.

Response: Apparently, in the Draft SEORMP the commentor refers to the fact that some seasonal OHV restrictions found in the existing situation of Alternative B are no longer present in Alternative C. Upon reevaluation, these seasonal restrictions on motorized vehicle use were determined unnecessary to meet wildlife management objectives in those areas.

480 1 1

Comment: There is no management practice stated in the plan which protects soil, vegetation, air quality, and other resource values from OHV use.

Response: Under each alternative, limited and closed OHV use designations within the planning area would help to protect these values. Application of an emergency OHV closure would also respond to resource protection needs.

481 1 1

Comment: More information is needed to show how open areas meet the OHV management objective.

Response: The OHV objective is to manage use to protect resource values, promote public safety, provide OHV use opportunities where appropriate, and minimize conflicts among various uses. Where appropriate, open OHV designations exist to provide the opportunity for those users who enjoy participating in cross-country motorized vehicle travel.

482 1 1

Comment: Explain the difference between OHV use limited to existing roads and OHV use limited to designated roads.

Response: Appendix I (Off-Highway Vehicle Use) was expanded to clarify this distinction.

483 1 2

Comment: The North Loop Road on Steens Mountain should not be closed to landowners during the winter months.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

484 1 1

Comment: If and when wilderness designations are addressed by Congress for the Trout Creek and Oregon Canyon Mountains, the Mud Springs, Twin Peaks, and Wood Roads should remain open.

Response: This issue is beyond the scope of this plan. BLM recommendations regarding wilderness designation which affect, in part, this planning area have been submitted through the President to Congress and are presently awaiting congressional action. However, an emergency motorized vehicle use closure may be implemented, regardless of an area being designated, if necessary within a defined area for reasons such as resource

protection, public safety or to resolve user conflicts, an SMA such as a WSA.

485 1 1 **Comment:** In the Pueblo Mountains, the Arizona Creek road should remain open.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

486 2 2 **Comment:** OHV use in the Keeney Pass area should be stopped.

Response: Under the Proposed RMP and other alternatives, motorized vehicle use would be limited to designated routes. Certain currently existing routes not designated under these alternatives would be closed and reclaimed.

487 2 2 **Comment:** Close the south portion of the Steens Mountain Loop Road.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

488 2 2 **Comment:** Close and reclaim other roads where they serve no function.

Response: Roads recognized by the BLM as existing would be closed with any required NEPA documentation if it is determined that road closure is the best solution for resolving issues such as impacts on resources, public safety, conflicts of use, or to meet RMP management objectives. Unauthorized roads and ways would be closed and reclaimed.

489 1 1 **Comment:** Rehabilitate user-created roads incompatible with ecosystem-based management goals.

Response: See comment response 488.

490 1 1 **Comment:** Complete a transportation plan before completing a regional plan. A transportation plan must be made public for comment.

Response: Under the Proposed RMP and other alternatives, the transportation plan would be tiered from the SEORMP, with public comment, and so must be prepared in accordance with SEORMP decisions.

491 1 1 **Comment:** Allowing OHV use on existing trails encourages OHV use and creates new trails which become existing trails.

Response: Refer to Appendix I (Off-Highway Vehicle Use) as modified. Unapproved routes would be subject to closure and reclamation.

492 1 1 **Comment:** Do not have off-road restrictions that hamper livestock management.

Response: Under the Proposed RMP and other alternatives, conditions and any restrictions of motorized vehicle use on public lands affecting a livestock operator who is authorized to graze livestock on public lands would be stipulated in the permit and tailored to the area of authorized grazing. Clarification of this action has been provided in the Off-Highway Vehicles section of Chapter 3.

Opinion or Preference

3	4	Support Alternative D for OHV use.
1	1	OHV use increases spread of weeds; oppose Alternative C.
1	1	BLM should better educate people on the importance of OHV's.
1	1	Unclear what the resource management plan for these lands really is.

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

Visual Resource Management

No.	I	S	
493	1	1	**Comment:** Important to manage Pickett Rim and P Hill areas as VRM Class II; explain why Pickett Rim needs to be changed. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
494	1	1	**Comment:** VRM is the overriding factor in S&G's. **Response:** The determination of VRM classes are not a factor associated with requirements of BLM's S&G's. Refer to PSEORMP/FEIS Appendix Q (Areas Removed from Livestock Grazing).
495	1	1	**Comment:** There is no relationship between the important and relevant values and the VRM class of the proposed Coal Mine Basin ACEC/RNA. **Response:** Refer to added text of this proposed ACEC/RNA in PSEORMP/FEIS Chapter 3. Additionally, based on the significance of given resource values to be managed, a VRM class can be assigned to assist in meeting the management objective for the given resource values. A higher VRM class, such as Class I or II, would help in providing mitigation and protection of resources which are more sensitive to surface disturbing activities.
496	1	1	**Comment:** VRM is subjective and unscientific. It depends on who is viewing and observers may lack knowledge about site ecology. **Response:** To eliminate individual subjectivity, assessment of scenic quality is conducted by a team, with each team member using evaluation criteria which are applied universally on all pubic lands administered by the BLM. Numerical results from individual members are summed, then the team's results averaged for each delineated scenic quality rating unit within a planning area.
497	1	1	**Comment:** ACEC/RNA's should have more VRM Class I classifications. **Response:** VRM Class I would assist in preserving the existing character of the landscape for ACEC/RNA's by protecting RNA values. VRM Class II management objectives would provide for adequate protection and integrity of identified RNA values while allowing for consideration of other possible future proposed management actions which, through environmental assessment, would result in no adverse short- and/or long-term effects to those RNA values. Protective management of identified RNA values would be a primary objective when assessing any future proposed actions within a designated ACEC/RNA.

498 1 1 **Comment:** Without special designation status, such as WSA or ACEC/RNA, public lands should be managed as VRM Class III or IV.

Response: VRM class designation of a tract of public lands is not dependent upon SMA designation, but may be influenced by SMA management objectives. A VRM class determination is affected by factors as scenic quality, visual sensitivity, and viewing distance from travel routes or observation points.

499 1 1 **Comment:** Need to describe visual impacts of burns of woody vegetation and of cheatgrass invasion.

Response: Visual impacts from dead, standing woody material resulting from wildland or prescribed burns would be short- to mid-term in duration, depending on factors such as the intensity and extent of a given burn, the rate of decay of the dead material, and the size and density of vegetation burned. Replacement of native grasses by cheatgrass may be up to a long-term visual impact, and would be adverse to persons who do not want to see this species in a landscape setting. Visual values are considered when assessing prescribed burns and when mitigating the effects of wildland and prescribed burns and other surface-disturbing actions. Mitigating actions to return native grass species would be conducted where determined desired and feasible. PSEORMP/FEIS Chapter 4, Visual Resources, now includes this analysis.

Opinion or Preference

1 1 We support Alternative D for VRM.

LETTER NUMBER: 107, 166, 217, 241

Wilderness Study Areas

The RMP does not change existing management for WSA's as identified in Chapter 2, Special Management Areas.

No. I S

500 3 8 **Comment:** Manage WSA's for wilderness values first, not for private livestock operations, which is the intent of Congress. It is not public duty to make private operations economically feasible.

Response: Wilderness values associated with WSA's are managed in accordance with the BLM's IMPLWR so as not to impair a WSA's suitability to be designated by Congress as a component of the national wilderness system. For those public lands which were being grazed by livestock (or were part of an approved livestock grazing system) at the time the FLPMA became law in 1976, then consequently became part of a WSA, the law recognizes that livestock use as a grandfathered activity of those public lands. Management by the IMPLWR is in affect until Congress takes action on the wilderness designation issue.

501 2 7 **Comment:** Prohibit livestock structures including fences (violation of FLPMA).

Response: Under the IMPLWR, placement of new livestock improvements in a WSA may be approved if they protect or enhance wilderness values and meet the wilderness nonimpairment criteria as addressed in the IMPLWR. Also see comment response 500.

502	2	7	**Comment:** Need a reinventory of BLM lands by outside experts. It should focus on overlooked lands, consider newly acquired state or private inholdings, and be less biased. **Response:** A global reinventory by BLM to address wilderness values within the planning area is outside the scope of this plan. In accordance with FLPMA, with substantial public input and review, BLM has completed its required evaluation and assessment of wilderness values on public lands with earlier planning efforts. The agency's wilderness recommendations in Oregon derived from those planning efforts have been submitted and are presently awaiting consideration by Congress. For additional information, refer to Issues Eliminated From Detailed Study of Chapter 1, Wilderness Study Areas in Chapter 2, and applicable sources under References. Also refer to the Lands Adjacent to WSA's section in Table 3-1 and the associated text of Chapter 3. Various interest groups and/or organizations have conducted their own appraisal of wilderness values and/or proposed wilderness designations of BLM public lands, using guidelines or standards they have accepted for the task. These groups pursue congressional representation and sponsorship for their proposals. Congress is the single governing Federal body with the authority to pass wilderness legislation. BLM has recently published guidelines for conducting wilderness inventories and studies under Section 201 and 202 of FLPMA (H-6310-1). That guidance applies only to new inventory and land use planning efforts. Ongoing wilderness-related land use planning should be completed using the State-specific guidance and procedures developed for these projects.
503	2	7	**Comment:** Prohibit construction of Lauserica and Stephens fences. They would reduce the natural character of WSA's. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
504	1	6	**Comment:** Prohibit livestock in WSA's where monitoring shows a decline in ecological condition. **Response:** Actions common to all alternatives stated in the Rangeland/ Grazing Use section of Chapter 3 includes, "Where livestock grazing is found not to be consistent with meeting objectives, actions that control the intensity, duration, and timing of grazing and/or provide for periodic deferment and/or rest would be required to meet the physiological requirements of key plant species and to meet other resource management objectives. Upon determining through the adaptive management process that existing grazing management practices or levels of grazing on public land are significant factors in failing to achieve resource objectives, appropriate actions would be implemented." Therefore, livestock exclusion is one of a number of actions which could result within a WSA in the event that the rangeland management objective—Restore, protect, and enhance the diversity and distribution of desirable vegetation communities including perennial native and desirable introduced plant species. Provide for their continued existence and normal function in nutrient, water, and energy cycles.—is not being met due to current livestock management practices.
505	1	6	**Comment:** Prohibit the use of OHV's in WSA's.

Response: In accordance with the IMPLWR, the general use of OHV's is limited to designated WSA boundary roads and to designated vehicular ways within WSA's until Congress acts on the wilderness issue. An emergency closure of specific roads or ways associated with an affected WSA could be implemented if undue and unnecessary degradation of resource values by motorized vehicles should occur, or where there is a need to provide for public safety or resolve user conflicts.

506 1 6 **Comment:** If P Hill area loses WSA status, it would be difficult to maintain original landscape quality.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

507 1 6 **Comment:** Apply VRM and OHV classes to lands released from wilderness consideration.

Response: Under the Proposed RMP and other alternatives, public lands within a WSA released by Congress from wilderness designation, unless otherwise designated as OHV closed in this SEORMP or as a result of a motorized vehicle use emergency closure, would retain a limited to designated roads (and vehicular ways) OHV use designation. Additionally, such lands would be managed under VRM Class II unless otherwise VRM inventoried as Class I or designated as Class I under a management action of this plan.

508 1 6 **Comment:** Released WSA lands should be protected from mineral/energy entry.

Response: See comment response 60.

509 1 1 **Comment:** Adaptive management will not protect/restore high desert wilderness.

Response: WSA's are managed in accordance with the IMPLWR so that their wilderness values are not impaired and they remain suitable for wilderness designation until Congress takes action on the wilderness issue.

510 1 1 **Comment:** Include a report of numbers, kind of structures and developments in WSA's, since designations with rationale for how this enhances wilderness values.

Response: A report of this nature is not within the scope of this plan. Such information has been compiled and assessed in previous BLM wilderness planning documents with resultant BLM recommendations for congressional wilderness designation. Any new structures or developments which have been placed within a WSA since designation has occurred only after the IMPLWR and NEPA (or court ordered) requirements have been met on a case-by-case basis.

511 1 1 **Comment:** The Honeycombs and Owyhee Canyon WSA's should be expanded.

Response: See comment response 502.

512 1 1 **Comment:** Overlapping plans on Steens Mountain are confusing and vague.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

Opinion or Preference

2	7	Support recommendation of land adjacent to WSA's to be acquired and added to existing WSA.
1	1	Oppose expanding existing WSA's.
1	6	Livestock grazing, livestock structures, and unabated presence of livestock degrade ecological and wilderness values. These also render the lands and adjacent lands less suitable for designation.
1	6	Support Leslie Gulch wilderness designation.
1	6	Support Sierra Club recommendation for wilderness designation.
1	1	Protect wilderness for future. It is important for physical challenge and for spiritual sustenance.

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

Wild and Scenic Rivers

Comments within this section are subdivided into General and Donner und Blitzen River.

No.	I	S	General
513	6	6	**Comment:** All streams that fit the NWSR criteria should be designated. **Response:** Under the Proposed RMP, the four study rivers/streams within the planning area which met both the eligibility and suitability criteria are recommended for congressional designation as components of the NWSRS. In PSEORMP/FEIS Chapter 4, under the Wild and Scenic Rivers section, clarification is provided regarding the nature and purpose of Alternative D for assessment of study rivers. Under this alternative, all eligible rivers were considered suitable.
514	3	3	**Comment:** Do not allow livestock grazing in NWSR's. **Response:** When managed in a manner which allows for the protection or enhancement of identified ORV's of a congressionally designated NWSR, livestock grazing may be allowed.
515	1	6	**Comment:** Without NWSR protection, streams are at risk for riparian degradation. **Response:** There are numerous management actions available to the BLM to assist in the management of riparian areas without the need of NWSR designation for their protection from degradation. BLM considers all riparian areas important and has developed management within this document to aid in restoring, protecting and maintaining desired riparian/wetland conditions. This document provides management direction for all riparian/wetland areas and does not rely on designation of rivers to provide the needed protection to correctly manage these areas.
516	1	6	**Comment:** The plan fails to consider and disclose that designation of a "water quality limited" stream means that "best management practices" have been determined to be inadequate to achieve water quality standards. **Response:** Several segments or portions of segments of the NWSR are listed as water quality limited under Section 303(d) of the "Clean Water Act" because monitoring that occurred after the NWSR designation showed that water temperatures were higher than the Oregon water quality

standard. No assessment of the effectiveness of BMP's was made by the State of Oregon prior to the 303(d) listing; therefore, placement of these streams of the 303(d) list does not necessarily equate to a need for special management beyond BMP's or failure of BMP's. Although BLM has water quality temperature for numerous streams, until rangeland health standards and allotment evaluations are completed by interdisciplinary team, a determination of actual sources impacting water quality cannot be fully appraised. For allotments that have evaluated grazing BMP's and have existing riparian conditions improving, BLM believes that it is complying with the intent to meet State water quality standards and is moving toward the delisting of these streams from the 303(d) list.

Until TMDL's are established by the State of Oregon, BLM would develop water quality restoration plans as needed and following the priorities of its GMA's. As TMDL's are established for river basins by the State of Oregon, BLM would adjust or implement monitoring and management practices as needed to comply with approved State water quality management plans.

517 1 1 **Comment:** Jackies Butte permittees want their statements regarding NWSR plans considered in the plan.

Response: Comments concerning the management of Owyhee River NWSR ORV's were considered during the development of the PSEORMP/FEIS. Resolution of litigation concerning this NWSR would provide additional guidance concerning future management.

518 1 1 **Comment:** Opposed to closing Deary Pasture on Owyhee NWSR to livestock grazing. Cattle do not damage ORV's. Cattle improve wildlife habitat.

Response: ORV's of theMain Owyhee NWSR are recreation, scenic, geologic, cultural, and wildlife. Three (recreation, scenic, wildlife) of the five ORV's have been determined to be negatively impacted by livestock use in the Deary pasture. The Deary pasture was not grazed from 1978 through 1988. Grazing use of this area began in 1989 and continued through 1994 as a result of the lack of livestock water availability in other portions of the allotment due to prolonged drought. This use demonstrated an increase in grazing frequency and degree within the boundaries of the Main Owyhee NWSR. During the 1994 grazing season, over-utilization (heavy to severe category) of the riparian and upland vegetation occurred as a result of concentrated use. The use levels resulted in the Deary pasture being left more susceptible to erosion during spring runoff events. Other detrimental impacts included excessive utilization of vegetation, trail proliferation, and trampling and degradation of campsites. The grazing use during 1994 was not in compliance with the VRM Class I objective for the NWSR corridor.

The grazing use in 1994 was not in compliance with the existing land use planning documents. Livestock grazing may not be increased during periods of drought or at other times when forage and/or livestock water, in other parts of the allotment, are in short supply. The excessive livestock use in the Deary pasture decreased both the quantity and quality of forage availability, decreased thermal cover, decreased nesting cover, and decreased hiding cover for medium-sized ungulates, small mammals, upland birds, and, potentially, waterfowl. Also see comment response 182.

519 1 1

Comment: NWSR status for the Owyhee River Below the Dam should be rejected because BLM would restrict the Nyssa Road District No. 2 and Malheur County's responsibility and ability to maintain the road.

Response: The asphalt road along the river is administered by Malheur County as a county road. Within the road's associated right-of way, NWSR designation of the river segment with the recommended recreational river classification would have no effect on the county's ability to maintain the road.

520 1 1

Comment: In Table S-1, there is no adequate justification relative to legal requirements, characteristics, or need of any of the NWSR alternatives.

Response: Information is provided in Chapters 2 and 3, Wild and Scenic Rivers. The purpose of Table S-1 is limited to displaying a quick summary of comparative acres by alternative of selected management actions addressed in the planning document.

521 1 1

Comment: It has not been proven that cattle damage the ORV's. In many cases cattle grazing actually improves wildlife habitat. It has been shown in many areas that once the cattle are permanently removed much of the wildlife would also leave.

Response: Improper grazing has been shown to adversly affect ORV's, such as wildlife habitat. Recent court decisions regarding livestock use associated with the three Owyhee River NWSR's have required mitigative actions be taken to prevent livestock-caused adverse impacts to ORV's of these NWSR's.

522 4 4

Comment: Humans and livestock can not access the Antelope Creek (J19) study river corridor because of the land's topography; thus, the ORV's would be protected. The only access to Antelope Creek is through private property, which would cause possible vandalism, theft and degradation of private land. People would create new roads across WSA's to get to the river corridor. For these reasons, change the west boundary of the proposed NWSR to approximately 6 miles east to the east boundary fence of the Campbell Allotment.

Response: Indeed, the relatively easier motorized-vehicle access location to get closest to the creek's corridor is from where the private property borders the upper end of the 8.6-mile study river. BLM acknowledges this could lead to abuse and trespass of private property, as has reportedly occurred in the past. More distant and difficult foot access to the corridor is from a less traveled and rougher existing WSA boundary road, with the WSA subject to unauthorized cross-country motorized vehicle use, a circumstance no different than what presently exists. The remoteness of the study river, coupled with both the rough conditions of most roads distant and closer to it and with the area's extremely rugged topography, would continue to cause access to be contentious. This would be the circumstance, regardless of the managerial status of the study river.

The extreme topography of the creek's corridor would help protect certain ORV's from abusive activity, while remaining a contributing factor of its scenic ORV. Inaccessibility within portions of the stream's corridor would not preclude it from being suitable for possible inclusion in the NWSRS. With ORV's present the length of the study river and the study river

meeting suitability criteria for possible inclusion in the NWSRS, the 8.6 miles would be recommended for NWSR designation under the Proposed RMP and other alternatives. Should Congress designate Antelope Creek as a component of the NWSRS, a required river management plan would further address issues associated with access. At any time, appropriate directional and informational signing would help people to avoid trespass of the private land.

Donner und Blitzen River

523 2 7 **Comment:** The plan is insufficient as NEPA analysis for revision of "Donner und Blitzen River Management Plan."

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

524 1 6 **Comment:** Alternative C, Appendix N, Donner und Blitzen NWSR Plan Revision, fails to state where proposed fences would be located.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

525 1 6 **Comment:** Alternative C fails to define what "early season" means.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

526 1 6 **Comment:** Plan fails to analyze/disclose whether trailing will inhibit benefits of rest.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

527 1 6 **Comment:** Plan fails to analyze the range of naturally high water.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

528 1 6 **Comment:** Plan fails to analyze/disclose what "medium stubble height" means.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

529 1 6 **Comment:** Plan fails to analyze/disclose "palatable" species in the Blitzen Pasture.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

530 1 6 **Comment:** Plan fails to analyze/disclose the relationship between mean stubble height and most palatable species.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

531 1 6 **Comment:** Plan fails to analyze how any plant species will be fully protected and enhanced by a standard such as stubble height.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

532	1	6	**Comment:** Plan fails to analyze/disclose whether the young trees in the meadows are developing due to rest from prolonged grazing. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
533	1	6	**Comment:** Alternative B: Utilization standards are too general and unspecific to restore vegetation in the pasture. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
534	1	6	**Comment:** Alternative C: Plan fails to analyze relationship between stubble height and plant communities. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
535	1	6	**Comment:** The analysis, consideration, and disclosure of water quality issues on the Donner und Blitzen NWSR is inadequate. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
536	1	1	**Comment:** Lauserica fence plan should be removed from the plan. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.

Opinion or Preference

18	19	Alternative C is inadequate for the number of miles proposed.
8	14	Support Alternative D and recommend that all inventoried and assessed river miles be added to the NWSR system.
1	1	Support adaptive rotational grazing management in NWSR's.
1	1	Do not support new NWSR designations.
1	1	Do not support NWSR designation for Dry Creek.
1	1	Support maintaining the status for Donner und Blitzen as wild.

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

Special Designations

Comments relate to ACEC/RNA's and Steens Mountain.

No.	I	S	ACEC/RNA's
537			**Comments:**
	4	5	• Retain all ACEC's and designate recommended ACEC's.
	3	3	• Oppose designation of ACEC's.
	6	6	• Prefer Alternative D for ACEC's.
	1	1	• Support Alternative B on ACEC's and RNA's.

Response: Analysis of the merits of designation under each alternative may be found in Chapters 3 and 4 for ACEC's. Final determination of designations that best meet management considerations for ACEC relevant and important values within the framework of multiple use is found in the Proposed RMP.

538 3 3 **Comment:** Oppose proposed additions to ACEC's.

Reasons:

not consistent with legal authority; and

not needed on well-managed lands.

Response: The legal authority and mandate to establish ACEC's was granted with the passage of FLPMA; therefore, establishment of ACEC's is consistent with BLM's legal authority. ACEC's are established to provide management attention for relevant and important values. If lands are managed to the extent that the relevant and important values can be maintained and protected, then management changes would not be necessary. If new management would be proposed, implementation would depend on its potential positive and/or negative impacts on the relevant and important values. The designation of ACEC's helps to keep attention focused on management of specific values of an area.

539 3 3 **Comment:** Mahogany Ridge ACEC/RNA: Support Alternative B.

Reason:

too much private land within.

Response: There is no private land within the Mahogany Ridge ACEC/RNA. BLM's authority does not extend to designation of private lands as ACEC's.

540 **Comments:**

3 3 • Owyhee Views ACEC: Support Alternative B.

2 2 • Jordan Craters ACEC/RNA: Support Alternative D.

Reason: to enlarge to the full extent of lava flow.

2 2 • North Fork Malheur River ACEC: Support Alternative C.

Reason: links Blue Mountains and Owyhee Uplands Province, rare trout and vegetation transition .

2 2 • Castle Rock ACEC: Support Alternative C.

Reason: site fills several natural area cells.

2 2 • Coal Mine Basin ACEC/RNA: Support Alternative C.

2 2 • Coal Mine Basin ACEC/RNA: Support Alternative B.

2 2 • Keep Alvord Peak an ACEC.

1 1 • Oppose ACEC designation for Hammond Hills.

1 1 • Oppose designation for Owyhee Views ACEC.

1 1 • Oregon Trail ACEC: against designation.

1 1 • Oregon Trail Keeney Pass ACEC: Support Alternative B.

1 1 • Oregon Trail-Tub Mountain Segment: Support Alternative B.

1 1 • Oregon Trail ACEC Birch Creek Segment: Support Alternative C.

1 1 • Honeycombs ACEC/RNA: Support Alternative C.

1 1 • Leslie Gulch ACEC: Support Alternative C.

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

Reason: gives greater representation of the target natural community and adds diversity because species are mostly on private lands.

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

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

Reason: adds diversity to western juniper and low sagebrush types.

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

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

1 1 • Dry Creek Gorge ACEC: Support Alternative D.

Reason: scenery, geology that supports salt desert shrub communities.

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

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

Reason: threat of mineral leasing and importance of NSO stipulations; and excellent representation of sandy soil alkali communities.

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

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

Reason: lands contain best low sagebrush/bluebunch wheatgrass, and silver sagebrush/Nevada bluegrass playa vegetation.

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

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

Reason: great representation of plant communities which need protection from grazing.

1 1 • Ott Mountain ACEC/RNA: Support Alternative B.

1 1 • Owyhee Below the Dam ACEC: Neutral

1 1 • South Alkali Sand Hills ACEC: Support Alternative B.

1 1 • South Alkali Sand Hills ACEC: Support Alternative D.

Reason: protects two sensitive plant species with maximum habitat and management latitude.

1 1 • South Bull Canyon ACEC/RNA: Support Alternative B.

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

1 1 • Spring Mountain ACEC/RNA: Support Alternative B.

1 1 • Spring Mountain ACEC/RNA: Support Alternative C.

1 1 • Spring Mountain ACEC/RNA: Support Alternative D.

Reason: potential to represent a suite of quaking aspen communities (support exchange for willing sellers).

1 1 • Owyhee River ACEC: Support Alternative C.

1 1 • Saddle Butte ACEC: Support Alternative C.

1 1 • Whitehorse Butte ACEC: Support Alternative C.

1 1 • Dry Creek Bench ACEC/RNA: Support Alternative B.

1 1 • Dry Creek Bench ACEC/RNA: Support Alternative D.

Reason: larger acreage needed to act as buffer.

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

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

Reason: benchmark area for low elevation riparian need additional protection.

1 1 • Mendi Gore ACEC/RNA: Support Alternative C.

1 1 • Mendi Gore ACEC/RNA: Support Alternative D.

Reason: additional acreage for important plant representations.

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

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

Reason: designation will better recognize some plant representations and has other attributes needing management.

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

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

Reason: added diversity that Bull Flats provides.

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

Reason: recognizes complete extent of Alvord and benefit from resulting level of management.

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

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

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

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

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

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

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

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

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

1 1 • Steens Mountain ACEC: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 • Tum Tum Lake ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 • Fir Groves ACEC: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 • Mickey Hot Springs: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 • Serrano Point ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry).

1 1 • Big Alvord Creek ACEC/RNA: Support Alternative C (with addition of withdrawal for mineral entry.

Reason: quality examples of natural communities

1 1 • East Fork Trout Creek ACEC/RNA: Support Alternative C, with extension of boundary to ridge to ensure protection of wetland/riparian areas.

1 1 • Keep Pickett Rim as an ACEC.

Reason: for peregrine falcons and high nesting/breeding values for raptors, plants, and ACEC and VRM status.

Response: Discussion and analysis of the merits of designation under each alternative may be found in Chapters 3 and 4 for ACEC's. Final

determination that best meets management of ACEC values within the framework of multiple use is found in the Proposed RMP of the PSEORMP/FEIS.

541 2 2 **Comment:** Do something about trash, weeds, and OHV use within the proposed Keeney Pass segment of the Oregon Trail ACEC.

Response: Under the Proposed RMP and other alternatives, appropriate management of noxious weeds and OHV use has been provided. Due to the proximity of this trail segment to urban settings and to the county's landfill waste site with its limited weekly operation hours, the Keeney Pass (Lytle Boulevard) road corridor remains subject to roadside refuse dumping. BLM continues to work with Malheur County and interested persons and organizations for periodic trash removal in the area. Also see comment response 486.

542 **Comments:**

2 2 • Need for ACEC's should document a biological issue or management problem.

1 1 • Needs for ACEC have not been justified.

Response: Interdisciplinary teams were formed to review relevant and important values for areas nominated to be ACEC's or ACEC/RNA's. Determination by the teams was also made regarding the need for special management attention for these areas. Those areas with relevant and important values in need of management attention were brought forward for consideration and analysis under the management scenarios within each alternative.

543 1 2 **Comment:** The Pickett Rim ACEC should be expanded.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

544 1 1 **Comment:** Give Lone Mountain special designation.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

545 1 1 **Comment:** OHV restrictions in ACEC's need to be clarified.

Response: In all ACEC's not closed to OHV's, OHV use would be limited to designated roads and trails. Maps depicting these designated roads and trails would be available at the Vale District Office. OHV management for each ACEC is provided in the text of Chapter 3 and Table 3-12.

546 1 1 **Comment:** Cryptobiotic crusts should be mentioned in the description of Leslie Gulch ACEC and may make the area eligible for ACEC/RNA status.

Response: BLM personnel are not aware at this time of excellent examples of biotic crusts in Leslie Gulch. However, except in high recreation use areas, current management of the area should provide satisfactory management for crusts which occur in the area. The extent of human activity in the Leslie Gulch ACEC would not make the area as a whole eligible for consideration as a research natural area.

547 1 1 **Comment:** Owyhee River ACEC should not be dropped because of NWSR designation.

Response: Because no relevant and important values were identified for the river which are not currently managed under the existing management plan for Owyhee NWSR as ORV's, it was determined that no additional management protection would be provided for the Owyhee River NWSR corridor as a result of ACEC designation.

548 1 1 **Comment:** Grazing impacts in ACEC's appear to be the same for Alternative C as for Alternative A; concerned that the 1998 "Oregon Natural Heritage Plan" document was not used in the draft, which shows Harney Lake as a key area needing management.

Response: As analyzed, grazing impacts would be anticipated to have a greater impact in Alternative A; however, relevant and important values of ACEC's would be protected in all alternatives, with fencing having the greatest likelihood for management of those values on the generally smaller acreages in Alternative A. Text in the ACEC section has been updated and revised to indicate that the l998 "Oregon Natural Heritage Plan" has been used as the most current information available. The Harney Lake area mentioned in that plan, is not in the SEORMP planning area.

549 1 1 **Comment:** The existing Oregon National Historic Trail be designated as a SRMA instead of ACEC.

Response: Under the Proposed RMP and other alternatives, the Oregon National Historic Trail would be designated as a SRMA in 1989. The value of adding ACEC designation is discussed in comment response 555.

550 1 1 **Comment:** Support right-of-way avoidance in place of ACEC designation for the Oregon Trail.

Response: See comment response 555.

551 1 1 **Comment:** There is a discrepancy in the text between the length of the ruts mentioned in several paragraphs.

Response: Text has been amended to clarify length of ruts in each segment and across the Vale District BLM.

552 2 2 **Comment:** There is a discrepancy in the text for the corridor width for the Oregon Trail, Keeney Pass segment.

Response: Text was clarified with regard to corridor width.

553 2 2 **Comment:** The Oregon Trail ruts in Keeney Pass were mostly made by motor vehicle use.

Response: It is correct that Lytle Boulevard overlies the original route of the Oregon Trail in many places and also that the ruts at Keeney Pass were used as the main travel route for vehicular traffic prior to the construction of Lytle Boulevard. While this vehicular traffic may have enlarged or deepened the ruts, the swales still follow the route of and represent the Oregon Trail.

554 1 1 **Comment:** No mention was made that numerous projects exist in the Oregon Trail-Keeney Pass segment.

Response: Text was amended to include a description of the projects within the corridor.

555 2 2

Comment: ACEC designation is not necessary to manage the Oregon Trail. It could be equally well managed under a different designation, such as SRMA. In addition, weeds and OHV's are not currently managed; ACEC designation would not make a difference.

Response: One of the objectives for designating the Oregon Trail segments as an ACEC is to protect not only the trail but also the viewshed and setting associated with the trail. The Oregon Trail is not a renewable resource and would vanish over time, protected or not, due to environmental factors (weather, erosion); the intent is to limit impacts associated with population growth and physical development on the ground. The Oregon Trail is more than the physical ruts; it is the entire setting. Maintaining the integrity of that setting for future generations is the goal of this ACEC. Over time, what has changed are the increased number of developments along the Oregon Trail. The management prescriptions outlined for the ACEC would provide tools to limit new developments and protect the integrity of the environmental setting. The prescriptions do not preclude the maintenance of existing facilities but may limit some activities. New projects would be evaluated for impacts to the integrity and aesthetics of the environmental. The ACEC designation would bring higher priority for OHV and weed management.

556 2 2

Comment: Concern was expressed about the potential change of grazing activities, focus on livestock grazing in Alternative C, and the ability to maintain current projects should the ACEC be designated in the Oregon Trail-Keeney Pass segment.

Response: Grazing as is currently conducted in the potential ACEC has not been found to impact the relevant and important values for which the ACEC would be established. Grazing would be evaluated as an ongoing process, and as changes in the current grazing system were proposed. Alternative C is not specific to discussion of livestock use only; such use is addressed in other alternatives. In addition, mineral activities would be limited or closed, depending on the proximity to the corridor and the viewshed adjacent to the Oregon Trail. All project maintenance within the corridor would continue as long as relevant and important values are not negatively affected.

557 1 1

Comment: Against ACEC/RNA designations per Malheur County Court 1996 position regarding vegetative communities and plant cells, etc.

Reasons:

deviates from multiple use; and

present management is compatible with well-being of the identified vegetative communities.

Response: Designation of ACEC's is considered part of multiple use as mandated by the FLPMA and is consistent with BLM management under the Act. Where present management is compatible with the maintenance and enhancement of identified vegetative communities, it would not be changed. Management would only change as the adaptive management process identifies conflicts with present management or proposed future management of the relevant and important values of designated ACEC's.

558 1 1 **Comment:** Oppose expanding existing WSA's because BLM has already recommended them to Congress.

Response: As indicated in Chapter 3, under Rationale for Land Adjacent to Wilderness Study Areas, sections 202 and 302 of the FLPMA provides authority to provide for WSA's under the BLM's land use planning process. In this plan, the only land parcels that would be subject to be added to existing WSA's are those parcels identified in BLM's 1989 OWFEIS and 1991 "Wilderness Study Report for Oregon." As WSA's, those lands would be managed in concert with all WSA's, in accordance with the IMPLWR. This would provide continuity in their management and preserve their suitability for wilderness designation until Congress takes action on the wilderness issue.

559 1 1 **Comment:** The Nature Conservancy (TNC) should not be paid to inventory for potential ACEC/RNA's.

Reasons:

locals and government are not included;

expertise of TNC is in question; and

BLM should have no control over private land.

Response: The BLM has entered into a partnership with TNC and maintains a 1990 national memorandum of understanding which recognizes TNC as the organization with the expertise to identify and evaluate specific ecological units and critical elements for management of biodiversity across the national landscape. This memorandum states that, as requested and as funds are available, TNC is to provide information and technical assistance for areas on BLM lands that have high natural values; areas of exceptional ecological importance; locations of rare or unusual plant or animal communities; and habitats of Federally listed endangered, threatened, proposed, and candidate species and State listed species. Neither BLM nor TNC have authority to determine ecological sites or management on private lands. All public and private entities have had the opportunity to provide input throughout this planning process.

560 1 1 **Comment:** It is incompatible to manage Mahogany Ridge ACEC/RNA for both purity and diversity.

Response: ACEC's may be managed for a variety of relevant and important values within the same unit. While the existing Mahogany Ridge ACEC/RNA is managed primarily for its excellent representation of a mountain mahogany community, additional acreage has been being proposed to add additional biological diversity, as well as a larger representation of the mountain mahogany community.

561 1 1 **Comment:** A cumulative reduction in grazing AUM's is resulting from all of the ACEC additions.

Response: There are no reductions in AUM's proposed in the SEORMP for any existing, proposed additions, or proposed ACEC's or ACEC/RNA's.

562 1 1 **Comment:** Livestock and recreational use are excluded from ACEC/RNA's, which deviates from multiple use.

Response: Livestock are rarely excluded, and recreational use has not been excluded from ACEC/RNA's, except as recreationists are limited to

designated roads and trails for OHV activities. The concept of multiple use does not mean that all uses are to occur on all acres. As part of adaptive management, some uses in ACEC's may be excluded if they would be shown to be detrimental to and incompatible with management and protection of the relevant and important values for which the ACEC was established.

563 1 1

Comment: Questioned the fact that no mineral leasing was designated for more acres for ACEC's under Alternative B than on all the other alternatives.

Response: The commentor is directed to a footnote in the ACEC table which explains that under Alternative B, the restrictions on mineral leasing imposed by current IMPLWR or other special designations are in effect for many of the existing ACEC's. For all other alternatives, IMPLWR was not shown, although IMPLWR management would continue to be in effect for those portions of any ACEC within a WSA.

564 1 1

Comment: Dropping of Alvord Peak ACEC could allow an increase in mineral activity in the area which could cause an impact to bighorn sheep.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

565 1 1

Comment: Noxious weeds would not be controlled in areas designated as ACEC's.

Response: As stated in Chapter 3, noxious weeds in ACEC's would be aggressively controlled using integrated weed management methods consistent with protection and enhancement of relevant and important values.

566 1 1

Comment: It is not appropriate to have ACEC's for visual or other subjective criteria.

Response: FLPMA specifically identifies scenic values as criteria for consideration that may require special management attention by ACEC designation in order to protect and prevent irreparable damage to those values.

567 1 1

Comment: Management should not be referenced as a purpose for ACEC establishment.

Reasons:

historic grazing did not damage their value; and

grazing use is fundamental to biological needs.

Response: FLPMA specifically states that ACEC's are areas where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from natural hazards. The need for management is therefore a critical consideration in establishment of ACEC's.

568 1 1

Comment: It is not clear how many ACEC's have been established for plant or animal habitats.

Response: The relevant and important values for each ACEC have been described in the introductory section for each specific existing or proposed ACEC in the text of Chapter 3. If plants or animals and their habitats are relevant and important values, they are discussed in that section.

569 1 1 **Comment:** It is not clear which plant or animal ACEC's will have grazing, recreation, or mining as secondary objectives.

Response: ACEC's do not have secondary objectives, only relevant and important values for which the ACEC's would be managed. Ongoing uses, such as grazing, recreation, or mining, may be permitted which do not adversely impact relevant and important values. Also see comment response 570.

570 1 1 **Comment:** It would be useful to identify where conflicting management actions in ACEC's may occur.

Response: The process of adaptive management, including gathering of data as part of the future monitoring program, would be used to identify conflicting management actions in ACEC's. Potential future conflicting management actions have been identified ACEC's in the table and text of ACEC discussion in Chapter 3.

571 1 1 **Comment:** Acceptable levels of change need to be identified in ACEC's.

Response: Each ACEC would be evaluated in the future for acceptable levels of change consistent with the relevant and important values identified for that area. Also see comment response 570.

572 1 1 **Comment:** ACEC's in Bully Creek should include quaking aspen in shrub steppe mosaics.

Response: There were no specific nominations for ACEC/RNA's in the Bully Creek watershed of areas which include quaking aspen in shrub steppe mosaics.

573 1 1 **Comment:** Long Draw ACEC/RNA: Extend boundary consistent with landscape to better protect sandy soil plant communities.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

National Conservation Area

574 5 5 **Comment:** NCA designation should be separate from plan.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

575 4 9 **Comment**: Support NCA for Steens and include Alvord Desert.

Reasons:

they are integrally tied;

large enough area to manage from a landscape approach; and

major issues involve both areas.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

576	4	9	**Comment:** The NCA proposal contains no clear approach or planning and nothing to evaluate. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
577	1	2	**Comment:** The BLM should provide landowners and business owners in the proposed NCA a copy of NCA-H.R.-100-24, along with positive and negative impacts. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
578	1	1	**Comment:** NCA designation could severely impact cattle industry. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
579	1	1	**Comment:** Fire suppression should be reduced in NCA. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.

Opinion or Preference

4	6	Do not support NCA for Steens. *Reasons:* *too much private land within;* *too many unknowns of legislation; and* *states that BLM would manage wildlife.*
3	4	Steens Mountain needs permanent federal protection.
2	2	Steens are of vital interest for recreation.
1	6	The NCA proposal in Alternative C fails to protect the area.
1	6	We are pleased to see the BLM is adding over 28,000 acres to Steens Mountain ACEC.
1	1	Alvord Desert is of vital interest for recreation.
1	1	Frenchglen is of vital interest for recreation.
6	7	Support NCA for Steens Mountain
1	6	We urge the BLM to offer thorough discussions of various proposals for protection of Steens Mountain.
1	1	Steens and Owyhee Canyonlands should be national parks or monuments.
1	1	Need to add P Hill and Pickett Rim to NCA proposal.

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

Human Uses and Values

Some Human Uses and Values comments may be under GRAZING or GENERAL COMMENTS.

No.	I	S	
580	1	2	**Comment:** The draft should include "impacts to private lands and business."

Response: The draft and final are similar in their discussions of impacts to private lands and businesses. These impacts are discussed generally, identifying how opportunities for continuation or growth of certain types of businesses would increase or decrease under the various alternatives. Business sectors such as tourism, mining, timber, and livestock grazing are examined. Hopefully, this plan provides enough detail to existing business owners and operators to guide them in effectively operating their businesses as Federal land management changes with adoption of a new resource management plan.

581 1 1 **Comment:** Tribal economy and use was not represented in this section.

Response: A brief discussion of Native American subsistence uses was added as part of the environmental justice discussion. Additional information appears under Cultural Resources and Areas of Critical Environmental Concern.

582 1 1 **Comment:** Data selection and analysis are biased towards livestock producers.

Reasons:

inflates economic importance of grazing; and

generally flawed.

Response: The estimate of impacts related to changing livestock use has been revised based on additional research into source data. This revision reduced the economic importance of forage provided on BLM-administered lands.

583 1 1 **Comment:** The plan fails to recognize increased recreation use as result of decreased grazing.

Response: The BLM is unaware of any studies that suggest decreased grazing use results in increased recreation use in the absence of other factors such as special designations, improved public access, recreation facilities, or notations on maps.

584 1 1 **Comment:** The economic impact studies by Ashley (1993) and Johnson (1995) are flawed.

Response: Table 2-37, Expenditures by Activity Category, references Rebecca Johnson of OSU. Her 1995 study addresses recreation expenditures throughout Oregon and not within the planning area specifically. For this reason, the information on visitor spending was included to provide a context for readers about the potential economic contribution of recreation to the area but was not used to develop detailed economic impact estimates. The study by Ashley refers specifically to the Steens Mountain area and is no longer cited in the RMP.

Opinions or Preference:

Comment: Support Alternative D

LETTER NUMBER: 110, 227, 241

Cultural Resources

No.	I	S	
585	2	2	**Comment:** The Burns Paiute Tribe encourages the BLM to record cultural plant distribution during project surveys. **Response:** As a matter of current practice, BLM botanists make thorough plant lists that include cultural plants during project surveys.
586	2	2	**Comment**: Alternative C shows little or no Native American recognition. **Response:** Chapter 1, page 17 in the draft explains the coordination with the Tribes. This is the same across all alternatives.
587	1	1	**Comment:** Number of cultural sites is in error. **Response:** The number of cultural sites enumerated in Table 2-40 is a cumulative total of all known sites in each resource area. Because these areas have not been completely inventoried and no Native American subsistence areas have been reported to BLM, the total number of cultural sites is undetermined at this time.
588	1	1	**Comment:** Do not mix permanent sites with temporary sites. **Response:** Significant sites are given higher priority than sites determined ineligible for nomination to the National Register of Historic Places (NRHP). They are monitored, patrolled, and protected to the extent possible. However, because the entire range of archaeological site types is required to represent a full spectrum of prehistoric activities, a number of less significant sites are preserved.
589	1	1	**Comment:** Page 1-17: "Malheur Reservation was largely abandoned by the Northern Paiutes in 1878 during hostilities" is not correct and serves no purpose in this document. *Reasons:* *implies that the Northern Paiute left on their own choice, which was not the case.* **Response:** The sentence was amended to read: "The Northern Paiute people were forced off the Malheur Reservation in 1878 because of their participation in the Bannock War."
590	1	1	**Comment:** Page 2-80: regarding "No American Indian subsistence areas have been identified": reword sentence. **Response:** BLM is in active communication with tribal representatives concerning subsistence areas. To date, no locations within the planning area have been reported.
591	1	1	**Comment:** The Burns Paiute Tribe is in support of the Castle Rock ACEC nomination. **Response:** The Castle Rock ACEC is designated under the Proposed RMP.

592	1	1	**Comment:** The Burns Paiute Tribe encourages closure of Castle Rock to mineral development. **Response:** In the PSEORMP/FEIS Proposed RMP alternative, 3,280 acres of the 14,599-acre Castle Rock ACEC would be withdrawn from locatable mineral entry and closed to salable mineral activity. The entire Castle Rock ACEC would be subject to NSO stipulations for leasable minerals. Also, refer to Comments Regarding Andrews Resource Area on page 1.
593	1	1	**Comment:** Cultural Resources are not specifically considered in the VRM section. **Response:** Visual setting is considered when management actions are proposed within or near a NRHP eligible site. It is a component of site integrity and evaluated and mitigated under the "National Historic Preservation Act" (NHPA) as amended. Visual setting is considered for cultural resources.
594	1	1	**Comment:** The visual impact to cultural resources should be considered during management actions. **Response:** Visual impacts to significant cultural resources are considered when assessing proposed management actions. It is component of site integrity and evaluated and mitigated under the NHPA as amended.
595			**Comment:** Restore impacted cultural plant communities in the plan. **Response:** The BLM does not know of any cultural plant communities in need of restoration. Also see comment response 590.
596	1	1	**Comment:** Protect cultural resources from grazing impacts in consultation with SHPO and NHPA. **Response:** The BLM does protect significant and nonsignificant (NRHP eligible and ineligible) cultural resources from grazing impacts in consultation with SHPO and consonant with the NHPA as amended.
597	1	1	**Comment:** ODFW requests additional clarification language stating that legal hunting and fishing activities are allowed. **Response:** The plan presumes that Native American traditional use activities on public land would be practiced within applicable state and Federal laws. This plan deals only with management of wildlife habitat.
598	1	1	**Comment:** The SEORAC feels that communication with the tribes could be improved—a process for improving communication with tribal entities could be delineated in the plan. **Response:** Vale District is presently writing a memorandum of understanding (MOU) with the Burns Paiute Tribe. The MOU is intended to provide structure to the consultation process with the expressed purpose of improving communication.

Opinion or Preference

1	1	Support Alternative D.
1	1	Commend BLM for restoring requirements for clearances for fence construction.

1	1	Support Objective 3, Alternative B.

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

Land and Realty

No.	I	S	
599	3	8	**Comment:** BLM should acquire private land within Zone 1. **Response:** Regarding land exchanges/acquisitions—under the Proposed RMP alternative, BLM would maintain its land exchange options within Zone 1, 2 and 3 areas. When opportunities arise to acquire lands of high and public resource values, and such acquisition is determined to be in the public interest and meets the requirements of NEPA, it is necessary that BLM have the latitude of offering lands with lesser public resource values, regardless of which land tenure zone is affected. The laws and regulations are in no way affected or diminished by this RMP. Potential acquisitions and land exchanges are governed by the availability of funds from Congress and the priorities established at the state and national BLM levels.
600	2	8	**Comment:** Public land within Zones 1 and 2 should be retained. **Response:** Current policy is to identify public lands with high resource values and recommend them for inclusion in SMA's such as ACEC's, NWSR designation, critical wildlife habitat areas, wild horse herd areas, critical fish habitat areas, and threatened and endangered species areas. Long-term retention of public lands in these SMA's is required by law. Most of the lands identified in Zone 1 and 2 exhibit public value resources, but not the caliber of resources which would qualify them for inclusion in SMA's. For these types of lands, under the Proposal RMP alternative BLM would maintain its land exchange options within Zone 1, 2 and 3 areas. When opportunities arise to acquire lands of high and public resource values, and such acquisition is determined to be in the public interest and meets the requirements of NEPA, it is necessary that BLM have the latitude of offering lands with lessor public resource values, regardless of which land tenure zone is affected. In order to clarify the use of terms such as *high resource values*, *public resource values* and *acquired lands*, definitions were developed, text footnoted, and the term definitions were placed in the Glossary.
601	2	3	**Comment:** BLM should not restrict or control access to private land. **Response:** BLM policy is not to deny access to private lands. Oregon State laws gives landowners the right to access their private lands.
602	1	1	**Comment:** The purpose for tenure adjustment needs to be emphasized in Alternative C. **Response:** To clarify the preferred methods of consolidation of landownership, the following changes to consolidated land ownership were made: (1) Appendix L, Land Exchanges section added the following sentence: "Land exchange is the preferred method for consolidating land ownership."; and (2) Methods of Disposal section added: " . . . include the

following in order of priority." BLM is required to identify such well-blocked public land with public resource values for retention.

603 1 1 **Comment**: The plan must be changed to allow land exchanges in all areas of the plan.

Response: See comment response 599 and 602.

604 1 1 **Comment:** Consolidation of land with high profile values should replace retain in all of the alternatives.

Response: See comment response 602.

605 1 1 **Comment:** BLM should not be in the business of increasing holdings at the expense of private sector.

Response: See comment response 602.

606 1 1 **Comment:** We are opposed to substantial net loss of public lands.

Response: Both Harney and Malheur Counties have gone on record as preferring that there be no net loss of private land within their boundaries. BLM is in agreement with this position, and BLM would conduct its activities in accordance with this premise to the extent possible. The potential for net loss of public lands is an important evaluation criteria when specific land exchanges, sales, or acquisitions are proposed. The SEORMP establishes land tenure zones but does not address specific land exchanges, sales, or acquisitions.

607 1 1 **Comment:** Increase the legal access to public lands.

Response: Map LAND-1 in the Draft SEORMP/EIS identifies critical BLM access needs. Although these access needs were identified, BLM still has to negotiate with willing private land owners for the best access routes and compensate the private land owners for any easement acquisitions. Obtaining access would depend on the resource values involved and public needs.

608 1 1 **Comment:** Commentor is interested in specific lands to purchase or exchange.

Response: Specific land exchange proposals and sales should be submitted to the District Manager in writing. The SEORMP is not the appropriate forum for consideration of individual exchange and sales transactions.

609 1 1 **Comment:** Land tenure adjustments seem restricted in Steens Mountain area.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

610 1 1 **Comment:** Pursue land acquisition of private inholdings on Steens Mountain and roadless areas.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

Opinion or Preference

1	1	Support Alternative D for Lands and Realty.
1	1	We agree with ownership consolidation as long as land values, total private ownership, and farming is protected.
1	1	A clean-up program should be started on public lands to remove fences, culverts, close roads, etc.

LETTER NUMBER: 001, 036, 100, 107, 180, 218, 232, 237, 239, 240, 241, 247

Specific Sites

Some specific sites are also addressed under other sections.

No.	I	S	
611	16	19	**Comment:** Steens Mountains should be allowed to recover from grazing. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
612	12	13	**Comment:** Alvord Desert should receive increased protection/national designation. *Reasons:* *because of unique geology and rare plants and animals.* **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
613	18	18	**Comment:** Donner und Blitzen is of special interest and needs further protection from livestock. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
614	7	7	**Comment:** Blitzen: Reduce grazing. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
615	7	7	**Comment:** Protect the Owyhee River (general protection statement). **Response:** Under all alternatives, significant values associated with the Owyhee River corridor are provided some level of protective management. Examples include management prescriptions under ACEC designation and existing provisions of the river management plan for its three congressionally designated NWSR's. As a suitable study river for potential inclusion in the NWSRS, the river below Owyhee Dam would be managed to comply with established IMPLWR until Congress acts on BLM's NWSR recommendation. Additionally, where the river corridor is within existing WSA's, it is administered in accordance and compliance with the protective measures of the IMPLWR. Other resource management objectives would be met through the adaptive management process.
616	6	6	**Comment:** The Owyhee River system is of special interest and needs further protection from livestock. **Response:** The existing river management plan addresses livestock use of the three NWSR's, and has been further addressed through recent judicial litigation regarding protection of ORV's from livestock use impacts within the plan's identified "areas of concern." The PSEORMP/FEIS Wild and

Scenic Rivers section of Chapters 2, 3, and 4 have been edited to reflect the recent litigation.

Under the Proposed RMP and other alternatives, livestock use of public lands along the river located below Owyhee Dam would be limited to be consistent with protection of both the ORV's associated with this administratively suitable study river for potential inclusion in the NWSRS, and the important and relevant values of the ACEC. Presently, livestock use in the corridor is limited to seasonal trailing.

617	5	5	**Comment:** Steens Mountain is important and needs increased protection/ national designation. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
618	4	12	**Comment:** The Owyhee Canyonlands is a national-class area and needs increased protection/and or national designation. **Response:** It is not possible to interpret the bounds of the commentor's envisioned "Owyhee Canyonlands." Management prescriptions under the Proposed RMP and other alternatives address protective management measures and congressional designation for extensive public lands associated with and abutting the Owyhee River's entire length through the planning area. Examples include management prescriptions under ACEC designation, existing and administratively suitable NWSR's status, and OHV use restrictions within and outside of such SMA's. Further, the IMPLWR for existing administratively designated WSA's of the area requires highly protective management of wilderness values. Any public lands congressionally designated as wilderness would be managed in accordance with the "National Wilderness Act" of 1964. The proposed SRMA's associated with the area would be managed to balance appropriate recreation use opportunities while providing protection of important resource values.
619	1	2	**Comment:** Owyhee Below the Dam and Birch Creek Ranch: Do not develop, except for parking. **Response:** Any development would need to be in accordance with BLM's interim management guidelines for administratively suitable rivers and allow for protection of known ORV's and relevant and important ACEC values. For Birch Creek Ranch, refer to the PSEORMP/FEIS Proposed RMP alternative under both the Recreation and Wild and Scenic Rivers sections of Chapter 3 and to Appendix U (Potential Recreation Sites, Trails, and Improvements of Existing Sites). For Owyhee Below the Dam, see comment response 431 and 432.
620	1	2	**Comment:** The Steens Mountain North Loop Road should not be closed to landowners during the winter months. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.
621	1	1	**Comment:** Complete Lauserica and Stephens fences as soon as possible. **Response:** Refer to Comments Regarding Andrews Resource Area on page 1.

622 1 1 **Comment:** Lauserica fence was covered as an EA; remove from Appendix.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

623 1 1 **Comment:** Trout Creek and Oregon Canyon Mountain: Mud Springs, Twin Peaks, and Wood roads should remain open.

Response: These roads are associated with the Trout Creek group of WSA's, with decisions relating to them addressed in previous BLM planning documents associated with BLM's wilderness review program (1989 OWFEIS and 1991 "Wilderness Study Report"). Thus, reflective of Chapter 2 regarding WSA's, these roads are beyond the scope of this plan, since they were addressed in these planning documents, and presently their subsequent decisions and recommendations await congressional action regarding wilderness designation.

624 1 1 **Comment:** Pueblo Mountains: Arizona Creek road should remain open.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

625 1 1 **Comment:** This document does not support the need for another special designation for the Steens Mountain area.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

626 1 1 **Comment:** Mahogany Mountain and Spring Mountain Allotments are suitable for livestock use.

Response: Mahogany Mountain (10509) and Spring Mountain (10504) Allotments remain allocated for livestock grazing in the Proposed RMP. Details of current management of these allotments, as all allotments in the planning area, can be found in Appendix E (Allotment Summaries).

627 1 1 **Comment:** Object to elk objective of 1,000 and the mule deer and pronghorn objectives, in the High Desert Hunter Unit.

Response: Big game management objectives are set by the State of Oregon under the planning criteria and public involvement process they deem appropriate. BLM references to state management objectives were included in the draft and final plans to show the public general population trends and areas of occupancy within grazing allotments.

628 1 1 **Comment:** Alpine habitats are of special importance and fragile and need extra consideration.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

629 1 1 **Comment:** Volcanic ashbed habitats should be withdrawn from mineral entry.

Response: Protective withdrawals would only be pursued where it was evident that there was no other way to protect the habitat, and only if the withdrawal could be clearly justified in the national interest.

630 1 1

Comment: Do not change status of Owyhee Below the Dam.

Response: While there are presently some measures which assist in providing management of some of the significant natural values along the river below the dam, projected recreational use demands on the area and activities and expressed interest to conduct extractive consumptive uses which can adversely effect such values have focused the need to address conflicting uses of the area. Management actions under the Proposed RMP and most alternatives are designed to retain the area's significant values. Such actions, overall, would result in maintaining the river's existing landscape setting.

630a 1 1

Comment: Highly erodible soils should be identified specifically.

Response: See comment response 286 and 272.

631 1 1

Comment: Object to increasing shrubs on Mahogany Mountain and Spring Mountain Allotments.

Response: See comment response 187, 190, and 116.

632 1 1

Comment: Riddle Creek is not part of Harney-Malheur Lake drainage.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

633 1 1

Comment: Riparian condition and trend for Riddle Creek is outdated.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

634 1 1

Comment: Many range improvements in the Keeney Pass segment of the Oregon Trail probably preclude it from qualifying as a SMA.

Response: The presence of developments does not necessarily preclude public land tracts from being considered a SMA. The historic Oregon Trail route that passes through this corridor is already recognized as a SMA, since it is a component of the national historic trail system, and the Keeney Pass segment of the trail is listed on the NRHP. The corridor has qualifying important and relevent values associated with the trail and a special status plant species for ACEC designation consideration. Refer to Chapter 3, ACEC/RNA's for additional information. Also see comment response 549 and 555.

635 1 1

Comment: Remove the Alvord Hot Spring from the Steens Mountain Recreation Lands to help eliminate confusion between public and private lands.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

636 1 1

Comment: Removing grazing from Deary Pasture removes water source from Jackies Butte Allotment; another water source is needed.

Response: See comment response 518.

637 1 1

Comment: Map LVST-1J: Rome North is listed as a livestock exclusion area; it is needed for Jackie's Butte permittee.

Response: See comment response 638.

638 1 1 **Comment:** Rewrite plan to accommodate the livestock users in Deary Pasture and Rome North.

Response: See comment response to 519 about the Deary Pasture closure. The Rome North Pasture of the Jackies Butte Summer Allotment is excluded from livestock grazing. This decision is carried forth from the "Southern Malheur Management Framework Plan" (1983) and the "Southern Malheur Rangeland Program Summary" (1984) because the pasture is unfenced and interspersed with various land ownership. Livestock exclusion is defined as—no scheduled livestock grazing. However, uses of the public land including livestock grazing may be authorized as a result of adaptive management. Also see comment response 518.

639 1 1 **Comment:** Jackie's Butte permittees want to see range development provisions in the plan for their allotment.

Reasons:

plan needs to allow fence building to meet objectives.

Response: Rangeland projects and improvements (such as water development and/or fencing) on the Jackies Butte Summer Allotment may be proposed and completed as a portion of adaptive management and GMA evaluation to help reduce resource management conflicts and to achieve multiple-use management objectives.

640 1 1 **Comment:** Flooding of the Owyhee River at Deary Pasture is responsible for streambank damage and prohibits healthy development of riparian areas. Livestock grazing is not responsible for this. Their removal would not improve these areas.

Response: Although floods play a natural process of altering floodplains and riparian areas, the riparian areas along the Deary Pasture have also been influenced by livestock grazing. Results from the assessment of PFC for the Owyhee River in the summer of 1998 indicate that much of the existing woody riparian vegetation (such as willows) in the pasture were 2 to 3 years of growth behind many other riparian sites above and below the Deary Pasture. This observation is based on new woody riparian establishment in areas scoured by the large flood occurring in early 1993. New growth of woody riparian species in areas above and below the Deary Pasture were approximated 5 years of age whereas in contrast, the normal woody growth in the Deary Pasture was approximately 3 years of age. Authorized livestock use occurred in the Deary Pasture during 1994 and 1995. Also see comment response 518.

641 1 1 **Comment:** Map LVST-1J is in error—cattle are on west side of Cow Creek below Cow Lakes; remove Skinner Ranches private lands from shaded area on map.

Response: JRA range staff worked with affected livestock operators to more accurately define allotment boundaries of West Cow Creek Allotment (20902) between the draft and final documents.

642 1 1 **Comment:** Appendix E: Antelope Allotment 21002: season of use should be 4/01 to 12/31.

Response: The revised "Antelope Allotment Management Plan" (21002) was not signed by all permittees authorized to graze livestock in this

community allotment; thus, the authorized season us use remains 4/1 to 9/30.

643 1 1 **Comment:** Arock Allotment has no riparian areas; terrain prevents cattle from grazing the river.

Response: The allotment boundary for the Arock Allotment in the draft was along the Owyhee River. That boundary has been adjusted to canyon rims and existing fences which preclude livestock from accessing to the river. These adjusted boundaries and any existing boundaries located above the river are corrected and portrayed on Map LVST-1J for the Proposed RMP. The areas between the adjusted allotment boundaries and the river would not be allocated for livestock grazing use.

644 1 1 **Comment:** Overlapping plans on Steens Mountain are confusing and vague.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

645 2 2 **Comment:** Leslie Gulch should be allowed to recover from grazing.

Response: Livestock grazing was removed from most of Leslie Gulch ACEC as a result of the 1995 "Final Leslie Gulch ACEC Management Plan—Summary of Management Actions," thus grazing would not occur in most of Leslie Gulch ACEC as a result of implementation of this plan.

646 1 1 **Comment:** Appendix E, page 278, states plans to manage for native fish habitat in the Krumbo Allotment. There are no fish in this allotment.

Response: Refer to Comments Regarding Andrews Resource Area on page 1.

647 1 1 **Comment:** Various alternatives along the Oregon Trail are Visual Resource Management (VRM) Class II or II/III; these should not be designated because of existing improvements.

Response: Existing and future limitation considerations of cultural modifications associated with the National Historic Oregon Trail corridor were factors considered when determining the VRM classes associated with this nationally-significant cultural resource. VRM Classes II and III support both opportunities to mitigate the extent of some existing undesirable visual impacts and to allow for possible future proposed management actions so long as those actions satisfy the SEORMP's management objectives which affect the trail and its landscape setting.

Opinion or Preference

1	1	Bureau of Reclamation wants permission to develop a parking lot up Cherry Creek.
1	1	Reduce grazing on Malheur Refuge.
1	1	Reduce grazing on Fields.
3	3	Endorse overlook interpretive center at P Hill.
2	2	Trout Creeks are of special interest and are being damaged by livestock.
2	2	Hart Mountain is of special interest.

1	1	Pleased about grazing programs in Trout Creek Mountains, Oregon Canyon Mountains, Pueblo Mountains, and "Roaring Springs Ranch Conservation Agreement."
1	1	Pueblo Mountains are of special interest.
1	1	Concerned about past and present damage to desert lands.
1	1	Support adaptive management consistent with S&G's for Donner und Blitzen and Riddle Brothers Ranch.

LETTER NUMBERS (Numbers in bold are much more detailed information): 001, 002, 003, 006, 009, 020, 021, 033, 034, 044, 063, 064, 065, 066, 067, 071, 075, 079, 080, 081,082, 083, 084, 085, 086, 089, 092, 097, 102, 106, 107, 109, 112, 113, 114, 116, 119, 121, 124, 165, 166, 167, 205, 217, 232, 256, 257, 260, 261, 264

Other Comments

No.	I	S	
648	2	2	**Comment:** Not enough time to review and comment. **Response:** The Draft SEORMP was available to the public for 120 days. This amount of time exceeds that required by the CEQ regulations.
649	2	2	**Comment:** Not enough meetings in westside urban centers. **Response:** Meetings were held at various locations on the east side of the State and in Portland. A meeting held in Bend, Oregon, only drew one participant.
650	2	2	**Comment:** The plan pays inadequate attention to weeds. **Response:** The plan includes an objective to " Control the introduction and proliferation of noxious weed species and reduce the extent and density of established weed species to within acceptable limits." Noxious weed control remains a priority for the BLM in coordination with private, county, and State and other Federal agencies.
651	1	6	**Comment:** The plan fails to reveal the extent of degradation of soils in the planning area. **Response:** Soils information is limited as to what types of soils there are and what their "normal function" might have been. Further soil impact assessments would be conducted during the evaluation of GMA's by addressing soil health in terms of compaction (physical crusting), erosion, and loss of production as well as identifying some of the causes of current soil conditions. Specific soil conditions would be identified through evaluations of GMA's conducted on a priority basis. An Order III soil survey is proposed for Vale District, Malheur County, scheduled for 2002.
652	1	6	**Comment:** The plan must show how far current soil conditions deviate from potential natural condition. **Response:** See comment response 654.
653	1	6	**Comment:** The plan must provide monitoring data to support the contention that soils are improving. **Response:** See comment response 654.
654	1	6	**Comment:** The plan basically ignores microbiotic crusts; should address importance, status, and causes for degradation.

Response: The section containing microbiotic crusts in Chapter 2 has been rewritten to incorporate comments received on this subject. Microbiotic crusts location and distribution would be identified to the extent possible during the proposed Order III soil survey and ESI for Vale District, Malheur County, scheduled for 2002. Information on microbiotic crusts acquired from proposed soil surveys for Malheur County and from pertinent existing studies would be used during the evaluation of GMA's.

655 1 6 **Comment:** The costs and benefits of the different alternatives have not been analyzed.

Response: Cost-benefit analysis is not required as part of NEPA analysis. 40 CFR 1502.23 specifically discusses cost-benefit analysis and states, " . . . the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations." This plan strives to display and discuss various outcomes associated with the alternatives. Both quantitative and qualitative measures are used. A comprehensive totaling of costs and benefits was determined to be inappropriate because many of the outcomes can be both a cost or benefit depending on the perspective of the reader.

656 1 6 **Comment:** The number of jobs created by different uses of the land must be presented.

Response: This plan strives to discuss job impacts where data are available, generally for commodity uses. It is difficult to predict how jobs would be generated by noncommodity uses. These impacts are discussed using more qualitative measures. Thus a comparison of employment impacts from commodity versus noncommodity uses cannot be made.

657 1 1 **Comment:** We suggest a clear definition of "ecosystem-based management" be included in the document.

Response: A definition has been added to the Glossary.

658 1 1 **Comment:** The document should clarify how BLM will incorporate local citizens and government into ecosystem-based management.

R**esponse:** Comments were considered and some changes were made in the Proposed RMP. Annual planning updates, which typically request input, will keep the public informed of the implementation process.

659 1 1 **Comment:** The plan should give further attention to increased roads and costs.

Response: The plan does not propose additional road development. Refer to the Road Design and Maintenance section of Appendix O (Best Management Practices). Access management would be further addressed in transportation management plans developed for each resource area.

660 1 1 **Comment:** Page 377, paragraph 4: All livestock watering troughs should have wildlife safety ramps.

Response: Safety ramps for wildlife would be added to new developments and projects that require reconstruction. This was added to PSEORMP/FEIS Appendix S (Standard Implementation Features and Procedures for Rangeland Improvements).

661	1	1	**Comment:** BLM has failed to adequately address military overflights in the plan on natural and human environment. **Response:** See comment response 49.
662	1	1	**Comment:** Appendix O, BMP's: Surface disturbance activities 1–3 should be eliminated. **Response:** BMP's 1–3 in Surface-Disturbing Activities section deals with landscape alterations from soil disturbing activities and are considered appropriate for protection of all resources within the watershed, including visual.
663	1	1	**Comment:** Appendix O, BMP's: Forest Management 1 should be eliminated. **Response:** BMP's 1 and 2 in Forest Management sections deal with landscape alterations from soil disturbing activities and are considered appropriate for protection of all resources, including visual, within the watershed.
664	1	1	**Comment:** Fire suppression: BMP number 2 should be modified to permit use of nonnatives. **Response:** Nonnative species can be used to rehabilitate firelines in low precipitation areas and in areas where substantial competition from annual vegetation is expected. The use of native plant species is preferred for all rehabilitation efforts where their use is expected to result in a successful seeding.
665	2	2	**Comment:** Not enough representation of tourists who live outside the planning area. **Response:** See comment response 41.
666	1	1	**Comment:** BLM should promote public education and outreach regarding the plan. **Response:** See comment response 41.
667	1	1	**Comment:** Local planning discussion should be expanded to include zoning, policies, and goal requirement. **Response:** The State Land Conservation and Development Commission (LCDC) (see Appendix B) and county comprehensive land use plans were reviewed and no inconsistencies were found. BLM met several times with the Malheur and Harney County courts and requested input from the county during this process. Also, copies of the Draft SEORMP/EIS were sent to other Federal, State, and county agencies and Indian Tribes for input and to identify inconsistencies. The reference to "zoned exclusive farm use" statement in the Draft SEORMP/EIS was not indicating that was the only thing reviewed. See Appendix B, Table B-1, 3, for proper context.

Opinion or Preference

1	2	The goal of the plan is to eliminate access to nongovernment persons.
1	1	Grazing should not occur in areas that are still relatively weed free.
1	1	Federal government has no constitutional right to own or manage land.

Reprinted Letters

The following letters were received during the 120-day Draft SEORMP/EIS comment period. A letter number preceded by the letter "L" appears at the upper left corner on the first page of each letter. Some letters were found to be duplicates after they were numbered; hence there are no letters numbered L-164, L-254, L-255, L-257, L-259, L-265, and L-269. Some letters appear to be unnumbered on the first page, but those letters were written by the same respondent and mailed in the same envelope (and were considered the same letter). A few blank spaces are found in this record due to scanning duplication; these are noted for the reader.

L-001

Ontario, Ore.
12-2-98

B.L.M.
Dear Sir's,
I am writing in Regard to the easment you, Want accross My Property. In my words I think that we have a very workable Situation the way that it is. Now where you have access as needed & Visaversa. I can't see if we have a workable deal at this time why try to Fix it.

Yours Truly
Bernard T. Ingle

L-002

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

ART LEWELLAN
(Name)
(Street address)
(City) (State) (Zip)

Comments:
I THINK ITS "REASONABLE" TO FENCE OFF CERTAIN HABITATS FOR THIER PROTECTION FROM CATTLE RAISING.

STREAMS SHOULD BE PROTECTED FROM SILTATION & SHOULD BE NOT LOGGED.

MAIL TO:
Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144
or
Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

L-003

RECEIVED
JAN 13 1999
VALE DISTRICT BLM

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

Chris + Ann Bennight
(Name)
(S
(City (State) (Zip)

Comments: Thank you for your public meeting + your effort to get public input - it is appreciated.

Would it be possible to use prison crews to do thistle control in the Nyssa Allotment? The thistles have increased since we moved here in 1991. They are miserable to have around no matter what you want to do out in the desert, whether its ride, hunt, hike, etc.

Our neighbors are generally concerned about the drug activity at Snively Hot Springs. Its a dangerous crowd that hangs around there. Would you please consider making it a day use only facility?

Thank you for your consideration
Chris + Ann Bennight

MAIL TO:
Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144
or
Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

L-004

United States Department of the Interior
U.S. GEOLOGICAL SURVEY
Reston, Virginia 22092

RECEIVED
JAN 25 1999
VALE DISTRICT BLM

In Reply Refer To:
Mail Stop 423

JAN 19 1999

MEMORANDUM

To: Gary Cooper, Bureau of Land Management

From: James F. Devine
Senior Advisor for Science Applications

Subject: Review of Draft Southeastern Oregon Resource Management Plan/Environmental Impact Statement

The U.S. Geological Survey (USGS) has reviewed the subject Draft Southeastern Oregon Resource Management Plan/Environmental Impact Statement (DEIS) and offers the following comments and observations:

GENERAL COMMENTS:

The table of contents and body of the report are not properly marked with section numbers.

Page 1-1: Purpose and Need

The DEIS does not adequately address ground-water and surface-water conditions. A comprehensive framework for managing the public lands should include information and investigations on water resources. Flood-hazard mapping, streamgaging records, and other data related to surface hydrology are necessary to manage lands appropriately. An additional "Planning Issue" should be water resources.

This DEIS may meet some objectives of a management plan, but does not meet the objectives of a DEIS. There are no data, baseline or other, to evaluate the potential environmental impacts of this management plan. There are no reference articles, reports, or other scientific material to support the description of the area, analysis of impacts, or conclusions. Adaptive management of the area is the crucial goal of the DEIS, but without sufficient baseline data and monitoring design, or a detailed plan of the data sets to be collected and monitoring of the area, it will be impossible to analyze the impacts and adapt the management plan to achieve the stated objectives.

2

In addition, the DEIS contains conflicting statements, management practices, and analysis of impacts. The first management objective of off-highway vehicle (OHV) use is to protect resource values; however, there is no management practice stated in the DEIS which protects soils, vegetation, air quality, and other resource values from OHV use. In fact, in the preferred alternative, impact from OHV use will increase. It is stated that soil degradation is a long-term problem in semi-arid regions, and yet there is no section analyzing the environmental consequences of the management practices to soils. The objective for management of air resources is stated to be "Prevention of Significant Deterioration," and yet it is stated in the Environmental Consequences section that there will be an increase of dust emissions for the resource area. Therefore, it is unclear what the resource management plan for these lands actually is.

A section needs to be added describing the potential geologic hazards in the area. The seismic hazards include the probability of a magnitude 6 earthquake in the next 50 - 250 years. This hazard can be mitigated by using the appropriate building codes for this magnitude hazard in any future construction. The geochemical hazard of naturally occurring elevated concentrations of arsenic, mercury, selenium, and uranium/radon, which extends throughout the area, needs to be addressed also.

SPECIFIC COMMENTS:

Page xiii; Objectives, Off-Highway Vehicles

The resource values that will be protected need to be listed here.

Page 2-3; Geology

The USGS updated (1996) quantitative mineral resource assessment of the Malheur, Jordan, and Andrews Resource Areas should be on file at district offices also. The entire report will be available in 1999, not 1988.

Page 2-3; Groundwater

It is stated in the DEIS that studies on ground-water conditions are not available. These studies are necessary to protect the resources and to determine any trends in water-quality in the areas in Southeast Oregon. A detailed analysis of the extent of aquifers should be completed to protect them from contamination.

Are there any "hazardous materials" or incidents of "ground-water/surface-water contamination" identified on these public lands? Maps showing these areas, as well as the location of important wells, are important in land management activities and are lacking in the DEIS.

The interaction of water resources is not properly linked to issues such as, riparian areas/wetlands; forest and woodlands management; energy and minerals; special management areas; fire management; recreation management; and fish and wildlife. It is important to link water resources with the other issues in program planning activities.

3

Page 2-8; Gold, Uranium, and Mercury

The USGS reference should be (USGS 1994, 1996), which includes the reference assessment report mentioned above.

The 1996 re-estimate (a medium estimate) of the uranium reserves is 340,000 metric tons of ore at 0.12% uranium oxide.

Page 3-10, Table 3-1; Air Resources

An objective and management directive for PM_{10} emissions resulting from OHV, cross-country vehicle, extraction, and other soil disturbance uses in the resource area should be included here.

Page 3-35, Table 3-1; Off-Highway Vehicles

Page 2-10 contains assertions stating that current management practices which include "...restricting vehicles to roads and trails..." have mitigated erosion, and on page 2-67 it says that "Some of this [cross-country vehicle] use is...damaging to...resource values." More information is needed to show how "open areas" meet the off-highway vehicle management objective.

Page 3-109; Off-Highway Vehicles

Monitoring:

Baseline data should include PM_{10} monitoring sites, especially in areas of commercial, competitive, and other organized OHV activities. Soil maps, which do not exist for approximately 70% of the resource area (page 2-10), need to be completed as part of the baseline data. Soil, geologic, and vegetation maps to establish baseline data can also help in the decision process on which areas are most (and least) vulnerable to surface disturbance by cross-country vehicle use. Present baseline surface disturbance maps, photographic baseline data, compaction surveys, erosion vulnerability maps, and vegetation surveys (including areas of microbiotic crusts) also need to be included.

On page 2-10, it is stated that "Prevention of soil degradation is far more cost-effective and time-effective than remediation..." Here, it is stated that "...sites [will be] rehabilitated as necessary." A cost model and rehabilitation plan for cross-country land use would be helpful in this monitoring section.

Management Common to All Alternatives:

In order to meet the OHV objectives, public land could be designated closed to OHV use unless signed open.

4

Page 4-3, Analysis of Impacts; Air Resources

Data are needed to support the conclusion that increased dust emissions do not result in deterioration of overall air-quality standards.

Page 4-4, Summary of Impacts; Air Resources

Data are needed to support the conclusion that no long-term cumulative impacts to air quality will occur under all of the alternatives.

Page 4-121, Analysis of Impacts; Off-Highway Vehicles

We assume you mean that less restricted use will not impact resources. If you do, what evidence supports this assertion. Logic leads one to expect greater negative effects from less restricted use. If this assumption of your meaning is accurate, data is needed to support your conclusion.

Thank you for the opportunity to review this DEIS for scientific and technological validity. We hope the information we provided will improve the document and associated decisions.

Copy to: Director, Office of Environmental Policy and Compliance

L-005

SIERRA CLUB
Oregon Chapter

RECEIVED
DEC 09 1998
BURNS DISTRICT
BLM

December 4,1998

Gary Cooper
NRS/P&E
Bureau of Land Management
100 Oregon Street
Vale, OR 97918

Re: SEORMP

Dear Mr. Cooper:

I am writing to express the concerns of the Oregon Chapter of the Sierra Club's High Desert Committee about the outreach efforts in Western Oregon by the Bureau of Land Management with respect to the Southeast Oregon Resource Management Plan.

The various informational meeting in eastern Oregon were scheduled from 4:00 to 9:00 pm, but the only meeting scheduled in western Oregon will be held from 7:00- 11:00pm or 7:00 - 9:00pm, according to some various (conflicting) sources.

The SEORMP will affect a land mass equivalent to approximately one sixth of the state of Oregon. While it is obvious that the people who live in that area must have an avenue to learn about the BLM's plans, Oregonians outside the planning area should have the same opportunity. We note that the only meeting scheduled in the central, southern and western portions of the state is the Portland December 7th meeting. It is not reasonable to expect people from Bend or Eugene to travel several hours in order to attend one of the scheduled meetings.

In addition, we are concerned about the appropriateness of the scheduled times of the Portland meeting. It is not right that the Portland meeting is shorter than the others, and the scheduled time is not appropriate. The many Portlanders working downtown will be hesitant to return downtown after having fought the holiday rush time traffic on their way home from work. It would be infinitely easier to drop in right after work. We also believe that it is unreasonable to expect anyone to attend such a meeting past 9pm. 7pm is too late a start time for those traveling from outside the area, such as interested parties from Eugene or Bend.

Sincerely,

Irene Vlach
High Desert Committee

cc: Glen Patterson
Elaine Zielinski

To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness...

Printed on 100% recycled paper.

L-006

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Gary Cooper
Bureau of Land Management
Vale District Office
100 Oregon Street
Vale Or. 97918

February 16, 1999

Dear Gary,

After reviewing the Draft Southeast Resource Management Plan it states that there is a riparian areas within the Arock Allotment which must be the Owyhee River. Map LVST: Jordan area livestock grazing allotment shows that the southwest edge of the allotment in following the Owyhee River. This is in wrong, the Allotment line should be along the rim above the river. This area is very steep and rocky and form a barrier and no cattle from the allotment can penetrate and get down to the river There for there is no riparian in the Arock Allotment.. Please make this change in your final draft.

Your truly,

Ed Davis

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

Ed Davis
(Name)
(Street address)
(City) (State) (Zip)

Comments: Remove the Alvord Hot Springs From the Steens Mountain Recreation Lands. & the boundary of the Steens Mountain Recreation Lands would then Follow the county road. This action would help eliminate confusion by the Public of recreation use between Public and Private land.

MAIL TO:

Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144

or

Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

L-007

BURNS DISTRICT
BLM

December 8, 1998

Mr. Glenn Patterson
Bureau of Land Management
HC74-12533 Hwy 20w
Burns, OR 97738

Re: Southeastern Oregon Plan, Portland meeting 12/7/98

Dear Glenn,

The information provided at the Portland meeting was interesting and assisted me in understanding your purpose and direction for this management plan.

I am writing this letter to give you my thoughts on the Plan, your staff indicated that only written comments were entertained for consideration.

First, please understand that my bias is not with any formal group, alliance etc.. If anything would apply, I could be lumped in with the non-vocal majority of Oregonians who enjoy driving through Southeast Oregon as a change of scenery and "way of life." We do not go to creek bottoms and measure plant heights or roll over rocks looking for rare creatures and have no idea what AUMs are. We don't particularly care if deer, elk or cows crap in the streams. If we are passionate about something it would be devotion to family, business, recreation, and the unique freedoms we enjoy, not the management plan for Southeast Oregon. My group you very rarely hear from except maybe to ask road directions.

It was interesting to listen in on the various conversations occurring at the tables during your Portland meeting. It immediately became evident that the majority of people were representing or associated with a special interest conservation group of one kind or another. Because of this, it seems all the more imperative that your organization weigh the comments received against a broader but less organized and vocal majority of Oregonians that feel status-quo in Southeast Oregon is OK. Please represent the non-vocal majority of us who enjoy seeing Southeast Oregon as a place where access to roads is not denied and production of a crop from public land is viewed as good stewardship.

Best Regards,

Scott Gustafson

L-008

RECEIVED
DEC 14 1998
BURNS DISTRICT
BLM

December 11, 1998

BLM, Burns District Office
Attn. Glenn Patterson
HC 74-12533, Hwy 20 West
Hines, OR 97738

Dear Mr. Patterson:

I started my visits to the Owyhee River area in 1967, after returning from the Vietnam conflict. My friends and I would explore, go fishing, hunting, four wheeling, dirt bike riding, and just camp out. It was and is now our favorite recreational place to be.

Now, 31 years later, we will do a little fishing and hunting, but most of all we explore the beauty of this river, country, and wildlife. I personally have always seen the deer, antelope, coyote, and wild horses. But, now maybe because of my maturing and watching the landscape more closely, I have also seen beaver, otter, raccoons, cougar and all species of birds. It's always an adventure to visit such places as Sand Springs, Chock Basin and China Town. Yes, with all of the sightings and adventures on this river, I can say with pride, "I love this country. I would never say or do anything that would cause the destruction of this special place in Oregon."

I have not been witness to any damage of the riverbanks or to the river itself from cattle or other livestock. Mother Nature has a way of renewing the land from the use of animals of all kinds. I sure hope the people now coming into the area for recreational use will leave this land and this river as unchanged as it has remained over the last 31 years. They will have a long way to go to maintain the same level of ecology provided by the ranchers. The ranchers are the true people to be entrusted with the land and the river. It means more to them and their families, past and present. We just visit, they live here generation after generation. They will protect the land and the river for us so it will be there for the next generation and YES for us to visit.

The river has today the same beauty it has had for 31 years of my relationship with it. Please do not interfere by making unnecessary changes.

Thank you for this opportunity to voice my opinion. If I may be of further assistance, please call me.

Sincerely,

Pat Hutton

Pat Hutton

L-009

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

Larry Olley
(
-
(
(City) (State) (Zip)

Comments:

In volume 2 of 2 page 278 it states plans to manage for native fish habitat & game fish habitat. There are no fish in allotment "Krumbo Mt." #06032

RECEIVED
DEC 18 1998
BURNS DISTRICT BLM

MAIL TO:

Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144

or

Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

L-010

From: Scott A Moore
To: ilmoraso.smtp("irenev@teleport.com")
Date: 1/11/99 10:45am
Subject: SEORMP - Reply

Hi Irene, 1/11/99

Good question and sorry these terms were not better clarified in the document. The two terms are similar. A "limited to existing" route means that vehicles may only use those routes found on BLM public land that are there now. A "limited to designated" route means that vehicles may only use those routes that are recognized and that have been recorded/identified on a map as open for vehicle use. For instance, in WSAs an inventory of all the existing vehicle routes determined open or in use occurred between 1978 and 1980 during the wilderness inventory and were recognized as available for continued vehicle use. Routes in WSAs are classified as "limited to designated" as they are the only acceptable routes recognized and identified on maps.

In summary, both Limited to Existing" and "Limited to Designated" means that vehicle us can only occur on routes that are out there now except that in "Limited to Designated" those routes are identified/recorded on maps or inventory files. Most areas classified as "Limited to Designated" are within Special Management Areas such as WSAs and ACEC or other places of resource concern such as to cultural or wildlife sensitive areas.

I hope this makes things more clear, but if not please give me a call at (541) 573-4447.

>>> Irene Vlach <irenev@teleport.com> 01/07 3:32 pm >>>
Scott,

Can you explain to me (or forward my message to someone who knows) what the difference in SEORMP is between
- Off Highway Vehicle Use Limited to Existing Roads, and
- Off Highway Vehicle Use Limited to Designated Routes

Take your time - I'm off to Switzerland tomorrow early am. Would be great if you would have an answer by 1/17.

Thanks,

Irene

L-011

#11 dup

Dear Sir 2-1-99. I support alternative D of your R,M,P/EIS Draft with the following changes.

No mining until our ancient Federal mining law is updated.

Drastically reduce cow grazing

Use much more prescribed fire, esp to control noxious weeds. The Honeycombs and Owyhee canyon should be a National Park & much more wilderness added. Thanks

David Riz

POSTCARD
Message May Be Written On This Side
Address Only On This Side
USA 20

James Keena
Burns District Office
HC 74-12533 Hwy 20 W.
Hines, OR 97738

RECEIVED
FEB 04 1999
BURNS DISTRICT BLM

L-012

Dear District Manager Singleton:

Please strengthen Alternative D for the SEORMP and use it as the preferred alternative. 2/3/9

The next two decades are dependent on the choices made today. We need to guard against further degradation of our public lands & must exclude livestock grazing from riparian & sensitive areas and from those in already poor condition.

Respectfully yours,

John Saemann

L-013

To: BLM
Sent by the Award Winning Cheyenne Bitware

From: Joanne Vinton 541-684-0059

FAX

To: Ed Singleton and Jim Kenna
Fax Numbers: 541-473-6213 and 541-573-4411
Business: Vale and Burns Districts, BLM
Re: Southeast Oregon Resource Management Plan/EIS

From: Joanne Vinton
Date: February 9, 1999
Total No. Of Pages: 1

Dear Mr. Singleton and Mr. Kenna,

Here are my comments on SEORMP:

Adaptive resource management is a nice idea, but it must be bound by minimum standards that reflect public values. According to surveys, the public wants tough environmental standards with clean water and access to more wilderness areas.

Livestock grazing must be excluded from riparian areas, critical habitat and sensitive areas, wilderness study areas, and grazing allotments that are listed in poor or fair condition.

All streams that fit the criteria for Wild and Scenic Rivers must be given that classification.

Sincerely,

L-014

RECEIVED
FEB 10 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

I am writing to respond to the draft of the SE Oregon Resource Management Plan/Environmental Impact Statement.

I recommend that the BLM choose an improved Alternative D. This alternative should be strengthened to require that livestock grazing be excluded from riparian areas, critical habitat, Wilderness Study Areas and grazing allotments listed in poor or fair condition. Also Wild & Scenic River designation should be give to all streams that fit the criteria.

Sincerely,

Peggy Robinson

Peggy Robinson

cc: Jim Kenna, Burns District Manager

L-015

Desert Trail Association

hike the Desert Trail

RECEIVED
FEB 11 1999
VALE DISTRICT BLM

Feb. 8, 1999

U.S.D.I. B.L.M. Vale Dist. Office
100 Oregon St.
Vale Oregon 97918

Ladies/Gentlemen,

I write this date with reference to the inclusion of the proposed Desert Trail through BLM administered public lands in the Malhuer and Three Rivers Resource area as it pertains to the Southeastern Resource Management Plan.

I have reviewed this inclusion of the proposed trail and discussed this issue and plan including the optional trail segment with members of my Board of Directors and we heartily endorse the plan as proposed.

In our organizations long standing effort to establish a Trail (corridor) for the public though the desert lands of the west reaching from Canada to Mexico, the lands covered in this proposal provide a critical and unique link to a continuous route.

We urge adoption of the SEORMP as proposed.

Personal regards,

Dave Green Pres.
The Desert Trail Assoc.

L-016

INSTRUMENT #99-999
PAGE 1 OF 3 PAGES

FILED
FEB 10 1999
DEPUTY

IN THE COUNTY COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MALHEUR

In the matter of:
RESOLUTION CONCERNING RNA and ACEC DESIGNATIONS

RESOLUTION R99-06

WHEREAS, on April 16, 1996, the Malheur County Court signed a position statement (the Position Statement) concerning proposed RNA and ACEC designations. The Position Statement is attached hereto as Exhibit "A"; and

WHEREAS, the BLM proposes approximately 170,000 acres of ACECs without the benefit of a study or any evidence that livestock grazing has any effect on the special features and values in an ACEC; and

WHEREAS, the concerns of the County Court, Oregon Cattlemen's Association and citizens of Malheur County relative to ACECs and RNAs have not been adequately addressed by the BLM.

NOW THEREFORE BE IT HEREBY RESOLVED that the present Malheur County Court reaffirms and adopts the position statement of the previous County Court as set forth in Exhibit "A" attached hereto and incorporated herein by reference.

BE IF FURTHER RESOLVED that the Malheur County Court opposes additional ACECs and RNAs.

We hereby affix our signatures this 9th day of February 1999.

Russell F. Hursh
County Judge

Dan P. Joyce
Dan P. Joyce
County Commissioner

Louis M. Wettstein
County Commissioner

Approved as to Form:

Stephanie J. Williams
County Counsel

Recording Secretary:

Kathy Harrod

STATE OF OREGON, County of Malheur
I hereby certify that I have compared the within instrument with the original instrument now on file in my office, and that it is a true and correct copy of the same and of the whole thereof. Dated February 10, 1999
DEBORAH R. DeLONG, County Clerk
By Deputy

County of Malheur
251 'B' STREET WEST • VALE, OREGON 97918
(541) 473-5124

April 16, 1996

POSITION STATEMENT
OF THE MALHEUR COUNTY COURT
CONCERNING
PROPOSED RNA/ACEC DESIGNATIONS

We were gratified by the acknowledgement of The Nature Conservancy of Oregon of at least 21 natural vegetative communities which would qualify as study sites in Malheur County. This is excellent documentation of past management practices by the Bureau of Land Management and associated resource users, most notably livestock operators.

With the management flexibility afforded by the Vale Rangeland Restoration Project, native vegetation has made significant recovery during the ensuing years.

We recognize the merit of identifying various plant communities, or "cells" as sites for plant scientists to study and monitor change over time. However, we feel that neither classification as a Research Natural Area nor an Area of Environmental Concern is appropriate or necessary.

Many sites have been fenced to exclude livestock from Malheur County rangelands in the past. For example, the CCC exclosure southwest of Jordan Valley of some 80 acres, was fenced in 1939, as ware Sagehen exclosure and others in cooperation with the Oregon Game Commission. During the Vale Project and Trout Creek restoration programs, over 6,400 acres were excluded from grazing on several hundred sites representing riparian, wetlands, native uplands and seedings. The Court feels this existing but relatively unused resource adequate for future research and analysis.

Research Natural Areas (RNAs), with few exceptions, are established to preserve and monitor ecosystems unaffected by human activities. Thus, livestock grazing and recreational use are normally excluded. This Court does not support such a deviation from multiple use on public lands within Malheur County.

Areas of Critical Environmental Concern (ACECs), by Bureau of Land Management manual 1613 standards, (.02 Objectives) "ACEC designations highlight areas where special management attention is needed to protect, and prevent irreparable damage to, important historic, cultural, and scenic

values, fish, or wildlife resources or other natural systems or processes..." Similarly, under .06, Policy, states: "An ACEC designation is the principal BLM designation for public lands where special management is required to protect..." Special Management Attention is addressed specifically in .12. "To be designated as an ACEC, An area must require special management attention to protect the important and relevant values." (Underscoring ours).

We contend that present management is compatible with the continued well-being of the identified vegetative communities. Present vegetation is, in part, a result of past management practices. Existing vegetation may well be dependent upon grazing, as was the case in Harney County with Malheur wire-lettuce. Should problems be identified in the future, existing management authority (see 1613.22) adequately provides flexibility for correction (see 1613.33 E (1 and 2).

Summary Alternative:
Perhaps a more acceptable approach would be that of documentation of identified sites on a GIS overlay for future reference by the scientific community and land managers.

Research of existing exclusion sites, some protected for 56 years, should be initiated.

MALHEUR COUNTY COURT

Russell F. Hursh
Malheur County Judge

John J. Bishop
Malheur County Commissioner

R. Thomas Butler
Malheur County Commissioner

L-017

Bureau of Land Management
Edwin J. Singleton
Vale District Manager
100 Oregon St.
Vale, Oregon 97918
February 10, 1999

RECEIVED
FEB 16 1999
VALE DISTRICT BLM

Dear Ed:

Following are my comments on the proposed SE Oregon RMP:

SOUTHEAST OREGON RANGELAND MANAGEMENT PLAN 1999
MACKENZIE RANCH-JORDAN VALLEY, OR

The overview for the Resource Management Plan covers issues developed with the public's input. Grazing is not mentioned though it has been the predominant land use for the past 100 years. This suggests bias on the part of the BLM.

In regards to the Endangered Species: U.S. District Court Judge David Alan Ezra ruled that the Fish & Game and the B.L.M. attempted to prohibit the grazing of cattle near streams and potential endangered species habitat. He placed the responsibility for proving endangered species habitat on the government and said, "It is neither practical nor just to impose on the rancher the burden of proving the absence of listing of species in his allotment" and "I don't believe that Congress intended to have good people who are trying to make a decent living for themselves and their families in a hard business, put out of business based on mere speculation." Vale district rules need to be make for the good of our communities and counties, and for the good of our land. My family has been on the land for over 100 years and have survived through fires, floods, droughts, and stayed in touch with the land and its needs, and when was necessary removed the cattle, and improved on water systems, grazing rotations, etc.

In regrards to Recreation: Recreation and livestock grazing are compatible. Visitors enjoy seeing cattle and livestock on the range and many have stated to us that they add to the scenic value.

The report also peaked our attention when it stated that Alternative C proposes 68,000 new acres of ACEC's. Based on our experience in Leslie Gulch grazing will eventually be eliminated on these ACEC's resulting in substantial reduction of AUM's.

Each time BLM proposes a new ACEC or other similar designation they mention that if grazing is eliminated now or in the future that it is insignificant and will not affect overall grazing capacity. They claim it will be made up elsewhere. These incremental reductions are adding up to very significant cuts instead of restoring the grazing capacity as previously promised. They said this almost 40 years ago and are saying it today, yet the reductions made in the beginning of the Vale Project have still not been restored.

Existing and proposed ACEC's have been grazed for 100 years or more and have apparently maintained their relevant and important values (otherwise there would be no reason to designate them). Why then do they need to be designated at all (draws more attention to them) and why does historic land use (grazing) need to be eliminated to protect them.

The Resource Management Plan states on 3-157-158 that; "Livestock use would continue based on existing permit stipulations and approved AMPS. Any changes in grazing, including time and intensity of use, would be evaluated for impacts on the relevant and important values and would be permitted if the values would be maintained or enhanced. Where adverse impacts are identified, existing livestock use would be adjusted using a variety of methods, including but not limited to, fencing, reduction in livestock numbers, and changes in grazing season." The Resource Management Plan often references that studies will be conducted to determine whether livestock grazing is having an effect on the special features found in an ACEC. If so, fencing or livestock management changes will be implemented.

Contrary to these statements, witness Leslie Gulch where the BLM completely removed cattle from the area without any justification. In a meeting in Homedale concerning the final decision on Leslie Gulch the BLM District Manager, Jim May, essentially stated; We have done no studies in Leslie Gulch, we don't plan on doing any, we are just getting the cattle out." The arrogance in this statement plus the language in the final decision sets a precedence in terms of livestock grazing and its future on federal lands. There is no specific studies that grazing has any effect on the natural resources of Leslie Gulch. There was no evidence for the BLM to change a 100 year historical use of an area.

Chapter 4-128 states that "Grazing has not been identified as a major impact currently on any of the relevant and important values of potential ACEC's and would continue as presently authorized unless studies showed detrimental effects to those values." BLM has a history of making these statements to get ACEC's established then little by little eliminating grazing to protect the values (witness Leslie Gulch). Since no studies are ever accomplished, we suspect the same trend will continue.

The BLM claims they are; "choosing to error on the conservative side in Leslie Gulch and propose to eliminate all impacts that grazing by domestic ungulates may have on the species and their habitat." We question why the BLM is choosing to error instead of finding out the facts which should have been done over the past 40 years and then acting in an appropriate fashion.

The BLM produced no evidence in Leslie Gulch that livestock grazing is any problem. In fact they documented evidence that refutes their claims. They admit road construction is the primary disturbance to special status species habitat and one of the reasons that weeds have invaded. Despite this they closed the whole area down to grazing.

Leslie Gulch would certainly seem to be the blueprint for potential ACEC's. Why is grazing not compatible? Is there a large outpouring of public opinion against grazing in proposed ACEC's or

is the BLM trying to highlight these areas in hopes of trying to encourage protests in areas currently ignored by the public.

When grazing is eliminated on federal lands, wildlife will move onto private lands that are grazed. The tender shoots that come back after harvesting a plant are much more palatable and available than trying to reach inside old ungrazed bluebunch wheatgrass wolf plants. Wildlife are consistently moving into areas that are grazed in order to harvest the new growth. Some grazing of native plants actually enhances their growth, so the BLM may be getting an opposite reaction to what they intended. The public may actually see less game in ACEC's due to no grazing than if moderate grazing were allowed to continue.

An increase of wildfires due to lack of livestock grazing is also a concern. Fuels build up due to a lack of harvesting them. This has already occurred in Leslie Gulch where wildfires have burned a considerable area. Frequent wildfires, either natural or man made, can be far more destructive than grazing. If an area burns quite often the perennials are eventually replaced with annuals such as cheatgrass and medusahead. The problem is that the increase in recreation will cause an increase in wildfire. This combined with the available fuel may ultimately cause a reduction in endangered species and reduce forage for bighorn sheep. It appears that a lack of grazing will enhance wildfires which will have a vastly larger impact on native plants than livestock grazing. A very hot fire may even destroy some of the endangered species' seed source.

By eliminating grazing in ACEC's plus BLM proposing to restrict fire suppression (Ch. 4-27) it is very possible that fires may become more dominant and completely change the habitat. Endangered plant species may be put in more danger by such an action. If grazing reduces fuels then wildfires would be less likely.

The BLM even admits in Ch.4-37 that; "Grazing as proposed for the Birch Creek area, could be used to help enhance wildlife forage and cover. A small amount of authorized horse and/or cattle grazing could also help to maintain the historic landscape and allow for interpretive opportunities." At this time, no additional grazing on the Birch Creek Ranch has been approved.

There's no mention of how the Vale Project was supposed to reduce pressure on native ranges by transferring more AUM's to the extensive seedings developed in the 1960's. If this were accomplished then grazing could be more easily eliminated in current and potential ACEC's. People are constantly being brought in from around the world to see the Vale project yet we are certain it has never even met its primary goals of restoring extensive cuts and transferring AUM's out of native ranges.

Since Congress won't act on WSA's, it would appear that BLM is taking their own action without Congressional Approval by designating areas as ACEC's or other designation, then restricting land uses such as grazing and road access. Where did the term ACEC come from? Is it legal and authorized by Congress or is it just a management decision by BLM to control land use in their view without Congressional approval? This seems to be subverting Congress'intentions. Has the public ever demanded that an area be set aside as an ACEC or similar designation, then be removed from grazing?

In 1934, Congress addressed the final disposal of the Section 10 lands with the passage of the Taylor Grazing Act of 1934. The Taylor Grazing Act provided the creation of grazing districts and statutory authority for management of the grazing districts until individual property rights could be seperated out of the commons. This latter process was an adjudication. My own ranch, Mackenzie Ranch, was also adjudicated in 1934 using the Stock Raising Homestead Act guidelines of 1916. If the B.L.M. takes these adjucated A.U.M.'s (as what happened in Leslie Gulch) and water rights from my ranch, then they should be accountable for buying them at a fair market value on todays market. If grazing land is taken away or range is fenced out, and this occurs without fair payment it would be considered a "takings" under a split-estate provision of the Act of June 25, 1910.

The West was first opened up to gain access to its wide array of natural resouces whic would clearly have been Alternative A. Since then federal regulations have been trending more and more to Alternative E. Maybe we have gone too far towards E which eliminated economic production on federal lands. This might be very undesirable for the economy of the West. My suggestion is that something closer to Alternative A or B might be more realistic rather than putting more and more areas into ACEC's then eliminating economic production. Over the last 40 years, many millions of tax dollars have been spent to improve range production, but many more millions in cattle production have been lost by the failure of the B.L.M. to restore grazing capacity as promised. Instead they have been busy making additional cuts to grazing capacity and putting more and more areas off limits to all kinds of use in addition to grazing. In Malheur County alone 51% to 56% of total income in the 1990's was derived from livestock and agricultural products. Recreation does not contribute to the County tax base and support our school systems.

(Chapters quoted are from the Vale District Resource Management Plan)

Thank you.

Wannie Mackenzie

Mackenzie Ranch
Wannie Mackenzie

L-018

Gary Guttormsen

February 11, 1999

RECEIVED
FEB 16 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, Or 97918

Dear Mr. Singleton:

My family and I would like to take this opportunity to comment on the SEORMP . We stand committed to seeing that Oregon's High Desert Wildlands stay that way. We would like to urge you to adopt Alternative D with the following improvements added:
Livestock grazing needs to be excluded from 1) riparian areas, 2) critical habitat and other sensitive areas, 3) wilderness study areas, and 4) grazing allotments deemed to be in poor or fair condition.

In addition Wild and Scenic Rivers designation should be made for all streams that fit the criteria.

We appreciate the opportunity to be able to comment on this important and critical document. It is our hope that your agency will see to it that our desert wildlands are protected for future generations.

Sincerely,

The Guttormsen family

cc Jim Kenna, Burns District Manager

L-019

Desert Trail Association

hike the Desert Trail

RECEIVED
FEB 16 1999
VALE DISTRICT BLM

February 11, 1999

Bureau of Land Management
Vale District Office
100 Oregon Street
Vale OR, 97918

re: Desert Trail Route

To whom it may concern:

As Past President of the Desert Trail Association, I wish to encourage your work and endorse the Plan that you have proposed for the next section of the Desert Trail from Oregon Hwy. 78 to the Malheur National Forest over BLM administered public lands in the Malheur and Three Rivers Resource Areas.

The Desert Trail Association has worked long and hard with all the various groups to make this a vital link in its goal of creating a public corridor concept trail through the western states desert areas.

We also propose to get this section of Desert Trail recognized as a National Recreational Trail as are the other 160 miles of Desert Trail are in Oregon.

I urge that you adopt this proposal for the Desert Trail route as proposed.

Sincerely,

Ross Edginton

Ross Edginton, Past President
Desert Trail Association

cc: BLM, Burns District

Ross Edginton

L-020

RECEIVED
FEB 18 1999
VALE DISTRICT BLM

Lucky 7 Ranch

Bureau of Land Management
Vale District Office
C/o Gary Cooper
100 Oregon Street
Vale, Oregon 97918

February 10, 1999

Dear Sir,

This letter is to inform you of our objections to the "*Draft* Southeast Oregon Resource Management Plan/Environmental Impact Statement (SEORMP/EIS)".

Lucky 7 Ranch has a livestock grazing allotment located within the Jordan Resource Area. Our grazing allotment is identified as the "Campbell Allotment (#1306)".

The SEORMP/EIS has identified a portion of Antelope Creek as suitable for possible inclusion to the National Wild and Scenic Rivers (NWSR's). If Antelope Creek is actually included in as a NWSR, there may be some negative effects on private land owned by Lucky 7 Ranch. The portion of land that is affected can be seen of a map labeled "MAP WSR-1J: JORDAN RESOURC AREA EXISTING DESIGNATED AND PREFERRED ALTERNATIVE WILD & SCENIC RIVERS", which was included with the *Draft* SEORMP/EIS. The area is labeled "J19" on this map and it runs west from the Owyhee River for approximately 8.6 miles and ends at the private land boundary of Lucky 7 Ranch.

The objective of the SEORMP/EIS is to protect and enhance the Outstandingly Remarkable Values (ORV's) of the river. The area of Antelope Creek extending from Lucky 7 Ranch's private land boundary east to the eastern boundary of the Campbell Allotment will retain it's ORV's even without being included as a NWSR. Livestock and humans cannot enter the river corridor because access to Antelope Creek is completely restricted by the topography of the land. The only access to Antelope Creek in this area is through our private land. There are no existing roads into the canyon or to the edge of the canyon except the road to our private land and cow camp. The uplands surrounding the canyon on the north and the south sides of the river corridor are within a Wilderness Study Area (WSA) and therefore, no new roads may be built to the river corridor.

The problems that we foresee include people trying to access this "new" NWSR area and finding the only access is through our private land. With this come possible vandalism, theft and degradation of our private land. Another problem that may occur is people creating new roads across the WSA to get to the river corridor.

For these reasons, we object to this portion of Antelope Creek being included as a NWSR. We believe that Antelope Creek can retain is ORV's without formally including it as a NWSR. The topography of the area alone will protect and enhance the ORV's of the river corridor.

Our recommendation is to change the west boundary of the proposed NWSR (J19) approximately 6 mile east to the east boundary fence of the Campbell Allotment. This will protect the private land of Lucky 7 Ranch from encroachment, the WSA will protect the river corridor from other encroachments, and the topography of the river corridor will protect and enhance the ORV's of the river.

Sincerely,

Mike Harry
Partner/Owner
Lucky 7 Ranch

L-021

ONRC ACTION
South Central Oregon Field Office
Aggressive Defenders of Oregon's Wild Lands

RECEIVED
FEB 18 1999
VALE DISTRICT BLM

February 15, 1998

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

The following are ONRC-Action's and ONRC Fund's comments on the Bureau of Land Management's 6.3 million acre, Southeast Oregon Resource Management Plan.

It is ONRC's desire that the BLM show the greatest consideration possible to protect and enhance the native species and biological diversity of these places such as the Steens Mountain, Alvord Desert, Owyhee Canyonlands, Blitzen River, and other lands in the far southeastern corner of Oregon. As you know, these lands provide critical habitat for rare kit fox, threatened Lahontan cutthroat trout, and dwindling populations of sage grouse. Within this remote extension of the Great Basin lies some of our nation's wildest roadless areas. They deserve better treatment than they have been receiving!

ONRC is concerned that while many of these lands have been heavily impacted by years of cattle grazing, the BLM's preferred alternative offers little to change the grazing status quo. To recover and enhance these lands ecological past and potential, we ask that you, reject the presently identified preferred Alternative, Alternative C (the agency's preferred alternative, and instead choose a strengthened Alternative D that excludes livestock grazing from:

Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers; Riparian areas; Critical fish and wildlife habitat; Areas of Critical Environmental Concern; Wilderness study areas; and Grazing allotments in "fair" or "poor" condition.

"Adaptive management," upon which this plan is heavily reliant, is no substitute for objective standards and guidelines. Without constant, on-the-ground monitoring, something BLM is incapable of assuring given budget constraints, adaptive management may only lead to further resource degradation. Further, so-called "adaptive management" allows for a degree of latitude that is unacceptable in a major planning document such as the Southeast Oregon Resource Management Plan. While BLM states that Alternative C is designed to "protect natural values while allowing for commodity production," our past experience tells us that this nothing new from what we have been told for years and years. Over this time we have seen little change, and more often a decline in range condition and other natural resource values.

The following are Alternative C's seven sins. (Excuse our cynicism, but your agency continues to provide the basis for it.) In short Alternative C:

1) fails to call for any livestock grazing reductions, even when resource damage occurs;

2) allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, contrary to agency scientists' recommendations;

3) nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status;

4) proposes a Steens Mountain National Conservation Area, but makes no changes to grazing management there;

5) leaves the overwhelming majority of the planning area (3.8 million acres) open to off-road vehicle use, while closing less than 1% of the area (22,000 acres) to ORVs;

6) relies on controversial "adaptive management," which in the past has served primarily to only justify allowing livestock operators to graze beyond the limits of the their permits; and

7) fails to satisfy the Southeast Oregon Resource Management Plan 's stated intent to adhere to ecosystem management principles.

A strengthened and improved Alternative D would be the BLM's best alternative to meet the objectives the agency claims it desires to meet. Only Alternative D would provide a management plan which could allow for reductions in livestock grazing levels; emphasize undeveloped types of recreation; de-emphasize fire suppression; restore or close recreation sites where natural values are jeopardized by overuse; add 26 new Areas of Critical Environmental Concern, totaling 191,000 acres; propose 289 river miles for federal Wild and Scenic River status.

Yet, even Alternative D needs improvement, as it fails to set reasonable limits on livestock grazing and would allow for the continued degradation of cherished wild places such as Steens Mountain and the Alvord Desert.

If the BLM intends to protect these 6.3 million acres for future generations, it MUST choose a strengthened Alternative D. Alternative C only represents more of the same continued, abusive (non-management/non-monitoring) grazing practices.

Sincerely,

Wendell Wood
Southern Oregon Field Representative

L-022

...STRICT BLM

February 15, 1999

ED SINGLETON, Vale District Manager
Vale District BLM Office
100 OREGON STREET
VALE, OR. 97918

Dear Mr. Vale:

I am writing about the Southeast Oregon Resource Management Plan. I am concerned about the long-term stewardship of Stenos Mountain, the Levered Desert, the Owyhee Canyonlands and the Blitzen River. I think livestock grazing should not be the preferred use of the land in southeast Oregon.

Please reject Alternative C and choose a strengthened alternative D that excludes livestock grazing from:

1. Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers.
2. Riparian areas throughout the region.
3. Critical fish and wildlife habitat.
4. Areas of critical environmental concern.
5. Wilderness study areas.
6. Grazing allotments in "fair" or "poor" condition.

"Adaptive management" sounds like a euphemism for turning southeast Oregon into a cow pasture. Constant, on-the-ground monitoring is not possible with the current understaffing with which you are operating. The Southeast Oregon Resource Management Plan simply allows too much latitude, especially given the handicap that you face with regard to monitoring.

More than a mere 43 miles out of 289 miles of eligible river should be committed to the Wild and Scenic status. Livestock grazing should be stopped when resource damage results. 3,000 cows should not be allowed to graze along the Blitzen River! Steens Mountain should be made a real national Conservation Area by controlling or excluding grazing there. Off-road vehicle use should be prohibited to most, not 1%, of the area involved.

Please adopt a strengthened Alternative D.

Sincerely yours,

Thomas L. Gritzka, M.D.

The BLM should follow the lead of Dombeck & the USFS! G

L-023

RECEIVED
MAR 01 1999
BURNS DISTRICT BLM

Dear Mr. Kenna,

I am writing my comments to you in regards to the Southeast Oregon Resource Management Plan.

I moved to Burns last September because I feel strongly about the area that is covered in the Plan. This is my home now, and I intend to strongly appreciate and defend the natural wilderness areas that have touched me so deeply.

As a member of the Sierra Club Hi-desert Committee I have visited and explored many of the places that are discussed in the plan such as the Steens, Blitzen Rivers the Alvad, and other areas surrounding the Steens.

I am deeply concerned about the future of the area and would like to express how I feel about a couple of the alternatives in the SEORMP.

1.) I do not like your preferred Alternative C because it mentions nothing about reducing the livestock that graze in this area. As far as I can see, cattle are not endangered. They are only a food industry. Like other industries, they should be contained without hurting others. Precious plant life, and beautiful streams and rivers, should be kept that way, so people and the eco system can live in its natural state without one certain business (cattle), threatening its creation.

2.) I prefer Alternative D because of its livestock reductions, protection of over-used areas, and the addition of new ACEC's. But I would strongly suggest adding to the Alternative D a stronger and more defined limit on livestock grazing and more protection of the Steens and Alvord Desert.

I love and respect this area of the country and hope the people who make long-range decisions about its beauty and sensitivity will honor the things this land is naturally trying to express.

Thank-you —

Patricia Leahy

L-024

RECEIVED
FEB 19 1999
VALE DISTRICT BLM

George B. Hutchinson
4730 W. Griffin Creek Road
Medford, OR 97501

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

I understand that the Bureau of Land Management (BLM) is now seeking comments on the Southeast Oregon Resource Management Plan, the planning document that will guide the management of 6.3 million acres of public lands over the next 20 years.

These lands -- which span the far southeastern corner of Oregon and include places like Steens Mountain, Alvord Desert, Owyhee Canyonlands, and the Blitzen River -- provide critical habitat for the rare kit fox, threatened Lahontan cutthroat trout, and dwindling populations of sage grouse. Within this remote extension of the Great Basin lies some of our nation's wildest roadless areas.

However, many of these wild places are in a state of ecological red alert, caused in large part by livestock grazing. The bulk of the SEORMP's 6.3 million acres are wholly unsuited to cattle grazing, yet the BLM's preferred alternative does virtually nothing to change the grazing status quo. It is time to get serious about protecting Oregon's magnificent desert wildlands.

WHAT I WISH TO SEE THE BLM DO:

1) Reject Alternative C and instead choose a strengthened Alternative D that excludes livestock grazing from: Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers; riparian areas; critical fish and wildlife habitat; Areas of Critical Environmental Concern; Wilderness Study Areas; and grazing allotments in "fair" or "poor" condition.

2) Cease support for "adaptive management." "Adaptive management," upon which this plan is heavily reliant, is no substitute for objective standards and guidelines; without constant, on-the-ground monitoring (a logistical impossibility given the current understaffed situation at BLM), adaptive management may only lead to further resource degradation. Further, adaptive management allows for a degree of latitude that is unacceptable in a major planning document such as the SEORMP.

3) Support Alternative D as it will allow for reductions in livestock grazing levels; emphasize undeveloped types of recreation; de-emphasize fire suppression; restore or close recreation sites where natural values are jeopardized by overuse; add 26 new Areas

of Critical Environmental Concern, totaling 191,000 acres; and propose 289 river miles for federal Wild and Scenic River status.

4) Note that Alternative D needs improvement. It fails to set reasonable limits on livestock grazing and would allow for the continued degradation of cherished wild places such as Steens Mountain and the Alvord Desert. If the BLM intends to protect these 6.3 million acres for future generations, it MUST choose a strengthened Alternative D and curtail cattle grazing by setting scientifically determined limits.

While Alternative C attempts to "do it all," this management option is seriously flawed. Alternative C: fails to call for any livestock grazing reductions, even when resource damage occurs; allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, contrary to BLM's own scientists' recommendations; nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status; proposes a Steens Mountain National Conservation Area, but makes no changes to grazing management there; leaves the overwhelming majority of the planning area (3.8 million acres) open to off-road vehicle use, while closing less than 1% of the area (22,000 acres) to ORVs; relies on controversial "adaptive management," a tool the BLM has used in the past to justify allowing livestock operators to graze beyond the limits of the their permits; and fails to satisfy the SEORMP's stated intent to adhere to ecosystem management principles.

A strengthened and improved Alternative D is the BLM's -- and the land's --best bet. If the BLM intends to protect these 6.3 million acres for future generations, it MUST choose a strengthened Alternative D. Thank you for your consideration of these comments.

Sincerely,

George B. Hutchinson

L-025

RECEIVED
FEB 19 1999
VALE DISTRICT BLM

2016 Northcrest Court
Modesto, Ca. 95355
February 16, 1999

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

This letter is concerning the Southeast Oregon Resource Management Plan.

I would like to recommend that Alternative D be selected as the preferred choice for the future direction of this area. This alternative does a better job of protecting the rivers in this area. In addition, standards are also needed to insure that an adaptive management approach does not result in further degradation of the area.

I have had the opportunity to visit this area on several occasions and am quite familiar with the Owyhee River canyon. Although it is a beautiful and scenic area, there are definitely areas that have been negatively impacted by over grazing.

Thank you for your consideration.

Sincerely,

Dean Danielson

L-026

Bureau of Land Management / Vale and Burns Districts

FEB 19 1999
VALE DISTRICT BLM

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

Larry C. Asmussen
(Name)
(Street address)
(City) (State) (Zip)

Comments: To: Gary Cooper B. L. M. Vale District Office

I was able to attendthe Burns meeting & review the South-eastern Oregon Resource Management Plan. The assistance of personnel from both Vale & Malhuer (was) Districts was apprec-iated. The Plan including maps, well prepared with documentation.

I believe in the multiple use conceptfor public lands & certainly encourage this in our local area. I write in reference to the inclusion of the proposed Desert Trail through B.L.M. administered public land. Much progress has already been made and we look forward to the day when the Desert Trail will be completed from Canada to Mexico. As a board member of the Desert Trail Association I want to express my appreciation for the efforts put forth in this area so far.

As an individual I endorse the proposed Plan. It will help so much in extending the trail north toward Canada. It will further open up great Scenic areas for hikers of public lands, included in the proposed National Scenic Trails .

I wish to support the adoption of the SEORM Plan as proposed.

MAIL TO:

Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144

or

Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

L-027

RECEIVED
MAR 19 1999
VALE DISTRICT BLM

Date: March 15, 1999

To: Mike Golden, Chairman
SEORAC

From: Tom Harris, Member
SEORAC

Subject: **Comments on SEORMP**

The broad scope and scale of this RMP does indeed require some separate and individual comment as explained by Mike Golden. The possibility of consensus on many issues is there but the time factor for discussion is not given the broad cross-section and limited meetings of the committee.

This RAC has not been afforded the formal designation of an OHV Representative which is unique and unexplainable. We have, however, dispersed and commercial recreation positions. For purposes of comment on the RMP it would be difficult, I think, to separate the two since the areas of concern are the same.

The focus of my concerns are:

Reasonable Access - The needs for backcountry access seem to be lost in the hurry to comply with road density reduction and transportation plans. Recreation consideration shouldn't wait until all other resource considerations are satisfied. Good resource planning is like a good receipe, recreation may be akin to a dash of salt to the RMP but the end product will suffer for the lack of it.

While it is true that most denials for access are based on real ecological concern, it is just as true that many of these concerns have remedial answers other than closure. There is adequate engineering information in the text of existing CFR's and regulations to address trail deficiencies. The argument of lack of personnel and funding shortages have some answers in partnerships, volunteers and the availability of gas tax dollars through Oregon's All Terrain Vehicle Account Allocation Committee. These assets are ignored frequently enough to make one wonder if the recreation specialists are fully apprised of these tools.

Education - Elementary education is the real answer and BLM and USFS does more to combat ecological ignorance than our school systems by sponsoring educational programs. My main point, however, here is not elementary but college level education. At a northwestern college this year 20 resource bound students were asked their opinion of motorized recreation - **ALL** replied that it should not be allowed. This negative bias is

Of special note is Virginia's Warbler, a Neotropical migrant that is declining in much of its limited range and is rated of high concern by Partners In Flight. In 1998, expert birders participating in the Oregon Breeding Bird Atlas Project discovered this species during the breeding season on BLM land in three separate mountain mahogany habitat areas of the Vale District. Although unable to confirm nesting in the limited time available to monitor these birds, the birders found the birds in typical habitat and believe it likely at least some of the birds were breeding. Details are enclosed (Attachment B).

I also note that your list of species of concern in the appendices (pp. 319-326, volume 2) is more comprehensive than Table 2-15. This inconsistency needs to be explained. In drafting the above list, I assumed that the Table 2-15 is your "official" list.

Besides the above additions, I suggest you make the following changes to Table 2-15 (Special Status list), based on information collected so far from the Oregon Breeding Bird Atlas Project (SB= suspected breeder, DB= documented breeder; I don't currently know for certain if all these sightings were from BLM land):

Black Tern: DB in Andrews, SB in Malheur and Jordan RA's
Bufflehead: SB in Andrews and Malheur RA's (they may not require trees)
Grasshopper Sparrow: SB in Andrews and Jordan RA; DB in Malheur RA in 1997
Mountain Quail: DB in Malheur RA (fledglings in July 1996)
Snowy Egret: SB in Jordan RA in 1996
Western Bluebird: DB in Malheur RA
White-faced Ibis: SB in Andrews RA
White-headed Woodpecker: DB in Malheur RA in 1998
Williamson's Sapsucker: DB in Malheur RA in 1995

Breeding locations of many birds of potential management interest also are shown (somewhat generally) on maps I sent to Jon Sadowski at the BLM-Vale office last week. Additional details on location and observers associated with any of these records can be provided upon request.

Sincerely,

Paul Adamus

Paul Adamus

cc: Al Bamman

- Wilderness Study Areas.

Alternative D needs improvement. It permits for the continued degradation of cherished wild places such as Steens Mountain and the Alvord Desert.

If the BLM intends to protect the diversity and beauty of Oregon's 6.3 million southeast desert lands for future generations, it must choose a modified/improved Alternative D. We look forward to your response.

Sincerely,

Timothy J. Coleman
Executive Director

Cc: Secretary of Interior
Sen. Ron Wyden
Sen. Gordon Smith

L-028

Kettle Range Conservation Group

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

February 17, 1999

Ed Singleton, District Manager
Vale District, Bureau of Land Management
100 Oregon Street
Vale, Oregon 97918

RE: Southeast Oregon Resource Management Plan (SEORMP)

Dear Mr. Singleton.

On behalf of the Board of Directors and membership of Kettle Range Conservation Group (KRCG), I want to respond to BLM's proposed management plant for southeastern Oregon desert lands. Members of KRCG regularly use these lands for recreation and relaxation, and therefore have a vested interest in their management.

Proposed management plans rely heavily on adaptive management. Standards based guidelines are necessary as without constant, on-the-ground monitoring, adaptive management may only lead to further resource degradation. Adaptive management allows for a degree of latitude that is unacceptable in a major planning document such as the SEORMP.

Our experience with Owyhee Canyonlands is that extensive cattle grazing is altering the natural diversity of plants in riparian areas. In addition, grazing is leaving banks completely denuded of vegetation some areas, particularly below the confluence of the South Fork to Three Forks.

The canyonlands of this region are of unparalleled beauty in North America. Your proposal to protect a mere 45 miles of the 289 miles that are eligible is preposterous. It permits 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, contrary to agency scientists' recommendations. It appears BLM's highest priority for this area are cattle grazing, conversion of native vegetation to cheat grass and noxious weeds, and Off Road Vehicle usage (leaves 3.8 million acres open to ORVs).

We oppose Alternative C, the preferred alternative. Instead we urge your to choose a modified Alternative D that excludes livestock grazing from the following areas:

- Wild and Scenic Rivers, including the Blitzen and Owyhee Rivers;
- Grazing allotments in "fair" or "poor" condition;
- Riparian, and other areas of critical environmental concern;
- Key fish and wildlife habitat;

L-029

Malheur Lumber Company

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

February 11, 1999

Edwin J. Singleton, District Manager
Vale District, Bureau of Land Management
100 Oregon St.
Vale, OR 97918

RE: Southeast Oregon Resource Management Plan

Dear Mr. Singleton,

Thank you for the opportunity to comment on the proposed Southeast Oregon Resource Management Plan. The following comments will pertain to the Forest and Woodland portion of your document. Although there are not many acres of forest, these areas are still important.

The first thing that jumps out of the document is the fact that you have no data on which to base your alternatives. All alternatives talk about the amount of acres treated per year and the volume that will be produced, but "Forest stand age classes, condition, productivity and stocking rates are variable, and the extent of each cannot be determined with available data." (SEORMP @ 2-18) How can you develop alternatives with no data?

My suggestion is to gather the data or change the way alternatives are presented. Another way to present the alternatives would be to state that the forested acres would be managed to maintain forest health and other characteristics. You could go further by identifying the amount of acres that would be managed for different attributes. Do not commit to volumes without having the data to back it up.

In the affected environment section of the document, it states that the forested areas are overstocked, and susceptible to disease, epidemic insect infestations, and intense wildfires. The entire forested area needs to be managed to remedy the problem. Doing so will enhance wildlife habitat, and help maintain old growth. If areas are not treated, forest stands, including old growth, will continue to have mortality due stressed conditions.

All of the 5,877 forested acres need to be available for management. Setting acres aside for old growth or other habitat will only exacerbate the current forest health problems. These acres cannot support the amount of trees necessary for true old growth habitat. Therefore, you should provide the habitat you are able, by maintaining healthy stands on

all acres. In addition, you do not need to provide a substantial amount of old growth on your limited acres. Adjacent Forest Service and BLM lands have already set aside many acres.

From the draft SEORMP it appears that large trees will be cherished for the future. Hopefully, you will heed the previous comments and have old growth as part of the management block. If nothing else, to reduce overstocking and risk of wildfire. While you are promoting forest health, the large dead and dying trees in the area should be available for harvest. They improve the economic feasibility of forest health sales.

I will be looking forward to your decision on the Southeast Oregon Resource Management Plan/ Environmental Impact Statement.

Sincerely,

Steven J. Courtney
Operations Forester

of exotic plants are all serious threats and should be avoided. Special management areas should be considered for such sites. There should be no grazing in ACECs, Wilderness Areas, or RNAs. Monitoring of special status plant communities should be done a regular basis and alterations of management practices employed when necessary. Reintroduction of special status plants should be done if they have been extirpated from a site. Again, we feel that Stephanomeria malheurensis needs further attention to be brought back from the brink of extinction. We also feel that Leslie Gulch ACEC, as the most remarkable spot of plant endemicity in the planning area, should receive special consideration.

Fire Regimes
All of the native plant communities in Oregon east of the Cascades evolved with regular fires. We strongly urge reintroduction of fire to restore these communities. Of course, care must be taken to prevent an increase in invasive weeds. Prescribed burns and prescribed wildfires should be part of the plan. Restoration of functioning native ecosystems should be the driving force in management decisions, not commodity concerns for grazing.

Recreation/Off Road Vehicles
Threats from ORV recreation are serious. ORV's should be tightly controlled. Districts should be closed to uncontrolled ORV use. ORV use should be restricted only to designated trail systems. Introduction of non-native, noxious weeds are a major concern. Cleaning of vehicles should be required on all trail systems. Trails should be regularly monitored for escaped exotics and aggressive suppression with Integrated Pest Management employed. Horses, llamas, and other livestock use should be monitored so as to not introduce pests.

Cultural Plants
Surveys should be done for plants that Native Americans used. Consultations with the appropriate tribes should be performed. Restoration of impacted cultural plant communities should be part of the plan. Protection of other cultural resources from grazing impacts should be implemented and consultation with the State Historic Preservation Office obtained and compliance with the National Historic Preservation Act assured.

Noxious Weeds
NPSO perceives this as a huge issue. We ask for mapping of problem areas and aggressive control with Integrated Pest Management.

Management Resources/Monitoring Resources
Too often we have seen management plans abandoned when fiscal resources are scarce in the Agency. We ask that if you do not have the fiscal resources to adequately plan, implement, and monitor any part of the grazing activities in this plan, that grazing not take place.

Sincerely,

Stuart G.Garrett, MD
Eastside Conservation Chair

L-030

THE NATIVE PLANT SOCIETY OF OREGON
Dedicated to the enjoyment, conservation, and study of Oregon's native vegetation

RECEIVED
FEB 2 2 1999
VALE DISTRICT BLM

February 17, 1999

Ed Singleton
District Manager
BLM
100 Oregon St
Vale, OR 97918

Dear Mr. Singleton:

I would like to respond to the SEORMP for NPSO. We are a 30 year old statewide group representing 900 members.

We wish to support all of the RNAs, ACECs, and Wild and Scenic Rivers proposed in Alternative D. These areas will help in the management of the native species of plants and animals BLM is charged with conserving. We are particularly concerned with rare plant species. We would like to see the development of species/habitat management plans for all of your rare and sensitive species. We would like a further analysis of the impacts of grazing on sensitive species and how grazing would take place in the Steens NCA. I would offer the following comments in these areas:

Vegetational Biodiversity and Grazing
We strongly support management activities that promote the long-term preservation of Oregon's native vegetation. Management activities that occur over a large scale, such as grazing, have important long term impacts. Ecological change can occur so slowly that many observers are not aware of the substantial alterations that have taken place. We support efforts to return BLM lands to a series of naturally and fully functioning ecosystems. Stocking levels (AUM's per allotment) should be based on a "poor year" scenario and increased in better years rather than stocking for a "good year" and having to try to take cows off in worse years.

Riparian systems have especially been altered. We ask that they be restored as soon as possible. Severe restrictions or elimination of grazing in riparian areas is appropriate. If grazing occurs, it is preferable in the non-growing season. We oppose mono-culture plantings of non-native species like crested wheatgrass. Any plantings should be for native restoration and with locally native seeds and plant material.

Special Status Plants
We ask for surveys to locate sites for these plants. Rare plant sites should not be grazed and should be exclosed. Alterations to soils, hydrology, plant community composition, microhabitats, and introduction

L-031

M R Hanselka,

19 Feb 99

Dear Mr. Singleton –

RE: BLM Southeast Oregon Resource Management Plan

Please get serious about protecting Oregon's diverse wildlands, which provide habitat for the kit fox, Lahontan cutthroat trout, and sage grouse, but are not suited to cattle grazing, especially in riparian areas.

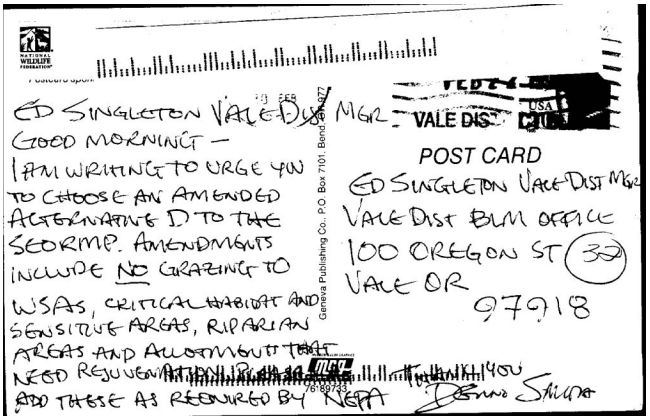
Alternative C must be REJECTED!

A strengthened Alternative D should be selected, which would exclude livestock from Wild + Scenic Rivers, like the Blitzen Owyhee, and other riparian areas; also from other critical wildlife habitat and wilderness study areas.

Thank you,

Mark R Hanselka

L-032



ED SINGLETON VALE DIST MGR
GOOD MORNING —
I AM WRITING TO URGE YOU TO CHOOSE AN AMENDED ALTERNATIVE D TO THE SEORMP. AMENDMENTS INCLUDE NO GRAZING TO WSAS, CRITICAL HABITAT AND SENSITIVE AREAS, RIPARIAN AREAS AND ALLOTMENTS THAT NEED REJUVENATION. THANK YOU
ADD THESE AS REQUIRED BY NEPA

VALE DIST

POST CARD
ED SINGLETON VALE DIST MGR
VALE DIST BLM OFFICE
100 OREGON ST
VALE OR 97918

Geneva Publishing Co. P.O. Box 7101, Bend, OR 97708

L-033

Feb. 18, 1999

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

Dear Mr Singleton,

We are writing to comment on SEORMP.

It is the responsibility of our generation to make the decisions that will best protect the Great Basin for those who come many generations from us.

Most particularly, we have seen firsthand the damage free ranging livestock do to Riparian habitat.

A few livestock operators seek water and grazing rights which change forever the wild and scenic areas we must protect.

Alternative C is not our choice. Alternative D comes closer but doesn't go far enough to protect Steens Mountain and the Alvord Desert. You must strengthen it.

Sincerely, Dottie Daughen

L-034

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

2-17-99

Dear Mr. Singleton;

I have become aware that you are taking comments on the Southeast Oregon Resource Management Plan until sometime in early March, and would like to take this opportunity to add my thoughts.

I urge you to take a very close look at Alternative D, and reject Alternative C. Alternative D excludes livestock grazing from

- Wild and Scenic Rivers, such as the Blitzen and Owyhee.
- Riparian areas.
- Critical fish and wildlife habitat.
- Areas of critical environmental concern.
- WSA
- Grazing allotments in "fair" or "poor" condition.

I have lived and worked in Eastern Oregon most of my life....now sliding along towards 50 years. The public lands that I have hunted, hiked, and recreated for all these years are being altered before my very eyes. Drainage's I used to hike are now devoid of water and all riparian cover due to the drastic and continued cattle grazing that the BLM, and USFS seems to not want to regulate, or even take issue with. There are localities that I helped restore while working for the USFS in the early 80's that I have recently revisited only to find total cattle devastation. So, please accept my comments, and choose Alternative D.

Most environmental restoration happens at the speed of nature. Which is to say, damnably slow...it can use your help.

Sincerely,

John Laing

L-035

February 19, 1999

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Re: Southeast Oregon Resource Management Plan EIS

Dear Mr. Singleton,

I am writing to comment on the draft "Southeast Oregon Resource Management Plan/Environmental Impact Statement" (hereinafter "EIS"), which lays out options for managing 6.3 million acres of BLM land in Southeastern Oregon. This enormous area has tremendous potential for low-impact recreational use, with its spectacular vistas, scenic rivers, and unique natural landscape. This vast area is also of great importance for plant species, fish and wildlife which are uniquely adapted to this high desert environment. The area contains critical habitat for species of concern such as the rare kit fox, Lahontan cutthroat trout, sage grouse, bull trout, and inland redband trout.

I urge BLM to choose an improved Alternative D, as opposed to Alternative C, which is the preferred alternative. Alternative D best accomplishes the EIS's primary goal of "developing management practices that ensure the long-term sustainability of healthy and productive land, consistent with the principles of ecosystem management." It would meet this goal by:

(1) de-emphasizing fire suppression. Prescribed burns are often needed to rehabilitate brush infested areas and restore native plant populations.

(2) emphasizing low-impact recreation, with less developed facilities. This alternative would also rehabilitate or close sites where resource values are jeopardized by overuse.

(3) proposing 289.2 miles of rivers and streams for wild and scenic status, which would provide adequate protection for these rivers and their riparian zones from human disturbances such as mining, dams, cattle grazing, and developed recreational uses. Alternative C, which proposes adding only 34 river miles to the system, is entirely inadequate in this respect.

(4) increasing acreage in Areas of Critical Environmental Concern at Castle Rock, along the Owyhee River, and at Steens

Ed Singleton Page 2

Mountain, and proposing numerous smaller protective designations for selected native plant communities throughout the planning area.

(5) rehabilitating or closing sites where resource values are jeopardized by overuse.

(6) emphasizing reductions of authorized livestock use where monitoring shows a need to reduce grazing impacts.

I do not feel that the draft EIS explores the full range of alternatives as required by NFPA. More specifically, Alternative D should be strengthened to exclude grazing from riparian areas, critical habitat and sensitive areas, Wilderness Study Areas, and grazing allotments in fair or poor condition.

Sincerely,

Karen Jeanne Sjogren

cc: Jir Kenna
Burns District BLM Office

L-036

Navillus Press

William L. Sullivan

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FEB 2 2 1999
VALE DISTRICT BLM

February 18, 1999

Ed Singleton, Vale District Mgr
Vale District BLM
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

As the author and publisher of outdoor guidebooks covering Southeast Oregon, I would like to comment on your proposed Southeast Oregon Resource Management Plan, and urge you to adopt a revised version of Alternative D that decreases cattle grazing and increases the emphasis on non-motorized recreation.

I have hiked extensively through the Steens Mountain, Alvord Desert, Pueblo Mountain, Sheepshead, and Owyhee River areas in researching my books, and have come to the conclusion that the long-term economic health of the Harney County area will rely on leaving the natural treasures in an environmentally healthy condition, in order to attract non-damaging ecotourism. Already, bed-and-breakfasts, guide services, and Malheur-area birdwatching-related industries have become a large part of the area's economy, while cattle and mining continue to decline.

I urge you to recognize this trend, direct ecotourism development into non-damaging channels, and preserve the natural resource base, by:

- Moving aggressively toward the elimination of cattle grazing on Steens Mountain and all roadless public lands.
- Actively pursuing land acquisition or land trades to eliminate private landholdings on Steens Mountain and roadless areas.
- Banning snowmobiles from Steens Mountain and eliminating ATVs and other motorized vehicles on the Alvord Desert and other roadless lands.
- Allowing natural fires to take their course.
- Protecting all riparian areas (especially all forks of the Donner und Blitzen River on Steens Mountain), notably by eliminating livestock grazing.

Sincerely,

William L. Sullivan

Cc: Craig Hansen, Burns BLM

L-037

Nicholas L. Kenney, DDS, PC
McKenzie Dental Center

DDS

RECEIVED
FEB 2 2 1999
VALE DISTRICT BLM

February 18, 1999

Ed Singleton
Vale District BLM Office
100 Oregon St
Vale, OR 97918

Dear Mr Singleton,

I am writing in regard to the Southeast Oregon Resource Management Plan (SEORMP), which is now under discussion and the management alternatives which the BLM are now considering for adoption.

It is my understanding that management alternative C is currently the BLM's preferred alternative. As an interested and concerned sportsman/conservationist I feel that alternative C does not adequately protect the critical riparian and other environmental areas that are essential for optimal fish and wildlife management.

During recent conversations with several associates who have hunted and fished in the Steens Mts and Owyhee Canyonlands for many years, it became apparent that the single issue which we considered most important was that related to cattle grazing. We would like to see less of it.

I would like to voice my support for alternative D. This plan comes much closer to truly meeting the SEORMP's ecosystem management goals.

Sincerely,

Nicholas L Kenney DDS PC

L-038

RECEIVED
FEB 2 2 1999
VALE DISTRICT BLM

February 16, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

I am writing to you today in regards to the BLM's "Southeast Oregon Resource Management Plan". I wanted to express my concern to you regarding which plan I feel would better serve the environment.

Sir, I am urging you and the BLM to reject Alternative C, and instead asking you choose a *strengthened Alternative D* that excludes livestock grazing from:

* Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;

* Riparian areas;

* Critical fish and wildlife habitat;

* Areas of Critical Environmental Concern;

* Wilderness study areas; and

* Grazing allotments in "fair" or "poor" condition.

The "adaptive management," upon which this plan is heavily reliant, is no substitute for objective standards and guidelines; without constant, on-the-ground, adaptive management may only lead to further resource degradation. Further, adaptive management allows for a degree of latitude that is unacceptable in a major planning document such as the SEORMP.

Alternative "C" which your agency is considering has the following dire impacts on the land:

* Fails to call for any livestock grazing reductions, even when resource damage occurs;

* Allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, contrary to agency scientists' recommendations;

* Nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status;

* Proposes a Steens Mountain National Conservation Area, but makes no changes to grazing management there;

* Leaves the overwhelming majority of the planning area (3.8 million acres) open to off-road vehicle use, while closing less than 1% of the area (22,000 acres) to ORVs;

* Relies on controversial "adaptive management," a tool the BLM has used in the past to justify allowing livestock operators to graze beyond the limits of the their permits; and

* Fails to satisfy the SEORMP's stated intent to adhere to ecosystem management principles.

If the BLM intends to protect these 6.3 million acres for future generations, it MUST choose a strengthened Alternative D. Sir, I urge you to choose a strong Alternative D. Thank you for your time.

Sincerely,

Stephanie Abbs

Stephanie A. Cobb

L-039

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

Dr. Heather Henderson

February 19, 1999

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

I understand that the BLM has chosen Alternative C as its "preferred alternative" for the SEORMP, and I am writing to voice my strong objections to that alternative. I urge the BLM to adopt Alternative D instead; this approach would far better support the ecosystem in this southeast Oregon area. Moreover, alternative D should be amended to curtail livestock grazing even more than it now does. Only in this way will the BLM protect these areas genuinely and responsibly.

I have been visiting southeast Oregon regularly ever since the 1970s, when I was in high school. I first made trips there with a group of student researchers from OMSI in Portland; we were rehabilitating injured birds of prey at the Portland Zoo and, though OMSI's student research center, conducting raptor territory and population studies in eastern Oregon so as to determine the best areas to release our healed and rehabbed birds. I've hiked the craggy canyons of the Owyhee, camped near Steens Mtn., looked for great horned owl and prairie falcon nests, listened to the prairie grouse call, and generally cherished this wild part of Oregon most of my life. I have also watched as overgrazing and riparian damage from livestock have slowly eroded the integrity of so much of these fragile desert ecosystems.

For years I have been deeply concerned about the reticence of many branches of the federal government to place real and lasting limits on grazing in eastern Oregon. At last, you have a chance to do this: don't blow it! I urge you to adopt an augmented alternative D that, in addition to its current provisions, excludes livestock grazing from: all wilderness study areas and "Areas of Critical Environmental Concern;" riparian and other wildlife/fish habitat areas; all the Wild and Scenic River-eligible miles of the Blitzen and Owyhee Rivers; and any areas that are not in good condition.

The BLM needs to take up the mantle of land stewardship and protect these areas more aggressively, with rules that will stick. You know as well as I that true protection will not work any other way. Thank you.

Sincerely,

Heather Henderson, D.F.A.

cc. Craig Hansen, Burns Dist. BLM

L-040

February 19, 1999

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

ED SINGLETON, VALE DISTRICT MANAGER
VALE DISTRICT BLM OFFICE
100 OREGON STREET
VALE, OR 97918

Dear ED SINGLETON, I AM WRITING TO YOU ABOUT the BLM's "SOUTHEAST OREGON RESOURCE MANAGEMENT PLAN (SEORMP). IT has come to my ATTENTION AND the dozens of Freinds and relatives that I FIND Your Alternative C, the preferred alternative, to be flawed.

My main reasons for disapproval are the reliance upon Cattle in the management Plan. My experience in the Southeast corner of oregon is always tarnished by the obvious damage Cows do to native grasses and other forbs of the extremely dry and arid country. I have seen numerous small Creeks whose banks have been Flattened, trampled, and have Cow Pies Floating in what used to be Clean water! Alternative C fails to protect Wild and scenic creeks which are a part of the WILD AND Scenic River status. I Can not trust the individual Ranchers who fail to Promote healthy streams by ignoring the obvious damage their Cows do. IT is absurd and wholly un-scientific to claim that Cattle enhance this wild and roadless area, especially around the STEENS MOUNTAIN. Alternative C ignores the agency's own scientific reports about overgraging which appears to be the Status Quo amongst the Agencies Biologists and policy makers. The obvious difference between an overgrazed land and one with its unique flora is Hart Mt. Antelope refuge, where after a few years the → habitat has recovered from years of overgrazing to reveal a huge variety of native plants.

I would like the BLM to reduce the number of Cows it allows to graze on Public land, bring a Sense of balance back and restore the integrity of the BLM and also institu the trust of the Public. I believe "Alternative D" WOULD allow a more balanced approach and help protect the rare and Sensitive plants and animals.

The land will reflect what the people are like, their values, their deep concerns for the future. The past has shown much neglect, a loss of Vision for future generations. I often find myself defending the BLM, their biologists; your position is very difficult, between Public and Private interests. I know, because I work for the USES on the Willamette National forest and find it very challenging to help the agency work for a more balanced approach to logging and also the public's recreation and Concern for the forest. Please consider my letter and alternative "D" and thank-you for the time it takes to read a hand-written letter.

Yours Sincerely,

Thomas W. Baxter

THOMAS W. BAXTER

L-041

2-18-99

Ed Singleton
Vale District Mgr.
Vale District BLM Office
100 Oregon St.
Vale, Or. 97918

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

Dear Ed:

I would like to talk to you about the Southeastern Oregon Resource Management Plan. I would like to see it become a huge environmentally protected area reserve for our wildlife, providing habitat for the unlimited variety of species that are there or will migrate there. I would like to see it be roadless with no cattle grazing & logging or mining. Let's face it, grazing does damage and other species are affected. Wherever they water, they damage stream side vegetation, the water temperature rises and fish can no longer live there.

I would like to see ecosystem management instead of adaptive management. We should look to a far-sighted management plan to improve the earth - living with the animal & plant species rather than trying to remove them or change the face of the desert. Animals need to migrate according to their biological system & they don't know they should'nt cross roads or barbed wire or state lines.

Foresters or lumbermen have had to change jobs, so cattle barons can earn a living on a smaller scale or change. New insights, new technology has changed peoples lives for millions of years.

The earth will go on after we have gone. But while we are here, let's do some broad thinking. Let's not get greedy, protective or fearful of new changes. I am proposing Alternative D comes closer to the Southeastern Oregon Resource Management Plan goals.

Don't live in fear of cattle barons reprisals. Follow your heart. We are all beginning to recall our connection to the earth & its natural beauty.

Carol Jacquet
PO Box 2058 Terrebonne, Or. 97760

L-042

Feb 19 1999 42

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

Ed Singleton, District Mgr.
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton

I am writing to you today with much concern over your Southeast Oregon Resource Mgmt. Plan. Harris been a high desert advocate for 25 years and loving that area I want to see it restored and protected. I am hoping you will feel as I do that the only shape of sorts what's left is to work with your alternative D.

I have seen the state of the grazing allotments there and grazing has definitely deteriorated the riparian areas and that of fish & wildlife habitat.

The area needs on the ground monitoring and I feel your adaptive management won't be enough to protect and restore the areas of high desert Wilderness.

Alternative D comes closest to the ecosystem management goals that are necessary if we are to protect that wonderous area.

Thank you in advance for your consideration of alternative D

Connie Lonsdale

L-043

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

RECEIVED
FEB 22 1999
VALE DISTRICT BLM

Feb. 18, 1999

Dear Mr. Singleton,

Please consider these comments part of the official public record of testimony regarding the SEORMP. I vacation and travel extensively in Southeast Oregon for several weeks every year and consider myself a stakeholder impacted by management decisions.

My extensive explorations have revealed cows to be the most damaging influence on high desert ecosystems. I am disappointed that BLM continues to serve the cattle industry rather than the public at large. Clearly cows need to be forever removed from public lands and those lands need restoration to native conditions. The least your agency could do would be to remove cattle from riparian zones, WSA's, areas of critical habitat or sensitivity.

I am enclosing a poem I wrote a few years ago after one of my desert sojourns.

Thank you for considering my comments.

Sincerely,

Susanna DeFazio

RECEIVED
FEB 2 2 1999
VALE DISTRICT BLM

Harry L. Smith

Mr. Gary Cooper
BLM, Vale District Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Cooper:

The following are my personal comments to the Draft Edition of the Southeast Oregon Resource Management Plan/Environmental Impact Statement.

The first few of these comments are general in nature based on the section, "Desired Range of Future Conditions," Chapter 3-2. This section gives a "Chrystal Ball" picture for the next 50 to 100 years for a wide range of resources and uses. Two statements indicate a desired change from the past and current management so greater emphasis will be required in the future. The first of these is: "Western juniper generally occurs in low density...." Juniper in some areas appear to have dominated sites that do not have the "old growth characteristics." Active control is needed to prevent continued spread of this resource dominating plant.

The second statement is regarding noxious weeds; "existing large infestations are declining." To date little effort is being directed toward Scotch Thistle which has been a growing problem for 40 years. Only recently has there been any type of control and then only if grazing permittees bear nearly 50% of the cost. This weed will have to be attacked with much more effort than currently or some special status plant communities will be in danger of being crowed out by this invader.

A final comment for this DRFC section is that a major use of this vast resource has been totally ignored. Livestock grazing is a major economic use which historically led to the development of the culture and customs of the region. Other sections include this use but only as long as they are "consistent with other resource objectives and public land use allocations." Chapter 3-94 goes on to lead one to conclude that an effort is being made to reduce this use when it is stated, "The Current grazing levels would be maintained until analysis or evaluation ... identifies a need for adjustment to meet objectives." What part will permittees have in this evaluation process? Are there allotments already on the list for reduction of grazing capacity but not presented in this document?

The alternatives under Rangeland/Grazing Use describe additional grazing authorization called Temporary Nonrenewable (TNR). There are times when this would be beneficial to the range in preventing rank, unpalatable forage and reducing fire danger. However, the guidelines for this TNR use have not been found in this draft. I feel these guidelines need to be included in this document so all can determine when the conditions apply for this additional grazing.

The main protion of my comments will be directed to the proposed Oregon Trail ACEC-Keeney Pass Segment. This section was included when Congress designated the Oregon Trail as a National Historic Trail in 1978. This document is contradictory as to the width of this segment. The following references state the corridor is 1/4 mile, 1320 ft., or 660 ft. each way from the center in width; Chapter 3-103, 147, and 148. Chapter 3-147 also refers to a 0.5 mile corridor. I remember a 1320 ft. corridor from the discussions at the time the 1981 NPS Oregon Trail Management Plan was developed.

I also remember it being reported that as a part of the management of this Historic Trail; the Keeney Pass Interpretive Site would be developed, signs and markers for the trail would be installed, and Off Highway Vehicle use for climbing the hills in or along the corridor would be stopped so the hillsides could heel. During a drive through this section of the Oregon Trail, it will be obvious that the first two items have been accomplished, in fact the interpretive site has been enlarged, but no seeming effort has been attempted to stop the hill climbing. When asked about it several years ago, BLM personnel said they didn't have the funds for this effort. Are more funds going to be available in the future?

The current proposal to designate this Oregon Trail corridor (1320 feet in width and covering 1032 acres) an ACEC with an expansion to 3179 acres presents a number of problems and raises the question if it even qualifies. As the area was being studied, it became apparent that the maps of the area were very erronious as to the location of roads and range improvements. Improvements in this corridor include: Lytle Boulevard, a 2 lane asphalt county road, runs the entire length of the 4 miles; a Crested Wheat seeding has been established on the southwest side of Lytle Boulevard and a fence separates the seeding from the annual grassland (termed "native pasture") on the other side of the road, 6 stock water tanks and a wildlife guzzler are located in this designated area, water distribution lines run about 50% of the corridor length and cross the corridor 3 times, and a livestock corral is also located in the area.

All these improvements plus the Keeney Pass Interpretive Site mean that there will be constant maintenance in this area with various degrees of disturbance taking place. Another maintenance project needed along this entire corridor is control of the thick stands of Scotch Thistle which are becoming a greater eye sore than the OHV hill climing ruts. Appendices - 414 gives authourity to carry on this maintenance by stating "Normal maintenance of existing projects and new projects will occur, as consistent with original design, through the life of the plan in order to support authorized uses of public land." Appendices - 415 provides guidelines for pipeline maintenance which should be amended to include the use of a pipe trencher along with "a modified ripper tooth mounted on a tractor" as the trencher will disturb the soil less and make it possible to lay PVC pipe for a longer service installation.

The introduction to the Oregon Trail ACEC-Keeney Pass Segment gives a glowing report of the area on Chapter 3-147; "The rolling hills, covered with sagebrush, grasses and dust have changed little since the emigrants passed through this country and contribute to the overall scenic and recreational value." & "The segment at Keeney Pass covers a total of 1 mile of intermittent ruts, 100 feet to 0.5 mile long. These ruts are all that remain of the original route crossing 8 miles of BLM land." With Keeney Pass as the only ruts to view and its hiking trail for viewing the trail behind and ahead, what is the advantage to the proposed ACEC designation if the characteristics "have changed little since the emigrants passed through?"

The alternatives presented for this section, however, raise some questions as to the management of the area but are vague as to what they are. Alternative A on Chapter 3-148 states, "Where adverse impacts are identified, existing livestock use would be adjusted using a variety of methods including fencing, reduction in livestock numbers, and changes in grazing season." Have adverse impacts been identified and if so, what are they and why have they not been discussed with those with permits in this alottment? Alternative B also on Chapter 3-148 makes the statement in the Rationale: "Existing management to date has generally maintained some of the values of the area." Again, problems in the area are hinted at but none have been mentioned. Alternative C on Chapter 3-149 under Rationale, again, refers to partially protected values and continues, "...additional acreage and the proposed management for minerals, plant collecting, and livestock would more adequately protect the relevant and important values." What problems are being referred to and what changes in management are being proposed? As previously stated, from my point of view, the use of OHV for hill climbing has created more resource damage than all other uses in this corridor. I cannot accept or agree to new livestock management until the problems are presented and the changes discussed. The current grazing system has been in place for nearly 10 years and was developed through previous experience from the AMP that has been in place since 1982.

Visual resource objectives for the proposed Oregon Trail ACEC-Keeney Pass Segment also seem questionable due to the extensive improvements already in place. The various alternatives calls for either Class II or a combination of Class II/III. Since Class II "represents the minimum level of VRM for Wilderness Study Areas" it does not seem appropriate for this class to be designated for any part of this site due to the extensive improvements in the area.

Since there is a desire to prevent any further development in the proposed Oregon Trail ACEC-Keeney Pass Segment, I propose that Map OHV-3; Off Highway Vehicle Areas-Alternative C and Map Land-1; Preferred Alternative Right of Way Avoidance Areas be followed rather than the ACEC designation. This approach would provide the limitation for new roads and other disturbances that would require BLM approval. A No Surface Occupancy designation could also be made to prevent the disturbance of this area for energy and mineral resource development.

Finally, I propose that the existing Oregon National Historic Trail at its 1320 ft. width be designated as a Special Recreation Management Area instead of the proposed enlarged area for the ACEC. This would be in keeping with the existing corridor and interpretive site and recognize that the balance of the area has already been developed beyond what should be designated an ACEC.

This concludes my comments, concerns, and questions regarding the Draft Edition of the Southeast Oregon Resource Management Plan/Environmental Impact Statement. It is my hope that you can see these items as I do and make the changes in the plan that have been suggested. I would especially like to have the questions that the draft plan raised to be addressed in the final plan or answered directly to me personally. If any of the items need clarification, please contact me for further review.

Thank you for your consideration of these comments.

Sincerely,

Harry L. Smith

Harry L. Smith

L-045

Mark Davis

RECEIVED
FEB 2 3 1999
VALE DISTRICT BLM

February 19, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Re: Draft SEORMP/EIS

Dear Mr. Singleton:

I would like to make the following comments on the draft Southeast Oregon Resource Management Plan. For too long the emphasis in this region has been on commodity-oriented management. We need to stop the abuse of the land that would result from further grazing and mining activities.

Of the alternatives offered I find positive elements in both 'D' and 'E.' While I would prefer the land to be returned to a natural state as suggested in 'E', given the damage that it has already incurred, I suspect this alternative is not the best choice. Therefore, I support the general principles embodied in 'D'. However, I believe this choice could be improved by excluding grazing from the alternative.

Thank you for considering my opinions on this matter.

Sincerely,

Mark Davis

L-046

RECEIVED
FEB 2 3 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Mr. Singleton:

I am writing with respect to the Southeast Oregon Resource Management Plan/Environmental Impact Statement, recently released by the Bureau of Land Management.

A major concern that I have about all five alternatives in SEORMP is that none designate specific protections for any lands in the 6.2 million acres of high desert public land covered by the plan. Among specific lands that should be explicitly protected are:

- lands in riparian areas,
- areas providing critical habitat for wildlife,
- areas that are particularly susceptible to environmental disruption,
- lands upon which grazing is currently permitted that have become severely degraded, and
- Wilderness Study Areas.

My understanding is that BLM currently favors adopting Alternative C, out of the five alternative plans which SEORMP lists. Alternative C seems to endorse a strategy of "adaptive resource management." This strategy has the advantage of allowing resource managers to respond flexibly to changing conditions. However, since Alternative C does not provide explicit planning and management criteria for sensitive lands (such as those mentioned above), the the very immediacy of decision making which this strategy confers could place critical resources in jeopardy. Short-term considerations could readily prevail over long-term goods.

I believe Alternative D is more attuned to conservation than to resource extraction. I would urge you to modify Alternative D to include explicit protections for particular sensitive areas, and I would further urge that you adopt an Alternative D that has been so modified.

Thank you for your attention.

Sincerely,

Philip Lewin

L-047

Mr. Ed Singleton, Manager
Vale District BLM Mr Henry Dizney
100 Oregon St.
Vale, OR 97918

RECEIVED
FEB 2 3 1999
VALE DISTRICT BLM

2/20/99

Dear Mr. Singleton,

I write as a concerned citizen who enjoys and respects the Oregon High Desert. Our family each year visit Steens, Owyhee, and Blitzen River areas for hiking, camping, and birding. For the last three years, I have spent a week at Hart Mt. removing barbed wire from the Antelope Refuge. I love your country and am deeply disturbed by BLM's SE Oregon Management Plans. Habitat degradation is the great threat. We feel SEORMP's alternative C is fatally flawed and that alternative D needs to be strengthened to exclude cattle grazing in sensitive habitat and stream areas. Please, please for us and future citizens (owners) protect these precious areas now and in time to come. They cannot be rebuilt.

P.S. I am 73 summers old — my concern is for your generations. Let's walk softly on our land.

Sincerely,
Henry Dizney

copy to: Mr. Craig Hansen
Burns BLM Dist.

1999 Member
Running Strong for American Indian Youth®
A project of: Christian Relief Services,

L-048

2-20-99

OUR NATIONAL PARKS ARE NOT FOR SALE!

Congress has targeted our National Parks and c... public lands for sale to commercial interests. NRDC is mobilizing millions of Americans to halt this raid on our natural heritage.

USA 20

Dear Mr Singleton
I am writing about the SEORMP for Southeast Oregon. I encourage adoption of a strong alternate to protect the 6.2 million acres that must be protected for our future citizens. The Owyhee River must be saved as well. Please!

Ed Singleton - District Mgr.
BLM
100 Oregon St
Vale OR 97918

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NATURAL RESOURCES DEFENSE COUNCIL
40 W. 20th Street, New York, NY ...
Photo: Carr Clifton /Minden ...

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L-049

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon St
Vale OR 97918

19 February 1999

Dear Mr. Singleton,

I am writing to comment on the Southeast Oregon Resource Management Plan.

I urge you to reject Alternative C and select a strengthened Alternative D that excludes livestock grazing from Wild and Scenic Rivers, riparian areas, critical habitat, Areas of Critical Environmental Concern, wilderness study areas, and grazing allotments in Fair or poor condition.

Adaptive management is no substitute for real standards and guidelines; without constant monitoring, adaptive management can lead to further degradation.

Wilderness study areas should be carefully protected, as should beautiful rivers such as the Blitzen and Owyhee rivers.

Thank you for your time.

Sincerely,
Randall Keller

L-050

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

RECEIVED
FEB
VALE

Sir,

Concerning the Southeast Oregon Resource Management Plan. **The SEORMP fails to explore the full range of alternatives as required by NEPA.**

I ask that you drop Alternative C as the preferred alternative! While Alternative C attempts to "do it all," this management option is seriously flawed. Alternative C:
* fails to call for any livestock grazing reductions, even when resource damage occurs;
* allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, contrary to agency scientists' recommendations;
* nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status;
* proposes a Steens Mountain National Conservation Area, but makes no changes to grazing management there;
* leaves the overwhelming majority of the planning area (3.8 million acres) open to off-road vehicle use, while closing less than 1% of the area (22,000 acres) to ORVs;
* relies on controversial "adaptive management," a tool the BLM has used in the past to justify allowing livestock operators to graze beyond the limits of the their permits; and
* **fails to satisfy the SEORMP's stated intent to adhere to ecosystem management principles**

Once again, I urge the BLM to reject Alternative C and instead choose a *strengthened Alternative D* that excludes livestock grazing from:
* Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;
* Riparian areas;
* Critical fish and wildlife habitat;
* Areas of Critical Environmental Concern;
* Wilderness study areas; and
* Grazing allotments in "fair" or "poor" condition.

2) The "adaptive management," upon which this plan is heavily reliant, is no substitute for objective standards and guidelines. Without constant, on-the-ground monitoring, adaptive management will only lead to further resource degradation. Further, adaptive management allows for a degree of latitude that is unacceptable in a major planning document such as the SEORMP.

A strengthened and improved Alternative D is the BLM's -- and the land's -- best bet. Alternative D comes much closer to meeting the SEORMP's ecosystem management goals.
Alternative D would:
* allow for reductions in livestock grazing levels;
* emphasize undeveloped types of recreation;
* de-emphasize fire suppression;
* restore or close recreation sites where natural values are jeopardized by overuse;
* add 26 new Areas of Critical Environmental Concern, totaling 191,000 acres;
* propose 289 river miles for federal Wild and Scenic River status.

Still, Alternative D needs improvement. It fails to set reasonable limits on livestock grazing and would allow for the continued degradation of cherished wild places such as Steens Mountain and the Alvord Desert.
If you intend to protect these 6.3 million acres for future generations, you MUST choose a strengthened Alternative D.

Please add my comments to your plan and please write to me your plans concerning the future of our publicly owned BLM lands.

Sincerely Donald Fontenot
Cascadia Forest Alliance
Donald W Fontenot

Cc
Jim Kenna

L-051

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

February 22, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

I am writing to urge the BLM to reject Alternative C and instead select a strengthened Alternative D that excludes livestock grazing from critical fish and wildlife habitat, wilderness study areas, wild and scenic rivers, areas of critical environmental concern and any grazing allotments in fair or poor condition.

My husband and I visited the beautiful Steens Mountain a few years ago. I would like to see this and all other Oregon areas protected from livestock grazing. It saddens me to know of the damage already done by livestock grazing and for what purpose did it serve?

Adaptive management is no substitute for real standards and guidelines. Constant, on-the-ground monitoring is a necessity.

Thank you for helping protect and restore Oregon's High Desert.

Sincerely,
Brenda Felber
Brenda Felber

c. Craig Hansen, Burns District Manager
Burns District BLM Office

L-052

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Feb. 20, 1999

Ed Singleton, Vale District Mgr.
Vale District BLM Office
100 Oregon St,
Vale, OR 97918

Dear Mr. Singleton:

I am writing to request that the BLM reject Alternative C of the Southeast Oregon Resource Management Plan and instead choose Alternative D, with improvements that would exclude livestock grazing from (a) Wild & Scenic Rivers; (b) riparian areas; (c) critical fish & wildlife habitat; (d) Areas of Critical Environmental Concern; (e) wilderness study areas and (f) grazing allotments in fair or poor condition. As a frequent visitor to southeastern Oregon, particularly Malheur & Hart Mt., I have often been impressed by the dramatic contrasts between grazed and ungrazed areas, particularly along streams & rivers, & the poor water retention & impoverishment of plant life in grazed areas. That & the reading I have done on environmental impacts of grazing has convinced me that allowing cattle on desert public lands, especially in precious riparian areas, is environmentally unconscionable. It is my hope that the BLM will no longer be guided by antiquated traditions & the interests of a wealthy ranching interests but will start doing the work of the future – restoration of public lands that belong to all of us.

Sincerely,
Elisabeth Magnus

L-053

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

22. Feb 99.

Ed. Singleton.
District Manager.
Vale District BLM office.

Dear Sir
Re. the SEORMP.

I found these documents to be well researched & informative. However they fail to explore the full range of alternatives as required by Nepa. I urge you to choose an improved Alternative! That is strengthened to exclude grazing from 1) Riparian areas 2). critical habitat & sensitive areas, 3) Wilderness Study Areas. 4) allotments in fair or poor condition.

I also ask for Wild & Scenic Rivers designation for all streams that fit criteria.

Yours sincerely
Susan. E. Cox.

cc. Jim Kenna Burns District Manager. BLM.

L-054

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

February 17, 1999

Mr. Ed Singleton
Vale District Manager
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

I have been a resident of Oregon and an avid outdoorsman since 1960. Some of my most memorable trips have been to southeast Oregon to fish, camp and hunt. I am writing to you about the Southeast Oregon Resource Management Plan (SEORMP).

I believe that Alternative D will provide the best management to protect the ecosystem of this region, preserve unique recreational opportunities, and reduce the adverse impacts of grazing. I am especially concerned about cattle grazing along the Wild and Scenic Blitzen River and continued grazing on the fragile slopes of the magnificent Steens. These are my favorite haunts and we should keep them as undisturbed and undeveloped as possible for future generations to enjoy. I also strongly endorse BLM's plans to protect that 6.3 million acres for our future.

In summary, I urge you to accept Alternative D. Alternative C does not do enough to protect these wonderful ecosystems and wild lands.

Please keep me informed of your deliberations and decisions.

Sincerely,

W. G. Pearcy

Cc: C. Hansen

L-055

2-21-99

Ed Singleton, Vale District Manager
BLM,

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Dear Mr. Singleton,

I am writing to express my concerns about the need to protect the wildlife and natural habitat of south-east Oregon.

I visit this area about 6 times a year to enjoy the wildlife, the amazing scenery, and the unique natural features that abound in this part of Oregon. I have hiked the Pueblo Mtns, made many visits to Steens Mtn, and have birded over much of the area including the Jordan Valley. During the last 4 years I have covered much of this area doing a bird survey (Breeding Bird Atlas Project).

As I have learned about birds and other wildlife it becomes clear that natural vegetation and undisturbed riparian areas are critical for wildlife. I have seen much of the land, especially in riparian areas, has been degraded by over grazing.

Of the options you have developed for your Resource Management Plan, alternative D is the closest to what I think should be done. Grazing must be excluded for most riparian areas, and elsewhere if there is severe damage. This beautiful country and its wildlife must be protected for our enjoyment and especially future generations.

Sincerely, John Lundeen

cc- Burns BLM

L-056

February 22, 1999

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Mr. Ed Singleton
Vale District BLM
100 Oregon Street
Vale, Oregon 97918

Dear Mr. Singleton:

I am writing in response to the draft SEORMP/EIS. I support an enhanced Alternative E - Minimal Human Intervention - which includes the ACEC and Wild and Scenic River additions proposed in Alternative C.

I support Alternative E in spite of the fact that it would eliminate domestic livestock grazing. I am not opposed to properly managed grazing, and believe that continued agricultural activity in the planning area will help stabilize long term land use patterns. I also believe that this would result in a net benefit to natural values.

The key, however, is in the term "properly managed". I have come to the point where I simply have no confidence that the agency will plan, monitor, and enforce grazing plans that safeguard native species and biological communities, or even maintain helathy forage production. Until that capability has been demonstrated, I cannot support continued grazing in the planning area.

I do not minimize or discount the difficulties faced by both your agency and the ranchers who want to continue grazing. You are no doubt operating under budgetary and political pressures, and the ranchers in a depressed market for their product. Allowing continued grazing without effective monitoring and enforcement will not solve anyone's problems, however. Given that cattle prices are beyond the control of any of us, there is a very real possibility that environmental values would be scrificed in an attempt to save the weakest elements of an industry (arid land open range grazing) which are not economically viable in the long run in any case.

In short, I support Alternative E not because I oppose grazing, but because I oppose abuse of the resource. I look forward to the time when the agency has demonstrated an ability to both protect the resource and allow responsible grazing. Thank you for the opportunity to comment, and for your consideration of my views.

Sincerely,

John Shafer

cc: Jim Kenna

L-057

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

February 20, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

We are writing to you with regard to the Southeast Oregon Resource Management Plan. We believe that the BLM's ecosystem management goals would be more likely to be met with a strengthened Alternative D than with Alternative C, and we would like to make several comments about why we think this is so.

We regularly visit Malheur National Wildlife Refuge to bird and to take photographs, and we fish the Blitzen River whenever we can. We do not understand why cattle are allowed to graze along a Wild and Scenic River. Unlike some of its tributaries, the Blitzen is frequently off color, and the only likely explanation for that is erosion resulting from the activity of cattle. When we lived in Colorado we saw exactly the same phenomenon of murky water on the Colorado River near Rocky Mountain National Park because of cattle ranches upstream. Dr. Robert Behnke, a respected fishery biologist at Colorado State University, has studied the problem and has stated on numerous occasions that cattle are the major threat to the health of trout streams in arid areas of the western United States. The redband race of the rainbow trout found in the Blitzen deserve a better environment than they have at present; let's hope they don't have to be placed on the Endangered Species list for them to get it.

The BLM lands belong to all of us, not to just a few ranchers, and while we think ranchers should be allowed to graze cattle on some of those lands, it must be done in a responsible fashion. What is occuring along the Blitzen at present is not responsible; it is, instead, one more example of the misuse of public lands for short term gain with little regard for the consequences.

What is the rationale for the proposal to use 3,000 cattle to restore redband habitat in the upper Blitzen watershed? We find it difficult to believe that cattle can play a positive role in restoring watersheds that they have damaged.

Yours truly,

Robert Pollock

Jean Pollock

cc: Craig Hansen, Burns District Manager

L-058

Ed Singleton
Vale District Office
100 Oregon St.
Vale, Oregon 97918

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Feb. 19, 1999

Dear Mr. Singleton:

I hope you will consider the following points regarding the Southeast Oregon Resource Management Plan.

The preferred choice is, in my opinion, inadequate and fails to provide the degree of protection our public lands require. The preferred alternative relies too much upon "adaptive management." It is no substitute for objective standards that can be measured. The problem with adaptive management is that it allows for too much "wiggle" room for interpretation. Furthermore, given the chronic understaffing of the BLM, the proper monitoring necessary to make such adaptive management can't be assured.

I support wild and scenic status for all 289 eligible miles.

I support a Steens Mt. NCA, but ask that livestock be removed. Cows are causing most of the resource damage, and are the biggest source of exotic species invasion, water pollution, soil erosion, and wildlife habitat destruction.

I support more wildfires, and no fire suppression.

I support wilderness designation for all eligible areas.

In particular, there is not enough protection against cows. These areas should be off limits to livestock: wild and scenic rivers, riparian areas, wetlands, seeps, critical wildlife habitat (bighorn sheep, sage grouse leks, etc.), ACECs, and any grazing allotments currently in fair or poor condition. It seems reasonable to also ask that the BLM not wait until there are funds to fence riparian areas, etc. I.e. if a permittee wants to graze MY PUBLIC LANDS, then at the least he/she should absorb all the costs of doing that.

Of the range of alternatives provided, I support Alternative D with the above modifications.

Sincerely:

George Wuerthner

L-059

Collectors' Library

22 February 1999

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale OR 97918

Dear Mr. Singleton:

I have read the Southeast Oregon Resource Management Plan's alternatives and I am disappointed that BLM's preferred alternative is Alternative C. Alternative C is inadequate for the land and water and ignores both protections required and scientific warnings and recommendations.

Alternative C allows cattle grazing even when it deteriorates the land - which, unfortunately, is consistent with BLM's "adaptive management" that merely gives cattlemen a license to step beyond their permits with impunity.

And, in an area where water is a scarce commodity and where it is highly prized for its recreational value and scenic beauty, BLM has offered only 14% of the 289 miles of river for Wild and Scenic River status.

Though I think that BLM's Alternative D still falls short of sufficient land and water protections from cattle grazing and offers insufficient protections for the Steens Mountain area, Alternative D is far preferable over Alternative C.

I hope that BLM will reconsider its "preference" and adopt - at a minumum - the current Alternative D. Without that, the land and water in your trust is not being protected and the livestock lobby can continue to abuse the land and water in Oregon.

Thank you very much.

Sincerely,

R. Stephen Horsey

cc. Craig Hansen, Burns District Mgr., BLM

L-060

February 20, 1999

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton.

I wish to comment on BLM's Preferred Alternative C on the Southeast Oregon Resource Management Plan. (SORMP.)

As usual, BLM (and the Forest Service) prefer plans that favor the status quo, no matter how poorly they serve the environment and its wildlife. Alternative C is no exception. "Adaptive management" is just jargon for "lets try it and see what happens." By naming only a few of the area's rivers eligible for "Wild and Scenic" Alternative C is ensuring the further degrading of the area's precious waterways.

Yet even Alternative D fails to set grazing limits even on Alvord Desert and Steens Mountain! As with politicians, the public always has a choice only from the least of two evils. With work, Alternative D may do a little better, but as is it is merely a better compromise and the SORMP's wild occupants will survive only slightly longer. Already rare are the kit fox, the Townsend's big-eared bat, the Lahontan cutthroat trout and the sage grouse. With continued cattle grazing, the riparian areas and grasslands will continue to suffer along with every other native plant and animal.

It's too bad that mine is just one voice and that I can't afford to buy my very own congressman and senator as easily as those now beholden to timber, mining and livestock interests.

Rather than go on at length here, I'll enclose an excerpt from an article I've written about my impressions of a portion of the area included in SORMP.

Thank you for considering my input.

Sincerely,

Helen Jones

Helen Jones

Copy to: Craig Hansen, Burns District Manager
Burns BLM Office
HC 74-12533 Highway 20 West
Hines, OR 97738

L-061

February 22 1999

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Dear Sirs,

As a citizen of the great state of Oregon, I have some comments on the Southeast Oregon Resource Management Plan (SEORMP). I urge you to reject the preferred Alternative C and instead select a strengthened Alternative D that would exclude livestock grazing from Wild and Scenic Rivers (such as the Blitzen and Owyhee), riparian areas, critical fish and wildlife habitat, areas of Critical Environmental concern, wilderness study areas and grazing allotments in poor condition. These areas are too sensitive for livestock grazing.

"Adaptive management" is no substitute for real standards and guidelines. Without constant, on-the-ground monitoring, adaptive management will only lead to further degradation.

Manage the land for the entire public, not just the cattle ranchers.

Thank you for your time.

Lawrence Pagen

LAWRENCE PAGEN

L-062

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

February 20, 1999

Ed Singleton, Vale District Manager
Vale District BLM office
100 Oregon Street
Vale, Or 97918

Dear Mr. Singleton,

I urge you to reject Alternative C + to adopt Alternative D with respect to SEORMP's management goals.

Reductions in livestock grazing will help enhance the rivers, future recreation, + ultimately Oregons will being in the future

Very truly yours,

Ronald L. Mauk

cc: Craig Hansen, Burns District Manager, BLM

L-063

RECEIVED
FEB 24 1999
VALE DISTRICT B

Kendra J. Summers, Ph.D.

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

February 21, 1999

Dear Mr. Ed Singleton:

I am writing regarding the Southeast Oregon Resource Management Plan. I have spent some time in SE Oregon on the Owyhee river and have come to love the area for its natural beauty and solitude. I want to see this area protected, not only in the short-term but for future generations.

I understand that the BLM has selected Alternative C for the future management of the area. Please reconsider this selection. I would like to see Alternative C rejected, and instead see a strengthened Alternative D plan that would exclude livestock grazing from wild and scenic rivers and riparian areas. I have seen first hand the damage of livestock grazing to 100 miles of the south fork of the Owyhee river. This river is a national treasure and deserves to be protected.

Sincerely,

Kendra J. Summers

Kendra J. Summers, Ph.D.

L-064

FEBRUARY 21, 1999

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

TO: ED SINGLETON, VALE DISTRICT MANAGER
VALE DISTRICT BLM OFFICE
100 OREGON STREET
VALE, OR 97918

TO: CRAIG HANSEN, BURNS DISTRICT MANAGER
BURNS DISTRICT BLM OFFICE
HC 74-12533 HWY 20 WEST
HINES, OR 97738

DEAR SIRS:

I AM WRITING THIS LETTER TO ASK YOU TO STRENGTHEN AND ADOPT ALTERNATIVE "D." AS A TEACHER, NATURALIST AND A PARENT, I AM DEEPLY CONCERNED ABOUT THE FUTURE HEALTH OF ALL OUR LANDS. WE ALL KNOW ABOUT THE PAST AND CURRENT DAMAGE TO THE HEALTH AND PRODUCTIVITY OF OUR DESERT LANDS. SHOULD I TELL MY CHILDREN THAT WE ONLY CARE ABOUT OURSELVES AND CERTAIN SPECIAL INTERESTS AND TO HELL WITH THE FUTURE? LET US ALL FIND THE COURAGE TO PRESERVE THE HEALTH OF OUR HOME.

SINCERELY,
Joseph R. Doherty

L-065

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

1334 N.E. Purcell #6

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

I am writing in regard to the BLM's S.E. Oregon Resource Management Plan. The Preferred Alternative, C, is simply not adequate to improve and protect the land. If the grazing areas on Steens Mountain and around Leslie Gulch are as bald as they were when I visited the area a few years ago, they should be allowed to recover--permanently. How could it be a "National Conservation Area" if sheep and cows have reduced the land to bare dirt and rock? (However, I do admit that some of this damage has occurred because of too many visitors and their vehicles.)

In my estimation Steens Mountain and the adjoining Alvord Desert should be a wilderness area because of the unique geology and the many rare plants and animals.

Alternative D is a better choice but should be even stronger: Grazing should not be permitted along the Wild and Scenic rivers, in other riparian areas, in critical fish and wildlife habitat, in the AEC's and Wilderness Study Areas, nor on any grazing allotments now in "fair" or "Poor" condition.

Please reconsider. This wonderful area of Oregon needs to be protected and given a chance to recover its viability.

Sincerely,
Judith Byrd
Judith Byrd

L-066

JOANNE CLELAND

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
Vale, OR 97918

Dear Mr. Singleton,

We urge you to reject Alternative C and instead select Alternative D of the Southeast Oregon Resource Management Plan.

We strongly believe Alternative D comes much closer to meeting the SEORMP's ecosystem management goals.

Alternative D, however, needs improvement. It fails to set reasonable limits on livestock grazing and would continue to degrade places we love and visit often , the Steens Mt. area and the Alvord Desert.

If the BLM intends to protect these 6.3 million acres for future generations, It MUST choose a strengthened Alternative D.

Yours truly,
Joanne Cleland
Joanne Cleland
F. A. Cleland
Frank Cleland

C.C.
Craig Hansen
Burns District Manager

L-067

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

Ed Davis
(Name)
(City) (State) (Zip)

Comments: Remove the Alvord Hot Springs From the Steens Mountain Recreation Lands. The boundary of the Steens Mountain Recreation Lands would then Follow the county road. This action would help eliminate confusion by the public of recreation use between Public and Private land.

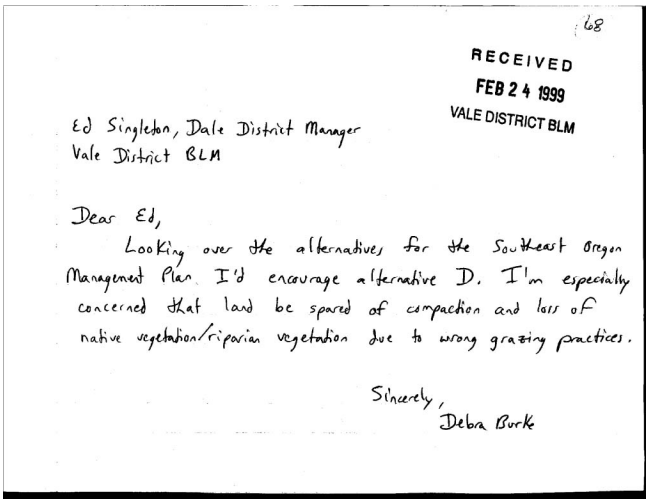
MAIL TO:

Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144

or

Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

L-068



68

RECEIVED
FEB 24 1999
VALE DISTRICT BLM

Ed Singleton, Dale District Manager
Vale District BLM

Dear Ed,

Looking over the alternatives for the Southeast Oregon Management Plan I'd encourage alternative D. I'm especially concerned that land be spared of compaction and loss of native vegetation/riparian vegetation due to wrong grazing practices.

Sincerely,
Debra Burke

L-069

Copy

From: LeRoy Fish <watershed@pioneer.net>
To: ilmoraso.smtp("or030mb@or.blm.gov")
Date: 2/24/99 2:00pm
Subject: RE: Comment SEORMP-EIS

Dear Mr. Singleton:

I write to comment on the SEORMP/EIS.

I choose to support Alternative D. This management alternative appears to give needed support to nongame wildlife riparian/wetland habitats. I am a wildlife biologist and naturalist for some 35 years with several professional affiliations; my comments are submitted as a private citizen who is interested to working with you through Partners In Flight on species conservation plans and Breeding Bird Surveys and Bird Banding Program through the USGS Patuxent Wildlife Research. I am a master bird bander.

Southeast Oregon natural resources are very important to me and my family. I support management that helps keep these natural resources in their native condition as much as possible. I urge BLM to accelerate its efforts to maintain, restore, enhance, and protect Owyhee mountain meadows and stands of mountain mahogany and aspen. There are a number of associated avifauna that need in depth study with careful habitat management in these areas.

Of special interest to me is Virginia*s Warbler, a Neotropical migrant that is declining in much of its limited range and is rated of high concern by Partners In Flight. In June 1998, I participated in the Oregon Breeding Bird Atlas Project in the Owyhee Uplands to help discover this species during the breeding season on BLM land in two separate mountain mahogany habitat areas of the Vale District, Mahogany Gap near Jordan Valley and Wood Canyon near Jackson Summit, Battle Mountain. I propose to conduct further collaborative fieldwork that would confirm Virginia*s Warbler nesting in Mountain Mahogany habitats at these higher elevations. Mahogany Ridge in the Trout Creek Mountains also has potential habitat as do other areas in southeast Oregon. As we focus on particular species, others will come to forefront as our experience and knowledge of these special habitats increases.

I urge BLM to consider adding Virginia*s Warbler to its list of Special Status species, and that management actions be planned accordingly. If Virginia*s Warbler breeds in the SEORMA, it should be considered a species at least as rare and sensitive as those currently listed.

Further, current observations from the Oregon Breeding Bird Atlas Project can/will yield additional information for SEORMP/EIS. Contact "Paul Adamus" <adamusp@ucs.orst.edu>

Sincerely,

LeRoy Fish, PhD
Ecologist and Watershed Ecosystem Consultant

Triangle Lake, Oregon Coast Range
PS Signed hardcopy sent via snail mail.

L-070

2-22-99

I would like to encourage the BLM to strengthen & adopt Alternative D in the current review process.

- 289 river miles for Wild & Scenic Status
- drastically reduce livestock grazing which degrades the land
- increase recreation uses
- de-emphasize fire protection

Sincerely
Ole Esson
Portland.

L-071

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

February 23, 1999

Mr. Ed Singleton, Vale District Manager
BLM Office
Vale OR 97918

Dear Mr. Singleton:

RE: SOUTHEAST OREGON RESOURCE MANAGEMENT PLAN

As someone who lives "east of the Cascades" and who loves the desert and eastern Oregon, I urge the BLM to adopt a management plan which really does protect the southeastern Oregon public lands. These are public lands not lands to be exploited by a few ranchers.

Because of the arid conditions of these lands, they are quite vulnerable -- especially to overgrazing by the animals which are interlopers on this territory. These are WILD PLACES and the desert denizens which depend on the limited resources there should be protected from encroachment by "outsiders."

Your Alternative D is preferable -- but still does not set reasonable standards on livestock grazinging. We need to protect such places as the Steens Mountain and the Alvord Desert. "Adaptive management" is not a suitable substitute for strict standards and guidelines. Even your agency scientists recommend disallowing the grazing of cattle -- especially when resource damage occurs.

I urge your reconsideration of your "preferred" alternative and adoption of Alternative D with strengthened enforcement standards.

Sincerely yours,

Fran Greenlee
Fran Greenlee

CC: Craig Hansen, Burns District Manager
Burns District BLM Office

L-072

February 23, 1999

RECEIVED
FEB 2 5 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Mr. Singleton,

I wish to comment briefly on your SEORMP, the plan that will determine the fate of so much of our wild and beautiful Southeast Oregon land.

Your preferred Alternative is no real Alternative at all - it simply continues the unsatisfactory status quo which gives most emphasis to livestock grazing. Your Alternative D is much better. However, it still needs a little tinkering, namely: environmentally suitable limits on livestock grazing; designation of and protection for more wild and scenic rivers (examples, the Owyhee and Blitzen); protection of fish and wildlife habitat; protection of riparian areas from cattle damage; rest and rehabilitation of grazing allotments already in fair or poor condition. There are other considerations also, such as realitic and enforced standards on grazing.

In considering the SEORMP, I am disappointed that the BLM is continuing its love-affair with cattle grazing instead of trying to protect our desert wildlands and the many species of plants, fish and animals that live in them. These wildlands are important for low impact recreation and are a part of our heritage. Please remember - nothing beats up the land and pollutes the streams like cattle.

Sincerely,
Margaret G. Forsythe
Margaret G. Forsythe

L-073

February 23, 1999

Ed Singleton, Manager
Bureau of Land Management
Vale District
100 Oregon St
Vale, OR 97918

RECEIVED
FEB 2 5 1999
VALE DISTRICT BLM

RE: SE Oregon Resource Management Plan

Dear Mr. Singleton:

As a life-long resident of Oregon, I love and appreciate all the areas of our state. As someone who enjoys watching wildlife I have found the beauty of SE Oregon to be a treasure. However, even if I did not ever visit this part of Oregon, I still would be concerned for its environmental health, the same as I am concerned for the environmental health of where I live, here in NW Oregon.

That is why I urge the BLM to adopt a strengthened Alternative D of the Resource Management Plan, which would exclude livestock grazing from:

- wild and scenic rivers such as the Donner and Blitzen and Owyhee
- riparian areas
- areas of critical environmental concern
- critical fish and wildlife habitat
- wilderness study areas
- any grazing allotment which is in poor or fair condition

Again, Alternative D, with the addition of reasonable limits on livestock grazing, comes the closest to meeting the SORMP's ecosystem management goals.

Sincerely,
Margaret Stephens
Margaret L. Stephens

Cc: Craig Hansen, Burns District Manager
Burns District BLM Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

L-074

2-22-99

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St
Vale, OR 97918

RECEIVED
FEB 2 5 1999
VALE DISTRICT BLM

Dear Mr. Singleton,

I'm writing to comment on the Southeast Oregon Resource Management Plan. Since I am very concerned about the damage livestock grazing does to the rivers and also the Steens Mt. National Conservation Area, Riparian areas and fish and wildlife habitat, as weee as Wild and Scenic Rivers need protection from livestock grazing. There should be monitoring to protect these areas.

I urge you to select alternative D. It may not be perfect but it is far superior to the other proposals. Thank you for protecting these sensitive lands.

Sincerely,
Shirley Cameron

L-075

RECEIVED
FEB 2 5 1999
VALE DISTRICT BLM

February 22, 1999

To: District Managers, Burns and Vale

From: Chair, Public Lands Restoration Task Force, Izaak Walton League of America

Subject: Comments, SEORMP/EIS

The following response to your SEORMP/EIS is respectfully submitted by The Oregon Division, Izaak Walton League, Public Land Restoration Task Force. We have been actively involved in grazing management issues, seeking agreement among federal land managers, state agency personnel, private landowners and other natural resource constituents. Our objective is to assist wherever possible in management activities that provides for healthy watersheds. We continue to strongly support the adaptive management concept and most of the objectives and criteria for land management contained in the draft, Southeastern Oregon Resource Management Plan/ Environmental Impact Statement. We're pleased to see no changes proposed in the excellent grazing programs that have been initiated by both the Vale and Burns Districts – i.e.: the Trout Creek Mountains, Oregon Canyon Mountains, Pueblo Mountains and the Roaring Springs Ranch Conservation Agreement.

The Public Lands Committee believes livestock grazing and its management to be of a major resource concern in the 6.3 million acres of BLM administered lands addressed in the SEORMP/EIS.

Our Comments Follow:

In appendix E the plan states the following is a summary of the current management for each allotment. We find the data falls far short of summarizing the current grazing management situation. BLM should include a section addressing current upland and riparian health issues and concerns by pasture as related to livestock grazing. In our view this minimum information is critical for both the public and BLM to prioritize future management emphasis. If you don't know where you are how can you determine the route required to reach your destination?

The allotment summaries in Appendix E should be up-dated to include new information or at least best professional opinion as to whether or not management practices are meeting the objectives. Of great concern are the total number of listed allotments in management category "C" and "I". Most of the "C" category have no management objectives listed., and some of these contain riparian areas as well as special status fish. Many of the management category "I" have no AMP listed; many of the objectives refer to special status fish, improve riparian zones, and ecological condition of upland vegetative communities etc. We are unable to determine in most cases whether these

allotments are improving, remaining static or what the status may be. In nearly all cases it is impossible to make or support a knowledgeable grazing management recommendation based on the data presented.

Chapter 2 – 13 – Rangeland Vegetation, Sentence 1 – paragraph 1 states that the rangeland landscape … is a product of geological and ecological process as well as human impacts. The next several pages address the geological and ecological aspects but ignore the human impacts. A map and table showing rangeland conditions and trend by ecological site would be extremely helpful. In the absence of this data, professional judgment should be used as the basis to complete both the map and the table.

In 4 – A, Riparian / Wetlands, Chapter 2 – 35, Affected Environments does an excellent job of identifying the value of riparian areas. "The 312.1 miles of riparian habitat on public land in the ARA are in a variety of habitat conditions". Of concern is the 55.1 miles rated in poor condition, 115.4 miles in fair condition and the 35.2 miles that has not been evaluated. The 106.4 miles in either good and/or excellent condition (34.1 percent) indicates a strong desire for improved watershed management. Of the 1,066 miles of known stream side riparian areas within JRA and MRA, 45.9 miles are in a downward trend, 53.9 miles are static and the trend has not been evaluated on 822.3 miles (77.1%). BLM should immediately move to document the status of the riparian and stream habitat conditions where unknown . This information is critical and should be tied to the allotment summaries otherwise there is no way the public can have meaningful input into the livestock grazing management portion of this planning process. There should be a map delineating perennial stream and riparian condition. It would appear that allotments containing riparian habitat in poor, fair or status unknown should receive immediate consideration for management changes.

Based on our understanding, "Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands in Oregon and Washington" (Standards and Guides), when implemented, will resolve all of the watershed health issues related to livestock grazing on both upland and riparian areas on public lands in this planning area. If this statement is true then it appears that the standards and guides as addressed in this document are required to be met under all five alternatives. If this is the case then there should be no variation to upland/riparian/wetland health among any of the five alternatives relative to livestock grazing. If this is not the case please explain how the standards and guidelines will be compromised under the different alternatives.

Since Standards and Guides are going to address the issues seen as most critical to the health of the bulk of the rangeland in Southeast Oregon we request that BLM incorporate at some point in this document an allotment implementation schedule.

In Appendices – 389, the fourth paragraph under Standards for Rangeland Health clearly established the necessity of comparing the existing situation to its capability or potential to determine functionality. Again without an assessment of condition it is impossible to determine the magnitude of the health issues or to participate in a meaningful way to help BLM determine priorities and focus of management efforts.

We would recommend any allotment that either suggests or has the potential to support redband trout, bull trout, bighorn sheep, or any species of concern receive priority consideration in up dating AMPs.

A map denoting fish bearing streams is recommended. On page 3-25 – fish and aquatic habitat, we recommend alternative "D" rather than "C". A table for condition of fish habitat would be very helpful. Fish abbreviations listed in Table D-2 are not identified.

We strongly support the need to control juniper where priority areas have been identified. Juniper should not be controlled on sites containing old growth characterization, rocky ridges etc. All quaking aspen stands should be managed to maintain a multiple aged stand including snags, enhanced distribution, density, regeneration and sustainability, and to favor regeneration of aspen. Remove all juniper from aspen stands. In riparian complexes – juniper should be removed. Consultation with ODFW regarding potential impacts on wildlife should occur early in the project design stage.

In the 136 miles of riparian conservation areas within juniper woodlands we support juniper removal (or control) and aspen regeneration to attain riparian management objective.

We strongly support the completion of the Lauserica and Stephen's extension fences as soon as possible.

On 3-39 Wild Scenic Rivers, the statement is made "implement specific actions for the Deary pasture and historic Birch Creek Ranch property". Other than no grazing in the Deary pastures what are the specific actions contemplated?

On 3-76 and 3-88 Special Status Plant and Wildlife Species, we agree with alternative "C" but emphasize the need for monitoring to assure objectives are met..

On 3-125 Areas of Critical Environmental Concern regarding monitoring, what is a **periodic schedule**? Define.

Anytime a need arises to restock an area because of fire or other natural catastrophe **native** seeds and or seedlings should be utilized.

The document states: i.e.: Livestock use would continue based on existing permit stipulations and approved AMP. What happens on all the allotments where there is no approved AMP? How can or does this meet the requirements for implementing the Standards and Guidelines?

On page 361 – NWSR's Adaptive Rotational Grazing Management, we support the following principles and practices to insure riparian protection and enhancements – items 1, 2, and 3, page 361.

On page 378 – Noxious Weed Management, Item 1, "All contractors and land use operators moving surface disturbing equipment in or out of weed infested areas should clean their equipment before and after use on public land". Change should to **must**. This emphasizes even stronger the need for noxious weed control.

On 2-11 Fire, the documents recommend 50,000 acres of prescribed burn over the 20-year life of the plan. This appears to be a target of about 2500 acres a year. Because of the extreme sensitivity of Wyoming sagebrush habitat to sagegrouse and other wildlife species it is imperative that planned burns are coordinated with ODFW.

If and when Wilderness designations are addressed by congress for the Trout Creek Mountains and Oregon Canyon Mountains the Mud Springs, Twin Peaks, and wood roads should remain open for public access. On the Pueblos the road up Arizona Creek should remain open to Sturgeon and Ten-Cent Meadows for public access.

Any management action that may lead to a grazing conflict or habitat loss between livestock and wildlife should be reviewed with ODFW. Where water has been developed on public lands to enhance grazing management opportunities those water supplies should remain operational after livestock have been removed for the grazing season. Review with ODFW to determine if it is necessary to maintain the water supply for wildlife.

On 2-55 the document states "No licensed domestic sheep grazing permits overlap Bighorn sheep range" but map WLDF – 2 shows domestic sheep and Bighorn sheep range overlapping south of Jonesboro and on Owyhee Ridge. This conflict must be eliminated.

On 377 – Best Management Practices, Paragraph 4, **All** livestock watering troughs should have wildlife safety ramps.

We support adaptive management that is consistent with the Standards and Guidelines for Rangeland health, for the Donner and Blitzen NWSR and the Riddle Brothers ranch.

This document does not support the need for another special designation for the Steens Mountain Area.

Monty Montgomery

Monty Montgomery

L-076

RECEIVED Feb 23, 1999
FEB 25 1999
DISTRICT BLM

Dear Ed Singleton –

I am writing to urge you to adopt a strengthened alternative D which would exclude livestock from riparian areas and other sensitive lands in the SEORMP. Although I live in Portland, I have spent a lot of time in the southeastern part of our state. I have floated the Owyhee in sun and rain, hiked in the Steens, birdwatched at Malheur and gotten sunburned at the Big Loop Rodeo. I love the area in all its diversity, except for the part about stomped down and munched over riversides and hillsides. Please consider the concerns of all Oregonians regarding these public lands. The cows can't be that satisfied anyway – having to graze so far mouthful by mouthful.

Sincerely, Ellen Reynolds

L-077

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

February 13, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Mr. Singleton:

I would like to comment on the BLM's proposal to set guidelines for management of the high desert public lands.

It is my understanding that several Alternatives have been listed. I support Alternative D, but it needs amending. Areas need to be set aside for wildlife preservation. Livestock grazing needs to be excluded from riparian and other sensitive areas, Wilderness Study Areas, and other areas that are already in poor condition. And finally, I think rivers that hit the criteria ~~as~~ Wild and Scenic should be so designated

Please give my above comments your consideration when setting guidelines to preserve and improve the high desert public lands.

Sincerely,

KAROL KOCHSMEIER

cc: Jim Kenna

L-078

From:
Eric T Schoenfeld [(541) 856-3646] 22 February 1999

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

To:
Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon street
Vale, Oregon 97918

About:
Southeast Oregon Resource Management Plan (SEORMP)

Dear Mr Singleton:

I write in response to an Oregon Natural Desert Association "Action Alert" flyer that arrived in this morning's mail.
The flyer raises -- what, seem to me, to be -- reasonable concerns ... mostly involving cattle-grazing projections ... in their synopsis of your agency's "preferred" Alternative C.

My usual stomping grounds for hiking, fly-fishing, and upland bird hunting tend to be mostly in the Baker Resource Area or the Wallowa Whitman NF. I frankly admit that I am Not particularly familiar with range and stream-bank conditions on BLM-managed lands in Malheur and Harney Counties.

The fish-carrying capacities of some (perhaps many) of Baker County's creeks -- with federally-owned stream-banks -- could definitely benefit from a multi-year period of livestock exclusion ... long enough for streamside trees to become re-established and grow large enough to become non-vulnerable to annual tree-top "cropping" by foraging cattle. For two of the most common streambank tree species (willow and cottonwood), a 10 —>15 year grazing exclusion would probably suffice.

The gray/Hungarian partridge population on local sage/grass rangelands seems to be inversely proportional to the intensity of late-spring—>early fall cattle grazing. I

suspect that a similar inverse relationship -- between desert partridge populations and cattle foraging intensity -- also pertains to most of the SE Oregon area that will fall under the aegis of any proposed/implemented SEORMP.
I realize that these partridges are Not Native birds and that protecting their environmental niches is probably a bit beyond the letter or intent of various "endangered/threatened species" acts, laws, admin rules, etc. None-the-less, those little birds are fun to hunt and excellent to eat. They seem to have survived -- and some years thrived -- during dozens of "wild" generations -- (ONLY) in the less-intensively-grazed sections of local sage/grass desert.

Thankyou for taking the time to read this note ...

Very truly yours,

L-079

21 February, 1999

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Mr. Singleton,

We are writing regarding the publication of the BLM's draft "Southeast Oregon Resource Management Plan/EIS (SEORMP). While we have not read the entire two-volume document, we have reviewed the Alternatives proposed in the plan, read the arguments, and discussed the issues with other interested parties. While Alternatives A and E are at the extreme ends of the spectrum, and clearly offer little in the way of realistic alternatives, we do believe Alternative D, with some modifications, offers the most appropriate approach to managing the vast area included in the plan.

Having visited many parts of the regions highlighted in this sprawling area of Southeastern Oregon many times over the last twenty years, we have always been amazed at the diversity and stunning beauty in this little-peopled area of Oregon. However, from the high Steens to the Alvord Desert, from the Trout Creeks to the Owyhee watershed, without a doubt, the most troublesome aspect of those many visits has been evidence, time and again, of degradation due to livestock grazing. So many delicate riparian areas need protection from indiscriminate cattle grazing that BLM's "preferred" Alternative C simply does not go far enough to address these concerns. Some of the features of Alternative C do move in the right direction to protect a few areas, but as a whole this option stops far short of what is truly needed. Indeed, the tiny number of river miles proposed under Alternative C for addition to the National Wild and Scenic Rivers system is embarrassing in comparison to Alternative D.

Alternative D could be significantly strengthened by excluding grazing from riparian areas and areas in especially mountainous terrain that are easily degraded. Past practices suggest that the agency's "adaptive management" policy is a tool that can be and has been used with far too much latitude in allowing grazing to take precedence over the application of sound principles of management. In the words of Alternative D, we would hope that BLM would choose the Alternative that would allow for "long-term sustainability of healthy and productive land, consistent with the principles of ecosystem management." We urge you to adopt changes to decrease the impact of grazing and modify Alternative D to meet those concerns.

Sincerely,

Michael A. Sequeira
Karen L. Theodore
63405 Deschutes Market Rd.
Bend, Oregon 97701

L-080

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

February 22, 1999

Bureau of Land Management, Vale District
Southeast Oregon Resource Management Plan
100 Oregon Street
Vale, OR 97918

Dear Area Manager,

I would like to comment on the Southeastern Oregon Resource Management Plan.

I survey and map vegetation in Hell's Canyon, and have seen firsthand the effect grazing has had on native vegetation, both directly and by speeding the invasion of alien species. In my experience, the higher the level of grazing, the lower the amount and variety of native species. Mechanical disturbance by off-road vehicles also often devastates native plant populations and riparian vegetation.

I would like to see the Southeast Oregon Management Area managed in a manner such that soil erosion would be minimized, riparian vegetation protected, native vegetation protected where it persists and restored where it no longer exists.

I strongly support the protection of native plant communities and rare plants through the establishment of new ACECs and RNAs and the retention of those presently established. I visited Leslie Gulch in the early 1990s and was introduced to many of the rare and interesting plants that grow there. I would like to see it maintained as an ACEC with the current management strategies retained.

Public lands belong to the public. As a citizen, I urge you to manage our land with the welfare of native plants and organisms given the highest priority. Special status plants and animals must be given effective and immediate protection. Other activities such as recreation and grazing should be allowed only at levels that will allow the native species to flourish in whatever semblance of natural ecosystem function it may be possible to retrieve.

Sincerely,

Karen Gray

Karen Gray

L-081

February 18, 1999

Ed Singleton, Vale District Manager
Vale District BLM office
100 Oregon Street
Vale, OR 97918

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

Dear Mr. Singleton:

This letter is in regards to the draft Southeast Oregon Resource Management Plan (SEORMP) and an area that has meant a lot to me since the 1960's when I first got acquainted with it. Before retiring from teaching biology at Redmond High School I studied some of that area in college geology and biology classes and then took some of my students back on field trips. I've hunted deer in the Steens and floated the Owyhee River from Rome to the reservoir four times beginning in the early 1980's.

That background information should help explain why I prefer Alternative D in the SEORMP, which I think does the best job of emphasizing natural values. I have fished most of the Blitzen River from Page Springs clear up to its headwaters behind the Roaring Springs Ranch and would like to see grazing reduced or eliminated in that riparian zone. Some places look amazingly better since grazing was reduced about 20 years ago, but more needs to be done.

I am disappointed that BLM would choose only 34 out of 289 river miles that qualify for Wild and Scenic protection. That's a pitiful amount to help protect our valuable desert waterways.

Frankly, the term "adaptive management" frightens me, much like "creative accounting," even though it might have its place in allowing management flexibility. It sounds more like a smoke screen to justify grazing as usual and has little value in an acceptable resource management plan.

In conclusion, I urge you to reject Alternative C and adopt Alternative D but with some improvements. Livestock grazing should be excluded from Areas of Critical Environmental Concern, wilderness study areas, and habitat essential to fish and wildlife. All riparian areas need protection but desert ones seem to be especially critical. I strongly urge a reduction in grazing where resource damage is occurring and follow sound ecosystem management principles.

Sincerely,

Walt Wolfe

Walt Wolfe

L-082

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

2-24-99

B.L.M.
100 Oregon st E.
Vale, Or 97918

Attn. Mr G. Cooper.

I see no advantage to changing the status of the Owyhee River located in the Corridor below the Owyhee Dam. Please leave it like it is so we may enjoy it.

Helen Willis

L-083

BRUCE JACKSON
PHOTOGRAPHY

L83 dup

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

February 20, 1999

RECEIVED
FEB 23 1999
BURNS DISTRICT BLM

Dear Ed,

'Thank you' for this opportunity to communicate my input into the Southeast Oregon Resource Management Plan.

I have explored and photographed many public lands in America, and personally know what a rare gem Southeast Oregon is. We have a unique opportunity to work together and honor this great land, and this is why I am writing to you.

I strongly request that you reject Alternative C, and that you **please select a strengthened Alternative D** for the final Southeast Oregon Resource Management Plan. The final **Alternative D must** thoughtfully **exclude livestock grazing from**:

--- Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers
--- Riparian areas
--- Critical fish and wildlife habitat
--- Areas of Critical Environmental Concern
--- Wilderness Study areas
--- Grazing allotments in fair or poor condition
This is good common sense that needs to be applied.

Please acknowledge that 'adaptive management' is no substitute for real standards and guidelines. Without constant, on-the-ground monitoring, adaptive management may only lead to further degradation. We can't afford that.

Steens Mountain, the **Owyhee Canyonlands**, and the **Blitzen River** are the obvious reasons for selecting the **strengthened Alternative D**. And, there are so many other areas and reasons for honoring this land we call Southeast Oregon.

As stated in the Southeast Oregon Resource Management Plan, the intent is to; **adhere to ecosystem management principles** and **protect and manage these 6.3 million acres for future generations**. The way to actualize this intent, is to choose the **strengthened Alternative D.**

'Thank you' in advance for selecting a **strengthened Alternative D.** By choosing this path of enlightened management, **'Your Legacy'** of honoring these lands **will be acknowledged with gratitude by millions** of citizens in this country.

Sincerely,

Bruce Jackson

L-084

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

Feb.22,1999

To: BLM District offices @ Vale & Burns.

Dear Sir:

I wish to comment on the proposed SEORMP. I am a retired forester with 36 years of state service and also an avid birder. I have been making annual field trips to this Great Basin area since 1970 and have been leading birding trips there since 1975 on behalf of Salem Audubon. Of course the Malheur Refuge, Steens Mtn, Fields, and the Alvord has received the most attention.
Over the years I have noted the severe impact the constant, heavy grazing has exacted on much of this area. I recommend a plan that would include the most protection possible from the destructive grazing; especially along the riparian areas and the Blitzen and Owyhee Rivers, and other areas of Critical Concern. I strongly urge you to favor the Alternative D with the livestock grazing exclusion on all the special areas within the proposed Management Plan.
This would certainly be the "preferred" plan for many folks that I know.

Thank you and good luck.
Gerald B. Smith.

L-085

Dale and Cheryl Cruson

RECEIVED
FEB 26 1999
VALE DISTRICT BLM

February 24, 1999

Gary Cooper
BLM
100 Oregon Street
Vale, OR 97918

Dear Gary;

We would like to make our opinion known concerning any future development to the Owyhee River and Reservoir in Eastern Oregon.

We would like you to stay within the guidelines of the RMP. We feel there is a need for road improvements and additional parking at the reservoir area.

We do not want any multi-million dollar developments. It would take away the pristine beauty and the natural resources that are there.

Sincerely,
Dale E. Cruson
Cheryl Cruson
Dale and Cheryl Cruson

L-086

John C. Worsley

RECEIVED
FEB 26 1999
VALE DISTRICT BLM

February 23, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, Oregon 97918

Re: Southeast Oregon Resource Management Plan

Dear Mr. Singleton,

It is my understanding that BLM is favoring Alternative "C" as a Resource Management Plan. I am disappointed that this plan is favored, since it is really no plan at all, insofar as providing a viable future for this area.

There is no provision for reducing livestock grazing. One of the greatest sources of damage to streams and riparian habitat is livestock grazing. For example, it will allow thousands of cattle to continue grazing along the Blitzen River which is a wild and scenic river. The scientists for you agency are, I believe recommending against this grazing. Of approximately 300 miles of river eligible for wild and scenic status, only a pitiful 43 miles are recommended. It proposes a Steen Mountain National Conservation Area, but would allow grazing to continue. With cattle continuing to overgraze and degrade the area, this would be a designation and a fraud and deception.

The program relies on you euphemistic "adaptive management", which is a license to steal by the cattle operators. With this designation, the history is that anything goes! Finally, Alternative C does not come anywhere near satisfying the intent of the Southeast Oregon Resource management Plan, which was to adhere to ecosystem management principles. It is simply a way to state that it is a plan , while letting the cattle industry continue to destroy these public lands.

Frankly, Alternative "D" , if it were strengthened would be a positive step toward implementing a program to protect these 6.3 million acres for future generations. This alternative will provide for gradual reductions of grazing and bring some 300 miles of rivers into the Wild and Scenic status.

I have spent time in these areas over the years with my children who are now grown. We had wonderful experiences there and I hope that my grandchildren and my great grandchildren can experience some of the areas the way they used to be. It will never happen until someone has the guts to stand up to the cattle industry.

John Worsley

CC CRAIG HANSEN, BURNS DIST. MGR.

L-087

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

February 23, 1999

Ed Singleton
Vale District Manager
100 Oregon Street
Vale, Or 97918

Dear Mr. Singleton

RE: Southeast Oregon Resource Management Plan

Please adopt Alternative D with some additional limits on livestock grazing. Alternative C looks like the Best Livestock Management (BLM) plan rather than the best plan from the Bureau of Land Management (BLM).

More than 43 out of 289 miles of river should get Wild and Scenic River status.

I do NOT want livestock grazing stopped. I do expect that taxpayers stop subsidizing this activity in terms of lost revenue and in terms of destroyed natural resources.

Please support a plan that represents ALL citizens and ALL business sectors with their varied economic and environmental needs. I want a more balanced plan.

Thank you for considering my views.

Sincerely,

Dave Kruse

Dave Kruse

CC: Craig Hansel, Burns District Manager
Senator Gordon Smith

L-088

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

February 23, 1999

Mr. Ed Singleton, Vale District Manager
Vale District BLM Pffice
100 Oregon St.
Vale, OR 97918

Re: SEORMP - Opposition to Alternative C

Dear Mr. Singleton:

First, let me acknowledge my awareness of the difficult position that you are in -- having to make decisions on issues where the opposing sides are so far apart.

After reviewing the issues and alternatives in this case, I must take strong exception to the BLM choice of Alternative C as the preferred choice. Damage to rivers and streams by cattle grazing has been demonstrated over and over, yet the preferred alternative calls for no grazing reductions even when damage occurs.

I urge you to strengthen and adopt Alternative D instead. This alternative comes much closer to meeting ecosystem management goals. It also needs improvement in that it fails to set reasonable limits on livestock grazing.

If it is truly the intention of the BLM to protect this area of southeastern Oregon, then Alternative D must be chosen and strengthened.

Thank you for your consideration.

Very truly yours,

Patricia Sims

Patricia Sims

cc: Craig Hansen, Burns District Manager

L-089

Donald Grev

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

Ed Singleton, District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

February 23, 1999

Dear Mr. Singleton,

I have been reading about the Southeast Oregon Resource Management Plan that will influence how this unique and beautiful region will be managed for many years to come. I applaud any effort to develop a reasoned and responsible plan for these fragile ecosystems. As a frequent visitor to the areas in question, I would like to offer my comments about some of the alternatives.

I understand BLM currently prefers "Alternative C." I believe Alternative C is less of a plan and more of a license to continue current, destructive practices. It does not appear to reduce livestock grazing, even in sensitive areas where resource damage can be demonstrated. It continues grazing on the Wild and Scenic Donner Und Blitzen River, which seems to contradict the recommendations of BLM scientists. It proposes Wild and Scenic River status for less than 1/6 of the eligible waterways in the subject area.

I could support a National Conservation Area that truly protects the resources and beauty of Steens Mountain, but such a proposal simply cannot coexist with continued grazing there. Alternative C continues the use of so-called "adaptive management" which has nothing to do with resource planning and everything to do with loopholes for grazing permits. Finally, Alternative C does not satisfy the intent of the SEORMP to adhere to ecosystem management principles.

Alternative D comes much closer to meeting the ecosystem management goals of the SEORMP. For the most part, it appears to be a proposal I could support. Alternative D needs to include livestock grazing restrictions from Wild and Scenic Rivers, critical fish and wildlife habitats, wilderness study areas and ACEC's. A real management plan should not include "adaptive management", particularly if the adaptation is only in the direction of resource depletion and without regard to resource conservation when damage is evident.

My family and I have enjoyed visiting the wild side of Oregon for a number of years. We backpack the gorges of Steens Mountain several times each year and always look forward to the remote and unique beauty of the place and the rare diversity of its plants and animals. These are not so much resources, but fragile treasures. It is the responsibility of us all to partake wisely and carefully for the sake of these special places, their inhabitants and our progeny.

Sincerely,

Don Grey

Don Grey

cc: Craig Hansen, District Manager
Burns District BLM

L-090

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

February 20, 1999

Ed Singleton
Vale District BLM
100 Oregon St.
Vale, OR 97918

We are writing regarding the draft Southeast Oregon Resource Management Plan. We disagree in choosing The Preferred Alternative. It is largely a status quo plan which does little to address major resource issues, such as damage to the ecosytems by large scale cattle grazing. We urge you to adopt Alternative D.

Many more waterways meet and deserve designation as Wild and Scenic Rivers. Water is precious and should receive the added legal protections under the Wild and Scenic River designations.

Status quo management (very close to the Preferred Alternative) has led to major degradation of both waterways and grasslands. It has certainly been a negative on out trips to the area-degradation is obvious in many areas. Reductions in the amount of grazing is necessary, as well as changes in the timing and location of the grazing. Alternative D would do that the best among the choices.

Sincerely,

George and Rhonda Ostertag

L-091

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

Ed Singleton
Vale District BLM

2/24/99

Dear Mr. Singleton,

I am writing in regards to the Southeast Oregon Resource Management Plan. Please reject alternative C and support a stronger alternative D that would exclude livestock grazing in riparian areas and other areas of critical environmental concern including wilderness study areas, and which would exclude grazing in any allotments that are in fair or poor condition.

Thank you,
Jon Tilles

L-092

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

2-25-99

BLM
attn Gary Cooper
100 Oregon St.
Vale OR 97918

Re: Lake Owyhee

Dear Mr. Cooper:

My husband and I would like to let you know how we feel about your plan for the area below the dam and Birch Creek Ranch. We think it should be left the way it is if the Sheriff can enforce the 14 day stay limit on camping.

We would not like to see any of that area (around the lake - downstream or upstream) developed. Except more parking is definitely needed - especially at the ramp by the dam.

over →

Thank you for listening -

Sincerely,

Gordon & Linda Curtis

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

RECEIVED
FEB 26 1999
VALE DISTRICT BLM

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

Gary Boor
(City) (State) (Zip)

Comments: General Comments Volume 1 of 2.
RMP SE OR

Chap 1-p12 para 6 "Livestock forage allocations will not be revised by this plan. Authorization of livestock use in the planning area will be subject to change through the life of the plan." (The only revising the BLM does is to cut AUM's.)

1-13 para 5 "Existing management systems ... will continue ..." (until the BLM changes its mind or does another plan.

1-14 para 9 "Coordination" is not just a BLM regulation but it is a Federal law that requires "coordination" with local government i.e. county courts.

2-13 para 5 "Locally heavy stocking of livestock probably ..." the word "probably". When you don't know, you guess. How much of this plan is based on guessing?

2-46 para 3 Note: Elk prefer livestock grazed areas to those that are not grazed for "a long period of time."

MAIL TO:
Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144
or
Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

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Gary Boor
(City) (State) (Zip)

Comments: General

2-47 para 5 the "livestock water developments were not just the BLM's. The permittees also had a hand in many. The maintenance is now done by the permittees and if not the permittees then who? The BLM does not even have the pipelines correctly mapped!

2-59 para 1 When evaluating Seedings/Rangeland Projects one must remember Potential/Capability, see Appendix p 390

3-2 Desired Range: talks about social, economic, and recreation but there is nothing about grazing. Grazing must be included, it is part of a multiple use concept and is very much a part of the economics of the County.
There is no mention of potential vs capability (Appendix p 390)

3-43 calls for "working cooperatively." with who?

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Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

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(Name) Gary Boor
(Street address) 1020 Morgan Ave
(City) Ontario, (State) OR (Zip) 97914

Comments: General

3-68 Seedings "appropriate mixes" of perennials. These must pass the potential/capability test. (Appendix 390)
Also Cost vs Success
Also Weather at the specific site. There are many micro climates in the RMP area. They must also be taken into account.

4-22 para 2 "About 75%..." the whole statement fails to take into account the Potential/Capability test (Appendix 390). Any seed, native or nonnative, must be certified, weed seed-free and double checked by the BLM before planting. Then monitored for 3 yrs for weeds and treated when/if weeds are seen.

4-47 para 2 how could less than zero be treated?
para 6 line 5 "... weed establishment may ..." the word may needs to be change to will. The BLM rules/reg's have not stopped the weeds yet!
para 7 line 4 "beneficial impact" this is only a guess. The plants are there now with 5 to ACEC's.

MAIL TO:
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Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

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(Name)
(Street address)
(City) (State) (Zip)

Comments: General

4-153 AHC these is no reason to decrease AUM's

4-161 these is a Split-estate!

Appendice p 378 Noxious Weeds
1) Strike the word "moving," replace with "using"
Strike "in By" out of weed infested areas should" replace with one word shall.
2) Who is going to do this?
3) Strike the words "weed-free zones."

p 390 Potential vs Capability
I'm talking with BLM employees at the open house, they did not understand this concept. They thought the two were the same. That BLM does not understand this concept.

App 4/4 Normal Maintenance must be continue.

There is no value in additional SMA's.

MAIL TO:
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Vale, Oregon 97918
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BLM, Burns District Office
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(541) 573-4400

L-094

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

RECEIVED FEB 26 1999 VALE DISTRICT BLM

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

Gary Boor
(City) (State) (Zip)

Comments: OR Trail ACEC Keeney Pass
Chap 3-147
Visual Resource Management "II" the minimum level of VRM for a WSA. If this "VRM" is so important, it is time to do something about the weeds, the garbage and OHV use.

3-147 Dev/values para 3
Fifty Blvd does not just overlies the trail in "some" places but in many places. The "cuts" are a crock. The trail was a motor route for many years. The "cuts" were machine made.

The Oregon Trail Management Plan provides more than enough protection, if the BLM would enforce it.

para 4 .25 mile corridor, which is
para 5 .5 mile corridor it?

para 6 - fails to mention that stockwater lines (laid by the BLM) cross the trail in 3 places, goes right down the trail in one place. Miles of fences are not mentioned nor are non native seedings.
(continued)

MAIL TO:

Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
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BLM, Burns District Office
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Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

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Gary Boor
(City) (State) (Zip)

Comments: Keeney Pass ACEC (cont.)
Not to mention numerous roads, a set of corrals, cattleguards, stockwater tanks, gravel pits, and a fibre optic line. The ACEC would contain at least 6 miles of stockwater lines.

Also there is no mentioned that the trail cuts the Allotment in two (2).

Compare the description of Keeney Pass ACEC with the Tub Mtn ACEC.

3-147 para 3 6miles of Trail > Which is it?
para 5 4miles of Trail

3-148 A4,C Why is this specific to livestock only? Is this because of a bias? The negatives that are seen + not taken care of by the BLM are: weeds, OHV, Trash. These are in part or totally related to people.

3-149 Rational "partially" protected. If the BLM can't enforce the rules as now written, because "there is no money for

MAIL TO:

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L-095

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

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Gary Boor
(City) (State) (Zip)

Comments: Keeney Pass ACEC (cont.)
enforcement." So we will just see more rules with no enforcement.

Conclusion
The BLM needs to enforce the rules it now has. There is more than enough protection now with the Oregon Trail Historical District/ Oregon Trail Management Plan.

The ACEC is a totally useless additional level of rules/regs.

Note: Get the map that Diane Pattegard has drawn up, showing the improvements.

Renewable natural resources are not fragile and static, but resilient and dynamic. Management not preservation - is the best way to achieve environmental progress.

MAIL TO:

Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
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or

Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

RECEIVED
FEB 26 1999
VALE DISTRICT BLM

FEB. 23, 1999

ED SINGLETON, VALE DISTRICT MANAGER

DEAR MR. SINGLETON:

I AM WRITING TO COMMENT ON BLM'S SEORMP/EIS. UNFORTUNATELY, THIS DOCUMENT FAILS TO EXPLORE THE FULL RANGE OF ALTERNATIVES AS REQUIRED BY NEPA.

THE BLM SHOULD SELECT AN IMPROVED VERSION OF ALTERNATIVE D AS THE "PREFERRED ALTERNATIVE." THIS IMPROVED ALTERNATIVE D SHOULD BE STRENGTHENED TO EXCLUDE LIVESTOCK GRAZING FROM: 1) RIPARIAN AREAS, 2) CRITICAL HABITAT AND SENSITIVE AREAS, 3) WILDERNESS STUDY AREAS, AND 4) ALLOTMENTS IN FAIR OR POOR CONDITION.

THANK YOU FOR YOUR EFFORTS TO PROTECT THE PUBLIC'S LAND, WATER, FISH, AND WILDLIFE.

SINCERELY,

David E Ehlen

L-096

Feb 20, 99

Dear Mr. Singleton,

RECEIVED
FEB 26 1999
VALE DISTRICT BLM

I just read a copy of the proposals of the SEORMP for your area.

I have to say that I think you all at the BLM are crazy to keep livestock grazing on all the options - but it especially worries me that alternative C uses the wording of "adaptive management" as an euphemism to allow ranchers to graze livestock beyond their permit limits - based on what? And who would judge and monitor this? The closest alternative that sounds good to me is Alternative D but it has flaws too. Alt. D need to set more limits on livestock grazing too. I'm especially concerned about grazing close to rivers & in wilderness study areas.

I'm a frequent visitor to all of South-eastern & Central Oregon and I can't believe the damage cows inflict - especially riparian areas. It's obvious even to a lay person like myself.

Take another look & rewrite Alt. D to limit grazing more specifically. Thanks for listening.

Juliana Cusker

L-097

Jonathan R. Duerst
Jon Springer

DUERST & SPRINGER, P.C.
Attorneys At Law,

RECEIVED
FEB 26 1999
VALE DISTRICT BLM

February 24, 1999

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

As a lifelong resident of Oregon, I am writing to you to express my concerns regarding the Southeast Oregon Resource Management Plan. This planning document will guide the management of approximately six million acres of public land for the next 20 years, and I appreciate greatly you taking a moment to consider my concerns.

The area covered by the SEORMP is a unique and special area where I have spent a lot of time. Anyone who has spent time in this area over the last 15 years cannot help but notice the tremendous destructive impact of the current livestock grazing policies. Alternative C set forth by the BLM does virtually nothing to address these problems. The ranchers and over livestock managers have consistently ignored these concerns, and have acted as if they don't exist. The current livestock and grazing practices are irresponsible and show no signs of changing. This is unacceptable and will lead to irreparable damage and destruction.

The BLM needs to adopt rules and procedures that protect these six million acres, not destroy them. Alternative D needs to be strengthened to exclude livestock grazing from wild and scenic rivers, including the Blitzen and Owyhee Rivers. Livestock must be excluded from riparian zones and critical fish and wildlife habitat. Wilderness study areas and grazing allotments in fair or poor condition must be protected as well.

The "adaptive management" proposal is a terrible suggestion that is completely unworkable. Without constant, on-the-ground monitoring, "adaptive management" will lead to one thing and one thing only: further damage and destruction by livestock and ranchers that simply do not care about anything except how much money they can make.

Steens Mountains, the Blitzen River and the Owyhee canyon lands are beautiful, magnificent places where one can be rejuvenated and restored. The destruction and degradation of these areas by and through short sighted policies designed to benefit only the livestock industry is truly a crime. Only through the adoption and enforcement of strong, unequivocal policies can the destruction stop. It is time to be serious, to take responsible steps toward adopting policies that provide effective protection for these truly priceless desert wildlands.

Sincerely,

JON SPRINGER

JS:cr

cc: Craig Hansen
Burns District Manager
Burns District BLM Office
HC74 - 12533 Highway 20 West
Hines, OR 97738

L-098

2/23/99

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, Or 97918

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

Dear Sir

I am writing today asking you to reject alternative C of the SEORMP. This plan is flawed and does little to restoring and protecting lands damaged by decades of overgrazing. The bulk of these C.3 million acres are wholly unsuited to cattle grazing. Nor does it address adequate protection of 289 m. of wild/scenic rivers.

What you need to do is think about your responsibility as protector of Oregon's fauna and flora in the SEORMP. Alt. C is nothing but rolling over to grazing/development interests. I love Oregon, am a native, and I travel to SE Oregon to get away from the development of W. Oregon. I'm asking that you put your vote in for Alt. D and add further restrictions to grazing. After all, we all need beautiful open spaces, not a lot of hamburger.

Sincerely,
Richard Keysor

cc: Craig Hansen

L-099

RICHARD MEDLEY

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

February 24, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton,

Re the **Southeast Oregon Resource Management Plan**, I urge you to adopt **Alternative D**.

In addition to adopting **Alternative D**, which emphasizes the natural values of the area, I firmly believe that alternative should also be strengthened. Tighter limits need to be set on livestock grazing in the area to avoid ecosystem degradation, especially on the fragile Steens Mountain and Alvord Desert areas.

Like many people who value this area, I am deeply suspicious of the concept of "adaptive management." I believe firm standards must be set for grazing and adhered to in order to avoid ecological degradation. The area covered by the SEORMP is one of Oregon's crown jewels; it belongs to us all, and not just to the cattle ranchers. We must protect it for future generations.

Sincerely,
Richard Medley

L-100

REGINALD R. EKLUND

RECEIVED
FEB 2 6 1999
VALE DISTRICT BLM

February 22, 1999

Mr. Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

I am writing to encourage the BLM to take an aggressive stance to protect the southeast Oregon desert and riparian areas from the environmental destruction caused by grazing.

Having been raised on a farm and ranch, I can speak from personal experience on two issues. First, the cow is not an indigenous species and for that matter neither are sheep or horses. I have seen the damage cattle inflict on the delicate desert and riparian environment. As you know cattle do not graze through an area. They stay and destroy. The only way to allow the land to heal is to get them out. Limiting grazing I am afraid will not work because cattle are not like the wild creatures. They remain in the areas they select until the forage is gone.

The second issue is that I have witnessed and personally experienced significant lifestyle and basic cultural change. There is great resistance but in the end it is not only necessary but also positive. It is time that the BLM do the same and deal firmly with the issue of pressure from the ranchers to maintain a culture that is not sustainable. It must be recognized farming and ranching in this country have undergone great change. Recognize that change will not stop; in fact it will accelerate. Today only a fraction of our population is involved in this activity and it is growing smaller each year. Ranching is a wonderful lifestyle and culture, but unfortunately in many areas of our country it cannot be preserved primarily because of the

are completely interconnected. This was borne out by the analyses of Anadarko data that was released upon forfeiture of the geothermal lease; in short, chemical analyses of flows from test wells depicted chemical compositions that were either identical to Borax Lake or highly similar to it. Because of these results the Conservancy believes that any geothermal development in proximity to the underlying geothermal basin of Borax Lake presents an unacceptable risk to the Borax Lake ecosystem which is the sole habitat for the listed endangered Borax Lake chub.

The Conservancy recommends for Objective 1 under Energy and Mineral Resources (3-11) that the BLM adopt Alternative D with reference to no leasing within a 3 by 8 mile buffer around Borax Lake. We also recommend that all ACEC/RNAs be withdrawn from mineral entry as exploration and development would substantially degrade the resources for which these areas were designated to represent and protect.

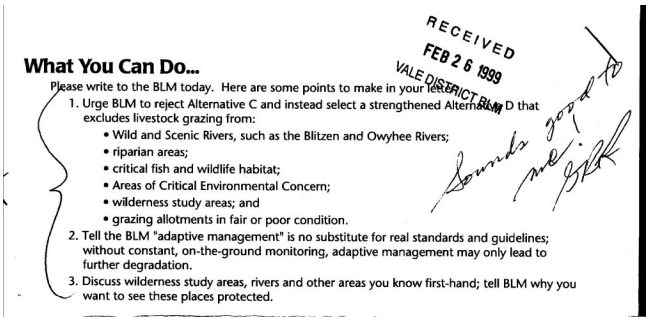
Rare Species

The special status plant species section (3-22) is quite brief and says many of the right things regarding using a mix of protection, restoration and enhancement measures for species and their habitats. However, given the large number of species that are listed in Chapter 2 of the RMP/EIS we feel that there should be more specificity regarding future actions for at least some of these species. Table 2-6 details how much of the likely habitat has been inventoried for certain species; TNC recommends that a goal of the plan should be that 75% of the likely habitat should be surveyed within the next 5 years. There is also no mention of the use of habitat management plans in the RMP or at least no goal to draft additional plans for other species. These plans have been drafted after typically lengthy studies of the species and their habitats such that they should be incorporated into the RMP and implemented as a primary means to meet the objective stated in Chapter 3.

Finally it is noted in Chapter 2 that several specific habitats contain a number of rare plant species and in general have a high degree of endemism associated with them. The Vale Sand Hills, Owyhee Uplands Ash Deposits, High Steens Alpine Zone, Playas, Lithic Soils, and Limestone are all discrete areas that should be focused on in the RMP as needed special attention for the contributions to botanical diversity in the region. Management attention in these areas should include but not be limited to regular botanic surveys and monitoring, impacts from land uses and management actions such as grazing, recreation, road maintenance, wildfire, among others.

Rare animal species also need more specific attention in Chapter 3 of the RMP/EIS. Specifically, the Conservancy recommends that greater effort be made to inventory unique habitats for groups of species of which little is known. These groups include but are not limited to aquatic and terrestrial mollusks, aquatic and terrestrial insects, bats, and other small mammals. Bighorn sheep are specifically identified in the plan Objective 2 (3-28); we recommend that greater protection for potential bighorn habitat be afforded by the curtailment of domestic sheep grazing where such allotments overlap with bighorn potential presence.

L-101



RECEIVED
FEB 26 1999
VALE DISTRICT BLM

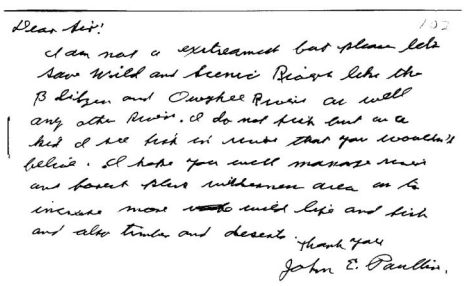
What You Can Do...

Please write to the BLM today. Here are some points to make in your letter:

1. Urge BLM to reject Alternative C and instead select a strengthened Alternative D that excludes livestock grazing from:
   - Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;
   - riparian areas;
   - critical fish and wildlife habitat;
   - Areas of Critical Environmental Concern;
   - wilderness study areas; and
   - grazing allotments in fair or poor condition.
2. Tell the BLM "adaptive management" is no substitute for real standards and guidelines; without constant, on-the-ground monitoring, adaptive management may only lead to further degradation.
3. Discuss wilderness study areas, rivers and other areas you know first-hand; tell BLM why you want to see these places protected.

Sounds good to me! JKK

L-102



Dear Sir!

I am not a extreamest but please lets save Wild and Scenic Rivers like the Blitzen and Owyhee Rivers as well any other Rivers. I do not fish but as a kid I see fish in creeks that you wouldn't believe. I hope you well manage rivers and forest plus wilderness area as to increase more wild life and fish and also timber and decent. thank you

John E. Pantlin.

L-103

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

Mr. Edwin J. Singleton
District Manager, Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, OR 97918

The Malheur-Owyhee Watershed Council, through sub-committee and in general session, have reviewed the draft Southeast Oregon Resource Management Plan / Environmental Impact Statement.

We strongly feel that a major emphasis toward control and possible eradication of invading noxious and exotic weed species is paramount for watershed protection. Use of chemical, biological, mechanical, and fire management tools is mandatory to achieve this objective.

Although the basic concept of areas of environmental concern and research natural areas held merit when multiple use management was less intensively managed, we strongly support the position of the Malheur County Court (April 1996) which stated:

" With the management flexibility afforded by the Vale Rangeland Restoration Project, native vegetation has made significant recovery during the ensuing years.

"We recognize the merit of identifying various plant communities, or cells as sites for plant scientists to study and monitor change over time, as identified by the Nature Conservancy through a possibly predisposed contract. However, we feel that neither classification as a Research Natural Area nor an Area of Environmental Concern is appropriate or necessary.

"Research Natural Areas (RNAs), with few exceptions, are established to preserve and monitor ecosystems unaffected by human activities. Thus livestock grazing and recreational use are normally excluded. This court does not support such a deviation from multiple use on public lands within Malheur County.

"Areas of Critical Environmental Concern (ACECs), by Bureau of Land Management manual 1613 standards, (.02 Objectives) "ACEC designations highlight areas where special management attention is needed to protect, and prevent irreparable damage to, important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes...Similarly, under .06, Policy, states: 'An ACEC designation is the principal BLM designation for public lands where special management is required to protect...' Special Management Attention is addressed specifically in .12. 'To be designated as an ACEC, An area must require special management attention to protect the important and relevant values.'

"We contend that present management is compatible with the continued well-being of the identified vegetative communities. Present vegetation is, in part, a result of past management practices. Should problems be identified in the future, existing management authority (see 1613.22) adequately provides flexibility for correction (see 1613.33 E [1 and 2])."

A more acceptable approach would be for documentation of identified sites on a GIS overlay enabling future reference by the scientific community and land managers.

Research of existing exclusion sites totaling over 6,400 acres in Malheur County alone, should be initiated. Such sites, estimated at several hundred in number, include riparian, wetlands, native uplands, and seedings.

Consequently, our council favors Alternative "B", viz. continue present management.

Our principal concern is that of management encumbrance through classification as ACEC or RNA will prevent or surely greatly restrict control of invasive weed species through various management tools available presently as well as in the future.

The Malheur-Owyhee Watershed Council recommendations for the specific ACEC/RNA nominations are as follows:

The following is a consideration of each existing or proposed ACEC or ACEC/RNA within the Malheur and Jordan Resource Areas by the Malheur - Owyhee Watershed Council. We wished not to discuss the merits of those of the Andrews

Resource Area, which is not within the Malheur or Owyhee watersheds.

Malheur Resource Area

Honeycombs ACEC/RNA (Existing and Potential Addition)

We agree with the existing status and concur with the 3,378 acre addition to this important geological, botanical, and zoological area. This area is worthy of RNA status.

Leslie Gulch ACEC (Existing)

We agree with Alternative C.

Mahogany Ridge ACEC/RNA (Existing and Potential Addition)

We agree with Alternative B. The amount of privately owned lands in the area precludes effective management of the small BLM tracts. Excellent similar areas exist in the Oregon Canyon/Trout Creek Mountains further south which are largely federal land.

Stockade Mountain ACEC/RNA (Existing and Potential Addition)

We favor retaining the original 653 acre ACEC/RNA but reject an additional 465 acres. Thus we favor Alternative B. We feel the isolated status of BLM lands amid private and state of Oregon holdings precludes management opportunities.

Black Canyon ACEC/RNA (Potential)

Our group had lots of discussion of this area. The canyon itself was deemed suitable for ACEC status -- but not for RNA status. Boundaries were questioned as being too inclusive. Much of the canyon floor and stream are now fenced for riparian protection. Our opinion was that such protection is proper and could well qualify as an ACEC, but not as an RNA. The included uplands do not require special management status.

Castle Rock ACEC (Potential)

Considerable discussion on this important transition area where forest meets desert. Native American values of Castle Rock plus the plant digging opportunities afforded by the resources of this area are considerable. The high botanic

and zoologic values, and recreational use of the area all suggested our group embrace the Alternative C option. Which we did.

Coal Mine Basin ACEC/RNA (Potential)

This relatively small (755 acres) area has been identified as being of importance to the botanic, geologic and fossil values of southeastern Oregon and adjacent Idaho. We concur with its suggested designation as an ACEC/RNA.

Dry Creek Gorge ACEC (Potential)

Consensus was reached for that portion of Dry Creek from Juniper Creek upstream to and including the cave as an ACEC.

Hammond Hills Sand Hills ACEC/RNA (Potential)

We do not support this proposed designation. Present management has protected this desert vegetation. Present management should continue to do so. Thus Alternative B is favored.

Lake Ridge ACEC/RNA (Potential)

We find little or no need to grant special status to plant communities that are common and certainly compatible with present management. Alternative B is thus selected.

North Fork Malheur River ACEC (Proposal)

We support this ACEC proposal.

North Ridge Bully Creek ACEC/RNA (Proposal)

We can not support such a designation based on native plant communities that are not in jeopardy. Present management is adequate for the resource values identified.

Oregon Trail ACEC-Kenney Pass Segment (Proposal)

Our consensus was that this area of presently highly disturbed rangeland is now adequately protected through existing management classification concerning the Oregon Trail. Seedings of crested wheatgrass adjoin the area, numerous water and cable systems follow or cross the subject area. Management constraints are available for future management

of this highly developed roadway.

Oregon Trail ACEC-Tub Mountain Segment (Proposal)

Again, our specialists felt that existing management was adequate to ensure values of the Oregon Trail. We therefore do not support this ACEC. This segment is highly developed ... a county road, 2-track and 4-wheel drive routes, numerous barbed wire, steel post fences, livestock water troughs, water wells, corrals, and reservoirs. It's kind of 100 years after the fact.

Oregon Trail ACEC-Birch Creek Segment (Proposal)

We support inclusion of this segment of the Oregon Trail as an ACEC.

Ott Mountain ACEC/RNA (Potential)

We feel this element has been fulfilled by the adjacent Castle Rock area. Ott Mountain is a small tract that is fraught with political problems.

Owyhee Below the Dam ACEC (Potential)

This area is highly recreation oriented. Plans by Bureau of Reclamation are just now coming on line. Malheur County, which maintains the rather expensive road system, would like BLM to take over. Great cost. The area is human controlled due to the dam releases, etc. It's a neat area but a very hot issue. We are neutral on this ... but beware.

Owyhee Views ACEC (Potential)

We can not support the rational for this proposal. All of the area of concern is protected at present through management plans now in place.

South Alkali Sand Hills ACEC (Proposal)

Our belief is that weed control, fire suppression, wildlife habitat, and watershed values are paramount in this area. We feel that an ACEC for endemic plants ... that have persisted through over 120 years of domestic livestock use ... is inappropriate. Management flexibility is mandatory. Hence we support Alternative B.

South Bull Canyon ACEC/RNA (Potential)

We agree with the Malheur County Court insofar as a general lack of need for specific sites for plant communities has not been documented. The sites occur universally throughout the area. We favor a listing of these sites so researchers and others can access them, as needed. Thus, we can not endorse this proposal based on plant associations. Therefore Alternative B is favored.

South Ridge Bully Creek ACEC/RNA (Potential)

This site is similar to the prior. It is a botanical issue that is merely filling a "cell" for the geographic region. We feel it is not necessary to so designate an area.

Spring Mountain ACEC/RNA (Potential)

Our group supported this nomination.

Jordan Resource Area

Jordan Craters ACEC/RNA (Existing and Potential Additions/Deletions.

We endorse Alternative D. The identified values of this ACEC/RNA are considerable and encompass botanical, zoological, and geological values. Little resource use is in conflict with proper and prescribed management.

Owyhee River ACEC (Existing and Potential Deletion)

We support deletion in Alternative C.

Saddle Butte ACEC (Existing and Potential Additions/Deletions)

We concur with the relevant values of this area. The public safety issue of ACEC nomination is most applicable here.

We therefore support this present ACEC and the addition.

Whitehorse Butte ACEC (Existing and Potential Additions/Deletions)

The Malheur/Owyhee Watershed Council believes present management, which is directed toward improvement of riparian

habitats, is highly successful. We therefore support Alternative C, which refers to Alternative A.

Dry Creek Bench ACEC/RNA (Potential)

As stated before, we recognize the scientific value of various vegetative communities. Such areas can be identified to researchers through many means ... GIS location, for example. We see no merit in declaring an area an ACEC or RNA just because it is universally present.

We all rejected this ACEC/RNA proposal.

Little Whitehorse Creek ACEC/RNA (Potential)

This classic exclosure of 1972 has had such an impact on riparian resource management through public education on tours. We of the Watershed Council support this site as an ACEC/RNA.

Mendi Gori Playa ACEC/RNA (Potential)

We support this 148 acre site (Alternative C).

Palomino Playa ACEC/RNA (Potential)

Our council concurs with Alternative C.

Three Forks ACEC/RNA (Proposal)

Overall, we support Alternative C.

Toppin Creek Butte ACEC/RNA (Potential)

This excellent condition rangeland has been managed well by the BLM and the rancher. We favor Alternative B.

Respectfully submitted 25 February 1999

Herb Futter

Herb Futter, Chairman, Malheur-Owyhee Watershed Council

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L-104

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FEB 25 1999
VALE DISTRICT BLM

10

We dont think that we need ACEC or NRA Desination on land that is under good management.
It is good management that has made the land the way it is now.

Terry & Terri
Amick

L-105

RECEIVED
FEB 25 1999
VALE DISTRICT BLM

Feb 23-99

BLM
Vale District,
100 Oregon St.
Vale Oregon, 97910
Att. GARY COOPER

Dear Mr. Cooper,

I have some questions on the resource management Plan.
① Did you follow the coordination process 43 CFR § 1610.3-1(a)?
I have recieved a number of calls regarding the A.C.E.C., I am led to Believe this issue has not been resolved.
② Was 16 U.S.C. § 1533 (b)(2) concerning econmic impacts considered (?)
③ 42 U.S.C. § 4331(b) concerns (culture) and (custom) (?)

I believe prior existing rights come into play here.
The questions seem endless according to todays paper.

④ Are the County livestock producers involved in "Coordinating Agency Status"?
Under U.S.C. or C.F.R.?

Sincerely,
Dan Joyce
Commissioner
Malheur County

cc.
Tom McElroy
Livestock Assoc.

L-106

From: "Brauner, Kalman" <Kalman.Brauner@PSS.Boeing.com>
To: "'esinglet@blm.gov'" <esinglet@blm.gov>
Date: 3/1/99 1:00pm
Subject: Comments on the SEORMP

March 1, 1999

Mr. Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale OR 97918

Dear Mr. Singleton:

I am writing to you to comment on the Southeast Oregon Resource Management Plan. I like to make two points:

* Please reject the BLM's preferred alternative, Alternative C. Instead, I urge you to adopt a strengthened Alternative D that would exclude livestock grazing from:

Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;
riparian areas;
critical fish and wildlife habit;
areas o critical environmental concern;
wilderness study areas; and
grazing allotments in fair or poor condition.

* In my view "adaptive management" is not a real substitute for real standards and guidelines. Without constant, on-the-ground monitoring, adaptive management may only lead to further degradation.

My wife and I have visited the Vale and Burns districts quite a few times. The area is magnificent and strikingly beautiful. However, the damage from overgrazing was extremely evident to us on several visits. In particular, on one drive on the east side of the main Owyhee River, south of U.S. 95, there were miles and miles of land that had so many hoof prints that there was virtually no grass left. The ONLY thing noticeable was hoof prints. It was very sad. Grazing must be reduced!

Thanks for listening!

Kalman Brauner

Kalman Brauner -

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

BALTZOR CATTLE CO., INC.
Allen & Virginia Baltzor

February 28, 1999

FAX TRANSMISSION and
CERTIFIED MAIL-RETURN RECEIPT REQUESTED:

USDI-BLM
Vale District Office
100 Oregon Street
Vale, Oregon 97918

Attn: Gary Cooper

Re: COMMENTS to the "Draft Southeastern Oregon Resource Management Plan/Environmental Impact Statement" (DEIS) dated September, 1998.

Dear Mr. Cooper:

Thank you for this opportunity to comment to the DEIS.

We own and control a Grazing Preference within the Mahogany Mt. Allotment (10509) and Spring Mt. Allotment (10504), Malheur Resource Area, Vale Grazing District (Oregon), to the extent of 2,729 AUMs, and 42 AUMs, respectfully. We also own a substantial amount of private within and adjacent to these Allotments. We also own water rights. We also own a substantial amount of livestock and farming/ranching equipment. All of these assets - as well as others - are used in combination to sustain a viable livestock operation; an operation which has existed well before the passage of the Taylor Grazing Act in 1934.

As is obvious from the extent of our Grazing Preferences, we are very much public land dependent. Our cattle presently graze annually under a deferred grazing rotation system within the Mahogany Mt. Allotment from March 25 to October 31, and our horses present graze annually within a certain pasture of the Spring Mt. Allotment from April 1 to October 31. While these livestock are grazing upon the public land within these Allotments, we manage our private land for grass and hay production, so as to sustain these livestock between November 1 and March 24/March 31. Therefore, the sustainability of the present livestock forage allocations within these Allotments is essential to the survival of our operation.

The DEIS at page x (Summary) states that "(t)here are no new allocations being proposed" (emphasis supplied) within this planning document. Although we accept this statement and intend to hold you to this statement, our review of the DEIS and our comments herein suggest to us that there is a defacto re-allocation of forage to other uses as it relates to our affected Allotments, like (1) enlargement and

new designations of ACEC/RNA, (2) restrictions relating to Off Highway Vehicle Areas, Recreation Opportunity Spectrum, and Visual Resource Management, (3) designation of winter range for Elk, and (4) creation of objectives, which are often vague. We are especially sensitive to these issues because any re-allocation can and will dramatically and adversely impact the stability of our operation, which is our sole livelihood.

We are good stewards. The proof of this fact is most apparent by the DEIS characterization of many features within the Allotments which we use as purportedly containing "important" values to purportedly justify the enlargement or establishment of ACEC/RNA and other restrictions. In short, since these "values" currently exist, then obviously and undeniably, our family's stewardship over the last many, many decades have maintained and improved these "values" overtime. We therefore find absolutely no rational justification to propose to implement additional ACEC/RNA and other restrictions, discussed herein.

We do not find fault with the whole DEIS, as to its Alternative "C" (preferred alternative). We are encourage by the change in land tenure. We are encouraged by the principle to make "no new allocations". We are also encouraged by the DEIS acknowledgment and recognition of our stewardship - as well as the that of BLM - in maintaining and enhancing overtime the "values" (discussed above). In the days of criticism of the ranching community (and sometimes that of BLM), those criticisms are totally unjustified as to the Allotments within which we are authorized. Therefore, and ultimately, we would advocate for a proposed action somewhere between Alternative "C" and Alternative "B".

To ease the review, our comments are divided into two major sections and principally deal with Alternative "C", the preferred alternative. The first Section comments upon certain statements made throughout the DEIS in Volume I and II, which relate (or may relate) to the Mahogany Mt. Allotment, Spring Mt. Allotment, our private land, or our livestock operation. The second Section comments upon the various Maps appended to Volume I and II. We have attempted to comment to specific statements throughout the two volumes, but to the extent that we have commented in one section to the same concept or objective in another section, please consider our comments to apply throughout the document to the issue (for example, we may have commented regarding a map delineation of an ACEC, but not made the same comment in an appendix or at each reference in the text of Volume I to the same issue).

****

1. COMMENTS RELATING TO CERTAIN STATEMENTS WITHIN VOLUME I & II.

Page x The DEIS states that "(i)f the evaluation of implemented actions identifies that objective(s) are not begin met according to criteria outline in the selected alternative, then management changes would be implemented."

Although this statement sounds good and would appear to sound fair, this is a "loaded" statement. What "objectives"? And even if they are the "objectives" stated as pages xi to xiv, or the "objectives" stated in Chapter

3, these "objectives" are not site specific to an Allotment or defined area. Any "objective" must be quantifiable, measurable, and reasonable. We have repeatedly witnessed through the decades the implementation of "change" based upon purported "objectives" which lack said qualities.

Page x The DEIS relies upon the "Scientific Assessment for the Draft interior Columbia Basin Ecosystem management Plan".

We take strong exception with the DEIS relying upon other "planning documents" to justify planning decisions in the DEIS, as well as making the DEIS conditioned upon the Interior Columbia Basin Ecosystem Management Project (See page 1-1) (See also page 3-4)

Page xi The DEIS states an objective to "(r)estore, protect, and enhance the diversity and distribution of desirable vegetation....."

We object to any objective, especially this one, which does not tie itself to the capability of the resource and a principle which defines that capability. What is "desirable" for one person, may not be "desirable" for another. We suggest this objective be modified to tie itself to the concept of "ecological condition", then everyone can not dispute what is capable at a given site and what is expected at a given site.

Page xii The DEIS states as to SSPS and SSAS an "order" to conserve certain species.

We do not object to (1) and (2). However, we object to (3) to (8), and especially (6) to (8), for the reason there is no cited authority to control management based upon the rating in (3) to (8). [See also the Predator recommendation below].

Page xii The DEIS ignores as to "wildlife" objective predators.

We strongly recommend that the "wildlife" objective be amended to include or an additional objective is establish relating management of predators of both wildlife and livestock.

Page xii The DEIS relies upon the "Oregon's Bighorn Sheep Management Plan"

We take strong exception with the DEIS relying upon other "planning documents" to justify planning decisions in the DEIS. However, it is possible that at least as to this Bighorn planning document the DEIS appreciates that it must be implemented "in a manner consistent with the principles of multiple-use management."

Page xiii The DEIS simply elected to "(p)rovide for a sustained level of livestock grazing consistent with other resource objectives and public land use allocations."

We strongly object to this objective. It is making livestock use a second-class citizen. The objective is conditional in nature, and making

livestock use subject to "other resource objectives" and other "allocations". Livestock is one of the principle multiple-uses under the Federal Land Policy and Management Act, and is the highest and best use within a Grazing District under the Taylor Grazing Act.

We recommend that this objective be rewritten so as to not only "provided for", but also maintain and enhance livestock use and resources within the capabilities of the range sites and adjudicated Grazing Preferences, including via artificial means, like prescribed fire and seedings. This will not only maintain and enhance livestock use, but wildlife as well.

Page 1-11 The DEIS states that "(p)rinciples of ecosystem management, as well as a continuing commitment to multiple-use and sustained yield, will guide land use decisions in the planning area."

What does this mean? This may sound good, but it is a meaningless statement. Concepts of multiple-use can be generally understood and applied, and concepts of sustained-yield can be generally understood and applied. However, "principles of ecosystem management" is not defined. As mentioned above, we object to the application of any objectives or "principles" which are not quantifiable, measurable, and reasonable. We have repeatedly witnessed through the decades the implementation of "change" based upon purported "objectives" and principles which lack said qualities. Why set up the public or the agency for conflict by using or applying objectives or principles which are not quantifiable, measurable, and reasonable.

Page 1-11 The DEIS relies upon "existing laws, regulations, and BLM policies" to drive this planning document. It also relies upon "plans, programs, and policies of other Federal agencies, State and local governments, and American Indian tribes."

We object to the DEIS reliance upon "BLM policies" because they are not law. We also object to the DEIS reliance upon other "plans, programs, and policies" by others to the extent not duly enacted as authorized by law.

Page 1-13 Livestock Management. The DEIS fails to cite or specifically rely upon the Taylor Grazing Act and the Federal Land Policy and Management Act to guide the program planning criteria, suggesting its non-reliance upon these laws. Moreover, "suitability" of rangeland is an irrelevant concept to livestock management upon the public lands. The former Secretary of Interior determined that the public land within the Vale Grazing District was effective suitable, when he concluded that the highest and best use was for livestock grazing. We contend that the public land within the Mahogany Mt. Allotment and Spring Mt. Allotment is "suitable" for livestock use.

Page 2-10 The DEIS makes reference to the fact that "[i]n many areas, natural or geologic erosion rates are too fat to develop distinct, deep soil horizons.

We concur, but these areas and/or "soil types" should be specifically identified as to location, setting, or other appropriate means of identification.

Page 2-10 The DEIS contains a paragraph dealing with soil compaction, which appears to state that compaction ALWAYS results from concentrated activity, grazing, and pedestrian traffic, and that it ALWAYS reduces infiltration, etc.

This is wrong. "Compaction" per se may not occur at all, depending upon the soil type (only soils with high clay contents normally are subject to compression), and if it does occur, it may be seasonal or longer-term. Seasonal compaction is rectified by the freeze/thaw cycles which occur over the winter, whereas longer-term compaction is that which does not respond to the seasonal changes in soil due to the normal climatic cycling. Even longer-term compaction is not irreversible, contrary to the impression left by the document.

We recommend that the statement be modified to reflect soils in which compaction does not normally represent a potential management challenge and those in which it might; that for those soils in which compaction may occur, the statement be modified to read that compaction MAY occur with the noted activities (and others, including wildlife and wild horse use); and that "compaction" comes in different degrees, most of which recover by the following spring.

Page 2-10 The document implies that the presence of early seral stage plant communities (annuals) is an indicator or lost soil productivity.

This is wrong. With rare exception, sites which are dominated by annual species have not lost their productive potential, as is witnessed whenever BLM or others convert an area dominated by cheatgrass to one dominated by perennial grasses, shrubs, and forbs through rangeland seeding. Such instances demonstrate that the underlying soil productivity remains, but is simply awaiting the seed source for perennial vegetation.

We recommend that this statement be modified to clarify those rare occasions to which it might apply and denote that the presence of annual species often is NOT an indicator of reduced site potential, or that the entire statement be stricken.

Page 2-10 Reference is made to microbiotic crusts, and that such crusts "play a role in fixing nitrogen, filtering water, retaining soil moisture, and controlling soil erosion." The paragraph ends by cautioning that the existing studies should be used "with caution".

In fact, the studies which have been conducted have had the full spectrum of results, and microbiotic crusts often act to inhibit infiltration, resulting in more run-off, and act to inhibit perennial seedling emergence. Their "role" in nitrogen fixation is, at the very best, minuscule, and is certainly questionable as to whether such function is at all significant, except in extremely limited soils and situations.

We recommend that this paragraph be modified to include a more thorough and balanced presentation of what the studies say, including the "con" of microbiotic crust formation, and also that the statement urging caution in the application be modified to note that such studies should NOT be applied to the SEORMP area.

Page 2-10 Reference is made to "Best Management Practices" (BMP's), which are discussed in Appendix O, Volume 2, page 371.

However, at page 371 of Appendix O, the statement is made that the document DOES NOT contain all of the BMPs, and that additional BMPs may be developed at other times, and that "continual refinement" is necessary.

First, we object to the never-ending, open-ended provision contained at this page, because such provision does not afford us the opportunity to make comment upon such future creation of BMP's, and is therefore contrary to the requirements of meaningful public comment for which this DEIS was created. We also object because such provision might render our permits in jeopardy at the whim of the authorized officer in future determinations.

However, we are not opposed to alternative means to accomplish the same goal, and we support such concept.

Therefore, the provision should be modified to provide that if additional BMP's are developed on a site-specific basis, they would be developed and implemented only with the concurrence of the affected applicant/permittee, and would be undertaken voluntarily, not manditorily.

Second, if BMP's are in need of "continual" refinement, then by definition, whatever exists at a moment in time must not be a "best management practice" because it is in need of refinement, and we object to such notion, because such position provides no stability to the applicant/permittee and would place our permits in jeopardy at the whim of the authorized officer if he/she made an instantaneous determination that already-implemented BMP's were, for any reason or no reason, in need of "refinement". Such open-ended non-commitment may lead to abuse of the process by the authorized officer, to which we would certainly object.

We believe BLM has in its discussion confused on-the-ground implementation activities (management actions) with guiding principles (BMPs), and attempted to list all conceivable management actions as BMP's. A separation of the guiding principle from the management action needs to occur in this Appendix, and we recommend that generic BMP's be listed, followed by a listing of some, but not necessarily all, management actions which are in compliance with the BMP's.

Third, as to the listing of "BMP's":

Road Design and Maintenance: No comment

Surface-Disturbing Activities: "BMP's" #1-3 have nothing to do with "maintaining or improving water quality, soil productivity, and the protection of watershed resources" and should be eliminated or placed in a separate section for consideration under VRM provisions. Whether eliminated or moved, they are not proper considerations for water, soil, or watershed maintenance or improvement.

Rights-of-way and Utility Corridors: No comment.

Forest Management: "BMP" #1 should be eliminated, as it is not a proper consideration for water, soil, or watershed maintenance or improvement, but is rather a VRM consideration. The portion of BLM #2 which references "high scenic values" should be eliminated, for the same reason.

Fire Suppression: BMP #2 should be modified to permit the seeding of non-native, but adapted, species to all sites. Such species are available at generally lower costs than "native" species, and are equal or superior to "native" species in watershed protection, and furthermore are generally superior in terms of germination on harsher sites and competitive ability with undesirable annuals and noxious weeds.

Prescribed Burning: No Comment.

Livestock Grazing Management: This section contains no "BMP"", but instead references Appendices R and S.

As to Appendix R:

1. The unsubstantiated, subjective, and incorrect opinion that "livestock grazing in desert steppe communities is seldom necessary to meet vegetation management objectives" should be removed. It is an opinion which is first of all wrong, and it is an opinion which, even were it correct, is irrelevant to BLM's obligation to manage for more than "vegetation

management objectives" (including its statutory obligation to safeguard the grazing preference of the permittees).

2. The entire discussion is an overly generic, incomplete, and sometimes erroneous discussion, depending on the particular areas and management being considered, and particularly as concerns the effects of utilization greater than 61% and the effects of grazing exclusion. It is our opinion that the great variety of vegetation responses to any combination of intensity, season, and rotation of uses, is the fundamental reason that BLM created monitoring protocols for measurement of resource utilization and conditions, and why BLM monitors condition over time to determine trends in those conditions.

In short, all of the "absolute" statements in this section can be, and often are, wrong when the monitoring data is analyzed. The bottom line is that Appendix R contains a discussion of simple and generic range management "principles" and self-serving statements (particularly regarding "heavy" utilization) that may not be found to be true under on-the-ground management conditions.

As to Appendix S:

1. We object to conditioning any permit to the presence of, or mitigation for, "federal candidate species", "assessment species", "tracking species", "Special Status species", or "Bureau sensitive species". There is no such thing as a "federal candidate species", and we believe BLM lacks the statutory authority to manage any non-listed species as though it were a threatened or endangered species, or to give such non-T&E species priority over other multiple uses.

2. The second sentence of the paragraph beginning with "Normal maintenance of" should be modified to read, "Maintenance can include, but is not limited to, ..."

3. Within the final sentence of the paragraph beginning with "Normal maintenance of", the provision for "mitigation" should be stricken. It is unreasonable and unfair to "overlay" a "special management area" on an area which contains Permitted range improvement projects, and then on account of the creation of the SMA, require modifications of the projects or the means of maintaining them. Further, if the creation of the SMA creates a defacto re-allocation of resources, then BLM must by law compensate the permittee for the range improvement.

Mining: No comment.

Wildlife Habitat Protection: This entire section should be stricken, because it has nothing to do with BMP's for soil, water, and watershed protection. It is instead a list of wildlife goals/objectives for the SEORMP area, and as such is inappropriate in this section or as any consideration in soil/water/watershed BMPs to achieve state water quality standards.

Noxious Weed Management: No comment.

Developed Recreation: BMP #2 appears contrary to the objectives stated for the creation of BMP's at the beginning of the Appendix. "Hardening" sites, including pavement and engineered road construction, unless they are properly mitigated by other management actions, tend to increase run-off and decrease infiltration, both normally contrary to water, soil, and watershed maintenance and improvement. This BMP should be modified to provide that, where such "hardening" occurs to accommodate recreation use, it will be properly mitigated through project design similar to those for "Road Design and Maintenance", and should also be modified to provide that such recreation development will be minimized. The portion of BMP #3 relating to "quality of recreation experience" should be eliminated, because it has nothing to do with meeting state water quality standards, or soil and watershed protection. Further, the "quality" of a recreation experience is entirely subjective and personal to the each person participating (one man's quality recreation experience is a jet ski, another's is a canoe). The portion of BMP #4 dealing with "public safety issues, and/or conflicts between recreation uses" should be eliminated, for the same reason. The part of BMP #5 dealing with "quality recreation experience" should be eliminated, for the same reason.

Page 2-20 The claim is made that the distribution of quaking aspen has declined over the past 100 to 200 years. No citation is given for this statement, and therefore no foundation for its inclusion in the document. The citation (Crow 1996) lists his work as occurring in the Blue Mountains, which are not part of the SEORMP area. Either the statement should be withdrawn, or credible citation for the presumption should be given. Furthermore, if Crowe's cited work is the result of research, the conclusions may mean something in the Blue Mountains (but not necessarily the SEORMP area), but if the claim is merely the recitation of an off-hand comment or claim made by Crowe, it means nothing.

Page 2-20 This page and subsequent tables and portions of the DEIS refer to "Special Status Plant Species".

We do not believe BLM has the statutory authority to create a "special" list of plants or animals which are to be treated with priority over other plants and animals and other resource uses. Furthermore, the

discussion which ensues in most or all cases indicates that the species discussed are usually located in specialized "soil inclusions". Therefore, the relative scarcity of these plants or individuals is a result of the fact that they are specialized in occupying very rare soils. Even assuming that all plants had a wide ecological amplitude, it is unreasonable to treat any species with priority of management on the basis of relative scarcity, since the community of plant species as a whole will always exhibit different degrees of abundance relative to their adaptations to the soils in which they live, and relative competitive ability with other plants.

BLM should desist from giving priority status to plant species on account of their relative scarcity within the SEORMP area.

Page 2-32 Table 2-10 lists water quality limited streams.

Although the table lists several streams with names the same as some on our allotments, they do not appear to be within the drainage areas within our allotments.

We concur that none of the streams on our allotments are water quality limited.

Page 2-37 The second paragraph of the "Riparian Condition and Trend" section discusses the use of reference streams to determine the "potential" of other streams.

This may or may not be appropriate. If "apples and apples" are to be compared, then the elevations, aspects, gradients, base and parent materials, upstream (and perhaps downstream) conditions, surrounding topography, and other features must be the same between the segments of streams being used for reference and the streams being assessed.

This section should be modified to include the above and other appropriate considerations when comparing "reference" streams to "target" streams, or individual segments thereof.

Page 2-38 The statement is made that trend evaluations have factored in site potential capabilities of the riparian area within the watershed.

If this is so, then we commend the BLM on its approach and recognition of variability dependent upon the many factors listed above and others. However, the document does not anywhere explain the specific process which was used, and which could be verified by others, to "factor in" the many variables. For instance, is it done with a dichotomous key, a checklist, a soil profile, or other means?

We commend BLM on such approach, and recommend that the protocol for assuring that areas of like potential are being compared be included as an appendix.

Page 2-39 This page references Appendix D, and Table D-2 as it refers to The Mahogany Mountain and Spring Mountain Allotments.

Although several creeks with the same names appear in the table, they are in different watersheds and different allotments. Table D-2 appears to list Cherry Creek (0.5 miles), Willow Creek (7.2 miles), Fish Creek (1.7 miles), Mahogany Creek (0.7 miles), and Thomas Creek (1.4 miles), and list the trend s Unknown for all.

We have no comment, except to add that we believe the riparian areas within our allotments have all improved over the course of the years, especially under the management systems now employed on the allotments.

Page 2-40 This page begins a discussion of fish and wildlife issues. It references Appendix E, which lists as "additional management considerations with implementation of proposed RPM alternatives" . . . and list competitive forage demand of over 500 AUMs of wildlife "demand" in Spring Mountain Allotment (page E-168) and nearly 500 AUMs of wildlife "demand" in Mahogany Mountain Allotment (page E-174).

We object to the objective, because the BLM represents in the opening paragraphs of the DEIS that no reallocation of resources is being made under the SEORMP, but the fact is that if the objective for wildlife is implemented, such reallocation of resources is in fact occurring.

We recommend, consistent with BLM's premise that no reallocation will occur with the implementation of the RPM, that wildlife demand objectives (AUMs) be removed from the document, and especially as it pertains to Mahogany Mountain and Spring Mountain Allotments.

Page 2-42 This page contains a discussion of steppe rangelands which advocates avoiding what it calls "shrub overstory fragmentation".

We believe the BLM is on an entirely incorrect course in advocating a monocultural overstory of shrubs, and especially so in areas which have been converted to seedings for livestock forage. It is an incorrect course because:

1. The natural condition is one of periodic disturbances by fire and insects, which in themselves create a continual and continuous "fragmentation" of the shrub overstory. The course laid out herein is therefore contrary to the natural state of affairs, even if the effects of man were to disappear from the landscape. It is also contrary to the stated intentions elsewhere in the DEIS for "adaptive management" and adaptive response to wildfires (versus full suppression).

2. It is a commonly known fact of wildlife biology that diversity of cover types and edge effect support greater numbers and diversities of species than do monocultural assemblages.

3. Moneys have been spent by the federal government and by private permittees to establish and maintain seedings for the specific purpose of livestock forage development. This has had beneficial impacts on other areas of the native range by allowing deferment, rest, and seasonal use patterns beneficial to the range. Presumably such benefits to the native range have permitted benefits to wildlife habitat. It is therefore critical that seedings be maintained at the highest level of production under the purpose for which they were created. The allowance of shrub canopies to close in these areas will decrease the grass productivity and place additional pressures on other areas of the range. Such shrub closure will also guarantee that the moneys spent to create the seedings will have been squandered by BLM, because BLM will have knowingly allowed these investments to deteriorate. We are opposed to such allowances.

Therefore, we recommend that BLM manage for a mosaic of vegetation types, a mosaic of shrub covers within each shrub class types, and the maintenance of seedings free (or relatively so) of big sagebrush.

Page 2-42 This page discusses generically riparian habitats.

The document alludes to the fact that riparian vegetation types vary greatly, but implies that well-developed riparian types all have trees, shrubs, grasses, forbs, sedges, and rushes. This implication is wrong.

We recommend that this section clarify that, like upland habitats, riparian habitat potential may be expressed by any number of combinations of trees/no trees, shrubs/no shrubs, etc.

Page 2-43 This page implies that all springs are the source of always unique assemblages of invertebrates.

This is wrong, because most springs are not at all unique in their assemblages of invertebrates. On rare occasions, such unique assemblages occur, but they are usually due to some unique property of the spring itself, such as the pH or temperature. However, the vast majority of springs do not differ greatly one from another, and there exists no validity to the statement.

The second paragraph from the bottom of the page should be stricken, because it is untrue.

Page 2-45 Table 2-12 lists a purported objective of 1000 elk in the "high desert" hunter unit, which we believe includes Mahogany Mountain and Spring Mountain Allotments. It also lists the "current population" as 850.

We object to the objective of 1000, and to the extent that the present population is deemed to be an objective which did not exist in the MFP,

we object to it also. The opening paragraphs of the DEIS inform us that no reallocation of resources is to occur under the auspices of the RMP, but the objective to have elk populations, especially expanded elk populations, is a defacto reallocation which we believe will cause conflicts and potential jeopardy to our permits.

All objectives for wildlife populations should remain at the level prescribed under the current land use plan, if any. If there are no such objectives in the current land use plan, none should be made in the RMP.

Page 2-46 Table 2-13 lists purported objectives for mule deer.

We object to these objectives, and to the extent that "current populations" are intended as objectives, if the numbers do not exist in the existing land use plan, for the reasons stated above under page 2-45.

Page 2-47 Table 2-14 lists pronghorn populations.

If these or any other number other than what exists in the exiting land use plan are intended as objectives, we object, for the reasons given above for deer and elk.

Page 2-49 This page and several following discuss purported "Special Status Animal Species".

As stated elsewhere in these comments, be object to such designation and priority treatment over other resource uses, and we do not believe BLM has the statutory authority to create such listings and give such species priority over other resource uses. We also believe that such priority status creates a defacto reallocation of resources, contrary to the premise of the DEIS and Draft SEORMP.

We recommend BLM desist from such listings which have no statutory authority.

Page 2-54 This page discusses sage grouse.

We note that there exists no discussion of sport hunting or predator populations and their effects of these birds. Any discussion of prey species and their populations is entirely inadequate without a discussion of the effects of predator populations and predator control efforts throughout the years. BLM may be aware that predator control efforts in past years have been significantly higher that they have been in recent years.

Further, the discussion at this page is an entirely inadequate one that implies that habitat in and of itself is the controlling factor in sage grouse populations. It ignores nesting failures due to weather, predation (human and animal), post-hatching chick loss for a number of reasons, and disease. In short, we believe that the wide fluctuations

which are mentioned do not correlate with wide fluctuations in the habitat conditions, but rather in the other factors which also help change population dynamics of any species and any population.

We recommend that this section contain a discussion of the annual sport hunter harvest of sagegrouse, which hunts are still held annually. We also recommend a discussion for this species, and others, of predator trends throughout the years. We recommend also that a discussion of other factors which affect populations be placed in this section.

Pages 2-66 and 2-67 We believe that Tables 2-23 and 2-24 conflict with each other. Appendix H informs us that within "semiprimitive nonmotorized" ROS classes, "use of motorized vehicles is prohibited". Table 2-23 lists the amount of acreage in "semiprimitive nonmotorized" as significantly different from that acreage listed as "closed" in Table 2-24.

We recommend that the seeming conflict between these two tables be rectified, or a discussion be included which informs the reader of the difference, if any between "use of motorized vehicles is prohibited" under the ROS section and "closed" under the OHV section.

See also our comments regarding maps.

Page 2-72 and 2-73 Table 2-27 lists primary resource values for nominated ACECs.

See our comments regarding maps. We are opposed to the designation of the Coal Mine Basin ACEC/RNA, the Owyhee Views ACEC, the Spring Mountain ACEC/RNA, and the expansion of the Mahogany Ridge ACEC.

Page 2-96 This section discusses land tenure adjustments.

See our comments regarding maps. We are interested in the purchase and/or exchange for several land parcels both identified and not identified in the DEIS.

Page 3-2 The DEIS states that "Desired Range of Future Conditions (DRFC) ... apply to all alternatives."

We object to this statement for the simple reason that these "desired" conditions are vaguely defined, and riddled with "value" judgments. This point is graphically illustrated at pages 3-66 to 3-69 as applied to "Rangeland Vegetation", as follows:

Page 3-66 states that "vegetation communities would be monitored to determine progress toward attaining DRFCs". It then goes on to state a variety of measurements, like plant composition, vigor, productivity, and others, to make such assessment. Page 3-68 (Alternative C) then states that this assessment of DRFCs will be "based on ... site potential". However, the recognition that DRFCs must be evaluated in light of site potential does not abate the inherent problem of what are the "desired

conditions" and what are the "natural values" to be achieved and monitored. See page 3-2 as to "Rangeland vegetation". This ambiguity will unquestionably result in conflict, because "value" judgments by agency people or others will determine what are the "desired conditions" or what are the "natural values". DRFC concept must be rejected, and the ecological concept within Alternative "B" must be continued. Alternatively, the "desired condition" concept must be articulated in the planning document itself consistent with site potential, or articulated in an activity plan after consultation with the livestock permittee.

Page 3-4 The DEIS states that the "concept of adaptive management uses the latest scientific information and professional judgment to select the management strategy that will most likely meet goals and objectives."

We do not object to this statement per se, except to emphasize the point that the scientific information should control the evaluation process and professional judgment should only be applied to decide - based upon the best and latest scientific information -what actions to implement to meet goals and objectives. In short, professional judgment should not control the evaluation process.

Additionally, the concept of "professional judgment" is not solely within the agency, but held by us, other permittees, and individuals/experts outside of the agency. This type of "professional judgment" should be given equal and due consideration within the adaptive management process.

Page 3-7 The DEIS (Activity Planning) states that "Activity plans identify actions to achieve these goals and objectives."

To the extent the DEIS does not articulate the DRFC to be achieved - which currently the DEIS totally fails to do - Activity Plan could and should be used to not only "identify actions to achieve", but the site specific "desired conditions" and "natural values" to be achieved. See comment above relating to page 3-2.

The adaptive management process can only work if everyone is informed up-front as to the quantifiable, measurable, and reasonable objectives to be achieved. As currently written, the DEIS does not articulate these type of objectives, which is a serious flaw of the planning document, unless the Department decides to establish these type of objectives within Activity Plans.

Page 3-16 The DEIS establishes an objective to "(r)estore, protect, and enhance the diversity and distribution of desirable vegetation communities, including perennial native and desirable introduced plant species."

As to what is "desirable", see comments above as to pages 3-2, 3-4, 3-7.

As to what are "natural values" (in "C"), see comments above as to pages 3-2, 3-4, 3-7.

Page 3-16 The DEIS (Alternative "C") establishes an objective to "(i)mplement actions to diversify structure and composition of nonnative seedings. Provide for and maintain forage production consistent with other resource objectives."

As to "structure and species diversity within all nonnative seedings", we object to this objective, because inherent in it is the encroachment and growth of brush in some seedings within the Mahogany Mt. Allotment, which will (1) decrease vegetative production; (2) decrease grazing capacity; (3) decrease Active Use; and (4) decrease watershed protection.

All non-native seedings should be maintained for the purpose for which they were created, which was primarily livestock forage, watershed protection, and their utility (as "grass pastures") in management systems which permit deferment and rest of native range pastures.

Page 3-16 The DEIS (Alternative "C") establishes a "preference" for use of adapted perennial species".

If this means that perennial species like crested wheatgrass will continue to be used to abate and mitigate impacted areas, we do not object. Nonnative seeds - like crested wheatgrass - are an efficient and cost-effective means to abate and mitigate watershed concerns which arise from disturbances like wildfire which may destroy the vegetative community and its associated seed source.

Page 3-16 The DEIS (Alternative "C") elects to "(c)onfigure treatments to maintain natural values ...."

As to what are "natural values" (in "C"), see comments above as to pages 3-2, 3-4, 3-7.

Page 3-17 The DEIS (Alternative "C") elects to "(r)estore the frequency, distribution, and ecological integrity of .... shrubs."

To the extent this encourages the encroachment and growth of shrubs within the Mahogany Mt. Allotment and Spring Mt. Allotment, this will have the consequence of decreasing vegetative production, grazing capacity, and watershed protection. In other words, as canopy cover of shrubs increases over about 15%, there is a disproportionate decrease in grass cover and production as to protect watershed resources. In short, if you manage for shrubs, then you manage against grasses, and consequently, watershed values.

Page 3-18 The DEIS (Alternative "C") decides to "(m)anage big sagebrush habitat to emphasize plant and animal community health at the landscape level."

What does this mean?

We would recommend that the DEIS establish an objective to encourage a mosaic of grass, shrub, and mix of shrub and grass communities upon the broad scale of the planning area as to abate or mitigate the adverse economic and environmental consequences that a total mixed-but-not-mosaic community will have, or a total shrub community will have.

Page 3-18 The DEIS (Alternative "C") elects to "(m)anage big sagebrush habitat for shrub cover, structure, and forage values in most seedings and native range for the benefit of game and nongame wildlife."

We strongly oppose this. If the predicate of this planning document is not to make a reallocation of forage, it just did in this objective. This objective makes a defacto allocation of the resource uses upon these "seedings" and "native range(s)" in big sagebrush habitat to wildlife (which is characteristic of portions of Mahogany Mt. Allotment and Spring Mt. Allotment). See Map Vege - M1. Further, what is meant by "most seedings"?

Page 3-22 The DEIS (Alternative "C") elects to "(m)anage for DRFCs desired by using a mix of protection, restoration, and enhancement measures for Special Status species."

We do not believe BLM has the statutory authority to create a list of species which have priority over other species on account of their natural scarcity. We also strongly object to the defacto allocation of resource which we believe BLM is making with such a prioritization.

Page 3-22 The DEIS (Alternative "C") uses the phrase "landscape-level issue resolution".

What does this mean? This is as nebulous and meaningless a phrase as "ecosystems management". Which landscape? Which ecosystem? What are the boundaries? Where does it end? Does this mean using a sledgehammer to fix a leak?

We recommend that BLM use terms that mean something to those of us to whom they are being applied.

Page 3-23 The DEIS (Alternative "C") elects for "streams with water quality limited segments, management activities would restore . . . ."

This may be construed as affecting management on entire streams when only limited portions of those streams may be water quality limited, and we would caution against over-reaching solutions to smaller areas of conflict.

We recommend that this statement be revised to read, "for segments of streams with water quality limitations which are the result of BLM-administered activities, management activities would restore . . . ." This

should help everyone focus on those segments which require changes in management, and focus on the direct causes of water quality limitations, and apply the least onerous management restrictions to the ground.

Page 3-25 The DEIS fish and aquatic habitat objective 2 appears to prohibit any and all multiple uses within a watershed of a surface water with aquatic habitat, unless such multiple uses satisfy the resource uses listed in the objective.

We strongly oppose this objective, because it gives priority to some multiple uses over others, and creates a defacto reallocation of resources.

We recommend that this objective be eliminated or modified to recognize that other multiple uses have equal standing to those listed in the objective, and are not "second class citizens".

Page 3-26 The DEIS (Alternative "C") elects to "Manage for desired future habitat conditions that emphasize structure . . . ."

See our comments above regarding structure, watershed, and forage values, and regarding desired range future condition. The same comments apply here.

Page 3-26 The DEIS (Alternative "C") elects to manage for habitat conditions which "equally" emphasize the requirements of game and nongame species in "most" areas.

What are "most" areas? Additionally, we believe the objective is unattainable, first of all because we do not believe the BLM knows the specific habitat requirements of each and every species which occur within the same locale, and secondly because it is impossible to manage "equally" for all species. When you manage "for" the needs of one species, you are very likely managing "against" the needs of another species. An example is managing to maximize the nesting (hiding) cover for sagegrouse - the manager is simultaneously managing against the hunting success of predators such as coyotes and ravens. Finally, the objective makes a value judgment that the public desires management (i.e. expenditure of funds) "for" each and every non-game species (virtually ALL wildlife) as much as they desire management (i.e. expenditure of funds) "for" specific individual game species. We are willing to bet that such is not the case.

Page 3-27 Special Status Animal Species

See our comments above regarding this concept and objectives.

Page 3-28 The DEIS (Alternative "C") elects to "emphasize" bighorn sheep within over 2 million acres of the SEORMP area.

This creates a defacto reallocation of resources, to which we are strongly opposed.

Page 3-32 The DEIS objective for a sustained level of livestock grazing is provisioned with "consistent with other resource objectives and public land use allocation".

We object to this provisioning, because it makes livestock grazing a "second class citizen", and elevates all other resource uses above livestock use of the resource, which we believe is contrary to law.

It is also unclear what is meant by "public land use allocation" at this point, because the premise of the DEIS/RMP is that no reallocation of resources is occurring as a result of the RMP proposals, but such defacto reallocation in fact seems to be intended at several locations.

Page 3-32 The DEIS (Alternative "C") calls for the abandonment of projects that "do not function to maintain resource values and meet management objectives".

The meaning of this is also unclear, because it is unclear what are the "resource values" intended, and which specific "management objectives" are intend. If it is intended that through overlaying of "elk winter range", "ACEC's" or any of the other apparent attempts to reallocate resource uses that existing rangeland improvement projects will be removed, then we object. Further, projects should not be abandoned unless they are not meeting the objectives for which they were designed and installed.

Page 3-41 The DEIS (Alternative "C") would add acreage to existing WSA's.

We strongly oppose this proposal. BLM was to have made its recommendation to Congress regarding lands suitable for wilderness study. It did so, and the existing WSA boundaries include both lands which BLM has recommended to be classified wilderness and lands which BLM has recommended not be classified as wilderness. To now add to the boundaries is unreasonable, and may not be within the authority of BLM to do so.

We recommend BLM drop this proposal completely.

Page 3-68 The DEIS (Alternative "C") prescribes that nonnative seedings in poor or fair condition would be managed to restore production and vigor, but then goes on to say that "structural and species diversity" would be "improved".

We believe this to be a self-contradictory statement, in that "structure" is generally thought of in terms of shrubs. Therefore, improving structure involves increasing the shrub component in these seedings, and this will generally mean sagebrush. However, the reason many

nonnative seedings are in poor or fair condition is that they have been rendered less productive and less vigorous by the invasion of sagebrush.

We recommend that either the provision for "improved structure" should be removed from all references to nonnative seedings, or if BLM intends by this "improved structure" that other nonnative desirable forage shrubs such as forage kochia will be interseeded with crested wheatgrass and other grasses, then BLM should so clarify.

Page 3-68 The DEIS states that "professional judgment" may be used to keep an area closed from livestock grazing for more than the stated timeframe.

We are opposed to what is termed "professional judgment" being used as a substitute for real monitoring data.

We recommend that this provision be removed from the text.

Page 3-69 The DEIS states that "annual rangeland vegetation communities at risk from frequent fires would be protected through the establishment of appropriate firebreaks.

We are opposed to this provision. Where ever it is possible, annual communities should be converted to perennial communities with adapted perennial species. With the advent of commercial availability of forage kochia, many sites too harsh for other species can now be successfully seeded to a desirable perennial shrub which is palatable to livestock and wildlife nearly year-round.

We recommend that either the provision be stricken from the document, or that it be made clear that such "protection" measures will be temporary only until full conversion can be made of the annual communities to perennial communities.

Page 3-70 The DEIS objective is to manage big sagebrush in seedings to meet the "life history" requirements of sagebrush dependent wildlife.

We are opposed to this provision, because it is a defacto reallocation of the resources, and because it may adversely impact the grazing management systems on our allotments. Further, the rationale is completely groundless. The document here states that 60% of the SEORMP area supports big sagebrush communities, and states elsewhere that about 3% of the SEORMP area is dominated by crested wheatgrass. It is completely inconceivable that 3% of the acreage can constitute a fragmentation of 60% of the acreage.

The citation of FLPMA and PRIA are likewise unfounded, misleading, and wrong, because NEITHER document directs the BLM to manage for every resource use on every acre, but rather that a mix of resource uses be managed for on the whole of the federal lands.

We recommend the provision for managing seeding to allow encroachment of sagebrush be eliminated. We recommend that the remainder of the provision be eliminated, because many species of animals which live in the "big sagebrush zone", including but not limited to pronghorn, are not benefited in all areas and all seasons by the mere presence of big sagebrush, and in fact do better when sagebrush disappears over large tracts.

Page 3-82 The DEIS states that monitoring will include assessment of PFC for riparian areas.

We are opposed to the substitution of PFC, which is not a monitoring method (it is a subjective assessment of how the observer "feels" about the riparian area), for legitimate monitoring methods which are measurable and repeatable. We oppose the former and support the latter.

We recommend that BLM drop PFC as a purported monitoring method, because it is not.

Page 3-84 Ditto.

Page 3-90 The DEIS proposes that monitoring to determine the objective for bighorn include "livestock utilization" and "rangeland trend".

We do not object to the collection of livestock utilization data, but the utilization of forage made by bighorn sheep, elk, deer, feral horses, and other game and nongame wildlife species should also be monitored. Livestock are not the only species making use of forage on the rangeland.

Likewise, "rangeland trend" is in and of itself a meaningless analysis. For example, if the trend is determined to be "static", it means entirely two different things if it is "static" and the condition is "good" versus if the trend is "static" and the condition is "poor".

We recommend the statement be modified to include utilization by all species of wildlife and feral (wild) horses, and be modified to include ecological condition as well as the rangeland trend.

Page 3-94 The DEIS proposes to monitor "conditions and trends of resources affected by livestock".

What does this mean? If it means the vegetation ecological condition and the trends it may exhibit over time, we concur with the proposal. If, however, it is intended that any trend in any species of animal or plant will simply be blamed on livestock because livestock also use the area, then we absolutely oppose the notion. Many factors, including weather, climate, predation, insects and diseases, floods, fires, inter-and intra-specific competition, and other factors, influence the cycles of all

plants and animals, and we do not support the willy-nilly blaming of livestock for all of the vagaries of nature.

Chapter 4 To the extent that any of the assumptions and analysis contained in Chapter 4 of the DEIS are demonstrably wrong, through research or on-site monitoring data, we reserve the right to challenge any presumption of proof which BLM would rely upon them for in future management decisions. A few of these follow:

Page 4-16 The DEIS assumes that bitterbrush will return in 10-15 years after wildfire.

This assumption is generally wrong, because bitterbrush in the Intermountain West is a usually a transitory species, and only in a few plant communities is it the dominant species at late seral stage.

Page 4-16 The DEIS assumes that reduced structure leads to increased soil erosion rates.

This assumption is wrong, because there is no correlation between soil erosion rates and "structure", unless all structure (i.e. all plants) are missing. However, a pure stand of grass, with lower "structure" is almost always superior in watershed protection to areas with shrub canopies like sagebrush.

Numerous other examples of assumptions which are made in the Chapter exist, and to the extent BLM relies or will rely upon any of the assumptions and analysis upon which the assumptions are made, we reserve the right to contest them.

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II. COMMENTS RELATING TO MAPS.

MAPS We do not comment about ALL of the Maps, because we only comment about those maps which relate to the Mahogany Mt. Allotment area, Spring Mt. Allotment ("Spring Mt. Native Range Pasture") area, and our private land area (which is located at 752 Mahogany Gap Road, just off Highway 95, 10 miles north of Jordan Valley, Oregon).

We do have one generalized comment about those maps which are relevant to us. That comment is that ALL MAPS should be made the same scale so it is easier to make comparisons and overlays.

Map ACEC-1M Malheur R.A. Existing & Potential ACEC/RNA.
Map ACEC-2M Malheur R.A. Preferred Alternative Areas of ACEC/RNA.

COMMENT: Mahogany Mt. Allotment:

Mahogany Ridge ACEC/RNA: The Map appears to depict this existing ACEC/RNA, as 317 acres (DEIS, pg. 2-69). [An existing designation for neotropical migratory bird habitat, vegetation community type of mountain mahogany-big sagebrush, and special status plants].

The Map also appears to want to double the size of this ACEC/RNA under Alternative "C" for "diversity" reasons. See DEIS, pg. 3-130. We object to this being a rationale to double the size of the existing ACEC, because the existing ACEC was designated because of its "purity" of the stand. Therefore, we recommend that the ACEC not be enlarged. Moreover, if the interest is now diversity, as compared to the purity of the stand, then the original designation should be de-designated. "Diversity" and "purity" are incompatible management prescriptions.

Owyhee Views ACEC: The Map appears to propose for designation a new ACEC, as 86,973 acres (DEIS, pg. 2-73). [The proposed designation relates to scenic values for rare geologic features and vistas, historic and cultural values, special status plants, and wildlife habitat]. See DEIS, pg. 3-157.

This proposal as to Alternative "C" only appears to apply to the northern part of this Allotment. It also appears from DEIS, pg. 3-157 that the basis for the proposal is potential mining development. However, this (purported) problem can be abated through a mining withdrawal, as compared to a ACEC designation. Additionally, the DEIS does not suggest any changes in current management of livestock, ORVs, or recreation which suggest any need for change from the status quo. Therefore, we recommend no ACEC designation.

Spring Mt. Allotment:

Spring Mountain ACEC/RNA: The Map appears to propose for designation a new ACEC, as 1,760 acres (DEIS, pg. 2-73). [The proposed designation relates to three vegetation plant cells including two upland cells and one riparian cell]. See DEIS, pg. 3-163.

It appears from DEIS, pg. 3-163, that the valued from which this designation is proposed relates to certain vegetation cells, which are not unique to the Great Basin, but in fact, ubiquitous to the Great Basin. Additionally, the DEIS does not suggest any changes in current management of

livestock, ORVs, or recreation which suggest any need for change from the status quo. Therefore, we recommend no ACEC designation.

Unknown Allotment:

Coal Mine Basin ACEC/RNA: The Map appears to propose for designation a new ACEC, as 755 acres (DEIS, pg. 2-72). [The proposed designation relates to special status plants on Succor Creek ash habitat, paleontological resources, and biological diversity].

It appears from DEIS, pg. 3-137 proposed a VRM 2 for this proposed designation. There is no relationship between such VRM class and the reasons for the designation. Additionally, the designation is unnecessary to manage the purported reasons for the designation. For example, if the public is concerned about mining, then withdraw the area, don't designate an ACEC. Additionally, the DEIS does not suggest any changes in current management of livestock, ORVs, or recreation which suggest any need for change from the status quo. Therefore, we recommend no ACEC designation.

Map FIRE-1M Malheur R.A. Fire History-Occurrence of Fires larger than 640 acres, 1980-1996.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map FIRE-2 Appropriate Management Response Categories.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map FORS-1 Forestry/Juniper Woodlands.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map FORS-2M Malheur R.A. Forest Lands.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment, except that it is to generic to comment.

Map GEN-2 Land Status.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment, except that it is to generic to comment.

Map HYDR-1 Subbasins/Precipitation.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map LAND-1 Preferred Alternative ROW Avoidance Areas, Critical Access Needs, and Transportation Systems.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map LAND-2J Jordan R.A. land Tenure Zones.
Map LAND-2M Malheur R.A. Land Tenure Zones.

COMMENT: The appears to propose a number of land status changes. However, any proposed action should also authorize the following changes in the land status:

Mahogany Mt. Allotment - Fish Creek Pasture.

The proposed action should authorize the sale or exchange of the following public land (See Appendices - 350):

T28S, R45E, Section 3: NESW, W1/2SE
T28S, R45E, Section 10: NWNE.

If an Exchange, Baltzor would offer T28S, R45E, Section 16: NE.

Near Baltzor Home (752 Mahogany Gap Road).

(1) The proposed action currently authorizes the sale of the following public land, which is wholly surrounded by private land, which is currently under Land Use Permit (in part), and which we would like to purchase as soon as possible (Appendices - 350):

T28S, R46E, Section 26: SENW.

(2) The proposed action authorizes the sale of the following public land, which is wholly surrounded by private land, and which we would like to purchase as soon as possible (Appendices - 350):

T28S, R46E, Sections 14 & 15
(everything offered in these Sections)

Map LVST-1M Allotment Map.

COMMENT: Although map appears to accurately describe the Allotment boundaries for Mahogany Mt. Allotment and Spring Mt. Allotment, we would recommend that the final map be bigger, so to better describe the boundaries and include the pastures.

Map MIN-1 Oil & Gas and Sodium Resource Potential.
Map MIN-2 Geothermal Resource Potential.
Map MIN-3 Disseminated Locatable Mineral Potential.
Map Min-4 Other Locatable Mineral Resources.
Map MIN-5 Salable Mineral Resources.
Map MIN-6 Alternative "C" Mineral Leasing.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map OHV-3 Off Highway Vehicle Areas - Alternative "C".

COMMENT: As to Spring Mt. Allotment, it shows that the entire area is subject to OHV use, except an area which appears to be one of the proposed ACEC areas in which OHV use is limited to designated routes. Since we object to this ACEC, we object to this limitation as well. We need broad access for range improvement construction/maintenance and livestock management. [Note also that the Map conflicts with Table 3-9, which states that ACEC area would be "closed" to OHV.]

As to Mahogany Mt. Allotment, it shows that the entire area is subject to OHV use, except an area which appears to be two of the proposed ACEC areas in which OHV use is limited to designated routes. Since we object to these ACEC, we object to this limitation as well. We need broad access for range improvement construction/maintenance and livestock management.

Map REC-1M Malheur R.A. Recreation Opportunity Spectrum.

COMMENT: Spring Mt. Allotment:

The Map appears to show some semi-primitive non-motorized, semi-primitive motorized, and roaded natural areas [See Appendices 329 for definitions].

We do not recommend and object to any prohibition of off-road vehicle use within this Allotment, because we use off-road vehicles to facilitate range improvement construction and maintenance, and to facilitate livestock management. It also appears to conflicts with Map OHV-3 (Alternative "C").

Mahogany Mt. Allotment:
The Map appears to show some semi-primitive, non-motorized and semi-primitive motorized

We do not recommend and object to any prohibition of off-road vehicle use within this Allotment, because we use off-road vehicles to facilitate range improvement construction and maintenance, and to facilitate livestock management. It also appears to conflicts with Map OHV-3 (Alternative "C").

Map REC-2 Special Recreation Management Areas.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map RELI-1 Relief.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

Map SS-1 Special Status Species Plants and Noxious Weeds.

COMMENT: The map appears to identify special status species plants in the Spring Mt. Allotment, and in the northern portion of the Mahogany Mt. Allotment.

Map Vege-1M General Vegetation.

COMMENT: No comment except that it is to generic to comment upon.

Map VRM-1 Visual Resource Management (Alt. C; Preferred).

COMMENT: Mahogany Mt. Allotment: The map appears to designate VRM ratings of Number 2 in the North, Number 4 in the middle, and Number 3 in the south. These designations of Number 2 and 3 do not appear to be based upon any special status, including WSA or ACEC. Therefore, it is unknown the rationale for a designation any higher than Number 3 in this Allotment. We recommend that this Allotment be designated as Numbers 3 and 4.

Spring Mt. Allotment: The map appears to designate VRM ratings of Numbers 3 and 4 in the "Spring Mt. Native Range" Pasture. No comment.

Map WLDF-1 Mule Deer, Pronghorn, and Elk Winter Ranges.

COMMENT: Although the map appears to describe elk winter range in the Spring Mt. Allotment, there is not any elk winter

range in this Allotment. There is too much snow in the winter, so except in open winters, we have never observed any elk in this Allotment. We recommend that elk winter range within this Allotment be removed.

The Map correctly includes mule deer winter range for the Spring Mt. Allotment.

Map WLDF-2 Sage Grouse Leks, Raptor Concentration Areas, and Big Horn Sheep Range.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment. However, the Map inaccurately indicates the use area for Big Horn Sheep. Such use area within the Mahogany Mt. Allotment is only west and north of Mahogany Mountain. We have never seen a Big Horn Sheep to the east and south. Note: My family and I have been grazing this area even before the passage of the Taylor Grazing Act.

Map WLHS-1 Active Wild Horse Management Areas.

COMMENT: No comment. The Mahogany Mt. Allotment and Spring Mt. Allotment are not within a 1971 wild horse use area.

Map WSA-1 Wilderness Study Areas.

COMMENT: The map does not depict any WSA in Mahogany Mt. Allotment or Spring Mt. Allotment. This is correct. No further comment.

Map WSR-1M Malheur R.A. Existing Designated and Preferred Alternative Wild & Scenic River.

COMMENT: No comment as to Mahogany Mt. Allotment and Spring Mt. Allotment.

****

Once again, thank you for the opportunity to comment upon the Draft.

Sincerely yours,

Allen Baltzor

L-108

Oregon
John A. Kitzhaber, M.D., Governor

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February 26, 1999

Mr. Ed Singleton
Vale District Manager
U.S. Department of the Interior
Bureau of Land Management
100 Oregon Street
Vale, Oregon 97918

Subject: **Draft Southeastern Oregon Resource Management Plan/ Environmental Impact Statement**

Dear Mr. Singleton:

The Division of State Lands (Division) has reviewed the Draft Southeastern Oregon Resource Management Plan/Environmental Impact Statement (RMP/EIS), and appreciates the opportunity to comment on this document. As the manager of over one million acres of surface and mineral rights in southeastern Oregon, much of which is intermingled with BLM parcels within the RMP/EIS study area, the Division recognizes the importance of this proposed plan.

The Division does not at this time have any specific comments concerning the draft RMP/EIS. We believe that in general, the management goals of the BLM parallel those of the Division concerning the management of its holdings within the RMP/EIS study area. We understand that you will receive discipline-specific input concerning the draft RMP/EIS from the Oregon Department of Fish & Wildlife and the Oregon Water Resources Department.

As you are aware, Division and BLM staff have a long history of working closely together in managing each agency's respective holdings in southeastern Oregon. We look forward to continuing this close working relationship, and in participating in planning activities involving BLM lands proximate to those managed by the Division. We want to continue to be kept informed of, and have the opportunity to comment on any substantive revisions to the draft RMP/EIS, as well as the subsequent activity plans.

We would like to commend the BLM staff who prepared this draft RMP/EIS. Their efforts have resulted in a comprehensive, informative document.

Sincerely,

Paul R. Cleary
Director

L-109

The Nature Conservancy
OF OREGON

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VALE DISTRICT BLM

March 1, 1999

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Bureau of Land Management
Burns District Office
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Ed Singleton
Bureau of Land Management
Vale District Office
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Dear Craig and Ed,

The Nature Conservancy of Oregon (TNC) would like to take this opportunity to comment on the Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement (DSEOR RMP/EIS). As you are aware the Conservancy is a non-profit international conservation organization dedicated to the preservation of biodiversity. We have had a long history of conservation action in SE Oregon that has included ownership and management of the Borax Lake Preserve, numerous inventories for rare plants and animals, surveys for potential ACECs and RNAs in preparation of the RMP/EIS as well as drafting of management guides for some of the most rare species in the region. Our comments will focus on these aspects of the RMP/EIS that most directly affect our mission of biodiversity conservation and the aspects of the plan for which we have detailed knowledge.

General Comments

Energy and Mineral Resources
Of special concern to TNC is the geothermal leasing that has occurred within the Borax Lake basin. Borax Lake contains a listed endangered fish, the Borax Lake chub, whose sole habitat is the lake and the associated runoff channels to lower Borax Reservoir. Borax Lake also contains other unique species, such as the Borax Lake ramshorn snail, which likely are endemic to the hot springs systems found at the site. It is safe to conclude that as inventories become more complete there will be a suite of endemic species found at this site, all of which are entirely dependent upon maintaining the specific hot springs environment that defines the area.

The recent actions by Anadarko, that were precursors to developing geothermal power generation, for all intent and purposes showed that the geothermal basins underlying site

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are completely interconnected. This was borne out by the analyses of Anadarko data that was released upon forfeiture of the geothermal lease; in short, chemical analyses of flows from test wells depicted chemical compositions that were either identical to Borax Lake or highly similar to it. Because of these results the Conservancy believes that any geothermal development in proximity to the underlying geothermal basin of Borax Lake presents an unacceptable risk to the Borax Lake ecosystem which is the sole habitat for the listed endangered Borax Lake chub.

The Conservancy recommends for Objective 1 under Energy and Mineral Resources (3-11) that the BLM adopt Alternative D with reference to no leasing within a 3 by 8 mile buffer around Borax Lake. We also recommend that all ACEC/RNAs be withdrawn from mineral entry as exploration and development would substantially degrade the resources for which these areas were designated to represent and protect.

Rare Species
The special status plant species section (3-22) is quite brief and says many of the right things regarding using a mix of protection, restoration and enhancement measures for species and their habitats. However, given the large number of species that are listed in Chapter 2 of the RMP/EIS we feel that there should be more specificity regarding future actions for at least some of these species. Table 2-6 details how much of the likely habitat has been inventoried for certain species; TNC recommends that a goal of the plan should be that 75% of the likely habitat should be surveyed within the next 5 years. There is also no mention of the use of habitat management plans in the RMP or at least no goal to draft additional plans for other species. These plans have been drafted after typically lengthy studies of the species and their habitats such that they should be incorporated into the RMP and implemented as a primary means to meet the objective stated in Chapter 3.

Finally it is noted in Chapter 2 that several specific habitats contain a number of rare plant species and in general have a high degree of endemism associated with them. The Vale Sand Hills, Owyhee Uplands Ash Deposits, High Steens Alpine Zone, Playas, Lithic Soils, and Limestone are all discrete areas that should be focused on in the RMP as needed special attention for the contributions to botanical diversity in the region. Management attention in these areas should include but not be limited to regular botanic surveys and monitoring, impacts from land uses and management actions such as grazing, recreation, road maintenance, wildfire, among others.

Rare animal species also need more specific attention in Chapter 3 of the RMP/EIS. Specifically, the Conservancy recommends that greater effort be made to inventory unique habitats for groups of species of which little is known. These groups include but are not limited to aquatic and terrestrial mollusks, aquatic and terrestrial insects, bats, and other small mammals. Bighorn sheep are specifically identified in the plan Objective 2 (3-28); we recommend that greater protection for potential bighorn habitat be afforded by the curtailment of domestic sheep grazing where such allotments overlap with bighorn potential presence.

We expected to see the RMP place a greater emphasis on native fisheries especially in the context of aquatic and riparian habitats. Great strides have been made in inventories for fish species and stream surveys are well underway in at least the Andrews RA, however, there is considerable survey work yet to be done in many areas of the Vale District. This should be an immediate priority of the RMP and then, as priority streams are identified from sensitive species presence and/or potential for high quality aquatic habitat, there needs to be rapid implementation of restoration projects at priority sites. Alternative C does not do enough to emphasize the need to work aggressively at riparian and aquatic habitat restoration and conservation. Alternative D is more in keeping with the urgency needed to address these habitats in a priority fashion.

Monitoring also needs to be detailed for special status species in such a way that it can be used in an adaptive manner. If populations of a certain species are declining due to management actions, as shown by monitoring, then what are the conditions under which a change in management is required? Determining appropriate levels of change in critical habitats or populations of rare species should be a goal of the RMP.

Special Management Areas
Special Management Areas are one of the principal areas where TNC has focused its effort on BLM lands in SE Oregon over the last decade. We conducted inventories under contractual agreements with the BLM if each of the Resource Areas affected by the RMP/EIS and many of our nominated sites have been brought forward in the preferred alternative. A number of additional sites have been recommended by the BLM and/or other individuals and in examining these additional areas, which include ACECs, ACEC/RNAs, and even the Steens NCA we feel they all justify designation in the plan. Our comments below reflect those sites which were not carried forward in the preferred alternative and which we feel are critically in need of designation.

The basis for all of our arguments for the specific sites and their boundaries is the ability of the site to adequately fill natural area cell needs, as described in the Oregon Natural Heritage Plan (1998). The Conservancy has evaluated potential natural areas and their ability to represent natural areas as defined in the Heritage Plan for 2 decades. Our ecologists have the broadest knowledge of natural areas and natural communities in state and rely on principles of conservation biology and conservation site design when proposing areas for designation. Proposed boundaries for sites are intended to include the natural diversity inherent in the target natural communities and the proscribed sites are defined so as to remain viable even in the face of potentially changing land uses on adjacent lands.

In general we support Alternative D with regards to ACECs and ACEC/RNA designations for the reasons that maximum protected acreages are proposed in this alternative and there is generally stronger protection from mineral entry as well.

Malheur Resource Area
1) Mahogany Ridge ACEC/RNA: TNC supports the boundary that is detailed in Alternative D which would result in an area of 1557 acres. This additional area would

give greater representation of the target natural community, mountain mahogany/big sagebrush, and would add needed buffer of mountain big sagebrush communities. Furthermore, the proposed addition would add diversity to the site with aspen-chokecherry communities found in late-lying snowbank areas. The Owyhee Uplands contain the greatest diversity of mountain mahogany communities known in the species range. Because extensive areas of mountain mahogany habitat is on private lands the few diverse areas of mahogany communities on public lands offer the only chance to protect these communities which have great wildlife significance as well as botanic significance.

2) Stockade Mountain ACEC/RNA Addition: The original TNC recommendation for expansion of this existing ACEC/RNA did not evaluate lands in sections 33 and 34. These lands could very well provide quality habitats that would add diversity to the western juniper types and low sagebrush types, which are the target communities at the site. We support the larger addition (Alternative D) based on somewhat limited knowledge of these sections.

3) Castle Rock ACEC: The Castle Rock site encompasses a TNC proposed area, Sheep Mountain, and does a better job at protecting the target natural communities which are transitional between the Blue Mountains and the Owyhee Uplands Provinces. The plan proposes an ACEC but because the site fills several natural area cells we strongly recommend that the BLM classify this area as an ACEC/RNA. Incidentally the maps accompanying the RMP/EIS list the area as an ACEC/RNA. There are extensive stands of mountain big sagebrush at this site as well as diverse expressions of ponderosa pine-western juniper communities, both of which are unfilled targets. Again, in order for the site to fulfill Heritage Program cell needs, we recommend an ACEC/RNA designation.

4) Lake Ridge ACEC/RNA: We support our original proposal that is described in Alternative D and includes lands north of the main road that runs through the site. The rationale for this is that these lands contain some of the best low sagebrush/bluebunch wheatgrass, the primary the natural area cell need represented at the site. The lands also include portions of the silver sagebrush/Nevada bluegrass playa vegetation that adds to the overall diversity of the site.

5) Coal Mine Basin ACEC/RNA: We support the designation of this site. It represents an important site both for the rare plants present there as well as the unusual Succor Creek ashbeds, which are well represented at the site. We are especially pleased that this site was nominated in light of its importance.

6) Dry Creek Gorge ACEC: We support the designation of this site as it contains some of more spectacular scenery in the Owyhee region as well as diverse geology that supports a number of high quality examples of salt desert scrub communities. This ACEC in combination with the Owyhee Views ACEC contain essentially a full range of the salt desert scrub communities found in the Owyhees. Again, protection of this area from mineral entry is essential so we support Alternative D.

7) Hammond Hills Sand Hills ACEC/RNA: Given the potential threat of mineral leasing at this site we support Alternative D with its NSO stipulations. This site is remarkable as it contains excellent representations of sandy soil alkali communities in high quality condition.

8) North Fork Malheur River ACEC: The North Fork Malheur River is the link between the Blue Mountains and the Owyhee Uplands Province and this site does a great job of protecting the values associated with the river canyon. Rare species including bull trout are a special reason for designation of this site but the transition in vegetation from continuous ponderosa pine to sagebrush steppe is also an important feature at the ACEC.

9) North Ridge Bully Creek ACEC/RNA: This site in conjunction with South Ridge Bully Creek ACEC/RNA provides great representation for several Wyoming big sagebrush communities in the Owyhee Uplands. Of special importance at this site is the combination of shrubs, notably squawapple and threetip sagebrush, that occur with Wyoming big sagebrush. We support Alternative D for additional acreage at the site and for greater protection from adverse conditions caused by livestock grazing there.

10) South Alkali Sand Hills ACEC: This site protects some of the best remaining habitat for two sensitive plant species, Mulford's milkvetch and the Malheur forget-me-not. We support Alternative D for this ACEC as it protects the maximum habitat present and provides the most latitude for management at the site.

11) South Ridge Bully Creek ACEC/RNA: This site complements the North Fork Bully Creek site. As noted previously these sites provide high quality representations of several Wyoming big sagebrush communities as well as threetip sagebrush communities, which reach their fullest expression in the Owyhee Uplands. The sites are wonderfully diverse and deserve maximum acreage protection as they are intended to represent some of the more widespread communities in the province. We support Alternative D for this proposal.

12) Spring Mountain ACEC/RNA: Spring Mountain is unfortunately a mix of public and private land that contains diverse upland sagebrush, mountain brush, and aspen on a well watered isolated mountain. The site has the potential to represent a suite of aspen communities that all arise due in large part to the springs, which are quite common on the peak and give it its name. We recommend designation of the acreage displayed in Alternative D and we would support an active exchange program for the private lands on the peak on a willing seller basis.

Jordan Resource Area

1) Jordan Craters ACEC/RNA: We support Alternative D to enlarge the RNA so as to include the full extent of the lava flow.

2) Dry Creek Bench ACEC/RNA: This site is within the Basin & Range Province and is a good example of mountain mahogany/big sagebrush. This type is well represented in the Oregon Canyon Mountains, especially in the upper canyon, but the Dry Creek Bench

area was a very compact site for the community. The larger acreage as portrayed in Alternative D should be designated as it acts to buffer this already small site. There are some concerns with the proximity of the road to the site but this also allows ready access to the site, which is in contrasts with other occurrences of this type in the upper canyon.

3) Little Whitehorse Exclosure ACEC/RNA: There are few examples of low elevation riparian areas that even remotely qualify as benchmark areas for monitoring or research purposes in the High Desert but the Little Whitehorse Exclosure is one. The site has been well researched by Angie Evenden for her Ph.D. and continues to be a site which is visited time and time again by researchers in many fields. The preferred alternative does not do the site justice with regards to protecting the watershed surrounding the exclosure, hence, we recommend Alternative D which encompasses more of the watershed.

4) Mendi Gore ACEC/RNA: This site was originally designed to include some of the larger examples of black sagebrush communities in the Vale District. Black sagebrush is an unusual sagebrush species that is not represented in any designated natural areas in Oregon and has a rather patchy distribution that makes it difficult to include in most natural area designs. Unfortunately the preferred alternative (Alternative C) was drastically reduced from the original proposal, which sought to protect the Mendi Gore basin and include several black sagebrush communities. The preferred alternative only captures a very small winterfat dominated playa and essentially misses the more important black sagebrush natural area target for the site. We emphatically recommend that a greatly enlarged ACEC/RNA be considered in the final RMP, one that is accurately described in Alternative D.

The Conservancy's original proposal included the entirety of the Mendi Gore basin, a compact alkali basin that lies south of the Bowden Hills. The basin is a well designed natural area with easily identifiable boundaries as it is almost entirely enclosed by surrounding hills. There are water developments in the basin but these do not warrant exclusion of the area as an ACEC/RNA. The black sagebrush occurs in pure stands as well as mixed with low sagebrush and usually has a diverse understory of Sandbergs bluegrass and herbaceous species. The site grades into Wyoming big sagebrush/Idaho fescue at the upper hill slopes displaying a nice progression of decreasing alkalinity in the soils. There are also some stands of sand dropseed as well as greasewood-shadscale providing a good diversity of communities at the larger site.

The smaller ACEC/RNA (Alternative C) would not protect nearly enough of the black sagebrush communities or the diversity of the site and thus would not adequately represent the natural area cell for black sagebrush community in the Oregon Natural Heritage Plan. Again, we strongly recommend designation of the boundaries for the site outlined in Alternative D.

Palomino Playa ACEC/RNA: We concur with the preferred alternative for this high quality site, which contains a very important occurrence of Davis' pepperweed, a rare plant species. One addition to the alternative description would be to attempt to close the road that leads through the playa. Also we recommend that all playas that contain this

species should not have maintained waterholes (dugouts) in them so no new dugouts should be created and there should be no maintenance done on existing dugouts.

Three Forks ACEC/RNA: The Three Forks proposal not being recommended for ACEC/RNA in the preferred alternative was a surprise to the Conservancy as the site contained virtually the only remaining high quality example of the coyote willow/Great Basin wildrye left in the province. The consideration that the site is protected by the Wild & Scenic River Management Plan is not the same as having the area designated as an ACEC/RNA. While protection of this riparian site is important, the recognition that it fills a very high priority natural area cell and the ability for designated areas to attract and thus concentrate research and inventory is not carried forward by mere inclusion in the river management plan. We recommend that Alternative D be implemented in the final RMP with management of the area being delegated to the river management plan.

Three Forks has a number of other diverse riparian and bottomland elements present including hot and cold springs, bulrush, cottonwood/willow, and 4th order river attributes including sandy beaches, erosion zones and natural flooding. We acknowledge that recreation use of the area is increasing and will be constant management issue for this most important area; nevertheless, we do not believe that this level of recreation use should preclude ACEC/RNA designation.

Toppin Creek Butte ACE/RNA: This remote area contains high quality low sagebrush/Idaho fescue shrublands with inclusions of bluebunch wheatgrass. The larger site proposal (Alternative D) has silver sagebrush playa communities represented at Bull Flat which adds diversity to the site but which also adds potential conflicts from water development. We like the added diversity that including Bull Flat provides.

Andrews Resource Area

1) Alvord Desert ACEC: The Alvord Desert ACEC contains excellent examples of salt desert scrub communities that provide habitat to a variety of wildlife species. When the Conservancy conducted potential ACEC and RNA inventories in the Andrews RA we were immediately struck with the importance of the Alvord Desert, especially in light of its relevance to the adjacent Steens Mountain range. But we were also struck with the irony that the designated ACEC did not include the actual "desert" which lies immediately to west of the currently designated site. We recommended to the BLM that the ACEC should include the actual playa to the west and we are shocked and dismayed that this recommendation did not even warrant inclusion as an alternative in the draft RMP. We again strongly recommend that the full extent of the playa be included in the ACEC designation.

We suspect that one of the BLM concerns regarding inclusion of the actual playa is that designation would preclude recreation use on the playa. Nothing needs to be farther from the truth. We recognize the existing recreation that occurs on the playa and feel that much of it is relatively benign in terms of its effects on the ecosystem. ACEC designation, though, would recognize the complete extent of the Alvord and include the

playa and lake, which is so visible and so unique in Oregon. This area would also benefit from the comprehensive planning that could occur under the ACEC designation.

2) Borax Lake ACEC; East Kiger Plateau ACEC/RNA; Little Blitzen ACEC/RNA; Little Wildhorse ACEC/RNA; Mickey Basin ACEC/RNA; Pickett Rim ACEC; Pueblo Foothills ACEC/RNA; Rooster Comb ACEC/RNA; South Fork Willow Creek ACEC/RNA; Steens Mountain ACEC; Tum Tum Lake ACEC/RNA; Fir Groves ACEC; Mickey Hot Springs ACEC; Serrano Point ACEC/RNA: We concur with the preferred alternative on these existing recommendations with the addition of withdrawal from mineral entry for the areas.

3) Big Alvord Creek ACEC/RNA : We support this recommendation as it contains high quality examples of natural communities. The site has essentially no conflicts from livestock grazing, as the terrain makes it difficult for access, but there is some potential of mineral entry and thus we recommend that the area be withdrawn from entry.

4) East Fork Trout Creek ACEC/RNA: The Conservancy's original recommendation for this site included the upper watershed of the East Fork so as to offer conservation protection to the entire site. The preferred alternative seems to scaled this back considerably such that it is unclear if even the riparian values for the site will be protected as currently designed. Of special concern is the sedge wet meadow or bog that resides on the west side of the stream; this site has been damaged by livestock use in the past and should be part of the site. We recommend extending the boundaries to the upper ridgeline to make insure watershed level protection for the wetland/riparian values as well as for the ease of recognizing the site from the ground.

5) Long Draw ACEC/RNA: The existing RNA has been controversial for several reasons but if the boundaries would be extended per the Conservancy's recommendations in 1994 and protection were afforded to the entire area some of the controversy would be avoided. The existing boundary is not consistent with the landscape and instead is drawn on legal (section) boundaries. We recommend that the site be extended to the northwest to Buck Buttes and include more of the upper drainage that is above the existing RNA. This will act to protect the sandy soil communities that extend beyond the current boundary as well as protect additional lands that contain communities dominated by purple sage and buckwheat. The upper basin grades into big sagebrush/bluebunch wheatgrass showing a nice transition from the sandy soils which support the Indian ricegrass target community.

Steens National Conservation Area

The Nature Conservancy read with interest the proposed Steens NCA, as we have long believed that the area was the most outstanding representation of basin and range country in the Northern Basin & Range Ecoregion. The one major modification that we felt must be made in order to bring the site into complete agreement with the rationale provided in Chapter 3 (3-217-218), however, was that the Alvord Desert must be included in the designation. The rationale for the inclusion of the Alvord is based on it being integrally tied to the accompanying range of Steens Mountain. In the Basin and Range Ecoregion

the two seemingly contradictory landscapes, desert mountain ranges and the intervening basins, work in unison in a host of ways. The wildlife of the area provide the easiest means to visualize this union as bighorn sheep, for instance, are found venturing out to Borax Lake in the winter and spend their summers on the rugged east face of Steens. Another example is with certain butterflies, which have hatched on the desert floor and then swarm up the mountain and top out at the crest in summer. More subtle alliances between the two landscapes also are readily recognizable such as watershed concerns. Snowmelt off the Steens feeds playa lakes, which then provide habitat and refuge for waterfowl and other species; actions affecting snowmelt on the mountain need to take into account downslope implications. Plant species also naturally migrate between the basin and the mountain, although this migration often takes place over a longer time frame than wildlife migrations do.

The rationale for the NCA designation (3-217) states that the "area would be large enough to protect and manage from a landscape approach where interrelated values of watersheds, vegetation and wildlife would be managed as part of an ecological system." This clearly supports inclusion of the Alvord Desert with the proposed NCA. As stated earlier, in the Basin and Range Ecoregion both landscapes taken together define the ecosystem.

Finally, the human uses of the area also dictate inclusion of the Alvord with the NCA proposal with increasing recreation and existing commodity uses both utilizing the basin and the range as a unit. Issues such as transportation, recreation facilities, summer range and winter pasture, and even residential development involve both landscapes and therefore support the addition of the Alvord Desert in the proposed NCA. Planning for such uses should be done on the entire area as a whole so that the human interactions between the two landscapes are factored into management decisions. It would be shortsighted to only include Steens Mountain in this NCA proposal when many of the issues for the region are based on both of these major landscape features.

Unique Habitats

1) Riparian areas and wetlands are critical habitats for wildlife and also contain a considerable amount of biodiversity of botanic resources. These areas are also obviously important for downstream water resources that often include seasonal lakes and marshes. The management actions specified for Objective 1 under Alternative C should be strengthened so as to focus BLM management in these critical habitats with meeting water quality standards. Similarly in Objective 2 that focuses on healthy riparian and wetland areas, management actions should only be allowed if they improve conditions in these areas or if they are neutral. As shown in Chapter 2, a over half of the riparian habitat in the Andrews Resource Area is in poor or fair condition (2-38) and over ¾ of Malheur and Jordan Resource Areas have not been evaluated yet. Again, given the enormous importance of riparian and wetland areas in the sagebrush steppe these statistics are not acceptable and one of the most important restoration activities that BLM can achieve (or at least tackle) is in these limited habitats.

2) Volcanic ashbed habitats have been addressed in comments regarding special management areas as well as with reference to rare plant species but these unique geologic sites warrant special attention here as well. The RMP does a good job of protecting these areas with special designations but we recommend that these sites also be withdrawn from mineral entry. The ashbeds are discrete areas, which are readily identifiable and, from the larger perspective, cover only a small percentage of the total RMP area. The minerals associated with these ashbeds are not classified as strategic minerals, in general, and can be found in other less sensitive areas as well.

3) Alpine habitats are found primarily on Steens Mountain very limited examples on the Pueblos and Trout Creek Mountains. These habitats are generally fragile, in terms of disturbance, they are very slow to restore, and add considerably to the botanical diversity of the SE Oregon region. The plant species found in these scenic areas are typically not considered sensitive, although several species there are on the BLM sensitive list, but they can be quite susceptible to disturbance impacts. The alpine habitats in the RMP area should receive extra consideration when any management action is proposed whether it is recreation focused or if it has a more traditional commodity extraction focus. Impacts to the alpine zone are still in need of better understanding, especially impacts which affect wetlands and watersheds.

4) Woodland habitats are not often considered in high desert resource management plans except with issues involving juniper management. Nevertheless there are several characteristic woodland habitats within the RMP area that warrant attention from more that just the perspective that juniper has received in the recent past. Western juniper forms a number of defining habitats in the sagebrush steppe and is critical for a host of wildlife species in the region. The species is currently undergoing an expansion of its range, not unlike similar expansions that it has undergone in the past, except that the current range expansion is occurring when we have the ability to monitor it. The expansion is both natural and fostered by human actions, most notably fire suppression. The Nature Conservancy recommends that BLM management efforts to control juniper be placed in the context of a return to natural rates of wildfire incidence with consideration being given to the affects of fire on the spread of weeds. Natural variation in juniper expansion should be studied, as is currently being undertaken by several researchers, but expansion should not be a landscape scale management action.

Another woodland habitat of special interest in the RMP area is mountain mahogany. Mountain mahogany, like juniper, is usually restricted to areas that have low fire return intervals. The shrub is important for a variety of wildlife and contains some its most diverse habitat expressions in the Owyhee Uplands, an area considered by researchers to be the center of mountain mahogany distribution. In the past, the BLM has not focused on habitats dominated by mountain mahogany and there has been a general practice to maintain stands of the species for their natural values. We want to reinforce this and encourage the Bureau to wherever possible protect these critical habitats from overgrazing, road construction, and other disturbance-based activities.

or those such as plants where it is easier to obtain data (plants aren't mobile, and are easier to study) . BLM must commit to monitoring of key populations/ habitats. BLM is mandated to be concerned about and assess impacts to loggerhead shrikes or pygmy rabbits equally to bighorn sheep.

We will use BLM's lack of data on and attention to pygmy rabbits to illustrate BLM's ignoring of non-charismatic special status species. Pygmy rabbits are known to be declining throughout their range, and may soon be listed under the ESA. Pygmy rabbits select sites with 28-46% cover (Washington Department of Wildlife 1993). Pygmy rabbits must have dense sagebrush cover to live. It has been known for some time that control or eradication of tall dense sagebrush is detrimental (Green 1980a, Green 1980b, Campbell 1982, Weiss 1984, Lyman 1991, Peterson 1995). Sagebrush of this density is precisely the sagebrush habitat type which BLM has selected for vegetation treatment in the past, and will select for vegetation treatment in the future. Alternatives propose treatment of large acreages of sagebrush. Without full and complete data on distribution, occurrence, and population status of pygmy rabbits in southeastern Oregon, BLM cannot analyze impacts of actions such as grazing levels, vegetation treatments or construction of range improvements proposed under any alternative.

To assess impacts of vegetation treatment, range improvements, OHV use, levels of livestock grazing or changes in season of use, BLM must acquire and analyze data on all special status species.

When will BLM propose a sage grouse/pygmy rabbit ACEC, or a collared lizard ACEC? Where in southeastern Oregon could mountain quail or kit foxes be reintroduced? If no sites are currently suitable, what can BLM do (changes in grazing practices, road access, OHV use, etc.) to restore suitable habitat?

SPECIAL STATUS PLANTS

BLM has compiled better data on special status plants. However, the analysis in the RMP contains several deficiencies. BLM must clearly identify causes of low numbers of plants, and specify activities currently threatening or impacting these species. A thorough analysis of management activities which could improve habitat conditions must be included. Clearly identify cause of low numbers, and detail necessary management changes to solve problems. Is a plant rare because it grows only on a limited soil type, or is it rare because it is highly palatable to livestock, or susceptible to trampling? Is mining destroying habitat? How can management be changed to enhance habitat? BLM must identify special habitats where unique assemblages of species may occur, and undertake management necessary to protect these sites.

Additional information on location and specific habitat types must be included in the RMP. Since BLM has some knowledge of plants, any inventory and monitoring data on distribution, size and trends must be analyzed in the RMP. Are population sizes increasing or decreasing? Why? How will BLM prevent mining activities from negatively impacting volcanic ash endemic plants?

We understand that BLM may be reluctant to reveal precise location of special status species, but the public should be provided with maps or approximate Township, Range, Section which at least identify general locations, so that future actions proposed under the RMP can be evaluated

Monitoring needs to be included in all restoration activities, including prescribed fires, such that changes can be made when it is determined that actions taken need to be modified to meet future objectives.

SEOR RMP and TNC's Ecoregional Plan

The Nature Conservancy has embarked on a national program to conduct ecoregional level conservation plans that will guide our efforts and those of our conservation partners to protect biodiversity. One of the first pilot plans to be completed was the Columbia Plateau Ecoregional Plan which included the entire area that is covered by the RMP. The Columbia Plateau Plan identified a number of sites that contained critical biodiversity values and we are happy to report that many of these sites contain existing and/or proposed special management areas identified in the draft RMP. Sites identified by the Columbia Plateau Plan include Steens/Alvord, Oregon Canyon Mountains, Owyhee Canyonlands, Succor Creek, Crooked Creek, Saddle Butte, Dry Creek, Alkali Gulch, Harper, Cottonwood Mountain, and Castle Rock. Some sites are very small rare plant sites while others, such as Steens/Alvord, are large landscape level sites that contain rare species as well areas capable of supporting ecosystem processes.

The inclusion of these sites in the RMP gives credence to the work that the Bureau has done but there are still other sites that will require additional work in years to come. An even more vexing issue is the management of designated sites as mere designation does not usually equate to adequate protection of the natural values of the sites. The Conservancy looks forward to working with the BLM on management issues of common concern. We are also happy to share with the BLM the work that went into the development of the Columbia Plateau Conservation Plan. We fully recognize the pivotal role that the BLM plays in conservation in SE Oregon and we look forward to continuing to work with agency on issues pertaining to protecting biodiversity values.

If you have any questions regarding our comments, please feel free to contact me.

Sincerely,

Dick Vander Schaaf

Dick Vander Schaaf
Conservation Planner and Protection Specialist

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Idaho Watersheds Project

Working to protect and restore Idaho watersheds

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VALE DISTRICT BLM

March 1, 1999

Ed Singleton
District Manager
Vale BLM Office
100 Oregon Street
Vale, OR 97738

Dear Mr. Singleton,

Idaho Watersheds Project (IWP) and the Committee for Idaho's High Desert (CIHD) are submitting the following comments on the Southeast Oregon Resource Management Plan (SEORMP). Our members use the public lands of southeast Oregon for recreational, scientific, educational, spiritual and aesthetic purposes.

We are deeply concerned about a broad range of deficiencies in the SEORMP. Incomplete information on current condition of public lands and waters is presented in the RMP. BLM has failed to adequately characterize the Affected Environment. Based on this inadequate characterization and description of the environment, BLM has presented a garbled and unrealistic set of alternatives. We are disappointed in BLM's range of alternatives. BLM must augment the range and depth of information on uplands, riparian areas, special status species, wildlife and vegetation assembled and presented to the public.

BLM has failed to incorporate information presented to it by the public during the scoping process in its development of alternatives and analysis of impacts. In October, 1996 we submitted extensive scoping comments on the nascent RMP to James May, then Vale District Manager. Our review of the SEORMP shows that those comments were ignored. For example, Appendix A p. 1-10, "Scoping Comments", omits any mention of a range of comments which we submitted to BLM on Manipulation of Native Plant Communities, Fire, and other issues. We ask that BLM again review our comments of October, 1996 and compare them to Planning Issues section of the RMP and Appendix A. We note that in Appendix 11, BLM has omitted us from the List of "Agencies and Groups that Sent In Comments During Initial Scoping". Please find our scoping comments, read them, incorporate them into a new range of alternatives, and assimilate relevant points into your analysis.

IWP and CIHD request that BLM prepare a Supplemental EIS that better characterizes the Affected Environment. BLM must also develop a new range of alternatives to address a pressing need to ameliorate environmental harms such as the continued degradation of redband trout habitat in southeast Oregon, and the establishment of many new ACECs and other specially designated wildlands.

WILDLIFE, BIODIVERSITY and SPECIAL STATUS SPECIES

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The RMP presents a short-sighted, out-dated analysis of wildlife. Throughout the RMP, BLM fails to consider impacts on 95% of the wildlife species in southeastern Oregon. Charismatic, huntable species dominate analyses of wildlife impacts.

A fundamental problem for the RMP is that for most non-game species, the BLM does not know 1) what species are out there 2) where they are located 3) why they are there 4) the status of their populations. Lacking data on population status, population distribution, metapopulation structure, and habitat requirements for many species, it is difficult if not impossible to assess potential impacts of the RMP - especially on populations of habitat specialists and sensitive, rare or locally endemic (geographically restricted) species.

No evaluation of habitat condition for the vast majority of species endemic to the RMP area was conducted as part of the RMP process. The RMP makes no attempt to apply coarse filter approaches for assessing likelihood of retaining viable, well-distributed populations of native species.

There is no evaluation of mechanistic/community relationships within the SEORMP area. There is no evaluation of: 1) Impacts of exotic species on native wildlife; 2) Predator-prey relationships; 3) Sensitivity of different species to human intrusion; 4) Site-specific disturbance in critical or core areas.

A discussion of wildlife can not be separated from a discussion of biodiversity. BLM is moving toward an ecosystem approach to land management. The RMP purports to be doing this. Secretary Babbitt's 1993 Ecosystem Management Statement, " Ecosystem Management in the BLM: From Concept to Commitment", directed BLM management to: stress sustaining natural ecological processes and functions to provide resilience and adaptation to long-term change; be based on science; minimize ecosystem fragmentation; reconnect fragmented parts. Secretary Babbitt gave clear direction to implement management change that conserves diversity and protects the integrity of the land. Obtaining crucial baseline data on wildlife species must be a BLM priority, as well as objective evaluation of scientific information, in achieving this goal.

FLPMA requires that 1) Public lands resources be periodically and systematically inventoried; 2) Public lands be managed in a manner that will protect the quality of scientific, ecological, and environmental values, and 3) ACECs be identified where special management attention is required to protect and prevent irreparable damage to important values, including fish and wildlife resources or other natural systems or processes. BLM Manual 6500.6 states: "Manage habitat with emphasis on ecosystems to ensure self-sustaining populations and a natural abundance nd biodiversity' of wildlife, fish, and plant resources on all public ds." Manual section 6840.06 states: "Conserve endangered and atened species and the ecosystems upon which they depend."

Where an agency has out-dated, insufficient, or no information on potential impacts, it must develop the information as part of the NEPA process. 40 C.F.R. 1502.22. BLM does not even present a timeframe or plan for obtaining biodiversity information. Key ecosystem indicator species must be identified, critical habitats identified, and landscape level biodiversity objectives and management strategies included in the RMP. This is critical to full evaluation of all RMP objectives and alternatives. If this is not done now, as part of the RMP process, it will never get done - funds will be diverted to other purposes.

The RMP fails to describe levels of biodiversity - genetic, species, community and landscape/ ecosystem diversity. We are concerned that several actions proposed in the management alternatives may seriously impact biodiversity of native plant and animal species at all of these levels. Example: vegetation treatment of juniper and sagebrush, construction of range "improvements". Vegetation manipulation projects eliminate mature and old growth communities and fragment habitats. They result in a loss of connectivity. Rangeland improvements in uplands fragment habitats for many native wildlife species, and extend the zone of livestock impact into previously less disturbed areas, with significant consequences for biodiversity at all levels.

There is no data presented for biodiversity at higher levels of organization, such as unique assemblages, and for gradient-related diversity and variability across the landscape. The RMP offers no assurance that areas of particular ecological uniqueness or animal species richness will be conserved.

The RMP fails to recognize the importance of corridors for migration and dispersal of wildlife. BLM must analyze both how its actions fragment and connect habitat. Patchy or fragmented habitat can have a deleterious impact on less common or late seral-obligate species and result in their population decline, or extirpation.

Species present in zones of disturbance including post-fire environments and early seral stages are typically common or weedy species (cheatgrass, fireweed, deer mice) whose populations are in no danger, or are habitat generalists such as mule deer.

A long-term, broad based view of biodiversity strives to maintain necessary habitat for old growth and late seral obligate species, as well as those which are declining in numbers, not just tally up the number of species that can be crammed into an area.

BLM is directed to move toward an ecosystem approach to management. The RMP does not contain sufficient information to analyze effects by watershed, or look at impacts as they radiate out over a large area. 40 C.F.R. 1508.8 (defining "effects" to include impacts to impacts on functioning of affected ecosystems). BLM NEPA Handbook, Glossary p.3. BLM confines its analysis to the area it manages, and fails to address broader influences across the landscape. As an up-dated planning document that will take BLM into the 21st century, the RMP fails to present sufficient data and analysis of wildlife, biodiversity and special status species to enable future land managers and the public to consider and analyze consequences of management actions. BLM fails to analyze impacts of proposed actions relating to biodiversity and wildlife in relation to management activities, habitat conditions, or foreseeable events in immediately adjacent areas, i.e. - the Owyhee Resource Area or public lands administered by Elko BLM just across the state line.

The RMP contains virtually no information on populations, habitat requirements, and habitat conditions in southeastern Oregon for non-game animals. BLM must gather this information because NEPA requires it. BLM simply can't make a reasoned choice among alternatives until it has an idea of what the impacts of proposed actions might be on native species.

Costs of baseline studies on a number of important species would not be exorbitant.

WILDLIFE

BLM must delineate clear areas of concern and specify actions it will take. For example, prioritize allotments, land conditions or wildlife concerns. Develop clear plans of action. Present this information to the public in the RMP. BLM must also specify how and when it will monitor wildlife species, biodiversity, populations, habitats.

BLM has presented no proof in the RMP that juniper or sagebrush density in the southeastern Oregon is contributing to unsatisfactory wildlife habitat conditions, yet the preferred alternative proposes large-scale manipulation of these habitats. Evidence contradicts BLM assumptions here: Trout and Thiessen (1972) in the most complete study conducted on the mule deer in the Owyhee ecosystem, specifically mention the importance of sagebrush and juniper to wintering mule deer, and the importance of dense shrub cover for fawns. Peterson (1995) presents much evidence of the harmful impacts of removing sagebrush, or decreasing sagebrush cover, on many wildlife species, and states : "the habitat with the greater structural and plant species diversity logically would tend to support a greater variety of wildlife than one less diverse." A challenge cost-share project between Boise BLM and Golden Eagle Audubon investigated bird diversity in western juniper woodlands in Owyhee County: Bird species diversity and numbers are greatest in intact communities, reduced in burns, and least in woodcuts.

Removing sagebrush cover drastically impacts songbirds: a significant reduction in nesting pairs of Brewer's sparrows (Best 1970, Schroeder et.al. 1975), declines in Brewer's and vesper sparrows (Walchek 1970) have been documented. Numbers of sage thrashers, sage sparrows, Brewer's sparrows, loggerhead shrikes, brown-headed cowbirds, mourning doves are positively related to sagebrush cover (Dobler 1994).

Species of special concern in Oregon (ODFW, USFWS, USFS and BLM) which nest in shrub-steppe habitat and which may be negatively impacted by vegetation projects include: loggerhead shrike (former C2 species), green-tailed towhee, Brewer's sparrow, sage sparrow, gray flycatcher and sage grouse.

Studies have shown sage grouse to be negatively impacted by sagebrush removal, whether through vegetation treatments or wildfire. Connelly et.al. (1994) found a decline in active leks in sage-steppe habitat in southeast Idaho following prescribed burning. Connelly's study was carefully designed to reveal impacts of prescribed fire. BLM must protect sage grouse nesting and winter habitat and other important upland game habitats through fire suppression activities. BLM, through the RMP, must recognize the importance of unburned woody plants to hundreds of other native wildlife species and not seek to burn these habitats.

Loss of shrub cover is also known to have drastic impacts on native reptiles. Reynolds (1979) found the greatest abundance of sagebrush lizards in native, ungrazed sagebrush habitat in southern Idaho, and noted that converting sagebrush range to crested wheatgrass reduced population levels of both sagebrush and short horned lizards. Werschkul (1982), in a study of species-habitat relations in a Malheur County, Oregon cold desert lizard community, looked at the abundance and diversity of 8 species of lizards in 9 habitat types. Werschkul found temporary streams in non-basaltic areas were most productive in terms of lizard abundance, and sagebrush areas were most productive in terms of number of species present. Lizards were NOT found in grasslands (defined by Werschkul as areas where native grasses had largely disappeared due to livestock grazing or range restoration projects - crested wheatgrass). Shrub cover and habitat structural diversity is important in determining lizard distribution and abundance patterns. (Germano and Hungerford 1981), (Werschkul 1982). Invasion of introduced grasses impacts the habitat of native reptiles (St. John 1985). BLM must fully consider impacts on reptiles of any activities which result in conversion of woody cover to annual or perennial grasslands.

Bats: A recent survey for bats found 7 BLM sensitive species in the Owyhee ecosystem (Perkins and Peterson 1997). Important habitat components for some species may include forested stands or riparian zones where tree age class exceeds 125 years. RMP must specify specific management actions which will be taken for bats, and discuss impacts of proposed actions on these species.

Intensive management schemes which masquerade as ways to increase diversity often harm declining native wildlife species. A false picture of biodiversity views fragmentation of late seral habitats and resultant increase in weedy species as increases in biodiversity. Cramming as many species as possible into a landscape by creating patches of weedy species, at the expense of rarer, non-weedy species is a false view of biodiversity.

BLM must change its focus, and recognize the importance of late seral or potential natural community (pnc) habitats, i.e. OLD GROWTH to native wildlife species, and not propose management schemes which move lands further away from these conditions, and set communities back to early seral stage. For example, BLM's 1996 Draft Owyhee RMP openly admitted IV-A-10, that "very little information is available concerning the impacts of Western juniper treatments on non-game wildlife", and that "wildlife species diversity may initially decline".

Off Highway Vehicle (OHV) use has significant detrimental impacts on native wildlife species. It fragments habitat, kills plants and alters plant communities, causes erosion, and provides corridors for weed dispersal. OHV use affects wildlife of arid regions through direct mortality, harassment, noise, and habitat destruction (Webb and Wilshire 1983), and has significant adverse impacts on a wide range of native species. Bury et.al. 1977, Luckenback and Bury (1983), Bondello and Bratstrom (1979), Luckenback (1978), Weinstein (1978).

The RMP fails to assess the impact of OHV use in arid, low elevation sites which: 1) are least resilient in recovering from soil and vegetation disturbance; 2) contain essential habitat for a diverse assemblage of reptiles and migratory songbirds; 3) are located near several populations of rare plants.

BLM must, as part of the RMP process, conduct a complete inventory of the herpetofauna and migratory songbirds in the salt desert shrub and Wyoming sagebrush habitats which are being most heavily degraded by OHV use. Reptiles which may be affected include: longnose leopard lizard, western fence lizard, sagebrush lizard, shorthorned lizard, mojave black collared lizard, side-blotched lizard, western whiptail lizard, desert horned lizard, common garter snake, western terrestrial garter snake, gopher snake, racer, longnose snake, western ground snake, night snake, striped whip snake, and western rattlesnake.

BLM must identify critical components of habitats for rare or declining plant and animal species, for unique assemblages of species, and establish long-term monitoring. Immediate closure or restriction of OHV use or grazing in areas found to be impacted by these uses must occur. Cumulative impacts of these activities on rare species must be assessed. Regardless of political pressures, BLM is legally mandated to protect habitat. Concrete action must be taken in arid, low elevation sites to prevent irreversible loss. Systems, once disturbed, may be pushed over thresholds from which they cannot recover.

Our members have seen a quantum level increase in OHV use and resultant habitat destruction on BLM lands in the past five years. A network of bare, eroding trails emanating for many miles in all directions from easy access areas now exists in many places. A decade ago, one or two small trails would have been visible. Hillsides and ash outcroppings, some critical habitat for rare plants, are defaced and disturbed. Vegetation changes and erosion resulting from OHV use fragment habitat for small animals, leading to increased vulnerability to predation, and an invasion of disturbed sites with exotic weeds . BLM must immediately act to control OHV use, and protect resources.

In the preferred alternative, BLM makes no commitment to ANY measurable standard of protection for sage grouse nesting and brood rearing areas. BLM must adopt a 9" stubble height requirement. A 9" standard is fully justified to prevent further serious population declines. Gregg et. al. (1994) found that nonpredated nests of sage grouse had taller (>18 cm.) residual grass cover than did predated nests of sage grouse in Oregon, and concluded that removal of tall grass cover and medium height shrub cover may negatively influence sage grouse production. DeLong et.al. (1992) recommend management practices that increase cover and height of native grasses in sagebrush communities to increase sage grouse productivity.

Water developments. Spring developments, pipelines, and wells: benefit livestock to the detriment of native plant and animal species; cause zones of intense soil disturbance (construction, livestock use) which provide ideal sites for weed invasion; increase erosion in uplands, lead to drying and desiccation of water sources which feed watering systems and result in lowering of water table and shrinking of wet meadow/spring areas/riparian areas; act as sites for disease transmission between domestic livestock and wildlife; deplete limited public funds available for restoration projects; serve as foci for species which may not normally be abundant (brown-headed cowbirds, starlings), cause long-term loss or destruction of microbiotic crusts through associated livestock trampling and trailing, result in a permanent increase in physical disturbance to sites from human use associated with roads stemming from project construction or maintenance; increase stress on wildlife associated with increased human disturbance (maintenance, use of new roads), result in increased mortality/hunting vulnerability; detract significantly from recreational uses of area; disrupt ecological processes and general ecological function.

Native wildlife species do not need water developments, which may impact the last refugia of native plant and animal communities which have not been significantly impacted by 140+ years of livestock grazing. BLM must not allow any additional water developments to be built, and must analyze the systematic removal of water developments which are currently causing harm to native species habitats.

A study of water developments on native wildlife species in ungrazed arid lands in New Mexico showed no definite effects on native species - including benefits (Burkett and Thompson 1994). If no positive effect was found in a No Grazing situation, how could BLM ever dream of a positive effect with grazing?

Fencing projects typically cut an ever diminishing pie of resources into smaller and smaller pieces, resulting in more ubiquitous and uniform degradation of native communities. Fence construction activity may involve blading or cutting native vegetation, and development of new roads and weed corridors along fence lines. Besides restricting movement of big game, barbed wire kills and maims wildlife, particularly birds such as raptors, sage grouse, and songbirds which are victims of wires. The RMP must analyze the impacts of existing fences, before any proposal for additional fences can be made. Fences also impact recreational users - cut and maim people and pets, have ugly visual impacts, or cause concentrations of livestock use resulting from fence layout. BLM fails to address long-term impacts of fence construction where livestock use is merely shifted to anew area, resulting in new degradation of all habitats.

Range improvements (water developments and fencing projects) spread zones of livestock disturbance and are common ploys used by BLM to temporarily sustain excessive numbers of livestock on stressed arid lands. BLM has built thousands of miles of fence in the southeastern Oregon, yet lands continue to be degraded. BLM has never monitored impacts of fencing - on plant or animal communities- to provide site-specific data on positive or negative impacts. Fences only serve to delay BLM's making hard management decisions. Unfortunately, these delay tactics cause harm to native wildlife species and plant communities.

RMP must establish a schedule for evaluating impacts of existing water developments, particularly those placed in upland habitats, on native wildlife and plant species. If it is found that water developments are impacting critical habitats for these species in any way, they should be immediately removed, and the land rehabilitated. Likewise for fences.

Only native species should be used in reseeding. BLM must commit to reseeding native shrubs in the winter immediately following any fire. Shrubs are of great importance to almost all native animals. We remind BLM here that nearly every prescribed burn and seeding which we have ever seen done has been done purely in an attempt to produce more livestock forage, and never for the benefit of wildlife. Both in the past and in the present, BLM has purposefully misled the public here and uses wildlife benefits as an excuse to justify livestock projects.

BLM must commit to a minimum of five years post-burn rest for both wild fires and prescribed burns. After 5 years, grazing can resume only if specific criteria are met. Recovery criteria must include: recovery of microbiotic crusts, successful establishment of native shrubs, sufficient vigor of native grasses, height of willows or other woody vegetation necessary to withstand livestock browsing, streambank cover and stability. Rationale: Snake River Birds of Prey Management Plan

recommends 5 year period of rest following seeding. Eddleman et.al. 1994 recommend a 3 to 4 year period of rest following fire in juniper community in poor or fair condition (92% of ORA), and then resumption of grazing at light levels. Willows and other riparian vegetation may take several years to achieve sufficient height to withstand grazing. These measures are necessary to ensure that vegetative resources recover to levels sufficient to sustain native wildlife.

Vegetation treatments fragment wildlife habitats. Knick and Rotenberry (1995) found that fire in arid sage-steppe habitat in southwest Idaho resulted in not only direct loss of habitat to birds nesting in the burn area, but also impacted songbirds nesting in adjacent unburned habitat. Populations suffered increased losses due to predation in habitat fragmented by burns and other disturbance.

Besides retaining interconnected blocks of habitat, BLM must develop proposals to restore connectivity to currently fragmented habitats. Example: planting native shrubs in seeding monocultures. Vision is necessary in a management document which will take the BLM into the ecosystem-based management of the 21st century.

Our review of the SEORMP leads us to the inescapable conclusion that BLM has no idea of what wildlife species occur when, where and why in the RMP area. BLM must develop sound, current site-specific baseline data as part of RMP process, and view wildlife from a modern perspective.

BLM often discusses drought as a major limiting factor and impact on wildlife species. Native plants and animals evolved with drought and are adapted to survival during drought conditions. However, the cumulative and immediate impacts of the stress of the "unnatural" grazing of domestic livestock during drought years on ecological processes and functions are the overriding issues here. The RMP must commit to substantially limiting/ eliminating livestock use of lands in poor or fair range condition during drought years, as well as reduced grazing in years following drought to allow adequate recovery of vegetation.

Livestock use during drought periods, or excessive livestock use during any season or period causes long-term, permanent drying and shrinking of springs and meadow complexes vital for species such as sage grouse. Livestock trampling and devegetation causes hummocking, erosion, drying and erosion processes which result in irreparable harm to wet areas. Shrinking meadows and springs means less food --succulent vegetation and insect-producing forbs -- for sage grouse broods is available. Grouse are also increasingly vulnerable to predation as they are concentrated in smaller, less productive areas. The RMP must address these issues and commit to removal of livestock from critical sage grouse meadows, springs, and seeps.

BLM must conduct site-specific surveys to identify known and historic leks, wintering areas, and critical brood rearing habitats. BLM should have developed this information as part of the RMP process. Until this is done, all areas indicated as sage grouse habitat must be considered critical habitat, and maximum efforts made to protect all potential brood rearing and winter habitat. Sage grouse numbers have plummeted throughout the West, and sage grouse may soon be considered for listing under the ESA. BLM must act immediately to protect habitat critical to sage grouse.

What proof does BLM have that winter grazing will improve habitat conditions for native wildlife? BLM has recently begun to advocate winter grazing on a number of allotments, without a full analysis if its impacts. The RMP must analyze impacts of increased winter grazing on habitat for pronghorn and nongame species, including small mammals, and nesting habitat for birds.

Overwhelming evidence exists on the deleterious impacts of livestock grazing on 1) ecosystems (Fleischner 1994); 2) migratory songbirds, (Page et.al. 1978), (Taylor 1986) (Bock et.al. 1993); 3) lizards Busack and Bury (1974). Vegetation treatments, water developments, increased levels of grazing and other proposed uses would have irreversible impacts on populations of native wildlife species. Local extinctions and extirpation would result. Late seral communities are vital to many declining wildlife species, yet BLM pushes vegetation treatments that will push communities back to early seral states. The RMP presents no scientific analysis that habitat manipulation would be beneficial to many wildlife species, particularly those dependent on old growth, late and mid seral communities. As previously discussed, vegetation treatments adversely impact rare, sensitive or declining wildlife species.

FLPMA instructs BLM to develop land use plans (RMPs). In developing land use plans, BLM must: 1) "use and observe the principles of multiple use and sustained yield...; ... 5) consider present and potential uses of the public lands; 6) consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values; 7) weigh long-term benefits to the public against short-term benefits..." 43 U.S.C. 1712(c). PRIA directs BLM to recognize rangeland values which include "wildlife habitat, recreation" and "water and soil conservation benefits."43 U.S.C. 1901(a)1. The land use planning process can lead to discontinuing grazing use on BLM lands. 43 U.S.C. 1903 (b). See Feller (1994) for discussion of this.

FLPMA and PRIA make clear that BLM is not required to permit livestock grazing on all of its lands. FLPMA's definition of multiple use specifically includes the use of some land for less than all of the resources", and PRIA specifically refers to BLM's authority to temporarily or permanently discontinue grazing on selected lands.

RMP must address removal of livestock grazing from lands where grazing is causing harm to sensitive or special status species, or unique assemblages of species. BLM must first identify critical habitats, and then act to protect them.

BLM must acquire sufficient information on native plant communities and wildlife in the process of developing the current RMP to enable it to make reasoned management choices eliminating or reducing grazing (or other activities such as OHV use) in areas where it is in the public interest. BLM must gather firm baseline information on native species, develop management actions based on habitat requirements, and present this to the public in a supplemental planning document with a new range of alternatives.

SPECIAL STATUS SPECIES

Our preceding comments on Wildlife and Biodiversity also apply to special status species. In addition, BLM must manage special status species and habitats to increase or maintain populations at levels where their existence is no longer threatened and there is no need for Listing. This objective is simply BLM's legal mandate. Actions proposed in the RMP openly fall short of this goal and are unacceptable. BLM must evaluate thoroughly the impact of grazing, OHV use, vegetation treatments, etc. on rare, declining, sensitive and threatened species, and propose management changes which will stop habitat loss and serve to increase populations of these species.

BLM must act to enhance and restore habitats for populations of rare species. We are not aware of any special status plant or animal species whose numbers have not declined significantly due to grazing, OHV use, mining, o other extractive uses. BLM can not simply accept the diminished population status/habitat condition as acceptable.

There are a large number of wildlife species currently considered sensitive species or species of special concern in southeastern Oregon, indicating both the wide range of habitats present as well as the seriously degraded condition of public lands.

Other species with declining populations may soon be recognized as special status species. Sage grouse numbers have plummeted, and as previously discussed, Listing under the ESA may soon be proposed. Many migratory birds, reptiles and small mammal species dependent on sage-steppe and juniper forest ecosystems will likely be recognized as special status species in the near future, and may also be petitioned for Listing under the ESA --- either collectively an assemblage of declining sagebrush-obligate species, or individually.

Special status species often have populations which are low in numbers, limited in distribution, or have suffered significant habitat loss. Little is known about most of these species. Without a thorough on-the-ground inventory, BLM cannot even prepare an adequate list of sensitive and special status species for the ORA. For example, the fauna of the Owyhee ecosystem has been poorly studied - BLM in the past has failed in its responsibility to assess, monitor, and take care of habitat for and populations of special status species in the past. As a result, the RMP contains no baseline or current information on most special status animal species, and no effort appears to have been made to collect this information as part of the RMP process, as required under 40 C.F.R. 1502.22.

Consequently, BLM must obtain information as part of the RMP process, and issue a supplemental document with a new range of alternatives for public review prior to publication of the final RMP. If this is not done as part of the RMP process, it will never get done, and funds will be diverted for other purposes. The bottom line is that BLM has been ignoring, or managing blindly, for special status animal species in the past, and the RMP continues the same path in the future.

BLM has made a better effort to obtain significant information on special status plant species in southeastern Oregon, has identified critical habitats for some species, and has eliminated livestock grazing from some critical habitats (Leslie Gulch ACEC). We applaud this effort, and urge the BLM to expand it.

BLM must commit to monitoring of ALL special status species, not just showy or glamorous ones. BLM can not manage only highly visible species, or those such as plants where it is easier to obtain data (plants aren't mobile, and are easier to study) . BLM must commit to monitoring of key populations/ habitats. BLM is mandated to be concerned about and assess impacts to loggerhead shrikes or pygmy rabbits equally to bighorn sheep.

We will use BLM's lack of data on and attention to pygmy rabbits to illustrate BLM's ignoring of non-charismatic special status species. Pygmy rabbits are known to be declining throughout their range, and may soon be listed under the ESA. Pygmy rabbits select sites with 28-46% cover (Washington Department of Wildlife 1993). Pygmy rabbits must have dense sagebrush cover to live. It has been known for some time that control or eradication of tall dense sagebrush is detrimental (Green 1980a, Green 1980b, Campbell 1982, Weiss 1984, Lyman 1991, Peterson 1995). Sagebrush of this density is precisely the sagebrush habitat type which BLM has selected for vegetation treatment in the past, and will select for vegetation treatment in the future. Alternatives propose treatment of large acreages of sagebrush. Without full and complete data on distribution, occurrence, and population status of pygmy rabbits in southeastern Oregon, BLM cannot analyze impacts of actions such as grazing levels, vegetation treatments or construction of range improvements proposed under any alternative.

To assess impacts of vegetation treatment, range improvements, OHV use, levels of livestock grazing or changes in season of use, BLM must acquire and analyze data on all special status species.

When will BLM propose a sage grouse/pygmy rabbit ACEC, or a collared lizard ACEC? Where in southeastern Oregon could mountain quail or kit foxes be reintroduced? If no sites are currently suitable, what can BLM do (changes in grazing practices, road access, OHV use, etc.) to restore suitable habitat?

SPECIAL STATUS PLANTS

BLM has compiled better data on special status plants. However, the analysis in the RMP contains several deficiencies. BLM must clearly identify causes of low numbers of plants, and specify activities currently threatening or impacting these species. A thorough analysis of management activities which could improve habitat conditions must be included. Clearly identify cause of low numbers, and detail necessary management changes to solve problems. Is a plant rare because it grows only on a limited soil type, or is it rare because it is highly palatable to livestock, or susceptible to trampling? Is mining destroying habitat? How can management be changed to enhance habitat? BLM must identify special habitats where unique assemblages of species may occur, and undertake management necessary to protect these sites.

Additional information on location and specific habitat types must be included in the RMP. Since BLM has some knowledge of plants, any inventory and monitoring data on distribution, size and trends must be analyzed in the RMP. Are population sizes increasing or decreasing? Why? How will BLM prevent mining activities from negatively impacting volcanic ash endemic plants?

We understand that BLM may be reluctant to reveal precise location of special status species, but the public should be provided with maps or approximate Township, Range, Section which at least identify general locations, so that future actions proposed under the RMP can be evaluated

with this knowledge in hand.

Even coarse, general maps may be a basis for assessing critical habitats which necessitate special management protection from an ecosystem perspective.

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LIVESTOCK GRAZING

"Destocking is the quickest, surest and most viable way to reduce current deterioration trends wherever they are occurring"; "Ecological forces exist which ensure that the tendency for continued degradation of rangeland, regardless of grazing system, unless a planned, general destocking strategy is applied." (Pieper and Heitschmidt 1988).

Reduction in stocking rates must be the first choice in obtaining resource objectives such as improved ecological site conditions, attaining the fundamentals of rangeland health, improving riparian condition, meeting state water quality objectives, etc.

Adjustments in livestock grazing management accompanying reduction in numbers should be made as follows in all allotments, and analyzed in a full range of alternatives :

- The goal of livestock management must be achieve proper functioning condition and good or better ecological status on all perennial and intermittent streams.
- Eliminate livestock grazing by July 15th, or earlier if necessary, in all pastures with riparian/wetland areas to meet resource objectives, regardless of the size of the riparian/wetland area.
- Streambank trampling damage occurring in the current year on any perennial or intermittent stream should not exceed 5% of the linear length of the streambanks.
- A streambank stability standard of 80-90% stable banks must be established.
- Establish a 6" stubble height standard for riparian area herbaceous vegetation.
- Establish a 6" stubble height standard for herbaceous vegetation at all upland springs, seeps and wet meadows.
- End of growing season and overwinter herbaceous stubble of 6" will be left on all streamside riparian areas to provide for streambank and channel stability, improved vegetation composition and structure, and hydrologic function.
- Allow a maximum of 10% annual utilization of woody riparian vegetation.
- Eliminate grazing in riparian/wetland areas after the growing season.
- Remove livestock from all non-functional and functional-at-risk streams until streams are in proper functioning condition.
- Determine which streams in allotment are water quality limited. Bring all streams into compliance with state and federal regulations.
- Allow a maximum 30% annual forage utilization of key forage species.
- Physiological needs of native shrubs, bunchgrasses and forbs must be fully considered when determining seasons of use and stocking levels.
- No use can be allowed on bluebunch wheatgrass during critical growth phases (Anderson 1992), see also BLM Challis Draft RMP (1996).
- Livestock grazing should be adjusted to avoid grazing during critical periods in growth cycle for
all native bunchgrass species.
- Do not allow range improvements that would increase livestock grazing of existing potential natural condition areas, or areas presently in fair or good condition.
- Livestock use should not be shifted to other areas to achieve goals in particular sites.
- Restoration of healthy cryptogamic crusts in upland areas must be an important goal. Crusts must be monitored, and actions taken to improve them.
- Land treatments and range improvements to maintain or increase livestock forage should not be allowed. As present improvements deteriorate, they should be phased out.
- Stocking rate and grazing system should be reviewed every five years and may be adjusted to protect the full spectrum of environmental, ecological, cultural, and recreation values.
- Livestock grazing schedules must include periods of rest during times of critical plant growth and regrowth.
- Grazing use must be adjusted before the next growing season where it is visually obvious, or where monitoring data or professional judgment reveal that key resources or watershed functional requirements are not being met because of livestock overuse.
- Terms and conditions of all grazing permits must include stocking rate, season-of-use, kind of livestock, deferment, rest, or other strategies that maintain good/excellent and improve poor/satisfactory vegetation communities and ecosystem function to achieve resource objectives. Livestock permittees should be held accountable for failures to meet objectives. Failure to comply and meet objectives shall result in a reduction of use in the next grazing season, 3 years of failure should result in permit termination.
- Stocking rates should be adjusted to allow a maximum of 25-30% utilization of key forage species.

* No ephemeral (Temporary Non-Renewable) livestock grazing should be allowed.
* A suitability analysis should be included. Exclude livestock grazing on all areas determined to be unsuitable. Suitability should evaluate such things as slope, distance from water, and site productivity, as well as harm to declining or special status plant and animal species resulting from grazing.
* Seedings should be done only to restore native plant communities, and should use only native plant species.
* Livestock management facilities, including salting sites, should be located in already degraded or disturbed sites. We have too often encountered native communities in the best condition be quickly degraded by establishment of salt licks.
* Manage for late seral and potential natural community throughout the RMP area.
* Habitat needs of populations of Special Status Species and other wildlife species must be adequately met on all allotments.
* A minimum of 9" of residual cover must be left on sage grouse nesting areas.
* Adequate monitoring to fully track upland and riparian condition must be instituted.
* Critical habitats for rare, declining, sensitive and T &E species must be delineated. Removal or reduction of livestock grazing necessary to sustain or enhance all such habitats must be fully assessed.
* Grazing privileges that are lost, retired, relinquished, canceled, or have base property sold for subdivision would have attached AUMs held for watershed protection and wildlife habitat.
* BLM will retain sole ownership of al permanent range improvements. Where necessary, BLM will acquire sole title and ownership of existing range improvements.
* BLM must not permit the drilling of any new wells.
* Watershed analyses should be completed within 5 years for all watersheds in the RMP area.

The above conditions and scenarios must be analyzed under all alternatives in the RMP. BLM must develop a new alternative which fully analyzes the incorporation of these conditions as the basis for management on BLM lands in southeast Oregon.

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FIRE

BLM Must Collect Current Information on SEORMP Lands.

BLM must conduct a site-specific analysis of current condition of vegetative communities on all public lands in the SEORMP area. BLM must determine which lands are vulnerable to cheatgrass invasion following any fire - prescribed or natural. This information must bepresented in detail to the public. This is necessary to prevent permanent and irreparable harm to native ecosystems as a consequence of prescribed fire. The following comments and recommendations must be incorporated in any prescribed burn scenarios,and a full assessment must be made in the RMP.

The assessment should include current information on :

- Presence of cryptogamic crusts
- % cheatgrass present
- % other exotic species present
- Condition of lands - poor, fair, good, excellent, pnc
- Determine whether previous fires which have occurred on similar sites have resulted in increases or invasion by cheatgrass, medusahead, other exotic species?
- Critical wildlife habitats, occurrence of special status species, etc. should be overlaid on the above information.

Maps depicting this information should accompany the analysis. This should be done on a watershed basis, as well as on an allotment-by-allotment basis.

The above is necessary to adequately analyze direct, indirect, and cumulative impacts on public lands. It is also necessary to adequately characterize the environmental context in which any actions would occur.

An assessment of habitat fragmentation and habitat connectivity for wildlife species on these lands should also be done and also presented in map form.

All lands which are vulnerable/susceptible to cheatgrass should be classified as zones of primary fire suppression - where all wild fires will be actively suppressed. There should be no prescribed burns conducted in vulnerable areas. An assessment of vulnerability should be made, based on bare soil, condition of vegetation, etc.

BLM must also carefully inventory all lands which have been burned during the past 40 years, or converted to crested wheatgrass during this same time. The public must be told how many acres of exotic seedings, or seral communities, or annual monocultures currently exist. This should also be presented in map form. It should be presented in a watershed, and allotment-by-allotment basis.

No prescribed burns should be conducted on lands in poor or fair condition, or in any areas vulnerable to invasion by exotic species.

BLM Health Jargon Is Deceptive.

The public has caught on to the play on emotionalism and fear being used by Agencies in promoting "health" schemes such as prescribed burns which would save us from "catastrophic" fire, and lead us to a self-serving "desired future condition".

Many Agency "forest health" proposals are now understood to be simply the same old extractive proposals dressed up in different words. Only the jargon has changed. It is the same with "rangeland health proposals". BLM may be using "prescribed fire" and "health" and "restoration" as disguises for standard BLM "burn shrubs to let the cows get at the grass better" projects.

BLM must provide clear science-based rationales for use of this terminology, and must clearly define "health", "productivity", "catastrophic", "restoration", etc. These terms must be explained on both site-specific and ecosystem levels.

BLM Must Demonstrate Need.

BLM must present a scientific basis for the need to burn public lands. BLM must demonstrate that fire will maintain health, vigor, productivity of vegetation and wildlife.

In reality, the use of "prescribed" fire to prevent "catastrophic" fire may have just the opposite effect. Fire results in increases in cheatgrass which, due to the continuity of fine fuels, causes any subsequent fire to burn more rapidly and spread faster. The end result of using prescribed fire in arid lands to prevent "catastrophic" fire actually results in increased probability of catastrophic fire. (See discussion of cheatgrass impacts below).

The bottom line is that cheatgrass has changed the naturalness of fire in southeastern Oregon BLM lands. BLM must fully address this fact in any discussion of need, goals, objectives or alternatives.

BLM Must Analyze A Full Range of Alternatives.

Alternatives to prescribed fire which must be analyzed include, but are not necessarily limited to:

* Reductions in livestock numbers to improve the health and vigor of native plant communities, increase diversity and productivity, increase their resiliency to fire, and decrease cheatgrass - thus reducing fuel loads which contribute to rapid spread of fire/catastrophic fire.

* Cessation of livestock grazing in areas determined through a Suitability analysis to be unhealthy, less diverse and unproductive, and with heavy fuel loads or degraded conditions resulting from livestock grazing impacts.

* Changes in grazing methods, changes in seasons of use, long periods of complete rest, etc. to improve health and vigor of native plant communities, increase diversity and productivity, increase resiliency following fire, and decrease cheatgrass.

* Use of mechanical means to achieve stated objectives. Selective cutting of trees is one such example.

* Any crested wheatgrass seedings which have been recolonized by sagebrush should be left alone. The structure of woody shrubs in crested wheatgrass monocultures provides some degree of suitable habitat for native wildlife. Migratory songbirds such as Brewer's sparrow, vesper sparrow, and sage sparrow will nest in old seedings which have a significant sagebrush component. Biodiversity is greatly increased by presence of shrubs.

Fire funds can legitimately be spent on the above alternatives, since these proposals would increase health, diversity, etc. as well as decreasing risk of catastrophic fire.

Additionally, BLM must consider using fire funds to buy out permittees whose degraded lands are most "at risk", most unhealthy, most unsuitable for grazing.

BLM Must Assess Impact of Each Alternative on Each Vegetation Community.

For each vegetation community type under each alternative, BLM must adequately analyze and assess impacts of prescribed fire on:

- Cryptogamic crusts
- Nutrient cycling/nutrient loss
- Soil stability/erosion
- Rare, declining or special status species and their habitats
- Native bunchgrasses and forbs
- Watersheds
- Cost and feasibility of restoration of native communities if project goes awry.

The above actions are necessary to: Adequately characterize the existing or affected environment; and to assess fire consequences.

BLM must also assess capability of watershed to handle increased erosion, sedimentation, runoff resulting from site disturbance such as fire.

Site Restoration Must Be Clearly Specified.

A detailed discussion of site restoration techniques which will be carefully followed after any proposed fire, or other purposeful disturbance of vegetation, must be included.

* Restoration must include specified periods of rest from grazing. Five years is a minimum period that should be considered.

* Specific site recovery standards must be established pre-burn. These standards must be met before any grazing can occur. After a five year period of rest, herbaceous native species must be equivalent to those in a "good" or better range site description. Cryptogamic crusts must be present in interspaces. Significant numbers of woody shrubs must be present, and visually obvious. These standards must be met in areas burned; unburned islands cannot be included in this recovery assessment. These standards must be met before any grazing can resume. This is necessary for the health of the plant communities.

* Any seeding that would occur following a prescribed burn must consist of only native species, and must include native shrub seeds, particularly sagebrush.

* BLM must carefully analyze and document pre-burn site conditions. BLM must rest all proposed burns for 2 to 3 years prior to burning to enhance vigor (and ultimate resiliency of native species).

* BLM must make a commitment to twenty years of monitoring to fully assess impacts and site recovery. Past BLM controlled burns/prescribed fires have never been adequately monitored. Thus, site-specific information on long-term fire impacts is lacking.

* If native shrub recovery does not occur within five years, shrubs and other woody species must be planted using the most effective techniques available.

* Large exclosures must be constructed to enable assessment of site recovery. Fire/prescribed burn funds must be used for this.This is necessary to acquire site-specific information on the impacts of livestock grazing on site recovery following fire.

BLM must post a "Burn Bond". A portion of money allocated for prescribed fire must be set aside at the time of the burn for future site restoration. Given the difficulty of site restoration in arid lands, this should be a minimum of 75% of total project funds. If not needed, this money can then be used to aid in restoration of lands invaded by cheatgrass (and thus help prevent "catastrophic" fire), or to increase biodiversity of crested wheatgrass seedings by interseeding with woody shrubs.

BLM Must Provide Economic Analysis.

BLM must provide a detailed economic analysis for all actions under each alternative. This analysis must include real figures for the values of recreational activities, wildlife, etc. on public lands affected by prescribed burns.

BLM Must Analyze Worst Case Scenarios.

It is our experience with BLM burns that things very often go awry, and far more acreage than is planned to burn ends up burning. BLM must assess condition and resource values of lands surrounding proposed burn areas. Predicted restoration costs of burn "accidents" must be assessed. Impacts on wildlife must be considered. Restoration costs for sites accidentally burned or disturbed - including any fire breaks, fire lines or any other ground disturbance must be fully considered.

BLM Must Disclose Impacts of Ground-Disturbance.

Fire breaks, fire lines, access trails or other disturbances caused by fire-fighting equipment or site preparation are seldom adequately rehabilitated, and serve as long-term erosion scars and visual blights on the landscape. They often become used as roads, or are weed corridors. BLM must address these issues under each alternative.

BLM Must Describe Impacts to Visual and Aesthetic Environment.

Burns of woody vegetation often leave long-lasting ugly visual scars that affect the public's uses of wild lands. Cheatgrass invasion may permanently affect use and enjoyment of public land. BLM must analyze these impacts.

How Cheatgrass Makes Today's Fires Have Unnatural Consequences.

Cheatgrass fundamentally changes both the response of native communities to fire (pattern of vegetational succession following fire) and the "naturalness" of the fire cycle. (Whisenant 1990, Peters and Bunting 1994). Following disturbance such as fire or intense trampling and grazing activity, cheatgrass carpets the ground surface, effectively excludes native seedlings and aggressively competes with established perennials. See Pyke and Novak (1994) for discussion of aggressive life history strategy of cheatgrass.

Cheatgrass provides abundant fine fuel for the start and spread of extensive range fires (Whisenant 1990, Billings (1994). Cheatgrass changes the fire regime from that of pre-settlement native communities. It creates a more continuous fuel that carries fire to widely spaced shrubs. Fires occur more frequently and burn over larger areas. (Whisenant 1990). The inevitable increase in cheatgrass following a burn in any community where cheatgrass and other flammable annuals are already present pre-burn would INCREASE the chance of widespread or catastrophic fire occurring in the future. Abundant seed production from cheatgrass in a post-burn environment would lead to increased infiltration into surrounding unburned areas.

Cheatgrass, spread by fire, particularly on degraded lands, is often the first in a wave of exotics. Increasing cheatgrass paves the way for white top, knapweed species, and other aggressive noxious weeds.

The following quotations succinctly describe the relation between fire and cheatgrass, and demonstrate the validity of our concerns:

"Cheatgrass has invaded and disrupted many plant communities throughout the Intermountain and Columbia Basin region. The presence of cheatgrass has resulted in the loss of plant diversity and associated resource values. The conversion of native communities to annual grasslands has occurred over an extended period, having a cumulative effect on existing resources. Many sites initially occupied by scattered cheatgrass plants have been converted to nearly pure stands of annual grass. The stands have been converted to annual grass by the intense competition of cheatgrass and the sequence of fires." Monsen (1994).

"Cheatgrass continues to expand its area of occupation and dominance. The plant now exists amid salt desert shrublands and upper pinyon-juniper communities. Significant increases have been reported within the past 20 to 40 years. The competitive features of this weedy annual prevents natural recovery of native species and requires extensive control measures to assure other species become established ..." Monsen (1994).

Billings (1994) states that, primarily because of the presence of cheatgrass: "there could be a genuine threat to the existence of large integrated ecosystems that have existed since the Pleistocene in the relatively arid lands between the Rocky Mountains and the Sierra Nevada."

Native shrubsteppe communities in the Snake River Plains have already been irrevocably changed by alien plant invasion coupled with increased fire frequencies (Whisenant 1990, Knick and Rotenberry 1995). The role of fire in this ecosystem has changed from the historical one where fire served to maintain mosaics of differing successional stages of plant communities to one of creating dysfunctional systems with excessively short fire return intervals. Once disturbed, semiarid shrubsteppe habitats may become sinks from which natural recovery is unlikely. (Dobkin 1994, Knick and Rotenberry 1995). Fire pushes degraded communities over thresholds from which they do not recover.

Health, Diversity and Productivity of Native Communities.

Cheatgrass invasion, altered fire regime and ultimate loss of shrub-steppe habitat has serious long-term consequences for shrub-obligate species. Knick and Rotenberry (1995) state: "because of restoration difficulties, the disturbance of semiarid shrubsteppe may cause irreversible loss of habitat and significant long-term consequences for the conservation of shrub-obligate birds". Loss of shrub habitat has the same consequences for reptiles. BLM must fully consider the staggering loss of biodiversity which occurs when fire sets the stage for conversion of sites to annual grasslands.

Mature perennial sagebrush reduces cheatgrass survival more than crested wheatgrass or bluebunch wheatgrass (Pyke and Novak 1994). Belsky (1996) describes the deleterious impacts of fire on juniper communities. For example, nitrogen loss in fire depletes the ecosystems nitrogen reserves, and reduces its future productivity.

Removal of sagebrush, juniper and other woody vegetation through the use of fire is the worst management strategy that could be employed by BLM. Peterson (1995) details the benefits of sagebrush to native wildlife, and the inherent diversity and productivity of sagebrush communities.

Mack and Thompson (1982) describe the impacts of livestock grazing on degrading arid western communities and opening them for exotic invasion. Fleischner (1994) discusses the plethora of negative impacts that livestock grazing has had on upland and riparian communities.

During our visits to the public lands in the SEORMP area during the past several years, we have observed that:

* Cheatgrass, and increasingly--medusahead-- are ubiquitous in disturbed sites
* Uplands continue to be extensively degraded by trampling and grazing activity of domestic livestock
* Riparian conditions continue to be bad - and streams can not handle further disturbance in their watersheds
* Noxious weeds are increasing dramatically in the wake of livestock grazing. This has been documented in the Owyhee Wild and Scenic River corridor.

Large acreages of SEORMP lands are "unhealthy" --- and it is grazing, not a lack of fire, which is the across-the-board cause in all vegetation communities.

VEGETATION MANIPULATION AND LIVESTOCK GRAZING

Given the degraded condition of BLM lands, only Alternative E adequately addresses impacts of vegetation manipulation, particularly in the context of past and present livestock grazing. Some impacts of prescribed fire have already been discussed above.

BLM must present and fully analyze additional alternatives including: immediate rest for all sites in early and mid-seral stage or in poor and fair condition, long-term rest or removal of livestock grazing from sites unsuitable for grazing (a suitability analysis should be an integral part of the RMP), and undertaking no purposeful site disturbances to native plant communities (burns, chemical control, woodcut). Goals to improve riparian condition can not be met if burns or other site disturbances occur in watersheds.

The use of "desired future condition" is not appropriate, since it is a value judgment as to what BLM wants to force the site to become, and because of the deep-seated bias throughout the RMP against native woody

vegetation. What specific criteria did BLM use to develop DFC for sites?

Woodcutting - BLM essentially gives away the wood to often slipshod fly-by-night operators. Old-growth rotten trees with cavities which provide nesting sites for flickers, kestrels,house wrens, and roost sites for bats, are cut and left when rot is discovered. Scarce nutrients such as nitrogen are exported from sites when wood is removed. Management goals are not achievable with woodcutting. We have seen sites where 1 tree is cut and 5 seedlings spring up in its place. BLM must include an economic analysis of woodcuts, which includes costs of habitat losses, uses of public land foregone, watershed effects. How much in administration time do they cost taxpayers? FORS 2 must be removed from list of objectives.

Prescribed burning, except in rare and unusual circumstances, should not be used. A burn will not improve highly degraded areas, such as public land in poor or fair condition. The RMP makes the blanket assumption that removing native woody plants somehow will improve areas where grazing has been the primary cause of degradation - in remote areas, it is often the sole cause of degradation. No information has been presented that demonstrates prescribed burns or wildfire will improve land for wildlife and native vegetation. In the RMP, juniper is portrayed as a scourge. It is featured as a management problem, yet BLM presents no evidence that western juniper is a problem in southeastern Oregon to the public, watersheds, wildlife or ecological processes - or that alteration of western juniper will move the BLM closer to improving condition of public land - or that killing junipers will help BLM meet objectives. BLM contrives ways to justify eliminating juniper rather than adequately solving the root cause of public lands degradation - which is abusive livestock grazing. Neither current scientific evidence nor site-specific data from southeastern Oregon is presented to show that sagebrush or juniper degrade resources on public land or that their removal will improve conditions.

BLM must provide information necessary to analyze all impacts of vegetation removal (fire, woodcut, chemical) on the soil resource - subsequent soil erosion, loss of productivity (nutrient loss in wind, runoff, volatilization), export of nutrients and minerals in harvested wood. Impacts of vegetation alteration on microbiotic crusts must be fully analyzed.

No current scientific evidence exists to show that western juniper negatively impacts watershed function. See Gifford 1973, Everett 1987a and b, Gifford 1987, Schmidt 1987, Belsky 1994, 1996 and Wilcox 1994. However, abundant scientific evidence exists that livestock grazing negatively impacts watershed function (Thurow 1991, Fleischner 1994, Ohmart 1996). The documented degraded condition of land in the ORA (Draft RMP data) plus the observations of our members of the destruction to native vegetation by livestock in southeastern Oregon from Arock to the Middle Fork of the Owyhee River to Juntura clearly reveal that it is livestock grazing which is directly and deleteriously impacting watershed function.

Domestic livestock are the direct cause of disturbance to public lands which make them susceptible to invasion by weeds. The first step in control of weeds is to eliminate livestock disturbance of native plant communities and resultant degradation of sites - the cause of weed invasion. See Sheley 1994 for discussion of need to limit site disturbance to limit spread of weeds. Limiting livestock abuse of lands is the key to maintaining the integrity of native ecosystems.

The RMP view is founded on the myth that western juniper is degrading arid lands, when it is livestock impacts which are responsible. BLM must dispel these myths by adequately discussing current literature which dispels outmoded thinking. BLM must also revise its own perception of western juniper and manage on the basis of sound science. Everett (1987a and b) and Belsky (1996) discuss the myths associated with western juniper.

We do not support any means of chemical control of native vegetation. If BLM contemplates chemical use, it must discuss types of chemicals to be used, their persistence in soil and water, impacts on non-target organisms, impacts on special status species, impacts on recreational use, economics of application, specific application scenarios, alternative uses of land foregone, etc.

BLM must include a complete analysis of site characteristics of areas being "invaded" by juniper. Impacts of livestock grazing on western ecosystems are well documented (Fleischner 1994, Ohmart 1996). Since virtually all BLM lands in southeastern Oregon have been grazed by domestic livestock for 100++ years, it stands to reason that soil erosion, loss of A horizon, nutrient loss - nitrogen, carbon, gullying =site drying and lowering water tables, and other processes have occurred which have altered site potential. Mesic sites, and sites which once may have had characteristics that resulted in a climax community of sagebrush and grass have become rockier, harsher, disturbed sites with depauperate native bunchgrass understories that now are juniper community climax sites. It is futile to try to stop native plant succession by declaring juniper an enemy to control. BLM must include a discussion of site alteration by livestock and resulting changes in site potential. See Mack and Thompson (1982) and Belsky (1996) for discussion of impacts of livestock grazing on bunchgrasses in shrub-steppe.

Fundamental changes in site characteristics and potential are primary causes of increases in western juniper in southeastern Oregon. It is futile to institute a disturbance regime, and keep communities in early seral stage caused by disturbance, if these sites have been permanently converted to juniper sites by wanton livestock abuse.

Juniper harvest does NOT control seral encroachment into sage-grass ecological sites in the long-term. We urge the BLM to revisit old woodcuts and see the ineffectiveness of woodcuts in limiting junipers in what have become juniper sites.

BLM must provide site-specific monitoring information on places in RMP area where past vegetation manipulation has occurred.What monitoring has BLM done on woodcuts or burns? Woodcuts and burns have been occurring for a long period of time. In how many allotments where junipers and sagebrush were removed has a long-term demonstrated improvement in land or stream condition resulted??? The public must be presented with any relevant data here. RMP must include maps of past treatment areas with land and watershed condition clearly shown. Changes in condition must be shown.

Direct evidence does exist that big game (mule deer) rely on juniper and sagebrush as winter food. See Trout and Thiessen 1973 - "Physical Condition and Range Relationships of the Owyhee Deer Herd". These authors repeatedly mention widespread overgrazing and livestock impacts to vegetation.

Fire suppression efforts should not be reduced. Natural and human-caused wildfires in WSAs susceptible to invasion by cheatgrass and other exotics must be suppressed. Rationale: exotic plant species which invade sites following fire have altered the consequences of fire to native ecosystems. (Whisenant 1990, Billings 1994, Monsen 1994). Human-caused fires are Unnatural and should be suppressed. Non-suppression is an invitation to extractive interests to set fires in special management areas to achieve their own ends.

Also, increased recreational use will result in increased accidental fires. Increased Air Force use of flares in MOAs (see military Overflight comments) will result in a significant increase in wildfires.

Natural fire should be suppressed in sites where "unnatural" conditions now exist. "Natural" site conditions no longer exist on many degraded lands in southeastern Oregon. Prescribed fire should not be used to control native woody species (sagebrush, juniper). Changes in livestock grazing practices should be used to improve site condition. Only after long-term site restoration has been accomplished through fundamental changes in livestock grazing, or grazing has been completely eliminated from a site, can use of fire be contemplated.

Prescribed fire should not be used to mimic historical fire regime. Natural or presettlement fire conditions no longer exist on degraded lands.

Few studies of historical occurrence of fire in western juniper exist. An historical fire regime no longer exists in sites already invaded by or susceptible to cheatgrass or other exotics see Whisenant (1990), Billings (1994). An historical fire regime no longer exists in sites with depleted native plant understories. Site conditions have changed. Livestock grazing in the arid west brought about sudden and immediate change -Julian Steward, the Shoshone and Paiute ethnographer, states that by 1870, cattle had so reduced native plant communities that hunter-gatherer Basin-Plateau Indians could no longer obtain adequate food from wild lands. We are playing with a different deck of cards in 1996 than we were in 1850. This realization must be made by BLM if public land is to be soundly and scientifically managed.

"Post-fire grass cover is a function of pre-burn conditions."(Everett 1987). Postfire succession in juniper woodlands which have been abused by grazing may not lead to the desired plant community - due to losses of seed reserves and remnant plants, presence of exotics (Everett and Clary 1985).

Only recreational or non-commercial woodcutting of trees under <100 years old in selected areas should be allowed, as follows:

All trees> 100 years should be marked as "leave" trees by BLM before an area is opened to recreational cutting. No sites should be clear cut. Other leave trees should be marked.
No commercial woodcutting should be allowed. BLM should issue wood permits for 5 cords/year. This must be considered as an alternative.

Post-woodcut fire often results in high nutrient loss, "scalded" or sterile soils, weed infestations, delayed recovery of vegetation, and long-term losses in site productivity. (ODFW 1994).

Livestock grazing is an ongoing disturbance which has altered site characteristics - at times permanently. Cheatgrass and other exotics occur, and at times are widespread, in nearly all the vegetative communities in the SEORMP lands. Using fire, a very major disturbance itself, on top of livestock-caused disturbance, can cause long-term and at times irreversible changes that are disastrous for native wildlife. BLM must first adequately address grazing, the root cause of ecosystemic change. Until the public lands heal from grazing impacts, we oppose the use of prescribed fire.

We provided BLM with extensive comments documenting the foregoing concerns in our comments of October 19, 1996 to James May on the Southeastern Oregon RMP/EIS. BLM, hell-bent on burning more public lands in southeast Oregon, has ignored our comments, and failed to analyze a reasonable range of alternatives which address our concerns about use of prescribed fire. BLM must develop a new alternative which carefully analyzes the impacts -- and unnatural" consequences of fire on degraded public lands subject to ongoing disturbance by domestic livestock, and vulnerable to invasion by alien plant species.

Impacts of smoke and dust from fire on human health must also be assessed.

References to accompany this discussion are found in the preceding section, and/or have already been submitted to BLM with our scoping comments.

WATER RESOURCES/WATER QUALITY

The overwhelming cause of water pollution and water quality problems on most of the streams in southeastern Oregon is livestock grazing. Stringent upland standards are needed to ensure that watersheds are in good condition. Range improvement projects such as wells and pipelines ultimately lead to wider spread impacts on watersheds. BLM must analyze removal of developments from sites with erodible soils, steep terrain, or where land condition is deteriorating. Water resources are impacted by sediment, livestock waste, increased runoff from such sites.

BLM fails to state how it will protect water quality in grazed watersheds. The Clean Water Act requires the restoration and maintenance of the chemical, physical, and biological integrity of the Nation's waters. Water quality is directly related to the health of riparian ecosystems and native fish populations. The RMP avoids discussion of livestock grazing as the primary factor in fecal coliform contamination, sedimentation and other degradation of water.

AQUATIC SPECIES

Native fish such as redband trout are disappearing from the streams of southeastern Oregon. Effective and aggressive BLM management is necessary to protect and restore habitat. We are distressed at the lack of effective management strategies in the RMP preferred alternative. The RMP does little to assure the public that concrete change necessary to protect and enhance habitat for Great Basin and inland redband trout will

occur. Stream inventory data and watershed analyses are not adequate.

The proposed action does not mandate necessary cuts in livestock numbers and removal of livestock from critical habitats, streams in non-functioning or functioning-at-risk condition.

BLM has not even determined the condition of a great number of streams in southeastern Oregon. See RMP Table D-2. A great number of streams have an "Unknown" trend.

Appendix D discusses "capability" -- as "the highest ecological status a riparian-wetland area can attain given political, social, or economic constraints". These constraints can not be the basis of land management decisions to perpetuate degraded conditions. BLM must manage streams for potential natural community. Throughout the discussion in Appendix D, BLM avoids even the mention of livestock, speaking instead of "Human activities that alter the area's capability".

BLM cannot rely on the "riparian conservation area" approach to manage public waters. Here, BLM attempts to focus on only portions of drainages or watersheds. This is wrong. It also violates the Fundamentals of Rangeland Health, FLPMA, and other mandates. ALL perennial and intermittent streams in the RMP area must be managed for maximum protection of water quality, quantity and aquatic species habitat.

BLM's use of "Riparian Management Objectives" is also invalid and incomprehensible. The reader has no understanding of what is really being stated, and what action (or inaction) will be taken by BLM. This can not be the basis for management. BLM says "the values apply where ecologically attainable" - this means - where BLM does not want to fix stream condition, it won't -- claiming it is not attainable.

BLM fails to present a clear picture to the public of riparian condition throughout the RMP area.

Immediate closure of degraded streams in critical habitats to livestock grazing is necessary to prevent irreversible harm. BLM must provide site-specific data on drainages where livestock grazing is impairing water quality and aquatic species, and remove livestock from these areas. Why does the RMP fail to detail and describe impacts of livestock on public waters? The RMP presents a sham analysis which lacks important and relevant data, and fails to adequately discuss causes. Based on the information presented, a reader has no idea cows are even grazed in southeastern Oregon.

Riparian pastures simply perpetuate the problem. When livestock are present, fecal coliform levels skyrocket, bank trampling occurs, banks slough off and deposit sediment in waters, etc. If the same number of cattle remain in an allotment, the same amount of livestock waste/pollutants will be deposited in watersheds, to the detriment of water quality and recreational uses of public lands and waters. Herding livestock simply redistributes wastes, which ultimately end up impairing water quality.

Vegetation manipulation projects such as prescribed fire, or mechanical removal of trees on add further disturbance to watersheds already impacted by disturbance associated with livestock grazing.

Redbands: Data in Table D-2 is misleading. For example, redband trout are indicated as being present in the West Fork Little Owyhee. Almost the entire West Fork is intermittent most of the year, and a small population of redbands is confined to only the upper portion.

BLM must provide information on number of stream miles occupied by redbands, population information -- strong, depressed, etc., presence of non-native predatory fish, condition of segments of stream occupied by redbands, etc.

ICBEMP maps show that nearly all the redband populations in southeastern Oregon are restricted to small portions of watersheds, and isolated mainly in the headwaters of drainages. Connectivity between populations has been lost. Such populations are in real danger of disappearing -- due to stochastic events, reduced gene flow, continuing habitat degradation and loss. Yet, the BLM preferred alternative fails to recognize this, and provide necessary management action to protect redband trout.

ICBEMP data also shows that there are virtually no "strong" populations of redband trout remaining in any southeastern Oregon BLM streams.

The shrunken redband distribution and low population levels on Oregon BLM streams demands immediate action by BLM.Some examples: Redbands are mostly gone from the Oregon Owyhee River drainage --- only small segments of streams in the upper parts of a few tributary drainages have populations, and fish are rare in the mainstem river. The Bully Creek watershed is a shambles - exotic species predominate. No strong populations of redbands are found on BLM waters in the Malheur River drainage. BLM knows this. ICBEMP data has been available for several years, yet meaningful use of this scientific information is avoided by BLM throughout the SEORMP. Instead, BLM has focused on contorted commodity-driven vegetation manipulation schemes and insubstantial and nebulous riparian management objectives, and the self-serving unaccountability of "adaptive management" schemes.

BLM must provide maps that indicate redband distribution. One look at a map of current redband distribution in southeastern Oregon, and a First Grader would be able to that the fish -- and public lands and water -- are in serious trouble.

ADAPTIVE MANAGEMENT AND OTHER SHORTCOMINGS

Adaptive Management is a hoax. There is no accountability. It allows BLM to justify allowing livestock operators to graze beyond the limits of their permits. It allows BLM to change management scenarios to accommodate grazing abuse.

Clear, quantifiable standards must be used. Adaptive management must be jettisoned.

Under the guise of "adaptive management", the RMP preferred alternative and garbled presentation of alternatives, attempts to prop up a livestock industry faltering under ecological decay which it has caused. The preferred alternative would burn, or otherwise mutilate, native plant communities in the futile name of ecosystem health or "restoration" while the agent of chronic ecosystem sickness - domestic livestock grazing - goes unchecked. This massive manipulation scheme was tried before by the BLM in the 1960's on a large scale - in the Vale Rangeland Rehabilitation Program. The Vale Project resulted in a half million acres of "brush control", i.e. burning and spraying sagebrush. Edwin Dimick, in Livestock Pillage of Our Western Public Lands described the Vale Project as: "perhaps the most expensive handout to the cowboys record ... a bail-out of the free-grass cowboys who had again fouled their beds from over-grazing public lands". The Vale Project of the 60's has been dusted off and dressed up in new, terminology for the late 90's.

A visitor to the "treated range" in Malheur County today is confronted with wastelands of crested wheatgrass, degraded shrubless grasslands, and large areas where only annual weeds now grow - in good years. The millions of Federal dollars spent eliminating shrubs accelerated desertification processes. Treated areas continue to lose soil, nutrients and productivity 30 years later. Sage grouse, nearly all migratory songbirds, reptiles, and many native mammals were reduced or extirpated from large areas of "treated" "rehabilitated" "restored" public land.

NEPA requires that agencies locate or develop high quality, accurate information concerning environmental impacts, including wildlife population and habitat. CEQ regulations recognize that intelligent decision-making can only derive from high quality information. Information in NEPA documents "must be of high quality. Accurate scientific analysis ... [is] essential to implementing NEPA." 40 C.F.R.1500 1(b). Where an agency has out-dated, insufficient, or no information on potential impacts, it must develop the information as part of the NEPA process. 40 C.F.R. 1502.22. In addition, agencies must ensure the scientific integrity of analyses in EISs.

Scientific information presented to the public is garbled, at times inaccurate, and often very little real data is presented. Little on-the-ground science was done. The RMP is too broad, fails to provide details of existing public lands conditions, and makes large assumptions based on scant real data. The RMP parrots broad generalizations made in the various skewed ICBEMP alternatives. ICBEMP relied extensively on models. Models are fraught with error, built-in biases, and there is significant risk in relying on models to predict complex ecosystem outcomes. Given the purposefully skewed presentation of information, the public has no assurance that assumptions on which models were based were not also skewed to come up with the "right" results. The use of an "adaptive management" scenario only worsens an already bad situation.

We do not believe that the presentation and evaluation of alternatives presented in the RMP complies with NEPA. The RMP should have identified lands where grazing is causing harm to sensitive or special status wildlife species, native plant communities, etc. and analyzed alternatives which considered removal of livestock from areas where harm is being caused, and analyzed significant changes in grazing management. Additionally, the alternatives appear to be thrown together in such a way that "poison pills" accompany alternatives. For example, despite being better in some ways, Alternative D proposes burning large acreages of vegetation. Alternative E proposes no grazing, but seeks no special land designations.

The RMP contains inadequate mitigation for its proposed actions - such as prescribed fire, or continued livestock grazing in redband trout watersheds.

Since virtually all of the southeastern Oregon has been grazed by domestic livestock for 100 ++ years, and nearly all public lands continue to be grazed, it stands to reason that soil erosion, loss of A horizon, nutrient losses, gullying, site drying - lowering water tables, desertification, presence of exotics - have altered site potential. Mesic sites, and sites which once may have had characteristics that resulted in a climax community of sagebrush and bunchgrass have become rockier, harsher, disturbed sites with a depauperate native grass and forb understory. These are now woody shrub or juniper forest sites. It is futile to try to "restore" such a site simply by burning it, as is proposed repeatedly throughout the RMP. It is bad science to make the assumption that such sites can be "restored", without first thoroughly analyzing the environmental context and extent of degradation, and without adequately considering effects of present and future livestock grazing on site potential and outcomes of restoration/disturbance activities.

If the money spent in assembling the mass of hazy adaptive management schemes would have been spent in doing on-the-ground surveys to determine current population status and habitat use and condition of special status species, the public would have concrete information about the precarious state of populations of many special status species, and would know what needed to be done to the public land to enhance habitat for these species.

PROPOSED WILD AND SCENIC RIVERS, ACECS, STEENS NCA

We favor the addition of new ACECs, and 289 river miles for Wild and Scenic River status. We believe the Steens and the Owyhee Canyonlands are deserving of National Park or National Monument status. If the Steens are to be managed as an NCA, livestock grazing must be eliminated.

MILITARY OVERFLIGHTS

Incremental military expansion is occurring in airspace over wild lands throughout the West, from Colorado to Arizona to the Enhanced Training in Idaho (ETI) Bombing Range. The ETI proposal directly affects public lands in the Owyhee Canyonlands of southeast Oregon. New, louder and nastier planes and training activities are occurring in wild lands removed from population centers where the rural residents, outdoor recreationists, and wildlife bear the brunt of impacts from these activities. In this context, BLM cannot continue to ignore its management responsibilities under NEPA and FLPMA, as has occurred in the Draft SEORMP.

An extraordinary number of Military Training Routes (MTRs) and Military Operating Areas (MOAs) exist in southeast Oregon. See Map ETI p.1-27. (Attached). This map shows a maze of military airspace in southeastern Oregon. MTRS are low-level or access flight pathways through an area, where "aircraft commonly operate at altitudes from 500 to 1000 feet". ETI EIS 1-36. For example, low level overflight occurs along the route MTR VR-316, 319 over the Steens. MOAs are broader areas of special-use airspace, where varying types of training activities which include air-to-air combat tactics, and intermittent supersonic flight occur. ETI EIS p. 1-33. The Paradise and Saddle MOAs in southeastern Oregon include large portions of the airspace over southeastern Oregon public lands. Supersonic activity, and use of flares and chaff spread over a wide area, occurs in the Paradise MOA in the Owyhee Canyonlands of southeast Oregon.

BLM's own Summary of Recommendations and Findings of April 17, 1998 on consequences of the ETI EIS states:

* Flares: "the use of flares would increase ... by as much as 22 percent over public lands in Nevada and Oregon under the Paradise MOA." p. 7.

* Chaff: "this ... [ETI] would include a projected increase of ... an additional 5,500 bundles from the current 9,934 bundles over the Paradise East/West MOAs". p. 8.

* Noise: "the BLM has identified that there is no measured noise baseline or defined threshold for acceptable noise levels specific to ... WSAs". p. 5.

Regarding current noise levels in the ETI area: "the current use ... does create adverse noise impacts which affect wildlife, recreation users, and other public land users". p.5

In the SEORMP, BLM has completely failed to:

1) Characterize, describe and quantify the increases in military use over southeast Oregon public lands since its last planning process.
2) Assess impacts of increases and expansions on these public lands.
3) Take measures and develop strategies to ensure that ORVs of WSRs are not being degraded. 4) Analyze whether opportunities for solitude and primitive and unconfined recreation in WSAs continues to exist.
5) Track levels of existing litter, pollution and annoyance from military activities.
6) Assess impacts on sensitive wildlife species (including sage grouse, California bighorn sheep, migratory songbirds and bats) inhabiting public lands, and which are subject to escalating military activity.
7) Determine means to minimize negative effects of military training activities in southeast Oregon over the life of this plan.
8) Aggressively pursue minimizing negative effects - through MOUs or legal action if necessary.

For example, instead of burying its head in the sand and ignoring the whole array of military training impacts in its development of the SEORMP, BLM should have actively acquired data on past, current, and predicted military activities, and assessed direct, indirect and cumulative impacts of military training activities on vegetation, wildlife, water quality, recreational use, and cultural resources on public lands. Following reasoned analysis, BLM should seek MOUs or other agreement with the Air Force, and/or assert its legal duties under FLPMA, to cease use of chaff, flares, supersonic flight over areas with critical wildlife resources, or specially designated management areas - such as WSRs, where recreation is a high priority. BLM must also institute adequate monitoring of overflights and military activities, so that deleterious activities can be curtailed before significant environmental harm occurs.

Our members who use public lands for recreational, spiritual and aesthetic purposes are annoyed, and our recreational experiences are destroyed by loud plane noises, a sky filled with a sea of contrails, and chaff particles littering the earth. We are concerned about pollution and health risks associated with exposure to military training activities while we are recreating in southeast Oregon.

The open high desert sage-steppe and canyonland country of southeast Oregon is a landscape where the intrusion of military and civilian overflights is maximized. Recreational experience of the rich scenery, wildlife, vegetation and cultural resources is impaired by intrusive noise and overflights. Above the canyons on the plateaus it is possible to see hundreds or thousands of square miles of open landscape. Overflights and training activities are particularly intrusive here.

Into this wildland setting, the Air Force in the AFI and ETI proposal has interjected composite force training (multiple warplanes of multiple types) of up to 85 or more different warplanes maneuvering throughout designated Military Operations Areas (MOAs). Composite force air campaigns would proceed in intensely orchestrated waves of attack two or three times a day for three to five days a month. Composite wing training activities will result in almost 1000 sonic booms a year down to 10,000 ft. Above Ground Level (AGL) in a 3.2 million acre training complex over southern Idaho, northern Nevada, and eastern Oregon. Eastern Oregon lands --including the Owyhee Wild and Scenic River, and several WSAs -- will be subject to management guidance under the SEORMP. These lands will be, and are being, significantly affected by military training activities. Pre-composite wing training activities in this 3.2 million acre training complex averaged two sonic booms per month above 30,000 ft AGL.

Composite force training deposits up to 100,000 bundles of aluminum-coated fiberglass chaff litter per year throughout the MOAs, with each bundle containing between 500,000 and 3 million fibers. Incendiary flares are ignited throughout the MOA. Each flare discharge may deposit up to two ounces of metal debris onto public lands and waters. Flares may also start wildfires in remote areas. A recent Air Force plane crash near the West Little Owyhee River resulted in significant disturbance to soil and vegetation associated with salvage activities.

There are serious potential and real environmental impacts from military training activities -- including effects on wildlife, wilderness study areas, and recreational use in the region. The Paradise MOA lies in the area defined as ETI "Region of Influence 3" in the AFI EIS. The SEORMP fails to acknowledge this, Oregon BLM failed to even provide comments on the ETI proposal. Oregon BLM has fled from any analysis of impacts of the ETI as a reasonably foreseeable event-- (now mandated by Congress), and ongoing activities of composite force training authorized in the AFI EIS.

Increased overflight and noise, including sonic boom activity, together with chaff and flare use, will cause stress to wildlife populations, including sage grouse and bighorn sheep. Wildlife responses to aircraft overflight include: Various fright reactions (panic, fleeing), which vary with species, season, reproductive status, previous exposure to aircraft, aircraft type, distance from the aircraft, and other factors.

Low altitude flight such as occurs in some southeast Oregon MTRs, could cause wildlife to avoid the disturbed areas; sensitive wildlife can be affected adversely by low flying aircraft, particularly at times when they are sensitive to disturbance.

In the Special Nevada Report of September 23, 1991, the Air Force as a co-author stated: "Possible effects of aircraft activities that concern wildlife biologists include sound pressures generated by sonic booms, and

recommends 5 year period of rest following seeding. Eddleman et.al. 1994 recommend a 3 to 4 year period of rest following fire in juniper community in poor or fair condition (92% of ORA), and then resumption of grazing at light levels. Willows and other riparian vegetation may take several years to achieve sufficient height to withstand grazing. These measures are necessary to ensure that vegetative resources recover to levels sufficient to sustain native wildlife.

Vegetation treatments fragment wildlife habitats. Knick and Rotenberry (1995) found that fire in arid sage-steppe habitat in southwest Idaho resulted in not only direct loss of habitat to birds nesting in the burn area, but also impacted songbirds nesting in adjacent unburned habitat. Populations suffered increased losses due to predation in habitat fragmented by burns and other disturbance.

Besides retaining interconnected blocks of habitat, BLM must develop proposals to restore connectivity to currently fragmented habitats. Example: planting native shrubs in seeding monocultures. Vision is necessary in a management document which will take the BLM into the ecosystem-based management of the 21st century.

Our review of the SEORMP leads us to the inescapable conclusion that BLM has no idea of what wildlife species occur when, where and why in the RMP area. BLM must develop sound, current site-specific baseline data as part of RMP process, and view wildlife from a modern perspective.

BLM often discusses drought as a major limiting factor and impact on wildlife species. Native plants and animals evolved with drought and are adapted to survival during drought conditions. However, the cumulative and immediate impacts of the stress of the "unnatural" grazing of domestic livestock during drought years on ecological processes and functions are the overriding issues here. The RMP must commit to substantially limiting/ eliminating livestock use of lands in poor or fair range condition during drought years, as well as reduced grazing in years following drought to allow adequate recovery of vegetation.

Livestock use during drought periods, or excessive livestock use during any season or period causes long-term, permanent drying and shrinking of springs and meadow complexes vital for species such as sage grouse. Livestock trampling and devegetation causes hummocking, erosion, drying and erosion processes which result in irreparable harm to wet areas. Shrinking meadows and springs means less food --succulent vegetation and insect-producing forbs -- for sage grouse broods is available. Grouse are also increasingly vulnerable to predation as they are concentrated in smaller, less productive areas. The RMP must address these issues and commit to removal of livestock from critical sage grouse meadows, springs, and seeps.

BLM must conduct site-specific surveys to identify known and historic leks, wintering areas, and critical brood rearing habitats. BLM should have developed this information as part of the RMP process. Until this is done, all areas indicated as sage grouse habitat must be considered critical habitat, and maximum efforts made to protect all potential brood rearing and winter habitat. Sage grouse numbers have plummeted throughout the West, and sage grouse may soon be considered for listing under the ESA. BLM must act immediately to protect habitat critical to sage grouse.

What proof does BLM have that winter grazing will improve habitat conditions for native wildlife? BLM has recently begun to advocate winter grazing on a number of allotments, without a full analysis if its impacts. The RMP must analyze impacts of increased winter grazing on habitat for pronghorn and nongame species, including small mammals, and nesting habitat for birds.

Overwhelming evidence exists on the deleterious impacts of livestock grazing on 1) ecosystems (Fleischner 1994); 2) migratory songbirds, (Page et.al. 1978), (Taylor 1986) (Bock et.al. 1993); 3) lizards Busack and Bury (1974). Vegetation treatments, water developments, increased levels of grazing and other proposed uses would have irreversible impacts on populations of native wildlife species. Local extinctions and extirpation would result. Late seral communities are vital to many declining wildlife species, yet BLM pushes vegetation treatments that will push communities back to early seral states. The RMP presents no scientific analysis that habitat manipulation would be beneficial to many wildlife species, particularly those dependent on old growth, late and mid seral communities. As previously discussed, vegetation treatments adversely impact rare, sensitive or declining wildlife species.

FLPMA instructs BLM to develop land use plans (RMPs). In developing land use plans, BLM must: 1) "use and observe the principles of multiple use and sustained yield...; ... 5) consider present and potential uses of the public lands; 6) consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values; 7) weigh long-term benefits to the public against short-term benefits..." 43 U.S.C. 1712(c). PRIA directs BLM to recognize rangeland values which include "wildlife habitat, recreation" and "water and soil conservation benefits."43 U.S.C. 1901(a)1. The land use planning process can lead to discontinuing grazing use on BLM lands. 43 U.S.C. 1903 (b). See Feller (1994) for discussion of this.

FLPMA and PRIA make clear that BLM is not required to permit livestock grazing on all of its lands. FLPMA's definition of multiple use specifically includes the use of some land for less than all of the resources", and PRIA specifically refers to BLM's authority to temporarily or permanently discontinue grazing on selected lands.

RMP must address removal of livestock grazing from lands where grazing is causing harm to sensitive or special status species, or unique assemblages of species. BLM must first identify critical habitats, and then act to protect them.

BLM must acquire sufficient information on native plant communities and wildlife in the process of developing the current RMP to enable it to make reasoned management choices eliminating or reducing grazing (or other activities such as OHV use) in areas where it is in the public interest. BLM must gather firm baseline information on native species, develop management actions based on habitat requirements, and present this to the public in a supplemental planning document with a new range of alternatives.

SPECIAL STATUS SPECIES

Our preceding comments on Wildlife and Biodiversity also apply to special status species. In addition, BLM must manage special status species and

minimize impacts of military training and overflights on public lands. For example, BLM should prohibit chaff releases to prevent accumulation in water bodies within sensitive wildlife habitat, or special recreational areas. Act to monitor chaff accumulation. BLM should prohibit overflights over sensitive areas during critical periods for native wildlife, or during periods of recreational use.

Increased numbers of sorties, or large-scale training exercises which will result over a broad area of public lands as a consequence of ETI will increase the incidence of startle effect and loss of solitude at primitive recreational locations along training routes. BLM has ignored every aspect of this in development of the SEORMP as a long-term plan. BLM has shirked its duties as stewards of these public lands. BLM has failed to protect lands under FLPMA, and the non impairment mandate. BLM proceeds to allow impairing activities to occur.

The IMP determination must be made by first ensuring that an activity conforms to the existing management and framework plan for the affected area. BLM must also review the proposed activity through an environmental assessment or environmental impact statement to determine whether it will be non impairing and to ensure that approval of such activity will not create a situation in which the cumulative effect of existing uses and the new proposed uses would impair the suitability of the area for designation as wilderness. NEPA documentation for a proposed activity in a WSA must consider under the non impairment standard whether:

"the addition of this proposal produces an aggregate effect upon the area's wilderness characteristics and values that would constrain the Secretary's recommendation with respect to the area's suitability or non suitability for preservation as wilderness" 44 Fed. Reg. At 72023.

The AFI proposal, amplified by ETI, results in multiple warplanes (between 50 and 80) flying at supersonic speeds down to 10,000 ft. AGL and dropping hot flares, firing debris and chaff over and on to WSA lands and waters . Pre-composite-wing activities consisted of subsonic training overflights of two to four aircraft or less with no chaff, flares, debris dropping. There has been no valid assessment of overflight and other aspects of past and ongoing AFI activities, and new ETI actions on southeastern Oregon public lands. BLM has also shirked its NEPA and FLPMA obligations in additional ways: Unique ACEC Resources must also be considered, and conflicts between military activities and the WSAs, ACECs, and other areas must be addressed.

A complete analysis of the information discussed above must be included in SEORMP sections including Air Resources, Recreation, Special Management Areas, Wildlife, and Cultural Resources. Changes must be made to SEORMP alternatives which reflect this analysis.

RELEVANT LITERATURE

BLM. Summary of Recommendations and Findings: Air Force Final EIS and Record of Decision for Enhanced Training in Idaho. April 17, 1998. 16 pages.

GAO. 1998. Environmental Protection: Management Issues Related to Chaff.

USAF. 1991. Special Nevada Report.

USAF. 1992. Air Force in Idaho FEIS.

USAF. 1998. Enhanced Training in Idaho FEIS.

ECONOMICS/HUMAN USES AND VALUES

We are extremely disappointed in the incomplete analysis of economic impacts and human uses and values presented in the SEORMP. There are serious omissions, oversights and errors in the limited amount of information which is presented.

Sharp contradictions exist between data in "Importance and Dependency of the Livestock Industry on Federal Lands in the Columbia Basin", a report prepared by Leslie Frewing-Runyon of the Oregon BLM State Office in 1995 for ICBEMP.

On p. 11, the Report states: "Changes in timing and amount of livestock grazing effect different operators differently. A small number would cease production ... For most operators, a period of transition would follow any changes. After the period of transition, it is expected that remaining livestock operations would operate efficiently and profitably given the timing and amount of livestock grazing permitted".

Table 9 of this Report contains "Calculated Dependency on Federal Forage By County, Rank Order". Page 1 of this Table shows Dependency on BLM forage for Malheur County as "0.1638", or 16% and Dependency on BLM forage for Malheur County as "0.1800", or 18%.

In sharp contrast, RMP 2-83 states, and Table 2-35 shows "beef cattle production in Malheur and Harney Counties has a calculated dependency on BLM forage of 50.0 and 34.6 percent, respectively." BLM has relied on Oregon State University information, and swept the USDA information used in the preparation of the ICBEMP report under the rug. The RMP fails to even mention the alternative USDA figures on BLM forage dependency. This is particularly egregious, given that the data presented in the RMP was also prepared by Ms. Frewing-Runyon.

Given such omission and oversight, the public can only assume that BLM selectively presented and analyzed data and information that was biased in favor of the public lands livestock industry, and failed to conduct a thorough, reasoned and scientifically credible analysis of alternatives and impacts.

Grazing permits have no legally recognized value as private property. The structure and rationale used by BLM in analyses throughout the RMP contain deep biases towards shoring up the livestock industry, despite this fact that there is no inherent "right" associated with holding a federal grazing permit. The BLM's preferred alternative goes through contortions to justify perpetuating excessive and destructive numbers of livestock on public lands. There is no necessity for BLM to perpetuate activities which harm public lands. Recently, this has been clearly and cleanly upheld by the 10th Circuit.

BLM's preferred alternative RMP 3-220: "continue to provide for customary uses " is not consistent with a broad range of other legal mandates -- FLPMA, Clean Water Act, Fundamentals of Rangeland Health, etc.

RMP 2-82 discusses "the Obermiller report", and "grazing multipliers", and cites this report as a basis for discussion of agriculture and related industries as the largest sectors of the Malheur County economy. Information presented by Dr. Hans Radke as an affidavit in federal court in the Owyhee River grazing lawsuit, Civ. No. 98-97-RE, illuminates several problems with the Obermiller study, as well as the RMP's portrayal of the economic setting of southeast Oregon.

Relevant information from Dr. Radke's Declaration that must be fully analyzed and considered by BLM includes:

- Most "Enterprise Budgets" prepared by Oregon State University show the average cow-calf operation will realize a negative return to land and livestock ownership.
- Most ranchers are in the cow business for other than financial benefits.
- Economic impact estimates should be viewed as something that may happen, but not necessarily. For example, beef industry prices have decreased by 40 percent since 1960, thus a total closure of the beef industry would have been expected.
- Obermiller's report uses "output" changes in estimating economic impact, whereas personal income or employment are the significant factors in estimating economic impacts.
- Malheur County is designated by the USDA as NOT being a farming-dependent county. (Malheur County personal income -- $491 million in 1996, farm income -- $42 million in 1996).
- Malheur County is experiencing consistent growth in non-farm payroll jobs.

BLM's analysis of impacts of alternative D are heavily biased in favor of the livestock industry, forecasting "significant changes in ranch operations", a " restructuring of the livestock industry in Harney and Malheur Counties", with "significant political and social impacts", and contradict that of Ms. Frewing-Runyon in the ICBEMP report .

Then, in its analysis of Alternative E and discussion of economic impacts of the elimination of livestock grazing on BLM lands , the RMP forecasts this would "reduce the productive capacity of the livestock industry in Harney and Malheur Counties by 14.6 and 50 percent respectively". An outrageous assumption, in light of Dr. Radke's data.

BLM uses the same projected 4% annual increase in recreation to accompany this Alternative E -- and fails to consider the likelihood of a greater annual increase in recreation on affected lands once the immediate negative impacts of grazing on recreation are eliminated. This analysis is unrealistic, since removing negative livestock impacts and conflicts with recreation will expand recreational experiences and opportunities on BLM lands. The RMP defies all reason here when it presents an invalid analysis of some consequences of ending BLM livestock grazing, stating that native plant and wilderness interests would have concerns [with ending grazing] because risks from noxious weeds would be higher. Risks from noxious weeds are highest with continued ecosystem disturbance caused by continued grazing. This type of analysis perpetuates the distorted reasoning processes of the deeply flawed ICBEMP alternatives. It is completely untenable, and is only done by BLM in an attempt to assemble some (albeit far-fetched) arguments against getting cows off public lands.

The RMP discussion of the Affected Environment 2-83 fails to present an accurate picture of the extent of range improvements, and great amount of federal subsidies, which have been poured into BLM lands in southeastern Oregon in the past 40 years to maintain an artificially high number of AUMs. Many millions of federal dollars were spent in the Vale Project on burning, spraying, plowing up sagebrush and other native vegetation, planting exotic forage species, drilling wells and constructing extensive artificial water sources throughout these public lands. See our previous discussion. The RMP limits its discussion of activities to the past 10 years, thus omitting full understanding of the background of the massive federal subsidies which have resulted in the present artificial grazing context and ongoing ecosystemic harm.

The importance of commodity production is overstated throughout the RMP. The RMP does not adequately measure the values and economic benefits of non-extractive uses of public lands. There is compelling evidence that protection of wild lands as wilderness and other specially managed or designated areas is very good for the economy. The RMP does not adequately address the following: What role do BLM lands play in attracting and retaining people/ business to the area, to Oregon and Idaho? How do roadless areas, wildlife and scenic vistas play a role in attracting and retaining people/business to the area, to Oregon and Idaho? How will alternatives described in the RMP affect people/business who are in the area, or Oregon and Idaho for quality of life reasons? How will alternatives affect quality of life?

The costs to taxpayers, and the local economy, of subsidized public lands grazing "welfare ranching" are ignored. The RMP does not detail the costs of administering livestock grazing on these public lands. The costs in resources impaired or lost, wildlife habitat degraded, and alternative uses foregone, as a result of continuing livestock grazing at various levels in southeast Oregon BLM lands, are ignored.

The RMP fails to discuss the economic and social impact of the increasing number of "hobby" ranchers - or large corporations involved in ranching. These individuals or entities enjoy the benefits of subsidized public lands grazing, yet grazing is an inconsequential part of their income. Indeed, this type of rancher, as well as large corporate ranchers, commonly exploits the local work force - employing workers in low wage jobs, and exporting profits from the community .

BLM must prepare a complete cost:benefit analysis of impacts of varying grazing levels, and adequately quantify and describe benefits such as increased hunting, fishing, and recreational opportunities which would accompany reductions in livestock numbers at varying levels.

IWP and CIHD recommend that, at a minimum, a supplemental draft EIS be prepared with reasonable alternatives which fully address all problems with the current draft RMP EIS which are documented in this comment letter.

Respectfully submitted,

Jon Marvel, President

Katie Fite, by JM

Katie Fite

L-111

MAR - 1 1999

VALE DISTRICT BLM

Bureau of Land Management
Edwin J. Singleton
Vale District Manager
100 Oregon St.
Vale, Oregon 97918
February 10, 1999

Dear Ed:

Following are our comments on the proposed SE Oregon RMP:

RANGELAND MANAGEMENT PLAN 1999
Mahogany Unit

The overview for the Resource Management Plan covers issues developed with the public's input. Grazing is not mentioned though it has been the predominant land use for the past 100 years. This suggests bias on the part of the B.L.M.

In regards to Endangered Species: U.S. District Court Judge David Alan Ezra ruled that the Fish & Game and the B.L.M. attempted to prohibit the grazing of cattle near streams and potential endangered species habitat. He placed the responsibility for proving endangered species habitat on the government and said, "It is neither practical nor just to impose on the rancher the burden of proving the absence of listing of species in his allotment" and "I don't believe that Congress intended to have good people who are trying to make a decent living for themselves and their families in a hard business, put out of business based on mere speculation." Vale District rules need to be made for the good of our communities and counties, and for the good of our land.

In regards to Recreation: Recreation and livestock grazing are compatible. Visitors enjoy seeing cattle and livestock on the range and have stated to us that they add to the scenic value.

The report also peaked our attention when it stated that Alternative C proposes 68,000 new acres of ACEC's. Based on our experience in Leslie Gulch grazing will eventually be eliminated on these ACEC's resulting in substantial reduction of AUM's. Note: in the early 1990's Jim May, B.L.M. District Manager, hired an organization that was anti-grazing and not for Multiple use to inventory the plant communities in the Vale District. If the B.L.M. intends to do this inventory of the plants and plant communities, they need to hire professionals that are unblased and are knowlegdable about good, healthy range management.

Each time B.L.M. proposes a new ACEC or other similar designation they mention that if grazing is eliminated now or in the future that it is insignificant and will not affect overall grazing capacity. They claim it will be made up elsewhere. These incremental reductions are adding up to very significant cuts instead of restoring the grazing capacity as previously promised. They said this almost 40 years ago and are saying it today, yet the reductions made in the beginning of the Vale Project have still not been restored.

Existing and proposed ACEC's have been grazed for 100 years or more and have apparently maintained their relevant and important values (otherwise there would be no reason to designate them). Why then do they need to be designated at all (draws more attention to them) and why does historic land use (grazing) need to be eliminated to protect them.

The Resource Management Plan states on 3-157-158 that; "Livestock use would continue based on existing permit stipulations and approved AMPS. Any changes in grazing, including time and intensity of use, would be evaluated for impacts on the relevant and important values and would be permitted if the values would be maintained or enhanced. Where adverse impacts are identified, existing livestock use would be adjusted using a variety of methods, including but not limited to, fencing, reduction in livestock numbers, and changes in grazing season." The Resource Management Plan often references that studies will be conducted to determine whether livestock grazing is having an effect on the special features found in an ACEC. If so, fencing or livestock management changes will be implemented.

Contrary to these statements, witness Leslie Gulch where the B.L.M. completely removed cattle from the area without any justification. In a meeting in Homedale concerning the final decision on Leslie Gulch the B.L.M. District Manager, Jim May, essentially stated; We have done no studies in Leslie Gulch, we don't plan on doing any, we are just getting the cattle out." The arrogance in this statement plus the language in the final decision sets a precedence in terms of livestock grazing and its future on federal lands. There is no specific studies that grazing has any effect on the natural resources of Leslie Gulch. There was no evidence for the BLM to change a 100 year historical use of an area.

Chapter 4-128 states that "Grazing has not been identified as a major impact currently on any of the relevant and important values of potential ACEC's and would continue as presently authorized unless studies showed detrimental effects to those values." BLM has a history of making these statements to get ACEC's established then little by little eliminating grazing to protect the values (witness Leslie Gulch). Since no studies are ever accomplished, we suspect the same trend will continue.

The B.L.M. claims they are; "choosing to error on the conservative side in Leslie Gulch and propose to eliminate all impacts that grazing by domestic ungulates may have on the species and their habitat." We question why the B.L.M. is choosing to error instead of finding out the facts which should have been done over the past 40 years and then acting in an appropriate fashion.

The B.L.M. produced no evidence in Leslie Gulch that livestock grazing is any problem. In fact they documented evidence that refutes their claims. They admit road construction is the primary disturbance to special status species habitat and one of the reasons that weeds have invaded. Despite this they closed the whole area down to grazing.

Leslie Gulch would certainly seem to be the blueprint for potential ACEC's. Why is grazing not compatible? Is there a large outpouring of public opinion against grazing in proposed ACEC's or is the BLM trying to highlight these areas in hopes of trying to encourage protests in areas currently ignored by the public.

When grazing is eliminated on federal lands, wildlife will move onto private lands that are grazed. The tender shoots that come back after harvesting a plant are much more palatable and available than trying to reach inside old ungrazed bluebunch wheatgrass wolf plants. Wildlife are consistently moving into areas that are grazed in order to harvest the new growth. Some grazing of native plants actually enhances their growth, so the BLM may be getting an opposite reaction to what they intended. The public may actually see less game in ACEC's due to no grazing than if moderate grazing were allowed to continue.

An increase of wildfires due to lack of livestock grazing is also a concern. Fuels build up due to a lack of harvesting them. This has already occurred in Leslie Gulch where wildfires have burned a considerable area. Frequent wildfires, either natural or man made, can be far more destructive than grazing. If an area burns quite often the perennials are eventually replaced with annuals such as cheatgrass and medusahead. The problem is that the increase in recreation will cause an increase in wildfire. This combined with the available fuel may ultimately cause a reduction in endangered species and reduce forage for bighorn sheep. It appears that a lack of grazing will enhance wildfires which will have a vastly larger impact on native plants than livestock grazing. A very hot fire may even destroy some of the endangered species' seed source.

By eliminating grazing in ACEC's plus BLM proposing to restrict fire suppression (Ch. 4-27) it is very possible that fires may become more dominant and completely change the habitat. Endangered plant species may be put in more danger by such an action. If grazing reduces fuels then wildfires would be less likely.

The BLM even admits in Ch.4-37 that; "Grazing as proposed for the Birch Creek area, could be used to help enhance wildlife forage and cover. A small amount of authorized horse and/or cattle grazing could also help to maintain the historic landscape and allow for interpretive opportunities." At this time, no additional grazing on the Birch Creek Ranch has been approved.

There's no mention of how the Vale Project was supposed to reduce pressure on native ranges by transferring more AUM's to the extensive seedings developed in the 1960's. If this were accomplished then grazing could be more easily eliminated in current and potential ACEC's. People are constantly being brought in from around the world to see the Vale project yet we are certain it has never even met its primary goals of restoring extensive cuts and transferring AUM's out of native ranges.

Since Congress won't act on WSA's, it would appear that BLM is taking their own action without Congressional Approval by designating areas as ACEC's or other designation, then restricting land uses such as grazing and road access. Where did the term ACEC

come from? Is it legal and authorized by Congress or is it just a management decision by BLM to control land use in their view without Congressional approval? This seems to be subverting Congress'intentions. Has the public ever demanded that an area be set aside as an ACEC or similar designation, then be removed from grazing?

The West was first opened up to gain access to its wide array of natural resources which would clearly have been Alternative A. Since then federal regulations have been trending more and more to Alternative E. Maybe we have gone too far towards E which eliminates economic production on federal lands. This might be very undesirable for the economy of the West. Our suggestion is that something closer to Alternative A or B might be more realistic rather than putting more and more areas into ACEC's then eliminating economic production. Over the last 40 years many millions of tax dollars have been spent to improve range production, but many more millions in cattle production have been lost by the failure of BLM to restore grazing capacity as promised. Instead they have been busy making additional cuts to grazing capacity and putting more and more areas off limits to all kinds of use in addition to grazing. 51% to 56% of Malheur County's total income in the 1990's, was derived from livestock and agricultural products. Recreation does not contribute to the County tax base and support our schools system.

(Chapters quoted are from the Vale District Resource Management Plan)

Signed by the Mahogany Unit Users:

Duncan Mackenzie Duncan Mackenzie	Feb 20 - 99 Date
Andrew Greeley Andrew Greeley	Feb. 23, 1999 Date
Mary Ellen Allison Mary Ellen Allison	2/23/99 Date
Ronald Cunningham Ronald Cunningham	2/23/99 Date
Bob Davis Bob Davis	2-16-99 Date
John Stoddart John Stoddart	2/23/99 Date
	Date
Doug Burgess Doug Burgess	2-22-99 Date
Duncan S Mackenzie Duncan S. Mackenzie	2-12-99 Date

L-112

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

23 Feb. 1999

Ed Ssingleton, District Mgr.
Vale District BLM Office
100 Oregon St. Vale, OR 97918

As a professional ecologist with some four decades of active involvement in environmental affairs, I am distressed that BLM has designated Alternative C as its preferred option for implementation of the Southeast Oregon Resource Management Plan. BLM is custodian for much of Oregon's fragile high desert country and the rivers that provide the life-blood for that magnificent Oregon heritage. To really assure that future generations will enjoy and use wisely these magnificent lands, I urge that BLM adopt the very much strengthened purposes and actions embodied in Alternative D.

Mr. Singleton, I grew up as son of a third generation Humboldt County cattleman, and during school vacations, spent hundreds of hours helping handle cattle. On the Ft. Baker Ranch soiutheast of Eureka, My dad, a U.C. Davis graduate, managed 1000 head of cattle on 27,000 acres of steep range land. The Mad River traversed one end of the property, the Van Dusen the other. I worked with him planting willows at overused cattle crossings to force the cows to move to more gradual stream accesses. I learned from my faather the importance of spreading cows across the terrain (with water troughs and salt licks as bait to influence their preferred grazing), and the need for everlasting vigilance to assure the integrity of the watercourses that were the lifeblood of the land.

Years later, as a professor at San Jose State College in California, I brought college classes to study the ecology of Steens Mountain. I know first-hand the beauty and environmental richness of that area, of the Alvord Desert, and of such rivers as the Blitzen, and I know how that richness stirred the minds of my students.

For all these reasons, and particularly the lessons I learned in my youth on the handling of cattle on fragile mountainous terrain and along even more fragile rivers and streams, I am disturbed that BLM's Alternative C fails to reduce cattle grazing on lands where damage has already been demonstrated, and along such rivers as the Blitzen, which I understand is contrary to recommendations of your own scientists. And I have no confidence in so-called "adaptive management", which too often becomes an excuse for non-enforcement of grazing permit limitations.

I strongly support provisions of Option D to reduce livestock grazing, particularly in presently over-stressed areas. I also support deemphasis on fire suppression. For countless eons, fire has been a natural environmental rejuvenator. And I support additional Scenic River status for rivers in the region. Let's assure that these will become vital contributors to the enjoyment of these lands and resources for public education and recreation for future generations.

Sincerely
John Marville Ph. D.

cc/Craig Hansen, Burns Dist.

L-113

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

26 February 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Subject: SEORMP

As an occasional visitor to southeast Oregon, I am always impressed with the natural beauty and habitat value of the High Desert. Unfortunately, I am also impressed with the considerable evidence of riparian damage and habitat alteration caused by cattle grazing.

As the steward of this area, I believe the BLM has the responsibility to ensure a program of sustaining the habitat quality of the area and conducting mitigation and enhancements where necessary to restore critical habitat for endangered species.

Therefore, I urge the rejection of "the preferred Alternative C" and, instead, strengthening and adopting Alternative D.

Thank you for considering my comment.

Sincerely,

Jef Kaiser

Cc: Craig Hansen, Burns District Manager

L-114

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Feb. 18, 1999

Dear Ed,

It has come to my attention that the BLM is now seeking comments on its Southeast Oregon Resource Management Plan. Since I have a particular fondness for this part of Oregon I felt compelled to express my views on the management of this public land.

Having spent time camping along the Blitzen River, exploring the Steens or trying to photograph an elusive antelope at Hart Mt. this area has come to mean very much to me as an unspoiled wilderness. I can still remember my first spectacular view of the Alvord Desert and a languid soak in the hot springs while viewing the snow shrouded Steens. Preserving this magnificent area is of utmost importance to me.

The SEORMP fails to explore a full range of alternatives as required by the National Environmental Policy Act; it lacks an alternative that seriously considers a reduction in grazing pressures. Reduction of cattle grazing seems to be one of the most crucial changes needed to maintain this area. Because of this I urge you to reject Alternative C and adopt a <u>strengthened</u> Alternative D which would include livestock grazing from sensitive areas. Some such places would be riparian areas (including Wild and Scenic Blitzen and Owyhee Rivers), critical habitat and sensitive areas, wilderness study areas and any grazing allotments that are in fair or poor condition. There needs to be real standards and guidelines with constant on the ground monitoring to insure there is no further degradation of these cherished wild places.

We in Oregon are truly blessed with an abundance of unparalleled natural beauty. It behooves us to preserve the natural gifts of our home for which we have made ourselves responsible. The wildlife, vegetation and water ways are all treasures that enrich our lives in immeasurable ways and I encourage you to consider this when deciding about future management.

Thank you for your attention.

Sincerely,
Susan Schlatt

L-115

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Mr. Singleton:

I am writing to you today concerning SEORMP. I have spent many weeks hiking the Pueblos in the spring and fall, skiing the Steens in winter, and generally traveling and camping throughout the region. As I understand it, the preferred alternative C basically is a status quo proposal. For the BLM to advocate such a proposal which makes no major adjustment for grazing is astonishingly ill advised in these days of concern over grazing degradation. Especially galling is the idea of allowing grazing in riparian zones, especially along the Blitzen River. I would prefer a management plan with more emphasis on correcting grazing damage. After all, the cattle and ranchers have had their fair share of these lands over the years, how about a timeout?

Although it too has deficiencies, Alternative D offers more protection to the area. It should be strengthened by excluding grazing in (1) all riparian zones, (2) critical habitat for fish and wildlife, (3) WSAs, and (4) grazing allotments in fair or poor condition.

Thank you.

Sincerely,

Michael Greenstreet M.D.

cc: Craig Hansen

L-116

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 26, 1999

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

RE: Southeast Oregon Resource Management Plan

Dear Mr. Singleton:

I am writing this letter to urge the BLM to provide real protection to BLM lands in southeast Oregon. I find that of the SEORMP alternatives only Alternative D is acceptable, and should be strengthened to provide better protection from the detrimental effects of livestock grazing.

For the past five years I have explored the Steens Mountain, Pueblo Mt. WSA and Trout Creek WSA areas. In addition to the usual hikes on the Steens and along the Donner und Blitzen River, my friends and I have climbed Pueblo Mt., hiked the Desert Trail in the Pueblo Mt. WSA, and hiked the Oregon Canyon Mountain area of the Trout Creeks with descents into upper Whitehorse Creek. We have also explored the high ridge between Whitehorse Creek and Oregon Canyon Creek.

Every time we have visited BLM land in this area of Oregon we have been shocked by the severe devastation caused by overgrazing! It is not an overstatement to say that we have literally observed that cow manure and evidence of overgrazing can be found on every square foot of the Pueblo and Trout Creek Mountains reachable by cattle. The devastation is complete and the land has been stripped of nearly all native vegetation.

Whenever we visit SE Oregon we usually include a visit to the Hart Mountain NWR. The contrast between Hart Mountain's abundant wildflowers, lush grasses, diverse bird and wildlife and the barren overgrazed Pueblo and Trout Creeks is remarkable. The BLM must realize that a policy that allows one of Oregon's premier scenic areas to be destroyed by grazing cattle will not be tolerated by Oregonians who truly care about the future of this wonderful area of our state.

The BLM must adopt a SEORMP that protects this area for the future. Livestock grazing must be stopped on all sensitive BLM lands including the Pueblo Mt. And Trout Creek and other WSA's, and all riparian areas, areas of critical environmental concern, Wild and Scenic Rivers and other areas devastated by decades of overgrazing.

Please reject Alternative C of the SEORP and choose a strengthened Alternative D that puts real teeth into rules that protect BLM lands from overgrazing.

Sincerely,

cc: Craig Hansen
Burns District Manager
Burns District BLM Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

L-117

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

DOBBINS, McCURDY & YU, L.L.P.

RICHARD G. DOBBINS
HANK McCURDY
CHUCK YU

LEGAL ASSISTANT
LISA MASON

February 26, 1999

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

RE: Future of Oregon's High Desert

Dear Mr. Singleton:

I have spent some time in Southeastern Oregon. I urge that Alternative C be rejected and that instead Alternative D be adopted. I urge that Alternative D be improved, however. It is my understanding that the beef production in Southeast Oregon's High Desert is a very small portion of beef that is produced overall. I know that I rarely eat hamburger or beef anymore and I know that beef consumption has reduced drastically in the last 10 years nationwide. I know that livestock prices have been down for about eight years and haven't significantly come very far off the bottom.

It is my opinion that the tradeoff to be made from reducing grazing in the Southeast Oregon area will prove to be a far greater bounty to the residents of that area than beef production will ever be in the future.

As I am sure you will agree, it is an area of immense beauty. The scenic and recreational values will only be enhanced by reducing cattle grazing and it will only be a few more years unfortunately (in my view) until that area is discovered. I foresee a significant influx in tourism and recreational outdoor use for the area generally in the coming years.

I have sympathy for the ranchers but just like the loggers and just like the luddites at the dawn of the Industrial Revolution in Britain, they will have to adapt.

Very truly yours,

Hank McCurdy

HM:lm

cc: Craig Hansen, Burns District Manager

L-118

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 26, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

I am writing in regards to the Southeast Oregon Resource Management Plan/Environmental Impact Statement currently receiving consideration. Since I am a frequent traveler (for recreation purposes) to the region, I want to add my opinion.

The Alternative "D" which emphasizes "Natural Values" is the option I would prefer seeing enacted. While I recognize the need to permit continue grazing in the region, it is important that Alternative D be strengthened to exclude grazing from riparian areas, sensitive areas, and designated Wilderness Study Areas.

Thank you very much for your consideration.

Sincerely yours,

cc: Jim Kenna, Burns District Manager

L-119

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Feb. 22, 1999

Ed Singleton, Vale District Manager
Vale District Office, BLM
100 Oregon Street
Vale OR 97918

Dear Mr. Singleton:

My family and I have visited the Steens Mountain area several times and will be going back as often as possible. While we are not anti-ranching, we do believe that public lands should be managed for other values than just cattle. As citizens, we think that these marvelous places should be managed for water quality, fish, recreation and preservation of desert beauty as well as for preserving a few ranch families' way of life.

Therefore, regarding the proposed Southeast Oregon Resource Management Plan, we totally agree with Oregon Natural Desert Association's viewpoint that Alternative D should be strengthened and adopted.

Specifically, we would ask that livestock grazing be excluded from wild and scenic rivers such as the Blitzen and Owyhee, from critical fish and wildlife habitat, from areas of critical environmental concern, from wilderness study areas, and from grazing allotments in fair or poor condition.

In addition, your "adaptive management" euphemism really means locking the barn door after the horse is stolen. You know what grazing damage is and how it progresses. The time to check the damage or to prevent it is <u>now</u> by writing and enforcing real guidelines and rules.

Beautiful as it is now, I would hope that my grandchildren may see a protected and enhanced Oregon high desert.

Very truly yours,

W. E. Pavera

cc: Craig Hansen, Burns Dist. Mgr. BLM
Hines OR

L-120

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Friday, February 26, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Comments on SEORMP:

1) Poor management and overgrazing of livestock on our public lands has already caused huge losses of biodiversity and exacerbated the proliferation of many non-native species. Past and current grazing practices have raised water temperatures, degraded water quality, reduced summer in-stream flows, and exacerbated winter and spring floods.
2) Alternative C of the SEORMP allows continued grazing in many areas that are wholly unsuited for cattle. Even the BLM's own scientists have come down against continuing the 3,000 head of cattle that graze along the Wild and Scenic Blitzen River. Alternative C fails to call for livestock grazing reductions even when resource damage occurs. Alternative C should be rejected and a strengthened Alternative D should be implemented while we still have the opportunity to protect the numerous threatened and endangered species that will become extinct if current overgrazing is allowed to continue.
3) Alternative D is the best option on the table and should be strengthened. It is time to nominate the 289 miles of river for Wild and Scenic status. Wild and Scenic majestic rivers free of livestock would bring more long term economic benefits for Southeast Oregon than short-sighted overgrazing practices.
4) Grazing is not a "traditional" use of this land- it is a practice that in less than 100 years has degraded and diminished the desert ecosytems almost to the point of collapse. Hunting, fishing, and camping are traditional uses of this land which are adversely impacted by the overabundance of cattle on public land. I have personally felt deprived from fully enjoying the public lands in the Steens Mountain/ Alvord Desert area because there are so many cattle on these public lands which diminish the wilderness and aesthetic traits of the landscape.
5) "Adaptive management" is inadequate justification for allowing operators to graze beyond their permit limits. This controversial practice will not improve the quality of our public lands. It is contrary to the principles of ecosystem management and will result in further adverse impacts on native species.
6) More Area of Critical Environmental Concern (ACECs) are needed to study and protect the unique high desert species that are vanishing at an alarming rate. Grazing, fire suppression, motorized recreation, and commercial logging practices should be avoided in areas where critical habitat for endangered species has been identified. How can we protect endangered species if we don't protect endangered habitat?

David A Stew

L-121

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

RE: SEORMP

Dear Ed Singleton:

I have lived in Oregon all of my life. Over the years I have enjoyed many of our state's scenic beaches, rivers, parks, and wild places. Several years ago I visited the Owyhee Canyonlands. Last summer, for the first time, I had the opportunity to visit majestic Steens Mountain, the Alvord Desert, and the surrounding countryside. These unique and awe-inspiring places are truly treasures for all Oregonians to cherish.

As evident as the stark beauty of this wild country is its fragility. At this critical juncture in planning for our public lands in this region, I encourage you to reject Alternative C and choose instead an alternative that will provide the greatest possible protection for this sensitive ecosystem and its critical fish and wildlife habitat.

Let's make sure we put enough teeth into our Resource Management Plan to adequately limit livestock grazing in our rivers and riparian areas. I believe this is essential to prevent degradation of Oregon's high desert wildlands.

I look forward to many more visits to Steens Mountain with hope that the wild creatures that live in this rugged terrain will survive and thrive.

Respectfully,

Lynne Taccogna

Cc: Craig Hansen, Burns District Manager
Burns District BLM Office
HC 74-12533 HWY 20 West
Hines, OR 97738

L-122

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale OR 97918

Dear Sir,

I wish to comment on the Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement.

Neither the no-action Alternative B nor the "Commodity Production" Alternative A provides enough protection for resources in the planning area. Both too much human intervention and too little (as in the non-NEPA Alternative E) would be damaging to the fragile environment of Southeastern Oregon.

The Preferred Alternative C, the hybrid "natural values/commodity production", might be more protective than Alternatives A, B and E, but Alternative C is too similar to Alternatives A and B.

It seems to me that the Objectives and the Desired Range of Future Conditions are most likely to be met by Alternative D, the "Natural Values" Alternative. For example, this Alternative uses language such as "promote progress" in place of "allow progress" toward the attainment of State water quality standards. It discusses restoration of habitat, not just maintenance. Alternative D calls for more National Wild and Scenic Rivers, more undeveloped and natural types of recreation, and less use of Off Highway Vehicles than does Alternative C.

I understand that the Bureau of Land Management is committed to multiple use management and that multiple use includes cattle grazing allotments on the public land. However, grazing must not be allowed to degrade other resources. The Adaptive Management model would need steady and serious monitoring to prevent degradation of rangeland. Rules and guidelines might be safer to administer. In particular, grazing should not be permitted in many types of sensitive areas: Wilderness Study Areas and ACECs, Wild and Scenic Rivers and other riparian areas, critical fish and wildlife habitat. It seems obvious to close allotments which are in poor condition.

(I realize the grazing issue is complicated by the intermixture of public and private land and the requirements of the Endangered Species Act. I found the discussion in Appendix T about the Catlow Conservation Agreement Management illuminating. Action on the BLM lands to improve conditions for the fish might result in actions on private lands which would be detrimental to them.)

My husband and I have spent a lot of time during the last thirtyfive years on Steens Mountain, camping at Page Springs, scrambling down to Wildhorse Lake, edging around the top of Kiger Gorge, walking out from a campsite at Fish Lake to watch deer, sitting quietly to watch hawks or flowers or the awesome desert below. Our son has run the Steens Rim Run a couple of times. I would like very much to see permanent, federal protection for the special irreplaceable natural values of this unique region. However, it is by no means clear that a National Conservation Area would be sufficiently protective. Multiple use, especially livestock grazing, is not appropriate to this area.

Finally, I appreciate the huge amount of information (and work) contained in the two volumes and the map packet of the draft.

Sincerely,

Barbara Dudman

Barbara Dudman

L-123

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Vale District BLM
100 Oregon Street
Vale, OR 97918

Subject: Southeastern Oregon RMP

Attention: Ed Singleton, District Manager

Dear Mr. Singleton:

Over the past 40 years, I have made many trips to SE Oregon to look at birds and wild flowers, to hike and backpack and to fish. The Malheur Wildlife Refuge and Steens Mountain have been the most visited areas with the occasional trip to the Pueblo and Trout Creek Mountains.

GRAZING. My foremost concern is the restoration of the natural values of the region and the retention of those few areas where the ecology has survived the onslaught of the comings of our mostly European forebears. To this end, the grazing of domestic livestock (cows, sheep and horses) needs to be carefully considered. Much of this is arid country has been severely over grazed for well over a century. Much of the range is in poor to fair condition from a combination of factors starting with overgrazing a long time ago that removed most of the grasses that allowed periodic wild fires to burn the range and keep the sagebrush and juniper from dominating the land as it does over so much of the vast area now. And our 'Smoky the Bear' mentality of controlling wild fires only has exasperated the situation.

To me part of the solution is cut way back on grazing so there is dry grass left to burn and use prescribed fires to try and get the range closer to the condition before domestic grazing started. You hear the term "My ranch and allotment is in better condition than when my grandfather had the place". The is likely true but is misses the point, it does not compare to the pre grazing conditions of the grass being belly high to a horse between widely scattered sagebrush plants that early pioneers described.

Scattered across this arid corner of Oregon, are areas containing streams, small lakes and wetlands. These are areas that grazing of domestic livestock needs to be essentially eliminated. It is these riparian zones that are so attractive to stock as it is about the only place where grass and shrubs now grow in this arid landscape. So the banks get trampled and broken down, and the shrubs and trees that could provide shade and cover for fish are consumed. Grazing has been eliminated from some of the Steens Mountain canyons, but I wonder how much trespass by cows occurs based on my past observation of cows in the upper meadows of the mountain which were off limits to them.

In many places, cattle tromping of the stream banks has lead to erosion and down cutting of the stream so that the meadows are no longer watered from below because the water table has been lowered. The meadows are now sage brush patches. The cows need to be kept off these meadows and stream banks with efforts taken to raise the water table by in stream check dams etc.

The idea of a Steens National Conservation Area sounds good to me. Parts of this NCA must be reduced fire suppression and the incorporation of a major reduction in domestic animal grazing including no grazing in the riparian zone to benefit fish.

Would also like to see many miles of wild and scenic rivers proposed which hopefully would provide more protection from grazing to benefit fish.

ALTERNATIVES. My preferred Alternative would be an improved **Alternative D**. I like its proposed Steens NCA and its generous proposal for wild and scenic rivers. I also like its emphasis on ACEC's. What it needs is an improved grazing program to allow the range to move to good and excellent condition. Part of this is a reduction in fire suppression and where appropriate prescribed fires. The riparian areas need complete protection from grazing. Where possible, and if grazing is appropriate in the uplands, water should be piped from the stream to cattle troughs with float control valves away from the riparian areas.

Your preferred **Alternative C** has too much emphasis on grazing and is short on proposed wild and scenic river miles.

The No Action **Alternative B** also has too much grazing.

Your **Alternative A** takes grazing in the wrong direction. With so much of the range in poor to fair condition, it would seem that in the long run, the condition of the open range would be further degraded.

And your **Alternative E** is a little to severe and unresponsive to the needs of the land and the local people. Limited grazing still has a place in the west on suitable public lands. And by suitable I mean range in good and excellent condition that is grazed in such a manner as to keep in that good and excellent condition by such means as rest rotations and timed grazing that leaves some of the forage on the range to disperse its seed, propagate fire and provide for browse native animals. This alternative also does not provide for prescribed burns and other means to help restore the land.

Please keep my name on your mailing list (**Note change of address**) for this project and send me your final RMP and decision document.

Sincerely yours,

Bob Powne

CC: Burns District BLM

L-124

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 25, 1999

Edwin J. Singleton
Vale District Office
100 Oregon Street
Vale, OR 97918

Re: Comments on draft Southeast Oregon Resource Management Plan / EIS

Mr. Singleton,

After reviewing the RMP/EIS documents I feel the people involved should be complimented for the most part as this is a document that can be used to manage the public lands in SE Oregon for the years to come. The following comments address areas that I believe need to be modified or changed to better manage the resource in the future.

The only area that I felt was out of line in regards to local public concerns was the compilation of the areas that may qualify for special use, i.e. RNA's or ACEC's. It is absolutely deplorable and unethical to turn to a non-local special interest group (TNC) and pay them to compile a list of potential sites. I fail to see where these sites meet the relevance or importance necessary to qualify them for inclusion. The extreme cooperation by the BLM and TNC, in this case illustrates what many local people and local county governments fear – the fact that non-local environmental organizations are driving the planning and implementation of nearly all land use decisions. I urge the BLM to not consider any new special land use designations until the locally affected people and governments desire the designation. I further believe that FLPMA's definition of ACEC is not being followed in that these proposed special use areas are **NOT "areas within public lands where special management attention is required to protect and prevent irreparable damage or to protect life and safety from natural hazards."**

Specific areas that need to be modified:

1). The maps illustrating livestock exclusion (JRA) need to be modified on the west side of Cow Creek below Cow Lakes. The maps show that livestock do not utilize areas west of the creek. This is absolutely not the case, as livestock use historically has and does occur on an annual basis well within the boundaries of the shaded livestock exclusion areas. It was pointed out during the information meetings held around the area that this was an area that was just overlooked and certainly would be modified in the final draft.

2). The specific areas mentioned above include in the shaded area (livestock exclusion) private lands that are owned in whole or in part by Skinner Ranches, Inc. This should be removed from the shaded area.

3). Appendices E, page 237, Antelope Allotment 21002.
The season of use should be 4/01 → 12/31 as a new AMP has been drawn up to allow more flexibility in season of use. There are no more AUM's being used or asked for, just increasing the season of use to allow for early winter use to improve the resource when BLM and the permittee agree. See p. 404 season of use, we would like the option of use during late fall and winter while plants are dormant as a management tool.

4). The draft documents do not include a list of livestock excluded areas, therefore it is impossible to know what is or what is not included. BLM needs to include for our review a list of livestock excluded areas in the next document.

Antelope Annexes in the Antelope Allotment specifically should be excluded from any list of areas of exclusion, as we have historically used this pasture and feel that it is an integral part of our grazing rotation system.

Sincerely,

L-125

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

2/25/99

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

I would like to comment on the Southeast Oregon Resource Management Plan (SEORMP).

I favor Alternative D. This alternative would provide stewardship that I feel is in the best long-term interest of the land and resources. **However, I would strengthen limits on grazing, which continues to seriously degraded land and riparian habitat.**

I oppose Alternative C. This sacrifices the integrity and health of the habitat and ecosystem in order to keep widespread and intensive grazing. Ranchers have been calling the shots on land we all own, and the result has been serious degradation of habitat and ecosystems. Alternative C would more or less continue this tradition. Alternative C and "Adaptive management," as described, would inordinately favor ranchers, and not to the owners (citizens) or residents (plants and animals) of the land.

Only by selecting a strengthened alternative D, BLM would be "walking the talk" regarding ecosystem management principles.

Thank you for considering my views on this and I appreciate your efforts to select the best management plan,

Sincerely,

Cc: Craig Hansen

L-126

February 25, 1999

Mr. Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:
I am writing you concerning the Southeast Oregon Resource Management Plan. I urge you to reject Alternative C in favor of much stronger measures to protect and improve this region.

I urge you to choose a stronger version of Alternative D. An improved version of Alternative D should exclude livestock grazing from critical fish habitat, other riparian areas, Areas of Critical Environmental Concern, and Wild and Scenic Rivers. I am a frequent visitor to the Blitzen and Owyhee rivers for natural history study, and I know firsthand the degradation of these areas due to livestock grazing.

In addition, I am very concerned that "adaptive management" will not be effective in protecting these public lands. We need sound standards and guidelines with effective tracking of compliance.

It is essential that we reduce the effects of excessive grazing. We need to greatly reduce, and where needed eliminate, livestock grazing that damages public lands. The best means of accomplishing this is a strengthened version of Alternative D.

Sincerely,

L-127

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

2/24

Mr Singleton,

Ive been reading some news about management related issues to do with a large part of eastern oregon.

Im writing to thank you for this work you've done to provide so many possible "alternatives" to what is I will call an underknown part of our very diverse state where natural resources are concerned. What Ive seen on television doesnt do justice to the size figurativly and literally of the land there you are to asess the use of. My personal first-hand observance of that country has been limited to what I see from a car transsecting it to Idaho and back. Not much. But I will say that I can see different east oregons that will be unique in each alternative so distinct are your five possibles. The one I like best is the second from last or 'D' category which try's to make better a comprimise of cattle range limitations to better serve research purposes, calming of habitats for species of plants and more complex organisms that need to go undisturbed from all the aspects of cattles presence, you know: stream disturbance, alteration of vegatation patterns through grazing, and giving a better demonstrated process that's result based/driven for the reparation of lands overstressed from human activities so that we may better perfect a model of management of these lands we can all be proud of and not merely "satisfied". I hope you'll consider this letter a vote of confidence in your judgement. Sincerely, Joel Edizer.

L-128

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

24 February 1999

Ed Singleton
Vale District BLM Office
100 Oregon Street
Vale OR 97918

Dear Mr. Singleton,

Please add my comments to the public record for the SEORMP.

Please reject your preferred Alternative C.

Please select and modify Alternative D.

Please add language to Alternative D to significantly and seriously limit livestock grazing. Because all overgrazed lands, at all levels of degradation, need to be restored to their original use. This use is the nourishment of the native species, not the introduced cattle.

Specifically, a modified Alternative D should exclude livestock from wild and scenic rivers, wilderness study areas, ACECs, in fact, all areas (despite their designation) that have critical fish and wildlife habitat.

It is not enough to just stop the increase in livestock use. It is time to rehabilitate overgrazed areas. The areas covered under SEORMP are just as much my property (in a philosophical if not legal sense) as they are the property of your current permittees. I am just as much a taxpayer as these grazing permittees. I believe that I have as much right to ask for the restoration of these lands and for their maintenance for the benefit of the native wildlife.

I deeply resent the fact that my tax monies are subsidizing these ranchers, either through artificially low grazing fees or by letting them continue to degrade these public lands.

And I am particularly skeptical of your bureau's recent infatuation with "adaptive management". Without definitive guidelines and without continuous and comprehensive monitoring, adaptive management won't be worth the paper on which it's printed.

Thank you.

Sincerely,

L-129

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM
Feb. 19, 1999

Vale District BLM Office
100 Oregon Street
Vale, OR 97918
Mr. Ed Singleton, Vale District Manager

I am writing to request that you give additional consideration to the Southeast Oregon Resource Management Plan "C", which will not limit livestock grazing to protect and preserve precious habitat for the kit fox, the Lahontan cutthroat trout, and endangered populations of sage grouse. As I understand it, the majority of the 6.3 million acres in question are wholly unsuitable for cattle grazing, yet the BLM's preferred alternative (C) does nothing to change the status quo.

I am urging you to reject Alternative C; the "adaptive management" that this plan is based on will not work without constant monitoring, a statistical and financial impossibility. Alternative C, is designed to "protect natural values while allowing for commodity production," and, while Alternative C attempts to "do it all," this option is seriously flawed.

Alternative C:
* **fails to call for any livestock grazing reductions, even when resource damage occurs**;
* allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, **contrary to agency scientists' recommendations**;
* nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status;
* proposes a Steens Mountain National Conservation Area, but makes no changes to grazing management there;
* **leaves the overwhelming majority of the planning area (3.8 million acres) open to off-road vehicle use**, while closing less than 1% of the area(22,000 acres) to ORVs;
* **relies on controversial "adaptive management,"** a tool the BLM has used in the past to justify allowing livestock operators to graze beyond the limits of the their permits; and
* **fails to satisfy the SEORMP's stated intent to adhere to ecosystem management principles.**

L-130

February 26, 1999

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR

Dear Mr Singleton,

I am writing to comment on the Southeast Oregon Resource Management Plan.

For years, I have been traveling to southeast Oregon to experience the unmatched beauty and solitude of Steens Mountain, Leslie Gulch and many other, more obscure locations on public land. I am always appalled at the condition of the land that has resulted from what seems to be uncontrolled livestock grazing.

The SEORMP offers an opportunity to correct this situation. Yet the preferred alternative (C) fails to meet this need, or even SEORMP's promise to apply ecosystem management principles. It continues to allow grazing at unsustainable levels and in many inappropriate areas, including the Wild and Scenic Blitzen river. It relies on dubious adaptive management methods. It leaves out many miles of suitable Wild and Scenic river protection and proposes a National Conservation Area on Steens Mountain that includes grazing! Conservation of what?

In order to give southeast Oregon public land the protection it needs and deserves, I urge you to select Alternative D with upgraded restrictions on grazing.

Thank you.

Sincerely,

I'm urging you to choose a "strengthened" Alternative D that excludes livestock grazing from:
* Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;
* Riparian areas;
* Critical fish and wildlife habitat;
* Areas of Critical Environmental Concern;
* Wilderness study areas; and
* Grazing allotments in "fair" or "poor" condition.

A strengthened and improved Alternative D is the BLM's -- and the land's --best bet. Alternative D comes much closer to meeting the SEORMP's ecosystem management goals. Alternative D would:
* allow for reductions in livestock grazing levels;
* emphasize undeveloped types of recreation;
* de-emphasize fire suppression;
* restore or close recreation sites where natural values are jeopardized by overuse;
* add 26 new Areas of Critical Environmental Concern, totaling 191,000 acres;
* propose 289 river miles for federal Wild and Scenic River status.

Still, Alternative D needs improvement. It fails to set reasonable limits on livestock grazing and would allow for the continued degradation of cherished wild places such as Steens Mountain and the Alvord Desert.

If the BLM intends to protect these 6.3 million acres for future generations, it MUST choose a strengthened Alternative D plan.

Please keep us posted as to future developments and decisions. Thank you very much for considering our input.

Yours sincerely,

Dennis M. Fisher
and

Kimberly A. Wilbur

L-131

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

ORAL & MAXILLOFACIAL SURGEONS, P.C.

February 25, 1999

William Knight, DMD
Kipp Hannon, DMD
Brian Allender, DMD

Diplomates, American Board of Oral and Maxillofacial Surgeons

TMJ Surgery
Orthognathic Surgery
Maxillofacial Trauma
Dentoalveolar Surgery
Laser Skin Resurfacing
Reconstructive Surgery
Facial Aesthetic Surgery
Osseointegrated Implants

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

I am writing to express my concern that you would consider Alternative C as the proper choice for managing the southeast corner of our state. As someone who considers himself a native Oregonian, I can tell you in my 54 years I've seen a very sorry degradation of our state's resources due to over utilization of public lands. As a child, I experienced forest and salmon runs in wild country which no longer exists. This is one of the sadnesses of my life that this heritage is not being passed on to my children and their children.

As someone who has owned a ranch and raised cattle, I'm not unsympathetic to the cattle industry, but I also know that the southeast corner of the state offers only a few places where their presence is acceptable. The simple fact is the land has been over-grazed and simply over-used.

I strongly urge you to reject Alternative C and choose Alternative D that's been proposed. I know you're under a great deal of pressure on this issue, but I think we have long since passed the point where we can make compromises that make everyone happy. In all candor, I think that day was probably about 20 years ago. I hope you will have the fortitude and the foresight to make your actions for future generations of Oregonians and not on the immediacy of special interests.

Your attention in this is most appreciated.

Sincerely yours,

William O. Knight, D.M.D.
Diplomate, American Board of
Oral and Maxillofacial Surgery

WOK/jch

xc: Craig Hansen, Burns District Manager

L-132

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Feb. 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

I am writing concerning the Southeast Oregon Resource Management Plan, and supporting a strengthened Alternative D, which I believe will better serve BLM's ecosystem management goals than Alternative C.

I spend time every summer in Southeast Oregon hiking, fishing and observing wildlife at the Malheur Wildlife Refuge, and have gained a healthy respect for the native redsides trout in the Blitzen River. The Blitzen River and its native trout population are a rare and precious resource, and I would hate to see it endangered as a result of cattle grazing. We need to find a win-win solution that protects the natural ecosystem, and allows grazing in areas away from the river. Having grown up in the Midwest, where virtually all of the spring-fed streams run through pastures, I am very familiar with the damage grazing can do. None of these streams support natural reproduction; they have to be stocked annually. A carryover trout is a rarity. Now the Midwestern Fish and Game Departments are attempting, at great expense, to gain easements to fence all these streams after they have been reduced to a state where they no longer support native trout. We should be able to learn something from this experience, and see that the Blitzen does not suffer the same fate.

If Alternative C is approved I fear that is exactly what will happen. The question is whether ranchers who have BLM grazing permits will have more say than recreational users. Do we have to be in conflict, or can we develop a solution that works for both. BLM lands belong as much to me and other recreational users as they do the grazing interests. So please give us a say, too. Recreational use is not just frivolous activity by city folk who ought to stay home. Recreational activities are every bit as important to our regional economy as ranching. It is not unreasonable for us to insist that cattle grazing be done in a responsible fashion, just as I must be responsible in my recreational use (fishing barbless and releasing all the trout I catch, and respecting the rights of ranchers).

There are some remaining ecosystems that are just to rare and valuable to be used for cattle grazing.

Sincerely,
Keith R. Stamm

L-133

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

27 Feb. 1999

Mr. Ed Singleton, District Mgr.
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

I am writing to provide comments on the Southeastern Oregon Resource Management Plan (SEORMP). I think preparation of the SEORMP document represents a good start, but I also think a more in depth analysis will be required to meet the NEPA requirement to analyze a full range of alternatives. Almost every alternative has vague descriptions of how various objectives will be addressed and what range of activities will be permitted under the different action categories (e.g. grazing, mining, recreation, wild & scenic rivers).

I think the presently identified Preferred Alternative (Alternative C) is out of the question, and that it does not warrant any further serious consideration. With the wealth of data now published on the types of environmental/ecological damage caused by cattle grazing in riparian areas it is both surprising and extremely disappointing to read that the BLM employees who prepared the SEORMP do not appear to be aware of the extensive literature on this subject. With our ever-increasing ecological knowledge, it is unacceptable for a public agency responsible for land stewardship to continue outdated management concepts that only continue to destroy riparian areas associated with wild and scenic rivers (or any watercourses for that matter). Any alternative eventually selected must call for the elimination of cattle from all riparian corridors – however that may be achieved.

I believe that, with some essential changes, Alternative D should be the Preferred Alternative. One major change needed is to eliminate all cattle grazing from the Wild & Scenic River corridors (riparian areas). Because of the present degraded condition of much land in the SE Oregon study area now classified as "rangeland", the number of AUM's proposed needs to be greatly reduced. I also believe that livestock should be excluded from all Wilderness Study Areas (WSA's). Exotic domesticated animals only destroy wilderness areas and compete with endemic wildlife. Places with outstanding natural values (unique values) and unique floras and faunas cannot be preserved if livestock grazing is permitted. The BLM should seek assistance from other government agencies in planning how to establish and protect wilderness areas and WSA's.

In all Alternatives, the term "adaptive management" is too vague. Where this term is used BLM needs to clearly describe what AUM's and grazing schedules are proposed for different areas. In management areas approved for livestock grazing AUM's should be controlled in a manner that favors a sustainable ecological integrity of the land.

Ecological values must receive preference over livestock grazing. Where feasible, grazing permits should be "bought out" and retired – as is being done in other states.

Lastly, Steens Mountain is a special place and needs to receive more detailed, careful attention in any alternative selected. Because NCA's permit multiple use management the NCA proposal for Steens Mountain will need to be described more specifically.

Sincerely,

Cc: Craig Hansen, District Mgr.
Burns District BLM Office

Tom Fry, Acting Director
BLM, USDOI
Washington, D.C.

L-134

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Mr. Ed Singleton,
Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

Regarding the Southeast Oregon Resource Management Plan, I am concerned that Alternative C does not sufficiently protect the plant and animal resources and hope that you might adopt an improved Alternative D in its place.

There are several areas where our resources need protection. Some of them are:

Exclusion of livestock grazing from "wild and scenic" rivers such as the Blitzen and Owyhee,

Protection of fish habitat along streams and rivers where grazing is uncontrolled,

Grazing reduction in sensitive wildlife habitat, in addition to riparian areas,

Increased river miles for wild and scenic status,

Restriction of livestock operators to the areas of their permits,

Reservation of an area larger than 1% from the damage of off-road vehicles

Monitoring and enforcement of grazing management in the Steens Mountain National Conservation Area.

I realize that livestock permits are a way of life for some people in your area of the state, and it is an uphill and largely unseen effort to protect the wild plant and animal resources from unchecked and uncontrolled grazing.
But I believe that the efforts you make now will result in lands that will have far more value in the future, especially in comparison to other territory that has not been protected.

Thank you for considering my views.

Sincerely yours,
James Keesey 2-26-99

L-135

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Friday, February 26, 1999

Mr. Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Re: Southeast Oregon Resource Management Plan

Dear Mr. Singleton:

Since this plan will guide activities on our public lands of southeast Oreson for the next twenty years, it seems this should be done with a long-term outlook.

The research I have participated in gathering for other parts of the Great Basin has repeatedly demonstrated the complex and interrelated nature of this habitat. BLM botanists, biologists and resource people certainly have more emcompassing material available to them. For the sake of the future of this land and the inhabitants, I hope this understanding prevails over short-term politics.

The "preferred" Alternative C fails to address this perspective. Alternative D with an additional exclusion of livestock grazing from Wild and Scenic Rivers such as the Blitzen and Owyhee Rivers and other riparian areas is absolutely necessary for the ecosystem to survive and prosper.

I believe it is crucial to adopt not only clear standards and guidelines on management, but to budget for ground monitoring and information exchanges with other agencies.

I also think that any plan should include protected wildlife and wilderness areas. It is especially important to educate the human users in mitigating their negative impacts, and to promote better understanding of this habitat on all our parts.

Sincerely,

M. Leigh Kuhn

M. Leigh Kuhn

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L-136

RECEIVED 2-26-99
MAR - 1 1999
VALE DISTRICT BLM

Mr. Singleton,

I strongly urge you and the BLM to reject alternative C of the SEORMP. Instead please advocate for the selection of Alternative D that excludes livestock grazing from: Wild + Scenic rivers, such as the Blitzen and Owyhee rivers; riparian areas; critical fish and wildlife habitat; Areas of Critical Environmental Concern; wilderness study areas; and grazing allotments in fair or poor condition.

Sir, "adaptive management" is really just a justification allowing livestock operators to graze beyond the limits of their permits; and fails to satisfy the SEORMP's stated intent to adhere to ecosystem management principles. Adaptive management is no substitute for real standards and guidelines. Without constant, on-the-ground monitoring, this type of "management" only leads to further degradation.

Thank you for your consideration.

Sincerely,
Janet R. Mance

L-137

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 27, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Mr. Singleton:

Please adopt Alternative D as the "preferred" alternative under the Southeast Oregon Resource Management Plan. Alternative D is the only alternative that, if livestock grazing is excluded, will provides adequate protection of the resources, such as Wild & Scenic Rivers, the Blitzen and Owyhee, riparian areas, critical fish and wildlife habitat, and wilderness study areas.

Thank you,
Tad Blank

cc: Craig Hansen, Burns District Manager
Burns District BLM Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

L-138

138

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

ED SINGLETON, DISTRICT MGR.
VALE DISTRICT BLM OFFICE
100 OREGON STREET
VALE, OR 97918

DEAR MR. SINGLETON,

I AM WRITING TO GIVE MY OPINION ABOUT SEORMP. I WOULD ALSO APPRECIATE BEING ADDED TO YOUR LIST OF CONCERNED PUBLIC TO RECEIVE INFO ON THE PROGRESS OF THIS RMP AND OTHER ACTIONS CONCERNING THE AREA.

I STRONGLY URGE THAT BLM REJECT ALTERNATIVE C AND INSTEAT SELECT A STRONGER ALTERNATIVE D THAT EXCLUDES LIVESTOCK FROM ALL SENSITIVE AREAS SUCH AS: WILD & SCENIC RIVERS, RIPARIAN AREAS, CRITICAL FISH & WILDLIFE HABITAT, ACECS, WSAS, AND ALLOTMENTS IN FAIR/POOR CONDITION.

ADAPTIVE MANAGEMENT IS NO SUBSTITUTE FOR REAL STANDARDS & GUIDELINES WITH CONSTANT ON THE GROUND MONITORING.

I HAVE NOT YET BEEN ABLE TO VISIT OREGON WSA'S BUT I DO SEE WHAT HAPPENS IN IDAHO WSA'S WITH CONTINUED GRAZING AND LITTLE MONITORING OR DISREGARD OF DEGRADATION.

SINCERELY,
Gerald J. Derhees

L-139

RECEIVED
MAR 02 1999
BURNS DISTRICT BLM

MR Hansen — 2/27/99

I have worked & lived most of my 59 years in Oregon. I grew up here, schooled here, left for military service & returned. My son and I hunt & fish & always take care of the land & water.

I have seen such damage done by the livestock grazing. My view is the livestock folks have destroyed much of what I love and has done so at a cost to the taxpayer.

Please —

① Protect the land from the livestock!

② Reject Alt # C.

③ Select a strong Alt # D.

④ Work to protect our land from the overuse by one group — the livestock folks.

Thanks

Lorn Sliesler

L-140

mary garrard

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Vale Street
Vale, OR 97918

Dear Mr. Singleton:

During the last twelve years, I have visited SE Oregon often and have come to know and love it well. I am fascinated by the constantly changing, open sky, the subtle yet vibrant colors of the land and its vegetation, the glimpses of wildlife, small and large, the presence of human history. In this time, I have been involved in the efforts of a number of environmental groups to check and reverse as much as possible the negative effects on the high desert ecosystem of recent human habitation. I am seriously concerned that the alternative chosen as preferred for the Southeast Oregon Resource Management Plan does not go far enough to accomplish this. Following are some of the issues of concern to me.

1. Livestock grazing is one of the most destructive uses of the land and should be eliminated from all riparian areas, wilderness study areas, allotments in fair or poor condition, Wild & Scenic Rivers, ACECs, RNAs, all critical fish or wildlife habitat, and places where primitive recreation is the dominant value. My take on multiple use is that not all uses need to take place in all areas all of the time. Some places are more valuable for other reasons than resource extraction, not least of which, to me, is simply for them to be there, undisturbed.

2. "Adaptive management" sounds great in principle-I'm all for flexibility-but in practice may not be a good substitute for definitive management prescriptions, until grazing livestock becomes less heavily favored as a mission of the agency as it has been historically.

3. Mineral and energy extraction should be restricted in all special management areas, including WSAs, ACECs, etc., in critical habitat, and in areas that are popular recreation sites.

4. Regarding roads, the south portion of Steens loop road should be closed. Other roads throughout the area should be closed and reclaimed where they serve no function. Off-highway vehicle use should be restricted to "designated" routes, as opposed to "existing" routes. There are new "existing" routes all the time caused by unrestricted use of OHVs.

5. Snowmobile use should be severely restricted if not eliminated entirely from Steens Mountain.

I urge you to choose a modified Alternative D instead of Alternative C as the preferred alternative.

Thanks for the hard work.

Sincerely,

Mary Garrard

L-141

RECEIVED
MAR - 1 1999
VALE DISTRICT BL

February 26, 1999

Mr. Ed Singleton, District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

These comments are in response to the draft Southeast Oregon Resource Management Plan:

- I believe your preferred Alternative C does not reflect ecosystem management concepts. Adopting this alternative would simply continue the degradation of natural resources in this awesome part of the state of Oregon.
- Of particular concern is the continued grazing of cattle along streams and other sensitive natural environments. Grazing should also not be permitted in allotments in fair or poor condition. (As a taxpayer, I resent having to subsidize cattle grazing as it destroys the environment!)
- Alternative D offers a better chance to achieve your management goals, although in my opinion it still allows too much grazing.

Adoption of an effective and comprehensive management plan provides the opportunity to begin the rehabilitation and enhancement of the great public natural resources found in this unique part of Oregon. I urge you to think of future generations of Oregonians as you make this important decision.

Sincerely,

Cc: Craig Hansen, Burns District Manager

L-142

Ed Singleton
Dist Manager

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

I live in S.W. Oregon. However, I spend considerable time, both summer and winter, in the Steens area. I hike and back pack OFF the beaten Path.

Observations and concerns:

1- Multiple use Pivots around cattle. OPEN range (outdated) needs drastic reform.

2- "The enhancement and protection of Natural resources and riparian zones" not compatible with open range.

3- Wildlife refuges should be just that. In visiting refuges, I saw more cattle than wildlife.

4- Kiger gorge streams polluted and riparian zones destroyed. Blitzen river and other streams the same.

I believe I read in your study plan that only 22% of ranchers have Allotment permits. That means 78% raise their cattle on their own land. Please choose Alt. D with reform to open grazing.

Sincerely
Tom Scriven

L-143

RECEIVED
MAR 01 1999
BURNS DISTRICT BLM

2/25/99

Burns District Manager
Burns District BLM
HC 74-12533
Hwy 20 West
Hines OR 97738

re: Protection/Restoration of high desert areas

Dear Manager Craig Hansen,

As a hiker, bird-watcher and lover of the natural world, I would like you to consider Strengthening Alternative D to exclude livestock grazing along the wild rivers (Blitzen + Owyhee for example). These are areas of Critical Environmental Concern for fish and other wildlife.

Having hiked often in areas of stock grazing I know well the trampled grass, which leads to muddy runoff spoiling rivers for fish.

Please consider that in protecting wild and scenic areas they will still be viable and beautiful for our children and grandchildren - There is no shortage of beef in this country.

Thank you for your consideration of these ideas in designing the DEERMP.

Sincerely,
Eleanor Egan
John Egan

L-144

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 24, 1999

Mr. Ed Singleton
Vale District Manager
Vale Dist. BLM Office
100 Oregon St.
Vale Or 97918

Copy to

Mr. Craig Hanson
Hines Oregon

Dear Mr. Singleton:

I am writing as a concerned citizen who has for years hunted, fished and done business in eastern Oregon.

Specifically, I am concerned about the planning for uses of BLM lands currently underway. My reading of details leads me to not favor alternative C.

Instead, I hope that a strengthened alternative D will be adopted by the Bureau and applied for future uses of the land. By strengthened I mean that D, to me, would appear to require more protection so that wild and scenic rivers, and other areas of important riperarean importance would gain protection.

I would also favor elimination of grazing allotments where the land has been affected and is in poor condition.

Thank you for your attention to my letter.

Very sincerely,

Eaton H. Conant

L-145

145

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Josephine B. R. von Hippel, M.D.

Feb 24, 1999

Dear Mr. Singleton,

I am writing to urge you to select Alternative D rather than C so that livestock grazing will be excluded from our wild and scenic rivers especially the Blitzen and the Owyhee. I have made yearly visits to Southeastern Oregon for the past 30 years. This region is an important part of my life. There are not many areas in the U.S (if any) that are like it. It is good for the soul.

We need to protect riparian areas, critical fish and wildlife habitat, and "Areas of Critical Concern"

I love Malheur the Owyhee and the Steens Mountain Area where everything seems to be so fragile and really needs protection to remain as beautiful and wild as they have always been.

Thanks for your help.

Sincerely yours,

Josephine B.R. von Hippel MD

cc to Craig Hansen District Manager
Burns District BLM Office

L-146

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Re: Southeast Oregon Resource Management Plan

Dear Mr. Singleton:

I am writing to you as a frequent visitor to the Southeast Oregon area. I have some grave concerns about the BLM's Southeast Oregon Management Plan.

My understanding is that the BLM is leaning towards Alternative C. Alternative C is seriously flawed for a number of reasons. It fails to reduce livestock grazing even when resource damage occurs. It allows continued grazing along the Wild and Scenic Blitzen River, contrary to scientists' recommendations. It nominates only 43 of 289 river miles for Wild and Scenic River status. It allows grazing in the proposed Steens Mountain National Conservation Area. It relies on "adaptive management" when more specific standards and guidelines and monitoring are needed.

More and more Oregonians are finding out about the precious resources we have in Southeast Oregon. The Steens Mountain and Blitzen River areas are big draws to wildlife enthusiasts like myself who visit the areas to bird and spot other wildlife and to study the plants and ecology native to the area. It is an area which can give us a sense of what pristine eastern Oregon was like and it needs to be protected.

Sincerely,

Patricia Vallerand

cc: Craig Hansen, Burns District Manager, Burns BLM

L-147

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

February 23, 1999

Dear Mr. Ed Singleton,

My name is Heather Ladd. I am a native Oregonian concerned with the health of our public lands. Recently I received word that the Vale District BLM Office is considering a new resource management plan for the Vale district. I realize that the land of eastern Oregon is fragile and must be managed with this in mind. For this reason I oppose the implementation of the BLM's preferred Alternative C Resource Plan.

The lands of south-east Oregon are beautiful and full of diverse plant and animal species. Although not the most productive lands, they must be cherished and managed appropriately. Alternative C does not reflect this sentiment. The 3000 cattle presently allowed to graze will find no new restrictions under the plan. The cows will be able to graze in the Steens Mt. Natural Conservation Area and to graze beyond the limits of permits. This means that they will continue to trample the riperian areas lining crucial water ways, remove large amounts of herbage beneficial to wild ungulates and threaten the livelihoods of local predators.

Multi-use management does not mean catering to the cattle industry. Other actors should and must be considered. Some very important actors include the threatened cutthroat trout and the rare kit fox. We fight invasive weeds everyday, yet give invasive cattle priority over wildlife. This blatant contradiction must be reevaluated. Under Alternative C restrictions to cattle numbers would no longer be allowed even when areas are damaged. Clearly this puts cattle ranchers before the interests of a vast number of concerned citizens, before wildlife and before the health of the environment.

Alternative C does not comply with the SEORMP ecosystem management goals. Vale District deserves to be protected from cattle grazing. Alternative D, however, appears to uphold some good ecosystem management principles. Fortunately it allows restriction to cattle grazing, de-emphasizes fire suppression and adds Areas of Critical Environmental Concern. However the plan still does not restrict cattle from Steens Mt. or the Alvord Desert, or define reasonable limits on grazing.

When visiting the Steens Mountain area I was awed by the beauty of the desert-like environment. The vast array of browns and reds delight the eye. Big horn sheep appear

out of nowhere and cause one to stand still with appreciation. At night the skies are so clear - you could swear you see at least a few far-away planets. Yet the low shrubs and scattered grasses continuously reminded me of the fragile environment which takes time to recover from damages.

Humans, like wildlife, are intricately tied to nature. We have the power to alter our environment. We can desertify previously vegetated areas, create new plant species and redirect rivers to name a few. Yet this power leaves us vulnerable to the destruction of our own habitat and health. Altering our environment to aid the economic well-being of the cattle industry is not worthwhile.

While writing this letter, I find it increasingly difficult to support either plan. Realizing that these plans set the guidelines for 6.3 million acres for the next 20 yrs. leaves a feeling of daunting responsibility to make the right decision. I hope you feel similarly. In order to condemn the worst plan I am pushing for the adoption of Alternative D. Please consider my opinion when deciding which plan to choose. The final decision means a great deal to me and to many concerned citizens that value the land for the land and not for economic reasons.

Thank you for your time and consideration on this important issue.

Sincerely,

L-148

Feb 22 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Mr Singleton:

Concerning the draft SEORMP/EIS I recommend the selection of Alternative D.

However some improvements might be considered. Keep riparian areas free of grazing. Also areas deemed in poor condition or critical habitats for sensitive species should be protected from cattle.

In the coming decades more emphasis on natural values will pay dividends to all of Oregon especially as habitat and intact ecosystems themselves will be only a memory in most of the west.

Thank you.

L-149

OREGON WOODCRAFT

QUALITY HAND-CRAFTED
CABINETS, FURNITURE & CARVINGS
WATERSHED ECOSYSTEM CONSULTANT

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MAR - 1 1999
VALE DISTRICT BLM

541-927-3259

February 24, 1999

Edwin Singleton, District Manager
USDI BLM Vale Dist
100 Oregon Street
Vale, OR 97330

Dear Mr. Singleton:

I write to comment on the SEORMP/EIS.

I choose to support Alternative D. This management alternative appears to give needed support to nongame wildlife riparian/wetland habitats. I am a wildlife biologist and naturalist for some 35 years with several professional affiliations; my comments are submitted as a private citizen who is interested to working with you through *Partners In Flight* on species conservation plans and *Breeding Bird Surveys* and *Bird Banding Program* through the *USGS Patuxent Wildlife Research*. I am a master bird bander.

Southeast Oregon natural resources are very important to me and my family. I support management that helps keep these natural resources in their native condition as much as possible. I urge BLM to accelerate its efforts to maintain, restore, enhance, and protect Owyhee mountain meadows and stands of mountain mahogany and aspen. There are a number of associated avifauna that need in depth study with careful habitat management in these areas.

Of special interest to me is Virginia's Warbler, a Neotropical migrant that is declining in much of its limited range and is rated of high concern by *Partners In Flight*. In June 1998, I participated in the Oregon Breeding Bird Atlas Project in the Owyhee Uplands to help discover this species during the breeding season on BLM land in two separate mountain mahogany habitat areas of the Vale District, Mahogany Gap near Jordan Valley and Wood Canyon near Jackson Summit, Battle Mountain. I propose to conduct further collaborative fieldwork that would confirm Virginia's Warbler nesting in Mountain Mahogany habitats at these higher elevations. Mahogany Ridge in the Trout Creek Mountains also has potential habitat as do other areas in southeast Oregon. As we focus on particular species, others will come to forefront as our experience and knowledge of these special habitats increases.

I urge BLM to consider adding Virginia's Warbler to its list of Special Status species, and that management actions be planned accordingly. If Virginia's Warbler breeds in the SEORMA, it should be considered a species at least as rare and sensitive as those currently listed.

Further, current observations from the Oregon Breeding Bird Atlas Project can/will yield additional information for SEORMP/EIS. Contact "Paul Adamus" <adamusp@ucs.orst.edu>

Sincerely,

LeRoy Fish, PhD
Ecologist and Watershed Ecosystem Consultant

jlf

L-150

Eugene H. Tennyson, Jr., M.D.
Diplomate of the American Board of Neurological Surgery

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

23 February 1999

Ed Singleton
Vale District Mgr.
Vale District BLM Office
Vale, OR 97918

Dear Sir:

With respect to the Southeast Oregon Resource Management Plan (SEORMP) I urge you to reject Alternative C and to select Alternative D to exclude livestock grazing from Wild and Scenic Rivers, riparian areas, critical fish and wildlife habitat, areas of critical environmental concern, wilderness study areas and grazing allotments in poor condition.

"Adaptive Management" is no substitute for real standards and guidelines, and leads only to further degradation of the resource.

Sincerely,

Eugene H. Tennyson, Jr.

EHT:a
cc: Craig Hansen

L-151

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

In responce to your SEORMP, which is now under consideration, please think seriously about adopting Alternave D. This would be a much better way to protect this unique area of the Oregon Desert, it should cut down on destruction by cattle especially in the riparian areas.

There must be a better place to run cattle and I'm sure on-the-ground management by personnel is better then "adaptive management". I know it's a big country--but frankly I prefer my beef from those cornfed critters from the midwest (or maybe the Ft. Klamath area) to that from range cattle.

So let's keep Steen's Mt., the Owyee and Blitzen in as good shape as possible for the resident animals, and for us and our children to hike in and enjoy

Sincerely,
Irene M. Currin
Irene M. Currin

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

L-152

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

To Ed Singleton, BLM Vale District Manager
cc: Craig Hansen, BLM Burns District Manager

re: SEORMP please reject Alternative C and strengthen Alternative D to exclude livestock.

It seems strange to me that those of us who do our homework and are concerned about the ecological catastrophe the human race is perpetrating on the planet have to keep asking those in charge of our "resources" to back off and leave them alone. We are in the midst of the biggest die-off of species since the meteor exterminated the dinosaurs 65 million years ago, and we humans are the sole cause of this die-off. If you truly do not understand the situation, I will be happy to send you a copy of the Worldwatch *1999 State of the World* free of charge. The idea of destroying our remnants of wilderness to make a few cents off some cattle is so repugnant to me that I cannot express the horror of it. Our grandchildren will curse us. The bit-by-bit destruction of our ecosystems that is going on all over the planet is taking a very clear toll, and I hope you know that Mother Nature bats last.

We are Spirits, infinitely deep, we can do better than this!

Don Schuman

L-153

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Columbia River Conservation League
1942 Hetrick Ave.
Richland, WA 99352

February 25, 1999

Ed Singleton, District Mgr.
Bureau of Land Management
100 Oregon St.
Vale, OR 97918

RE: Comments to draft Southeast Oregon Resource Management Plan & Environmental impact Statement (SEOMP/EIS).

Dear Mr. Singleton:

The areas covered by the SEOMP/EIS encompasses public lands frequently used by our membership including the Steens Mountain/Alvord Desert, Owyhee canyonlands and river system, and the Pueblo, Sheepshead, and Trout Creek Mountains to mention a few. As the population of the United States continues to grow, these spectacular public lands will be needed in their wild state for generation of Americans to come.

Unfortunately, the alternatives presented in the draft SEOMP/EIS ensure the demise of this area, the last of the best of the magnificent southeast Oregon high desert. To adequately protect the public's interests in these lands, severe cutbacks in grazing must be incorporated in the alternatives. Grazing is causing severe damage to major portions of the area including the Steens, Owyhee River, and Blitzen River. The damage by grazing ins recognized in BLM's own technical documents in studies of these areas, in public testimony against these damaging activities, in numerous independent scientific studies on the subject, and most recently, in court decisions against BLM for failing to adequately address grazing damage on the lands it administers.

Given this history, it is woefully inadequate for the BLM to present a draft SEOMP/EIS that does not meet its stated goal of "developing management practices that ensure the long-term sustainability of healthy and productive land, consistent with the principles of ecosystem management". The BLM has failed to include an alternative that ensures the principles of ecosystem management.

Improvement to Alternative D could possibly remedy the BLM's shortcomings in this effort IF the alternative were re-written to:

- Exclude grazing from riparian areas, wilderness study area, critical habitat areas, and allotments in poor or declining condition.
- Included all roadless areas over 1,000 acres as wilderness study areas.
- Included planning and coordination with other agencies properties for inter-connective wildlife corridors to adjacent areas outside the boundaries of the SEOMP/EIS.

It's time the BLM proposed a management plan to protect America's public lands for all Americans, not just the privileged few using our public lands for personal profit with the American taxpayer subsidizing them.

Sincerely,
Bob Wilson

cc: Jim Kenna, District Mgr.

L-154

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Edwin J. Singleton
Vale District
100 Oregon Street
Vale, OR 97918

Re: Draft SE Oregon Resource Management Plan

Dear Mr. Singleton:

We prefer Alternative D, with modifications to better assure protection of the native perennial grasslands in southeast Oregon.

We focus our concern on our excellent native perennial bunchgrasses, such as bluebunch wheatgrass, Idaho fescue, Junegrass, squirreltail, and others. The widespread destruction of the original Intermountain grassland was an ecological tragedy which may be irreversible. The Native Plant Society advocates strong protection for what still remains.

As the draft states on page 3-69, "Management actions would maintain the condition of those native communities whose vegetation composition and structure are consistent with desired conditions and natural values." We support this. Then on p. 3-97, "Vegetation manipulation projects would emphasize the conversion of rangelands dominated by exotic annuals to properly functioning native perennial communities." We also support this in concept. However, such conversion would be difficult and expensive to achieve. It would be more effective to prevent degradation of native perennial grasslands in the first place by, for example, reducing stocking levels, restricting spring grazing, limiting water developments, longer rest periods, and other gentle ways of managing the grasslands.

A very small fraction of the native perennial grassland in SE Oregon is in the "potential natural" condition, i.e., near natural remnants of the original Intermountain grassland. These remnant stands represent a precious resource which should be protected from livestock grazing.

Therefore, under the heading, Rangeland Vegetation, we urge adoption of Objective #4: Protect native perennial grassland from degradation, such as any conversion to exotic annual grassland; and Objective #5: Protect areas of "potential natural" (excellent condition) native perennial grassland from any livestock grazing.

We appreciate the opportunity to comment on this draft.

Sincerely,

Russ Valley, Conservation Chair, Portland Chapter

cc: James Kenna
Bruce Newhouse (NPSO)
Stu Garrett (NPSO)
Shane Latimer (NPSO)

L-155

Diane Nowicki

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM
100 Oregon St.
Vale OR 97918

February 24, 1999

Dear Mr. Singleton:

I am writing to urge you to reject Alternative C of the SEORMP. Against scientific evaluations and recommendations, Alternative C would allow cattle to continue grazing along the Wild and Scenic Blitzen and in the proposed Steens Mountain Conservation Area. Alternative C simply doesn't go far enough to protect the Blitzen and S.E. Oregon. It opens the door to further deterioration of fish and wildlife habitat.

I have roamed the Little Blitzen Gorge, admiring its unique wildflowers. I applaud efforts to restrict cattle from riparian areas. I do not know whether the Leslie Gulch wilderness study area falls under this jurisdiction, but it is another place I cherish. I have challenged campers I saw abusing the area--the land, air, and ground water-- a couple of summers ago. Oregon's share of the Great Basin is so remote from oversight that strong protective measures and monitoring are necessary to its safety.

I urge the BLM to strengthen and adopt Alternative D, which emphasizes low-impact recreational use and protects areas that are in danger.

Thank you for this opportunity to speak on behalf of Alternative D.

Sincerely,

Diane Nowicki

cc: Craig Hansen, Burns District Manager

L-156

2-26-99

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM office
100 Oregon Street
Vale, OR 97918

Dear MR. Singleton:

I am writing to urge you to reject alternative C of the Southeast Oregon Resource Management Plan. Instead, please choose a strengthened alternative D that includes protection for this land. It is imperative to set reasonable limits on livestock grazing. Livestock must be excluded from the Wild & scenic rivers, such as the Blitzen & Owyhee Rivers, riparian areas, critical fish & wildlife habitat, Areas of Critical Environmental Concern, wilderness study areas, and grazing allotments in fair or poor condition. Adaptive management is no ~~stand-in for~~ substitute for real standards & guidelines. Constant, on-the-ground monitoring is needed to prevent further degradation.

Every year I have camped near the Owyhee River for the past 2 years. I have seen first hand the degradation of desert streams caused by grazing cows.

Thank you for your consideration.

Sincerely,

Janet Ehrenfreund

Janet Ehrenfreund

L-157

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Feb 24, 1999 Ed Singleton, Vale Mgr.

~~Craig~~ Hansen, Burns District Manager
HC-74 12533 HWY 20 W
Hines OR 97738

Dear Mr. Hanson,

Please accept these comments on your SEORMP. This document represents a lot of work and I appreciate your attempt to look ahead for 20 years.

Mineral Resources:
If you won't close the entire area, then use Alt. D. Put a plan in place to protect any WSAs that might be dropped in the future. This whole plan needs to be more pro-active. We're talking 20 years here.

Fire: Use fire only to protect resource values and return vegetative complexity.

Rangeland Vegetation:
Stop using the word, this is not rangeland and never was, it was only because we didn't know this that livestock were introduced. This is a desert landscape and should be addressed as such. "Improving ecological condition and increasing forage production" (Alt B) are not compatible. While I would prefer Alt E here, I recognize our natural systems are so degraded that intervention may be necessary. The guiding principle must be to restore vegetation complexity and native species.

Forest & Woodlands:
Use Alt D. Juniper management must be used ONLY to protect natural diversity.
Please, no timber production. The amount is insignificant in these transition type forests and not worth the environmenttal losses.

Water Resources and Riparian/Wetlands Areas.
All livestock out of all streams that don't meet State Water-Quality Standards. This is a no-brainer and the only way those standards will be met. An "upward trend" just doesn't cut it anymore. I've seen too many places improved only to be hammered again when the first improvement showed. It is time to forget 'fair to good' and get our streams back into excellent condition and keep them there. All livestock out of all Wild & Scenic Rivers and critical fish habitat. Fish and livestock are simply not compatible.

Wildlife Habitat:
Alt C is fine, giving EQUAL emphasis to improving habitat for
all wildlife, game and non-game. Wildlife is wildlife, hunted or not.

Special Status Animals:
Alt. C is confusing... of course we want to "Emphasize management that fosters plant/animal community health, habitat integrity and landscape level issue resolution" but still we must take extra care of endangered species. The fences mentioned seem aimed at accommodating ease of livestock management, rather than protecting threatened fish It should not be the public's duty to pay for private commercial management. Livestock producers should simply have to run their operations so as not to endanger species. What's to understand?

Wild Horses: Do everything you can to remove or reduce drastically this alien species. Just remember that if you use the term 'ecological enhancement' to remove them, thats fine, but don't forget cattle.

Rangeland Landscape/Grazing:
Alt D sounds OK for the short term, but this document should look to the future. Given that cows are not desert animals, given that public-lands grazing is an economic disaster, given that we can never really restore our landscape heritage with continued livestock production, lets be honest. Lets say that some limited livestock production be allowed on certain public lands as a historical recognition of the ranching lifestyle as long as it does not impinge on the ecological integrity of the land; it should not occur in Wilderness or Wild and Scenic or ANY other special management areas. Lets share the land but not have everything go on everyplace.
Forget stubble heights, stubble is for cornfields, we want a beautiful, fully functioning desert.
Thanks for excluding cows in Little Blitzen and Indian gorges. Please enlarge that to all public lands on the Steens. It is simply too priceless a resource to degrade. Please find a way to permanently rest grazing allotments where needed.

Recreation: In years to come it will be just as important to control people as livestock. Start thinking about that NOW. Rest the Steens in winter, there is no reason for any vehicles to be there after gate closings. There is plenty of forest country north of Burns for snowmobiling. As visitors increase on the Steens, plan to close the road to personal vehicles above Fish Lake and use small mini-bus shuttles to take folks to the top. Do NOT make more parking lots, and the potties that would follow, at the rims. Most people just drive to the top and look over and that could be accommodated nicely with vans where educatinal interpretation could be included. Those that want to hike and backpack can catch a later shuttle back. People do not go to the top to see endless lines of traffic and parking lots. They go for the open space, don't ruin that. This

sort of thing works well in Denali and Africa and many places I have been.
Close the Rooster Comb section of the road. There is plenty good access from both ends without that section and its removal would strengthen the whole wilderness experience which is what Steens Mtn. is all about.
Rethink hunting on the Steens to become only quality, back-country type hunts involving more walking than driving. Limit the
number of outfitters now before this becomes a problem and do not allow any helicopter use on the Steens. Please realize that Steens Mtn is the best thing you've got. Keeping it natural is your biggest responsibility to future generations. Learn from mistakes elsewhere, be bold and pro-active, do the right thing now while you still can. Include the Alvord in Steens protection. It is all part of the same ambience. Don't let the Alvord become a race track and airfield.

ORV use: Do not allow more acres, (Alt C) than are open now. Limit this use to designated trails that YOU designate, not every "existing" trail that any outlaws can leave. This is not recreation, this is industrial strength competition. Do everything possible to limit it in time and location. It is not the purpose of public lands to make land available for every new invention or craze that comes down the pike. What if I really like to throw grenades and find it a good family activity because it keep the kids interested, should you provide public lands for me to do that!?!? Don't be afraid to take control. The American people show in poll after poll that they want these machines controlled.

ACECs: Retain ALL we now have and designate those your field people and the public find to be important. Don't drop the Pickett Rim ACEC. The values for which it was established have not changed. We monitor eagle nesting there. I would personally like to see the Lone Mountain area given some special designation. It truly should be one of your WSAs.

Wild and ScenicRivers: Good job here in Alt D. Do add the 289 possible river miles to this status.

WSAs: Good job on including new lands into WSA, IMP status. Its been a long time since the initial inventories. How about a re-inventory by outside experts such as was done in Utah, apparently to everyone's satisfaction.
Specific to the whole So. Steens mess, you have us totally confused by all the various overlapping plans, all very vague. The only solution you seem to see to protect threatened fish is the building of miles of fence inside the WSAs, in violation of FLIPMA. The building of the Lauserica and Stephens fences turns the WSAs into nothing

more than any other federal livestock pasture. Congress intended you to manage WSAs for Wilderness Values, not for the comfort of private livestock operations. Once again, it should be the responsibility of the livestock operators to run their business in accordance with the laws relating to resource protection, just like farmers and loggers. It is not the public's duty to fund projects that make private operations easier.

Steens NCA: This plan tells us absolutely nothing we need to know to evaluate this. The plan appears to be a name only with no change in management. Give us an unbiased report on all the possibilities for Steens protection, NP, Natn. Mon., NCA, Wildlife refuge. Give us specifics on how each would be managed. Whatever plan, it must include all the Steens, not just the high Country and it must include the Alvord.

Cultural Resources: Obj 3, Alt B sounds good if it would truly be fully implemented.

Lands and Realty: Use all available avenues and revenues to aquire sensitive lands and private inholdings in WSAs. Begin a program to clean up public lands, take out old fences and water facilities, cart off old culverts, close and naturalize roads and ways that shouldn't be there.

General Comments: Looking over the spread of alternatives, there really isn't much (spread). We are given a strong commodity driven Alt A which is not counterbalanced by an equally strong protection alternative. Alt E appears to just have been thrown in to make C look like the middle. Not much thought seems to have gone into it.

I cannot accept Alt. C which does not reduce grazing even where resource damage is occurring or even in your special management areas. So what makes them special? Surely your field biologists can't be telling you that 3,000 cattle grazing along the Wild & Scenic Blitzen is good management. Alt C doesn't seem to recognize the desperate condition of most of our desert rivers or the importance of designating the full 289 miles that are eligible for W & S designation. It doesn't protect the Steens now from the biggest problem, grazing, and it doesn't envision a plan to protect it in the future from people.

With a better track record of protecting natural resources we might be willing to try "adaptive management" but in such a huge area with constant on-the -ground monitoring so difficult, what we really need are serious and specific standards and guidlines

So, in closing, please adopt a strengthened Alt. D that recognizes that the American public wants strong

environmental protections. Don't be afraid to be bold and proactive and plan for the changes that are coming in the next 20 years. Exclude grazing from all Special Management areas (otherwise, they are not special management) and all allotments in poor and fair condition.

Its been a long time since establishing WSAs. How is the IMP going? Could you please make available a report on the number and kind of structures, developments and other projects that have been placed in WSAs, with their rationals for how they enhance Wilderness values.

Thank you very much for this opportunity to comment.

Respectfully Yours,

Alice Elshoff

Frenchglen OR 97736

PS. If my 6th grade math is correct, only 1.05% of this plan's 6.3 million acres is not allocated to grazing, a whopping 66,182 acres. Tell me I've made an error! Please!!

L-158

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 22, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Sir,

In Southeastern Oregon there are now opportunities to preserve, protect and enhance a large natural area that includes rivers and wetlands; bird, fish and other wildlife habitat; and probably as yet unnoticed and/or unmentioned treasures. The opportunities diminish each year.

As a manager in charge of this wonderful area it is your job, your responsibility, to see that it is preserved, protected and enhanced in its entirety. It would be a dereliction of duty to do otherwise. Allowing a few special interest groups such as cattle ranchers to in anyway continue to degrade any parts of this area is criminal. If allowed to do so, these few people can destroy what may never be recovered, what belongs to all people of the world now and in the future.

With these ideas in mind, Alternative D of SEORMP is by far the best choice. Even it needs improvement by: 1. further limiting, or better yet, totally excluding cattle grazing and 2. a diligent search by those of you in charge to find other ways to further preserve, protect and enhance the treasures that belong to all of us.

Bobby A Darkinen Dale V Darkinen

L-159

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 26, 1999

Mr. Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Re: Comments on Southeast Oregon Resources Management Plan

Dear Mr. Singleton:

Alternative D is closest to meeting ecosystem management goals. But it needs strengthening to exclude livestock grazing from wild and scenic rivers (i.e., Blitzen and Owyhee), riparian areas, critical fish and wildlife havitat, grazing in fair and poor condition, etc.

Real standards and guidelines are needed, with constant on-the-ground monitoring to lessen further degradation of areas of critical environmental concern.

Please consider these essential improvements to Alternative D.

Sincerely,

Dorothy J. Layman

cc: Mr. Craig Hansen
Burns District Manager
Burns District BLM Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

L-160

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

D. William Sinnett

February 26, 1999

Mr. Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

I believe the Southeast Oregon Resource Management Plan fails to explore the full range of alternatives as required by NEPA. I ask that you drop Alternative C as the preferred alternative. While Alternative C attempts to "do it all," this management option contains these serious flaws:

- It fails to call for any livestock grazing reductions, even when resource damage occurs
- It allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, contrary to the recommendations of agency scientists
- It nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status
- It proposes a Steens Mountain National Conservation Area, but makes no changes to grazing management there
- It leaves the overwhelming majority of the planning area (3.8 million acres) open to off-road vehicle use, while closing less than 1% of the area (22,000 acres) to ORVs
- It relies on controversial adaptive management, a tool the BLM has used in the past to justify allowing livestock operators to graze beyond the limits of the their permits
- It fails to satisfy the SEORMP's stated intent of adherence to ecosystem management principles

The adaptive management, upon which this plan is heavily reliant, is no substitute for objective standards and guidelines. Without constant, on-the-ground monitoring, adaptive management will only lead to further resource degradation. Further, adaptive management allows for a degree of latitude that is unacceptable in a major planning document such as the SEORMP. I urge the BLM to reject Alternative C and instead choose a strengthened Alternative D that excludes livestock grazing from:

- Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers
- Riparian areas
- Critical fish and wildlife habitat
- Areas of Critical Environmental Concern
- Wilderness study areas
- Grazing allotments in "fair" or "poor" condition

Alternative D comes much closer to meeting the SEORMP's ecosystem management goals. Alternative D would:

- Allow for reductions in livestock grazing levels
- Emphasize undeveloped types of recreation
- De-emphasize fire suppression
- Restore or close recreation sites where natural values are jeopardized by overuse
- Add 26 new Areas of Critical Environmental Concern, totaling 191,000 acres
- Propose 289 river miles for federal Wild and Scenic River status

Still, Alternative D needs improvement. It fails to set reasonable limits on livestock grazing and would allow for the continued degradation of cherished wild places such as Steens Mountain and the Alvord Desert. A strengthened and improved Alternative D is the BLM's (and the land's) best bet. If you intend to protect these 6.3 million acres for future generations, you MUST choose a strengthened Alternative D.

As someone who appreciates all things wild, I am reassured by the efforts of you and others in the protection of terra, flora and fauna here in the Northwest. Please add my comments to your plan and please write to me your plans concerning the future of publicly owned BLM lands.

With Thanks,

D. William Sinnett

L-161

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97738

Jeff Wester
5585 N.E. Farmcrest
Hillsboro, OR 97124

RE: Concern over BLM's plan, "Alternative C" . . . BLM's Southeast Oregon Resource Management Plan involving 6.3 million acres of public lands over the next 20 years.

I understand the SEORMP covers an area the size of Vermont and part of New Hampshire. These land which span the southeast corners of Oregon, provide critical Habitat for the rare kit fox, threatened Lahontan cutthroat trout, and dwindling populations of sage grouse.

I am a bit unnerved to find the BLM considers this land to be more important to less than 2% of the cattle making up our whole, than to threatened species needing it to survive.

Please reject Alternative C and instead strengthen and adopt Alternative D that excludes livestock grazing from:

-Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;
-riparian areas;
-critical fish and wildlife habitat;
-Areas of Critical Environmental Concern;
-wilderness study areas; and
-grazing allotments in fair or poor condition.

I would like to see these places protected because they are infinitely more important to me, because, I consider rare ecosystems capable of supporting endangered life more precious than for use as grazing land for cattle. We do not need further grazing land for cattle. I am a meat eater, and still I do understand the fact that we have enough land suited for that purpose. Please hear and do something about this dilemma!

Sincerely,
Jeffrey Michael Wester

L-162

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton
Vale District Manager
Bureau of Land Management
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

I would like to comment on the Southeast Oregon Resource Management Plan. I am concerned that there are not enough protections in the Preferred Alternative C for wildlife, riparian areas, wildernesses and wilderness study areas, wild and scenic rivers, and general range condition.

Livestock must be totally excluded from all riparian areas, unique habitats, critical habitats for sensitive and listed species, and wilderness and wilderness study areas. We must improve and maintain the ecological condition and scenic value of our streams, wetlands, and special habitat areas. The Steens Mountain, Owyhee canyon country, and all the streams and wetlands in southeastern Oregon are beautiful lands that must be preserved for the enjoyment of all people. Livestock grazing, in the areas listed above, is not compatible with these goals.

Other areas could be used for sensible livestock grazing if there is enough forage. But any rangeland in fair or poor ecological condition must be withdrawn from most grazing until it recovers. Any plan that does not do this defeats the purpose of the laws that were established to protect our public lands from degradation, i.e. FLPMA and the Taylor Grazing Act.

I hope you will develop a new alternative or revise Alternative D to better protect the ecology, scenic values, and range productivity in southeastern Oregon.

Thank-you for the opportunity to comment on the SEORMP.
Sincerely,
Karlynn Huling

L-163

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Feb. 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale OR 97918

Dear Mr. Singleton:

I am writing in regard to alternatives for management of SE Oregon's deserts. I have traveled this country, camped it, driven it and stopped at various points to enjoy the scenery, and regard it to be precious land in its natural state where it has not been overgrazed and degraded by cattle.

I think the major value of the land is maintaining its integrity as areas for soil, vegetation, fresh water, wildlife, & other valid ecosystem functions.

To allow grazing in a proposed Steens Mountain Conservation Area goes against common sense and biological knowledge. Also, the lifeblood of some of these areas depends on healthy and naturally-vegetated rivers such as those 280+ miles of rivers eligible for Wild and Scenic River designation. Please conserve the large majority of these rivers and make them cattle-free.

Just as in human society there must be laws, in nature there must also be laws governing prudent and sound use and management of these lands...please remember the natural laws of ecosystems and connectiveness of all factors present in any living system.

We need healthy land, soil, water, vegetation, wildlife, and human communities that balance exploitative uses with resource-conserving ones.

I believe from what I hear that Alternative D with additional limits on grazing would be fair and sound. Wildlife need a fair shake. Please act to preserve the ecosystems they need to survive and thrive in the wild.

Please vote on a "beefed-down" version of Alternative D that limits harmful grazing and maintains the biological richness and integrity of the area described in The Southwest Oregon Management Plan for both humans and the natural world.

Thank you.

YOURS TRULY,
CHRIS FOULKE

L-165

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Mr. Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97738

Dear Sir:

We are writing with regard to the Southeast Oregon Resourcr Management Plan, urging you choose Alternative D, but a strengthened Alternative D which addresses the very real dangers to the environment posed by livestock grazing. Those areas from which livestock grazing should be excluded are:

grazing allotments in poor conditions
wilderness study areas
riparian areas
critical fish and wildlife areas
wilderness study areas
wild and scenic rivers - the Blitzen and Owyhee, for example

We need constant on-the- ground monitoring to maintain real standards and guidelines. "Adaptive management" can so easily lead to abuses and further degradation. The Steens Mountain area is so breathtakingly lovely. It deserves the greatest possible protection.

Thank you for your attention.

Sincerely,
Alice & Jack Pueschner

L-166

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

JESSE WHITE

February 17, 1998

Gary Cooper
Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, OR 97910

Dear Mr. Cooper:

I have the following comments and concerns on the Southeast Oregon Resource Management Plan/ Environmental Impact Statement.

This document is heavily slanted toward the recreation uses on public lands. Vol. 1 Chapter 2- Pg 62 describes the number of visitors to the plan area. I believe these numbers are false and misleading. Jordan Resource Area is only accessible by Federal Highway 95, a main paved highway going between Mexico and Canada. I contacted Ken Freese at Oregon Department of Transportation for the logged numbers of 1997 average daily traffic for Highway 95 at Basque, Highway 95 at Rome bridge, and Highway 95 at the Idaho border. The average number (Highway 95 at Rome bridge) was 1000 vehicles per day. 30% of which is determined to be 4 axles or more (interstate truck traffic). 700 cars per day multiplied by 365 days per year is 255,500. The total number of visitors to Jordan Resource Area is 37,255. These calculations represent that 19% of the entire traffic on this federal highway was destined for Jordan Resource Area. 19 out of 100. This didn't allow for mini vehicles or luxury vehicles that cannot or are not willing to take these dirt roads. Every site is down a dirt road. This does not allow for weather conditions that make these areas completely inaccessible many days a year. The numbers are equally inflated for the Malheur and Andrews Resource Areas.

The statistical data further reveals:
When a recreation visitor gets in the river at Rome on a float trip and goes to Birch Creek he is then a visitor at Birch Creek--- two visitors, the float trip then takes him onto Hole-in-the-Ground--he has became three visitors, finally he gets out of the river at Leslie Gulch he has became four people recreating in JRA. This plan proposes a National Conservation Area, page 79 that could have severe impact on the cattle industry. The plan lists considerations: Livestock Management: Within the proposed NCA, there are 32 livestock operations, supporting about 100 families---- My family has 6 people so that could represent 600 people. The ranching industry has been reduced six fold while recreation has been exaggerated more an estimated 100 fold. It is against the law to give false and misleading information and the information in this document is misleading. It relies on misleading information to justify its need for this direction in management. The plan addresses conflicts between grazing and recreation in everything from fences to water quality, yet fails to address the potential conflicts between wildlife and recreation. The plan fails to list the local Canadian Goose population. These geese are disturbed and harassed by the boaters in their breeding season.

When doing scoping for this plan the people in our group: Jackies Butte Unit Permittees attended several meeting and sent the enclosed comment letter. This letter was ignored. Page 11 of the Appendices Volume lists the groups that sent written comments during the scoping process. Ours was not included.

As addressed in the initial comment letter our main concern is Visual Resource Management. Ocular Reconnaissance is an "eye of the beholder" evaluation and unscientific even when used in the interdisciplinary team concept. Personnel turnover and lack of actual knowledge of site specific ecosystem evolution stages preclude consistent measuring. Standards for Rangeland Health and Guidelines for Livestock Grazing address management of cattle yet Visual Resource Management is the overriding factor.

SEORMP, Wild and Scenic Rivers, page 71 eliminates grazing in Deary Pasture without due process of law. Deary Pasture represents the only live water in the field and the field is known for an inadequate water supply. This is not in accordance with the Wild and Scenic River Plan that says grazing can be eliminated when water is provided above the rim. Water has not been provided. In a letter dated February 1, 1993 to Jackies Butte permittees Jerry Taylor states "The Management Framework Plan (MFP), our land use plan does control and direct our actions, and it does give the authority to remove cattle from the canyon'where alternative water sources can be provided above the rim.' This authority and direction stands on its own." That same letter also states "Implementation of the MFP decision requires that alternate water sources be available to develop them and that the CCC process is used to involve all affected parties."
A BLM answer to appeal of ED DOWELL (Dowell Brothers), et al. States "BLM may exclude cattle from the Deary Pasture if and when adequate livestock watering facilities and forage are available in the upland pastures. This plan eliminates our due process of law.

In conclusion this plan is ambigous in the fact that is displaces the social and economic factors of our communities. Who is to say that the recreating public is not seeking the ranching lifestyles of the American West?

Sincerely:

Jesse W White

Jesse White for
Jackies Butte Unit Permittees Group

seormp2

March 28, 1996

Gary Cooper
Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Cooper,

After reviewing the Preliminary Issues, Planning Criteria, and Alternatives of the Southeastern Oregon Resource Management Plan and Environmental Impact Statement, we have the following concerns.

Issues #1, #2, #3, #4 indicate BLM will Use Visual Resource Management as the monitoring criteria. This is unscientific. It is unfair to all concerned when better, more reliable scientific methods exist. Ecosystem attributes are broken into developmental through mature stages with measurement levels for each. The need to provide a uniform basis for documentation is imperative. Personnel turnover and lack of actual knowledge of site specific ecosystem evolution stages preclude consistent measuring. At the March 26, 1996, Jordan Valley meeting concerning the SEORMP, Mr. Cooper indicated VRM was a recreation status analysis. This gives higher value to recreation. It also relieves BLM from supporting any claims of ecosystem damage with actual evidence.

That same meeting disclosed to many alarmed citizens that the Nature Conservancy had been contracted through a Memorandum of Agreement to help write this plan, to discover the ACEC and SMA's, and to inform the public. Our real concern is, "What is the expertise, accountability, and agenda of the individuals doing this work? Furthermore, is the final culmination of rhetoric and ground observations capable of producing an unbiased body of Work? How and where are the observations and concerns of the present land users being incorporated into the documents?
We would like to request a copy of this Memorandum of Agreement.

Statements are made in this document dealing with private property. The BLM should have no control over the private property rights of the individuals in the affected areas. The plan should exclude private property.

Having initiated legal action concerning the Wild and Scenic River Plan, we incorporate our statement of reasons for that action as part of our concerns in the development of this SEORMP.

As present users of this land we would like to see the plan include provisions for range improvements. Better utilization of the area could be accomplished with at least four stock water wells with necessary pipeline and tank systems. The ability to build and maintain reservoirs should be preserved. BLM and permittees have discussed dividing the Jackies Butte Allotment into semi-private allotments. To do this it would be necessary to build fences. This plan needs to provide for fence building when necessary to accomplish management objectives.

As licensed, fee paying, adjudicated users providing the tax base of specific areas, we are affected to a higher degree than the interested public and feel we should have a larger voice in the development of the draft and final SEORMP.

Sincerely,

Jackies Butte Permittees

L-167

United States Department of the Interior
BUREAU OF RECLAMATION

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

SRAO-6100
LND-1.10

February 25, 1999

Mr. Gary Cooper
BLM - Vale Dist. Office
100 Oregon Street
Vale OR 97918

Dear Mr. Cooper:

In general, we find the Southeastern Oregon Resource Management Plan and Environmental Impact Statement a very adequate document.

Our comments are directed specifically at the area immediately up Cherry Creek near the land Reclamation administers for recreation. As you know, we have our partner, Oregon State Parks, administer one area downstream from Cherry Creek. Additionally, we recently terminated the concession contract for the Owyhee Resort and are presently planning for the type and extent of facilities/services that will be located at that site. One issue that continually surfaces, related to recreation at both areas, is the lack of parking for vehicles and/or trailers of individuals that are using the reservoir for a weekend or longer period of time. As recreation use continues to increase at the reservoir, it becomes more and more important to find locations for vehicle parking close to the recreation activities without utilizing desirable lands immediately adjacent to the reservoir for parking.

Reclamation would like the flexibility to utilize up to 5 acres immediately across the cattle guard up Cherry Creek for parking of boat trailers and vehicles. No habitation would occur, only parking. Use of this small area for this purpose would greatly assist us to provide and accommodate the needed recreation facilities at the reservoir.

Sincerely

ACTING FOR Richard J. Wells

Jerrold D. Gregg
Area Manager

L-168

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Ed Singleton,

Thank you for the opportunity to comment on the Southeast Oregon Resource Management Plan. There has certainly been a lot of effort expended to develop these various alternatives and this has resulted in a lengthy document that I have enjoyed reading. Perhaps I have enjoyed this read all the more for I have been fortunate enough to have been able to travel through a lot of this country and think that I have somewhat of a "feel" for it.

When considering any management actions on public lands, the single most important end result must be preservation of those public lands and, where needed restoration of those public lands. Unfortunately, the choice of alternative C does not appear to accomplish these goals of preservation/restoration. Some reasons Alternative C fails:

- It fails to require reductions in livestock grazing even on allotments that are in fair to poor condition as evaluated by the BLM.
- It only proposes an addition al 34 miles of river for wild and scenic designation when an additional 289 miles have been found suitable.
- It fails to require the exclusion of livestock from fragile riparian areas, thus allowing further damage to occur where the bull trout, the lahontan cutthroat trout and the inland redband trout struggle to survive.
- It fails to reduce suppression of naturally occurring fires.
- It fails to adequately describe completely what activities would be allowed in a Steens Mountain National Conservation Area.
- In short, Alternative C fails to substantially change current conditions and management practices on these some 6.3 million acres even though there is no question at all that these conditions and practices have failed to protect/restore these public lands.

L-169

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Even alternative D needs to be strengthened in some of the above areas, but it is much better than Alternative C. At least Alternative D would put more acreage in Areas of Critical Environmental Concern, would propose some 289 new wild and scenic river miles, would reduce fire suppression, and would reduce grazing where monitoring shows a need to reduce grazing impacts. These actions should be taken to help protect/restore these public lands. I fail to understand how the BLM can do any less when the BLM's own studies indicate that so much land and so many riparian areas are in fair or poor condition.

Please adopt Alternative D and strengthen those areas that need to be to protect/restore these fragile public lands for future generations.

Sincerely,

Marty Wilson

cc: Jim Kenna, Burns District Manager

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

19 Feb 1999

Dear Mr Singleton:

This letter includes comments on the Southeast Oregon Resource Management Plan.

I urge you to choose alternative D which will allow for reductions in damaging livestock grazing, and restore areas where the rangeland has been overgrazed.

The BLM should reject alternative C. Livestock grazing should be eliminated from the Blitzen River, the Owyhee River, other riparian areas, Areas of Critical Environmental Concern, and Wilderness Study Areas.

I have often visited and camped on Steens Mountain and the Pueblo Mountains, and I believe all Cattle should be removed from BLM land on Steens Mtn and the Pueblo Mtns. Livestock grazing here is inconsistent with wilderness and recreational uses. I would like to see no more overgrazed meadows and riparian areas on these mountains.

Sincerely,

Eric Horvath

L-170

Erle & Patricia Norman

February 25, 1999

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St
Vale OR 97918

Dear Mr Singleton:

We are writing to you regarding the Southeast Oregon Resource Management Plan. We are frequent visitors to the Steens Mountain area, and are very concerned about its current status and its future.

We were horrified, for instance, when we found out that someone was planning to build a resort at Fish Lake, where we often camp. That proposed development would have totally ruined the wild beauty of the Fish Lake area. We strongly urge you to adopt a management plan which would protect the area from that kind of despoilation.

The rare flora on Steens Mountain needs protection so that they are not evenutally listed as endangered species. It is so thrilling to see these plants which are unique and limited to Steens Mt only. They are an important resource which deserve to be protected from grazing.

We fly fish on the Blitzen River and Little and Big Indian Creeks. These are a delicate resource which especially need protection. We strongly urge you to protect these watersheds and riparian areas, as well as those of the other rivers and creeks in the area. Please choose to reduce or eliminate grazing in these areas, so that they will be preserved and protected for fish habitat and recreational use.

Your current and Alternative C policies are excessively weighted toward the livestock grazing interests, and give short shrift to the rest of us. We feel that Alternative D of the Southeast Oregon Resource Management Plan comes the closest to balancing the needs of all the users of the Steens area, and urge you to adopt that alternative, so that true "multiple use" can finally be achieved.

Sincerely,
Erle R Norman
Patricia M Norman

cc: Craig Hansen, Oregon Rep Greg Walden, Senators Smith and Wyden

L-171

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Feb 24, 1999

Ed Singleton, Vale District Mgr
Vale District BLM Office
100 Oregon St
Vale, OR 97918

Dear Mr. Singleton,

I am writing to urge you to reject Alternative C in the Southeast Oregon Resource Management Plan. Buzz words like "adaptive management" are no substitute for actual standards and guidelines. Full-time monitoring is necessary to keep "adaptive management" from becoming increased degradation of the resource.

I urge the BLM to select a strengthened Alternative D that excludes livestock grazing entirely from :

- riparian areas, in general;
- Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers, in particular;
- critical fish and wildlife habitat;
- officially-designated Areas of Critical Environmental Concern;
- wilderness study areas; and
- any grazing allotments in less than good condition.

Oregon's High Desert must be protected from the damage that inappropriate livestock grazing causes.

Please keep me informed on the status of this issue.

Sincerely,
Alan Locklear
Alan Locklear

cc: Craig Hansen, Burns District Mgr

L-172

RECEIVED
MAR - 1 1999
DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Mister Singleton:

I am writing to you to urge you to choose Alternative D from the Draft of the Southeast Oregon Resource Management Plan/ Environmental Impact Statement. I fully support the exclusion of cattle grazing from riparian areas, other sensitive areas and critical habitat, Wilderness Study Areas, and those land allotments that are in only fair or poor condition. In addition, I fully support establishing the Steens National Conservation Area and creating 289 new wild and scenic river miles, as the proposal outlines.

Thank you for your kind attention.

Sincerely yours,
Scott Murray

L-173

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 25, 1999

Ed Singleton
Vale District Manager
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

I would urge the BLM to reject Alternative C that is proposed for the Southeast Oregon Resource Management Plan. Instead, I support the adoption of a strengthened Alternative D. BLM should exclude livestock grazing from riparian areas, critical fish and wildlife habitat, wilderness study areas and Wild and Scenic Rivers.

Furthermore, BLM should reject "adaptive management" and set clear standards and guidelines in its plan. The public needs to be assured that there will be regular on-site monitoring of activities to ensure that further degradation does not take place.

Sincerely,
Steve Apotheker
Steve Apotheker
1905 NE Going St.
Portland, OR 97211

Cc: Craig Hansen
Burns District Manager

L-174

TO: BUREAU OF LAND MANAGEMENT
ATTN: GARY COOPER

27 FEBRUARY 1999

Re: SEORMP

The following are my thoughts on the proposed alternatives with respect to the SEORMP.

Executive officers of the United States take an oath to support the Constitution. Congress can make needfull rules for land it owns. This raises a couple of questions about the SEORMP. What is needful about the rule you will propose? Pursuant to the Constitution what yo do must promote the General Welfare and secure to us the Blessings of Liferty. From my perspective I can not see where any rule you propose beyond alternative A will be anything but contrary to liberty and the general welfare of the country

The second question is, does the US government truly own the land? Article I Section 8 of the Constitution is very spedific about what land the US can own. Is there some kind of a document that state legislatures have signed off on allowing the BLM to manage the land in place of the states doing the job? Show me! Somebody needs to clear this question up

If you cite only Article IV, Section 3, second clause, as constitutional authority, I think you violate the supremacy clause of the Constitution. Article VI, "any Thing in the Constitution or Laws of any State to the Contrary notwithstanding".

I cite Amendmend #5 and #10 of the Constitution as my motivation to comment.

Thank you for your time on this matter.

Sincerley

L-175

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Re: Southeast Oregon Resource Management Plan

Dear Manager Singleton:

I am writing to comment on the options being considered by the BLM for its Southeast Oregon Resource Management Plan. In looking at the various alternative plans, I would urge you to reject your preferred Alternative C. This seems to be largely a continuation of business as usual. It is evident every time I visit BLM lands in Southeast Oregon that there are areas that need to have cattle grazing removed. Alternative C does not seem to seriously address the damage livestock cause to sensitive areas, nor does it seem to be based on sound science.

I would instead urge you to adopt a strengthened Alternative D. This option comes much closer to the goals of ecosystem management that SEORMP should embrace. To be truly effective, it should also curb livestock grazing on fragile lands and it should include better protection for wonderful places such as Steens Mountain, the Alvord Desert and the Blitzen and Owyhee Rivers. I hope that future generations can enjoy these wonderful places as much or more than I have, but that will not happen unless they are properly protected. I certainly do not want to drive the small-time rancher out of business and I do not believe that a conservation approach to protect our public lands will do that. If grazing can be accommodated on lands outside of riparian, wilderness study or other sensitive areas by responsible ranchers, then allow it. But these decisions should be based on what is best for the land and not on continuing bad practices.

Please strengthen Alternative D and adopt it for the Southeast Oregon Resource Management Plan.

Sincerely,
Kyle Allan Cleys

L-176

Trygve P. Steen, Ph.D.
Biologist - Photographer

February 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear BLM staff:

This **response to your DEIS** is from the perspective of a person who: 1) has a Ph.D. in Biology, is professor of Environmental Biology at Portland State University, and teaches courses in forest ecology plus general environmental studies; 2) has an intense interest in environmental and land use planning issues; and 3) has spent substantial time on the ground throughout this planning area.

Based on my extensive landscape level observations of the lands in this region, as well as my significant reading and contact with your scientific evaluations of the planning area, I am **writing to strongly urge not proceeding with your preferred alternative, "C"**. Within the context of your planning process, my general conclusion is to **urge adopting the essential elements of alternative "D", with additional protections from livestock grazing for all riparian areas, including especially Wild and Scenic Rivers and critical fish habitat that is relevant to listed fish species, as well as all wilderness study areas.** Furthermore significant restoration work of natural ecosystem characteristics needs to be done carefully within an experimental context that involves very careful monitoring. Finally, given the all too frequent fair or poor conditions of the grasslands in this planning area, I would urge substantial reduction of the levels of cattle grazing until it can be demonstrated that they help the condition of the range.

Cattle grazing is a major source of degradation in all elements of eastside ecosystems. Thus, we produce the generally poor condition of the majority of BLM managed eastside ecosystem. Cattle based disturbance of soil ecology, especially the biotic crusts (cryptobiotic/ microbiotic/etc) is highly significant. Grazing contributes to the exotic weed invasion through both soil disturbance and seed transfer. **Weed control** is an especially important issue to which you have paid inadequate attention. Great care should be focused on not having significant cattle grazing in areas that are still relatively weed free.

Thank you for your attention. I will be sending additonal comments on March first.

Sincerely yours,
Trygve P. Steen

Trygve P. Steen, Ph.D.
Professor of Environmental Biology

L-178

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

February 25, 1999

Dear Mr. Singleton:

Although I live in southwestern Oregon, the future of Oregon's high desert areas is of considerable concern to me. When my wife and I have the time to get away from our business and seek outdoor recreation, we often head for the Oregon desert. The environmental health of this region has been compromised for the sake of a few individuals engaged in extractive industries for far too long. It is overdue to reform management goals to represent the interests of the land's owners, all of the citizens of the United States, rather than the few local residents who currently profit from the continued degradation of our land.

Accordingly, I would like to recommend the adoption of Alternative D in the Southeast Oregon Resource Management Plan. Even that alternative could use further strengthening in the form of stricter limits on livestock grazing. For those in the livestock industry who feel that their support for "no changes" in the public-land grazing practices of the past carries no downside, I wish for them to know this: I have boycotted all beef products for the last 15 years, ever since the day that I found my only water source on the top of a 7,000 foot peak in a wilderness area too polluted with cow manure to drink. I cannot tell which beef was raised responsibly on private land and which beef was raised destructively on public land, so all beef growers get hit by my boycott for the sins of a few. Considering the decline in beef sales in the last few years, the beef industry would be wise to reconsider their unquestioning support for public land grazing. Few industries have such a small percentage of their production carried out in places with the possibility of pissing off so many people.

Beyond the issues contained in this specific Resource Management Plan, a question has been forming in my mind for BLM managers on a broader observation. (Please indulge this detour; it does raise issues about which alternatives end up being selected for consideration in resource planning documents.) As a regular attendee of the Burning Man art festival which takes place annually on BLM land in the Black Rock Desert in Nevada, I have been following the Winnemucca District's RMP process also. The big issue for Burning Man attendees and other Black Rock Desert user groups are the arbitrary provisions in the RMP to severely limit the total annual visitor days to a number so low that we would all have to fight with each other to use some of the most barren land on the planet. There is absolutely nothing out there to save except the flatness of the playa itself; no plants, no animals, endangered or otherwise. As a member of and financial contributor to several environmental organizations, I end up spending money on lawsuits to try to get the BLM to behave responsibly toward the forests and desert lands it manages. Yet when I want to use this surreal, starkly barren land where I couldn't possibly harm anything, I have to wrestle with the BLM again for permission to do that. Isn't there any overall management goal or philosophy in the BLM as a whole? Why would the BLM need to be sued to stop devastating clearcuts in one district, sued again to stop desert-killing grazing in another district, and then that same agency proposes rules to prevent an ephemeral art festival on a barren, dry lake bed? Am I missing something? Do I not make campaign contributions in the right places? I would be much happier giving my money directly to the BLM to properly manage my land than give it to environmental organizations to sue you into properly managing it. Everyone would be better off (except for a few lawyers).

To be fair to the BLM, I recently heard that this same phenomenon was at work in the USFS, where they are proposing strict new limitations on the number of people who can enter the Mt. Hood Wilderness Area. This, the same agency that floods my mailbox with announcements of new timber sales in my region that will produce thousands of new acres of stumps which will not return to their present glory of old-growth forest for centuries, can get all puffed up about too many footprints and fire rings! The get-a-grant question of the day is: What is it about the dynamics of bureaucracy that drives both the BLM and USFS to struggle to maintain the status quo for the most destructive uses of the land they manage, yet find the righteous concern to want to limit the most innocuous uses of that same land?

It would be money well spent if I had to buy an annual permit to use federal lands just like hunters and fishermen buy licenses. But just like hunters and fishermen would never pay into a system if they thought their money

would be spent to destroy the very resources they desire to use, I'll be damned if I'll pay to use federal land as long as it subsidizes logging and grazing. Was the complete failure of the Fee Demonstration Project on federal lands due to people not being willing to pay for that which they had previously gotten for free? Or was it due to those, like me, who feared what the money would be spent on and so refused to buy the permit? Prove that you can manage the land in my interests, and I will gladly pay fair market value for the tremendous pleasure I derive from my recreation on federal land. This is a much better deal than you have historically cut with the extractive uses of that land.

Returning to the SEORMP issue at hand, this is your chance to begin to escape the grip of the grazing industry which trashes our land and loses tax dollars to manage the grazing program, anyway. A strengthened Alternative D is a move in the right direction. Thank you.

Sincerely,

Tom Ness

Tom Ness

cc: Craig Hansen, Burns District Manager

L-178

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

2-24-99

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Or 97918

Dear Mr. Singleton,

We urge you to reject Alternative C and instead select an Alternative D that excludes livestock grazing from:

1. Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers. Also, the nomination of 289 river miles as eligible for Wild and Scenic River status would help mitigate the damage and degradation due to excessive grazing.
2. Riparian areas that can repair themselves as can be observed on the Hart Mountain National Antelope Refuge.
3. Critical fish and wildlife habitat that benefit from a lack of "adaptive management".
4. All Areas of Critical Environmental Concern, which would include the bulk of the SEORMP's 6.3 million acres.
5. Wilderness study areas that have a chance to bring values to the high desert other than degradation by beef.
6. Allotments in fair or poor condition, that have been judged as such by impartial scientists.

We have enjoyed this area for decades, but, in order to do so, we have had to become inured to cattle as the dominant feature of the landscape. The BLM "adaptive management" policy has exacerbated the problem such that there appears to be a lack of real standards and guidelines. The BLM, as a matter of policy, has supported cattle grazing at the expense of all other values---the land reflects it!

Jack Wheeler

L-179

MARCH 1, 1999

MR. EDWIN J. SINGLETON
DISTRICT MANAGER, BUREAU OF LAND MANAGEMENT
VALE DISTRICT OFFICE
100 OREGON STREET
VALE, OREGON 97918

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

MY COMMENTS TO THE SOUTH EAST OREGON MANAGEMENT PLAN:

I AM JOHN J. BISHOP, A FORMER AND RETIRED BUSINESSMAN-RANCHER OF 74 YEARS OF AGE.
I FIRST BECAME FAMILIAR WITH RANCHING IN 1936 TWO YEARS AFTER THE TAYLOR GRAZING ACT WENT INTO OPERATION NATIONWIDE. I WAS CHAIRMAN OF THE GRAZING ADVISORY BOARD FOR FIFTEEN YEARS (1975-1990), AND SERVED ON THE MULTIPLE USE ADVISORY COUNCIL FOR APPROXIMATELY EIGHT YEARS.
WHAT I SEE IN THE SEORMP ARE A FEW EXCESSES.

1. THE SCENIC RIVER STATUS FOR THE OWYHEE RIVER BELOW THE OWYHEE DAM SHOULD BE REJECTED BECAUSE OF THE NYSSA ROAD DISTRICT #2, AND MALHEUR COUNTY'S RESPONSIBILITY FOR MAINTAINING THESE ROADS. FOR EXAMPLE: THE RESTRICTIONS BY THE BLM REGARDING THE STEEP GRADE ON THE SOUTH SIDE OF THE OWYHEE RIVER BRIDGE AT THREE FORKS CANNOT BE WIDENED BECAUSE OF THE SCENIC RIVER AND WSA STATUS.
2. I DO NOT SEE ANY LOGICAL REASON FOR WILD AND SCENIC STATUS FOR DRY CREEK WITH THE EXCEPTION OF THE DRY CREEK GORGE AND THE CAVE LOCATED ABOVE THE STATE LAND ON DRY CREEK. THE REST IS INTERMITTENT STREAM.
3. HAMMOND HILLS SAND HILLS DOES NOT NEED ACEC/RNA DESIGNATION. THE PRESENT MANAGEMENT DOES A VERY ADAQUATE JOB OF PROTECTING THE RANGE AND VEGETATION.
4. OWYHEE VIEWS ACEC, (THE DRY CREEK BUTTE AREA) I DO NOT SUPPORT ACEC ON THIS, BECAUSE THERE IS NO COMPELLING REASON FOR THIS PROPOSAL.
5. AS A GENERAL RULE, UNDER THE CURRENT MANAGEMENT, I CAN SEE VERY LITTLE REASON TO BE GREATLY UPSET ABOUT GRAZING ACTIVITIES AND ENDANGERING ANY SPECIES OF PLANTS. REMEMBER, THE GREATLY OVER-GRAZED CONDITIONS IN THE NINETEEN THIRTIES, AND EVEN BEFORE FROM THE THOUSANDS OF SHEEP, WILD AND DOMESTIC HORSES, AND THE CATTLE HAS PROVEN STRONG EVIDENCE IF THEY SURVIVED SUCH CONDITIONS DURING THOSE TIMES, THE ONLY THING THAT COULD DESTROY THEM NOW WOULD BE UNDER-GRAZING, FIRE, AND UNDESIREABLE SPECIES CHOKING OUT THE DESIREABLE SPECIES.

THANK YOU,

John J. Bishop

JOHN J. BISHOP

P.S. I ONLY COMMENTED ON AREAS WHERE I WAS DIRECTLY INVOLVED FOR 58 YEARS, AND I AM QUITE DISTURBED IN PUTTING ANY ACEC/RNA'S IN AREAS THAT WERE NOT RECOMMENDED INTO WILDERNESS.

L-180

Oregon
John A. Kitzhaber, M.D., Governor

Department of Fish and Wildlife
High Desert Region
61374 Parrell Road
Bend, OR 97702
(541) 388-6363
FAX (541) 388-6281

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

February 26, 1999

Elaine Y. Zielinski, State Director
U. S. Department of Interior
Bureau of Land Management
515 SW Fifth Ave.
P. O. Box 2965
Portland, Oregon 97208

Re: Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement

Thank you in advance for allowing us to provide these comments on the Draft Southeast Oregon Resource Management Plan and Draft Environmental Impact Statement (DEIS). Our review of the DEIS has focused on how our initial scoping issues (letter dated October 30, 1995) were addressed. In general, most of our original issues were addressed adequately and we commend your staff on their efforts. However, there are several areas that we think need clarification or further analysis.

Oregon Department of Fish and Wildlife recognizes the purpose and need for resource management planning to meet our agency mission of protecting wildlife resources for future generations and to maintain or restore long term ecological health to the rangelands of southeast Oregon. To that end, the following general and specific comments are offered as our contribution to the planning process. The order of the narratives follows the Table of Contents in the draft and does not imply order of importance.

General Comments

In reviewing the document we found it difficult to relate and compare the analysis of objectives between resource programs. For example there are separate discussions of Rangeland Vegetation (2-13) and Rangeland/Grazing Use (2-58). There are statements related to bighorn sheep populations contained in the wild horse objectives (4-98). The arrangement of these and other elements of the draft make it difficult to assess if implementation of one resource objective is compatible (or possible) with the implementation of another. The addition of a cross-reference of subjects would be very helpful in understanding the document.

Cumulative impacts of any proposed action should be developed for each alternative at the watershed level to determine overall compatibility with resource objectives. It is possible that implementation of a proposed action has little impact on the small scale, but may pose serious effects when considered at the landscape level.

The document identifies stakeholders who are grouped into classifications based on similar interests and therefore, similar beliefs, feelings and responses to public land management actions (2-88). A fundamental split is identified between consumptive and nonconsumptive users. Hunters and anglers are classified as consumptive users along with grazing permittees, timber and mining companies, subsistence users and rockhounds. Nonconsumptive users include "most recreational users" such as Off Highway Vehicle (OHV), Wildlife Study Area (WSA) visitors, wildlife viewers, boaters, eco-tourists, etc.

Recreational hunting and fishing should not be characterized as a consumptive use in the same light as commercial resource extraction such as grazing, mining and timber. It is difficult to assess how this designation impacts the analysis of the alternatives, but it seems illogical that Alternative A, which emphasizes commodities, also best serves hunters and fishers. We request that a new analysis be performed with hunters and anglers included with other recreational users. Elsewhere in the plan, hunting and fishing are addressed as recreational uses as seen in 1-9, Introduction (Issue 7) which states "Fishing, hunting, hiking, camping…account for most recreation activities within the planning area". In addition the Table in Appendix G, page 237, lists coldwater fishing and hunting as recreation. To further emphasize the "non-commodity" definition, ODFW's Bighorn Plan states that "recreational uses of wildlife are nonmarket commodities not sold through a competitive market".

We found no "Analysis of the Management Situation" (AMS) in the document. ODFW previously provided information and received a draft copy of an AMS for wildlife in the Andrews Resource Area, yet find no mention of it. Is "The Affected Environment" section the current method of displaying the AMS? We also provided comments to the scoping process (letter dated October 30, 1995) which are not cited with other agencies written comments (Appendices -11).

One of the assumptions applied in the analysis of environmental consequences (4-2) that causes concern is that "Funding would basically be the same across alternatives". Experience has shown this to not be the case in the past. We question the validity of conclusions based on this assumption because some alternatives have the potential to generate revenue from fees collected. For example, 50% of grazing fees are returned to the BLM Range Improvement Fund (4-152). Alternative A, which maximizes commodities, would result in more revenue to the range program than it would receive if other alternatives were chosen. Recently, we have seen a growing emphasis on the use of prescribed fire and a resulting increase in funding to implement prescribed fire without comparable increases in other programs such as wildlife and recreation.

The plan has endorsed "adaptive management " as the over-riding process for reaching all resource objectives within the planning area. Adaptive management, by definition, relies heavily on monitoring to determine progress toward achieving plan objectives. The plan does not clearly outline the frequency and intensity of monitoring necessary to meet management strategies. Experience shows that funding for monitoring is often the key to its success or failure. We suggest that monitoring be given the highest priority for funding under adaptive management. Funding project activities without maintaining resource monitoring would violate the guiding premise of this plan.

Specific Comments by Resource Program

Rangeland Vegetation

ODFW supports maintaining shrub cover and structural diversity across the landscape. The plan refers to plant communities not meeting the Desired Range of Future Conditions (DRFC) due to dominance of woody species, and consequently suggests a need to reduce the shrub component. The plan is not specific enough in identifying which "woody species" need to be reduced in order to meet DRFC. Would this include bitterbrush?

Because of their value to antelope and sage grouse, and the fragile nature of these types, we suggest low sagebrush plant communities not be burned. Also, the Wyoming big sagebrush communities that dominate the lower elevation basins throughout the planning area must be managed to meet the needs of sage grouse (Connelly, et.al., 1998). In light of interest in the status of sage grouse and their possible listing under the Endangered Species Act (ESA), we suggest an additional assessment of proposed actions and their impacts on sage grouse be included in the final EIS. We further encourage BLM to continue efforts to identify new sage grouse leks and use the most recent lek inventories to assess impacts of management actions.

ODFW is very concerned that the preferred alternative does not provide adequate protection of upland shrub cover for wildlife (3-68). Alternative D provides a more conservative approach to achieving desired conditions. We would support the use of desired introduced species in alternative D if a list of such species including grasses, forbs and shrubs were included in the plan.

Noxious Weeds

The department supports an aggressive approach to noxious weed and undesirable vegetation control because of the negative impacts these plants have on fish and wildlife habitat.

Forest and Woodlands

ODFW supports and participates in managing stands of Western Juniper to restore biodiversity. However, we find it difficult to provide specific comments on the treatment of Juniper due to inconsistent statements regarding the amount of acres treated, and the percentage of the total, recommended in Alternative A and the preferred alternative (4-23). It appears that 75% to 90% of Juniper stands would be treated during the life of the plan (3-75, 4-33). This extent of treatment generates questions regarding adequate habitat security and winter range provisions for big game and other wildlife.

Management objectives for air resources limit prescribed burning to 50,000 acres per year in rangelands (3-10, 4-3). When compared to Rangeland Vegetation management objective assumptions (4-16) it is unclear if the 50,000 acre figure refers to black acres or treatment acres of which 40-60 percent is blackened.

Regeneration and management of Aspen stands is a high priority to ODFW. Based on our experiences and observations, we question the assumption that aspen will regain "dominance" within five years after burning (4-15) without fencing or other management actions to protect regenerating stands. This assumption that aspen will become dominant could be misleading in the analysis of environmental consequences.

The document also cites deer and elk as contributors to the decline in aspen regeneration (3-75). Although aspen may be a component in the diet of deer and elk, we do not agree that they contribute to the decline in aspen regeneration. There are several examples in the Burns District that illustrate aspen regeneration can be accomplished with exclusion of livestock, even with access by deer and elk.

Water Resources and Riparian/Wetland Areas

ODFW supports Alternative D, which allows uses to occur only if a riparian area is making progress toward meeting state water quality standards while minimizing the need to use extensive fencing to meet management objectives.
We encourage consideration of the presence of fish and fish habitat in determining whether or not a stream is functioning properly.

While Proper Functioning Condition (PFC) is an admirable goal for streams and associated riparian zones, the methodology to assess PFC relies too heavily on hydrology and bank stability, and too lightly on vegetation that holds the system together. Fish habitat requires riparian vegetation for shading, temperature and nutrient regulation. There is no mention of the need for riparian vegetation to meet the needs of wildlife. Riparian values to all wildlife are well documented, and more is becoming known regarding the value of riparian vegetation in meeting the needs of Neotropical migrant bird species. Southeast Oregon is a migrating corridor for many of these

species, and good quality riparian zones provide nesting and rearing habitat for many. We suggest vegetative structure in terms of shrubs and trees become a larger part of your riparian management program.

Fish and Aquatic Habitat

The preferred alternative states that habitat would be provided for fish and other aquatic organisms, while providing opportunities for commodity uses. It goes on to state that habitat will be "provided for *most* of the native species needed for self sustaining aquatic communities" (3-84). These two statements seem to be in conflict. Providing habitat for most native species does not appear to be consistent with the Federal Land Policy & Management Act (FLPMA) statement on 3-83. The 5,144 surface acres of flat-water fisheries habitat (2-41) is in error considering that Owyhee Reservoir alone exceeds 12,000 acres. In addition, Cow Lakes, Mann Lake and others have apparently been omitted.

Recreation use (Appendix G, page 237) lists coldwater fishing but fails to account for warm water fishing recreation. Depending on the definition used, popular warm water fisheries found in Owyhee Reservoir and other locations in the planning area may not be represented in this table. ODFW supports Alternative D, which provides management emphasis that maintains the distribution of *all* native species among subwatersheds (3-85).

Wildlife and Wildlife Habitat

Habitat needs of recreationally significant species such as pronghorn, mule deer and elk are not adequately addressed in the preferred alternative, Objective 2, which relates to management of upland habitats. The preferred alternative states an overall goal of providing for the habitat needs of game and nongame to the extent possible and practical in most habitats (3-87). The document falls short in providing for aggressive rehabilitation of degraded winter ranges. Many winter ranges are degraded as a result of past livestock use, wildfire, shrub conversion and invasion by undesirable vegetation. An aggressive rehabilitation program is needed to restore ranges to a condition capable of supporting wintering mule deer, pronghorn, and sage grouse.

There are apparent errors in Appendix E, Allotment Summaries. The calculations of competitive forage demand (AUM's) for three wildlife species are different for the SORMP than for the Three Rivers RMP in Burns District. The dietary overlap between wildlife and livestock was not taken into account in the current draft. Therefore AUM's shown in the draft are shown much higher than they should be. We ask that necessary corrections be made in the Final RMP.

Also, it would be relevant and helpful to explain how these calculations were made. We realize there are minor differences in the literature for the factors used. Regardless, the

protection to bighorn sheep and their habitat (3-184). Elimination would be inconsistent with goals for bighorn.

The "Analysis of Impacts" in the Wild Horse section (4-98) refers to increases in bighorn sheep distribution that could lead to greater competition between bighorn and horses. It suggests that bighorn populations may need to be "adjusted" if wild horse management objectives are not achieved. We do not support the analysis and conclusion that bighorn populations would need adjustment to meet wild horse objectives in alternatives A and C. Wild horse populations should be managed consistent with causing the least adverse impacts to native species.

Wild Horses

The preferred alternative proposes to add the Red Mountain North Pasture to the Coyote Lake HMA. It is unclear if the AML will allow the actual number of wild horses to increase. Because of the presence of Lahonttan Cutthroat Trout, a state and federally listed species, ODFW is opposed to the addition of Red Mountain North Pasture to the Coyote Lake HMA. Additionally, we request that allowable horse numbers in the existing Coyote Lake HMA not be expanded in recognition of possible impacts to Kit Fox, a state threatened species.

Rangeland/Grazing Use

ODFW has a vested interest in a number of areas previously excluded from livestock use by cooperative agreement or other management decisions. Table 2-18 (2-59) identifies certain areas of 3700 acres or more which are not allocated to livestock grazing. There are another 350 unspecified areas of 5000 acres or less that have also been excluded to protect wildlife developments or special plant and animal habitats (2-58).

Please clarify the intent of the plan regarding continued protection of cooperatively developed projects. Also clarify the relationship between the statement on page 2-58 regarding the 350 unspecified areas and the preferred alternative statement on 3-32 (paragraph 2) that refers to livestock exclusion and abandonment of project sites. A list of projects proposed for abandonment would have been helpful in developing comments on this issue.

Off Highway Vehicles (OHV)

The objective to manage OHV use to protect resource values is supported. We feel this can best be accomplished in alternative D, which limits organized events to existing roads and trails. While alternative D may adversely impact travelers who desire to drive off road (4-121), it also protects wildlife and recreationists seeking solitude from potential harassment.

Elaine Y. Zielinski
February 26, 1999
Page 7

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Noxious weeds and their detrimental effects on range productivity have been identified in Chapter 2 (2-18). The spread of weeds by vehicles of all kinds is well documented and may be the single leading cause in spreading weeds. OHV use as proposed in the preferred alternative would likely exacerbate the spread of noxious weeds resulting in loss of rangeland productivity and increased costs in control efforts.

National Conservation Area (NCA)

The objective to provide long-term protection and management of special resource values on Steens Mountain is supported by ODFW. The Department owns approximately 600 acres, which includes Fish Lake, one of the most popular recreational and scenic areas on the mountain. Fish Lake campground is managed by Andrews Resource Area through cooperative agreement with ODFW.

The recommendation to Congress that Steens Mountain be designated as a National Conservation Area (3-42) cannot be supported by ODFW until the provisions of such designation have been examined. A Resource Management Plan (RMP) which contains an agreement to accept the unknowns of legislation yet to be crafted is unacceptable. The draft RMP indicates that BLM would manage the wildlife under an NCA (3-217). The State of Oregon reserves the right to manage resident wildlife within its borders, while the Federal land management agencies are required to provide adequate habitat for wildlife. Consideration to establish an NCA should be a separate action from the draft RMP.

Cultural Resources

Alternatives B, C and D of Objective 3 (3-46) addresses American Indian requests and recommends allowing the practice of traditional activities on public land where practicable. ODFW requests that language be added to this section which clarifies that hunting and fishing activities are allowed when consistent with applicable state law.

Land and Realty

Alternatives C and D allow for the disposal of 70,000-80,000 acres of BLM land. ODFW recognizes the desirability of consolidating public lands into manageable units; however, we are opposed to substantial net loss of public land in the planning area. We encourage the acquisition of lands with high public resource values and fully support efforts to increase legal access to public land.

Summary

In general ODFW supports the adoption of Alternative D which is summarized best in the conclusion to the Human Uses and Values section (4-155) that states in part, "This

alternative emphasizes natural values and the functioning of natural system. This alternative maintains the highest level of natural resource values and management options for future generations." It is our belief that this alternative best serves our commitment to future generations and to our present hunting, fishing, and concerned public.

Thank you for this opportunity to comment. We look forward to continued involvement in the planning and implementation of a resource management plan for southeast Oregon.

Sincerely,

Diclair Kunkel
Acting Regional Director
High Desert Region

c Edwin Singleton
Gary Cooper
Glenn Patterson

Literature cited:

Connelly, J. W., M. A. Schroeder, and, C. E Braun. 1998. Guidelines for Management of Sage Grouse Populations and Habitat. Draft Revision. Western Association of Fish and Wildlife Agencies.

L-181

181

Chapter Office

SALEM AUDUBON SOCIETY

Neighbors working together to care for the beauty and integrity of our natural world

March 1, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Post-it® Fax Note 7671	Date Mar. 1, 99	# of pages ▶ 2	
To Gary Cooper	From Jim Conley		
Co./Dept. Vale Dist. BLM	Co. Salem Audubon		
Phone # 541-473-3144	Phone # 503-585-7340		
Fax # 541-473-6219	Fax # 503-378-0314		

Re: Southeast Oregon Resource Management Plan

Dear Mr. Singleton:

I write on behalf of Salem Audubon Society's 1,100 members many of whom (and I am one of them) visit the Malheur Wildlife Refuge, Steens Mountain, the Alvord Desert, the Owyhee Canyonlands, and nearby areas, more than once a year.

Please reject Alternative C. It is said to be designed to protect natural values while allowing for commodity production. That is simply not possible; most of the land affected by SEORMP is unsuited for cattle grazing. Further, it fails to require reduction in livestock grazing even when grazing damages the land or other natural resources.

In addition, Alternative C relies on adaptive management which has previously been used by BLM to allow livestock operators to graze beyond the limits of their permits. Adaptive management also fails to meet SEORMP's stated intention to adhere to ecosystem management principles. It is no substitute for objective standards and guidelines.

Alternative C also: 1) allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River contrary to agency scientists' recommendations, 2) nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status, 3) proposes a Steens Mountain National Conservation Area but makes no changes to grazing management there, and 4) leaves the overwhelming majority of the planning area (3.8 million acres) open to off road vehicle use, while closing less than 1% of the area (22,000 acres) to ORVs.

A strengthened and improved Alternative D is BLM's -- and the land's -- best bet.

Alternative D would:
1. Allow for reductions in livestock grazing levels;
2. Emphasize undeveloped types of recreation;

Letter to Ed Singleton
Vale District Manager
March 1, 1999
Page 2

3. De-emphasize fire suppression;
4. Restore or close recreation sites where natural values are jeopardized by overuse;
5. Add 26 new Areas of Critical Environmental Concern, totaling 191,000 acres;
6. Propose 289 river miles for federal Wild and Scenic River status.

A strengthened Alternative D would also exclude livestock grazing from:
1. Wild and Scenic Rivers such as the Blitzen and Owyhee Rivers;
2. Riparian areas;
3. Critical fish and wildlife habitat;
4. Areas of Critical Environmental Concern;
5. Wilderness study areas; and
6. Grazing allotments in only "fair" or "poor" condition.

Very truly yours,

Jim Conley

Jim Conley, President

cc: Craig Hansen, Burns District Manager
Burns District BLM Office

L-182

Southeast Oregon Resource Advisory Council
A Federal Advisory Committee

February 18, 1999

1784

To: Steve Ellis, Designated Federal Official
Southeast Oregon Resource Advisory Board
Lakeview District BLM Office
HC 10 Box 337
Lakeview, OR 97630

Dear Mr. Ellis:
The Southeast Oregon Resource Advisory Council (RAC) has completed its review of the latest draft of the Southeast Oregon Resource Management Plan. Our comments follow.

Initial review of the plan was undertaken in 1996, when the original draft plan was issued. At that time we identified nine issues and a total of 18 concerns. On December 9, 1998, a subcommittee of the RAC met with BLM personnel to review the latest draft and make comments. These comments were then reviewed by the entire RAC at their meeting in Boise on January 27, 1999.

Because of the size of the plan and the diversity of issues addressed we found it difficult to review the plan. In many cases we relied on individuals within the RAC to provide information to the whole group. BLM personnel have been extremely helpful in review of the plan. Their explanation of issues and delineation of changes made as a result of our original comments were extremely helpful.

Overall the RAC feels that our concerns have been addressed. It is a strong mid-level management document that can be effectively implemented at the ground level. The Southeast Oregon Resource Advisory Council believes that they can have the greatest impact by working at the implementation level to assure the beneficial application to the ground.

The RAC made no attempt to choose a preferred alternative or support one of the alternatives in the plan. Instead, we feel that issues should be addressed individually and then fit into the plan to make it as strong and adaptable as possible.

It should be pointed out that there were issues upon which we could not reach consensus and thus chose not to make group comment. The inclusion of the Steens Mountains National Conservation Area, Areas of Critical Environmental Concern, and Wild and Scenic Rivers are examples. In

Committee Members
Mike Golden, *Chair*
Robert M. Skinner
Vacant
John Monfore
Tom Harris
Jill Workman
Walt Van Dyke
Linda Reed-Jerofke
Vacant
Jane Helen O'Keeffe
Lillian Maynard
Thomas Bedell
Leonard Shrewsbury
Victor Pritchard
Robert R. Kindschy

Designated Federal Official
Steve Ellis

c/o Lakeview District
Bureau of Land Management
HC 10 Box 337
Lakeview, Oregon 97630

those cases, the RAC members will comment as individuals or through the groups and organizations that they represent.

The technical detail of the plan is very good and provides the basis for good resource protection and improvement. There are, however, areas that need improvement.

- Watershed management needs the cooperation of all entities within a watershed. The plan infers this type of coordination but does not take advantage of the leadership opportunity that is present to address as strongly and as often as possible the need to pursue and develop partnerships with all landowners, public and private, within any management unit.

- An ancillary issue to the entire management plan is public education. While not generally addressed in a management plan, it is our belief that public education is essential to the successful implementation of the plan and therefore should be addressed in some way within the document. The benefits of fire and watershed management, the value of developing strong and active partnerships across public and private land boundaries, and the impacts of recreation are all examples of this.

- Indian tribal cultural and archaeological sites are for the most part protected by law. The RAC feels, however, that communication with tribes could be improved. A process for improving communication with tribal entities could be delineated in the plan. This would strengthen the plan and give direction to the implementation process.

- As a general statement, the RAC supports the use of both naturally occurring and controlled fire as a management tool. There are concerns that there needs to be more coordination with tribal and wildlife biologists both internally and externally when burning is planned for winter ranges or other sensitive wildlife areas such as sage grouse habitat. The RAC is already involved in this issue at the ground level but it would strengthen the plan if there was strong reference to specific wildlife needs and the direction for coordination.

The RAC appreciates this opportunity to comment and looks forward to assisting with the implementation of the plan.

Sincerely,

Mike Golden

Mike Golden, Chair
Southeast Oregon Resource Advisory Committee

cc: Elaine Zielinski
Vale District BLM Manager
Tom Dyer, Burns District BLM Manager
Roy Masinton, Malheur Resource Area
Jerry Taylor, Jordan Resource Area
Miles Brown, Andrews Resource Area

-2-

L-183

Oregon
John A. Kitzhaber, M.D., Governor

Water Resources Department
Commerce Building
158 12th Street NE
Salem, OR 97310-0210
(503) 378-3739
FAX (503) 378-8130

February 26, 1999

Edwin Singleton
Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, OR 97918

James Kenna
Bureau of Land Management
Burns District Office
HC-74-12533 Hwy 20 West
Hines, OR 97738

RE: *Southeast Oregon Resource Management Plan/ Environmental Impact Statement*

Mr. Singleton and Mr. Kenna:

Thank you for the opportunity to review the Draft Southeast Oregon Resource Management Plan/ Environmental Impact Statement. This document offers an interesting variety of issues and assessment of the BLM lands of Southeastern Oregon.

The one main comment from the Oregon Water Resources Department concerns water rights for existing and additional uses. In a number of different sections in the EIS, additional or expanded recreational sites are proposed as alternatives. If developed as proposed, a viable source of water would be important for many of these projects.

I have included two examples to highlight these concerns. Alternative A of the recreational management alternative states that the Mann Lake Recreation and Watchable Wildlife Site would be expanded into a developed campground (3-99); other sites are also mentioned as possibilities for further recreational opportunities. Water sources developed to provide for the campground would likely require a water right, especially if used to irrigate the campground. Another example of where a water right would be needed is alternative A for the management of Wild and Scenic Rivers, which proposes to develop a water diversion to irrigate the meadows at the Riddle Brothers Ranch National Historic District (3-214). A water right is required to divert water for irrigation purposes.

Sufficient water supplies with valid water rights from the State of Oregon are necessary for both existing and proposed sites. The availability of water in much of the region covered by this EIS is limited and may hamper additional developments that are water dependent.

We are interested in the outcome of the management alternatives; please keep us informed as this process continues. In the meantime, please contact the Water Resources Department if you have questions about existing or new water rights on BLM land.

Sincerely,

Lara Burgel
Senior Water Resources Coordinator

cc: Jerry Rodgers, Regional Manager
Mitch Lewis, Watermaster, Region 10
Larry Powers, Watermaster, Region 9

L-184

Larry Walker
RangeBiome, A Public Rangeland Almanac

RECEIVED
MAR - 2 1999
VALE DISTRICT BLM

February 26, 1999

District Manager
U.S. Bureau of Land Management
100 Oregon Street
Vale, OR 97918

attn: SEORMP

Subject: Comments on Draft Southeast Oregon Resource Management Plan and Environmental Impact Statement

My comments focus on the rangeland vegetation and domestic livestock grazing aspects of the Southeast Oregon Resource Management Plan and Environmental Impact Statement (SEORMP).

Given the magnitude of what I consider to be fatal flaws in the SEORMP, I will limit myself to the following flaws:

1. Failure to consider a range of alternatives for the amount of domestic livestock use that will be permitted.

2. Failure to effectively tier to the Desired Range of Future Conditions in the Draft Eastside Environmental Impact Statement (DEEIS).

3. Failure to provide meaningful, and readily available information on rangeland conditions and trends to provide adequate baselines for public review and implementing Adaptive Management.

1. Failure to consider a range of alternatives for the amount of domestic livestock use that will be permitted:

It is not clear in Chapter 3, The Alternatives, how much domestic livestock use is planned or anticipated under the various alternatives. These estimates appear only in Chapter 4, Environmental Consequences, in the Rangeland/Grazing Use section.
-Alternative A (page 4-105): Permitted AUMs constant to plus 10%.
-Alternative B (page 4-107): Permitted AUMs not vary more than 5% from current.
-Alternative C (page 4-109): Permitted AUMs constant to minus 10%
-Alternative D (page 4-110): Permitted AUMs constant to minus 20%
-Alternative E: No commercial use authorized.

Except for Alternative E which is provided only for analytic purposes, Alternatives A through D are all the same. All include present levels of use as part of the range of expectations, and the greatest variation

contemplated (minus 20%) falls within the normal range of year to year variation. This can be illustrated by examining the authorized use on Section 3 lands for Oregon for the period 1980-1996 (the same period used in SEORMP for evaluating recent fire history) as reported in the respective editions of *Public Lands Statistics*. The average authorized use for that period was 834,601 AUMs for all Section 3 lands in Oregon, and the confidence interval at the .05 level of significance is plus or minus 210,267, or 25% of the mean (see attachment 1).

Therefore, up to 25% year to year variation in stocking is normal for Oregon public lands livestock operations, and Alternatives A through D are all the same as they all fall within that range of variation.

2. Failure to effectively tier to the Desired Range of Future Conditions in the Eastside Draft Environmental Impact Statement (DEEIS).

The "Desired Range of Future Conditions" in the SEORMP are extremely general and vague to the point that just about any kind of rangeland conditions could be rationalized as falling within the ranges specified. The SEORMP is supposed to be tiered to the DEEIS and should, therefore, reflect and refine the desired range of future conditions for the preferred alternative in the DEEIS. The SEORMP does not do this and, rather than being more specific, is actually more general and vague than the parent document.

In the absence of a tie of the SEORMP desired range of future conditions to those specified in the parent document, any analysis of cumulative effects is rendered null. In addition, how can you possibly attempt to manage to achieve those conditions if you haven't even determined what you have now?

The following table compares the desired range of future conditions for the preferred alternative for "Terrestrial Ecosystems - Rangelands" specified on page 3-34 of the DEEIS with an estimate of what you have now. The estimate of what you have now is based on tabulating data from the OAESIS database as presented in the appendix of *Some Major Rangeland Potential Vegetation Types and Community Classes in the Interior Columbia River Basin and Northern Great Basin*, by Larry L. Walker, BLM Oregon State Office, January 1997. (see attachment 2 for tabulation).

Potential Vegetation Group	Structure	DEEIS DRFC	You Have
Dry Grass	native grass-forb	60-80%	30%
Dry Shrub	native grass-forb	10-25%	4%
	open shrub/native grass-forb	50-70%	33%
Cool Shrub	native grass-forb	15-40%	2%
	open shrub/native grass-forb	60-80%	45%

3. Failure to provide meaningful, and readily available information on rangeland conditions and trends to provide adequate baselines for public review and implementing Adaptive Management.

As you have pointed out (page 2-14), you have nearly total coverage with Ecological Site Inventories. Most or all of this information has been compiled into computer databases and geographic information systems (GIS). With these resources, you could readily have produced tables and maps of Ecological Condition at

any level of detail - but you have not.

From GIS databases of allotments and pastures (which you also have) combined with monitoring data that you have collected and evaluated in accordance with Oregon's Rangeland Monitoring Handbook (Oregon BLM Manual Supplement H-1734-2) , you could have produced tables and maps of trend - but you have not.

Both of these items are necessary for an effective review of the SEORMP, and they are ESSENTIAL for "adaptive management". The Rangeland Monitoring Handbook, in fact, lays out a program of adaptive management not unlike what you propose (page 3-4), and which you have supposedly been following for over a decade.

In summary, the Southeast Oregon Resource Management Plan fails to comply with the National Environmental Policy Act, fails to fulfill the planning requirements of the Federal Land Policy and Management Act, fails to provide the inventory information required by the Federal Land Policy and Management Act and the Public Rangeland Improvement Act, and fails to comply with the umbrella requirements of the Draft Eastside Environmental Impact Statement.

Given these major deficiencies, I will hold my additional comments pending the release of the "Draft Supplement to the Southeast Oregon Resource Management Plan and Environmental Impact Statement" for review.

Sincerely yours,

Larry L. Walker

Attachments:
1. Statistical Analysis of Authorized Use, Oregon, 1980-1996
2. Existing Structure by Potential Vegetation Group

cc:
Director, Bureau of Land Management
BLM Oregon State Director
BLM District Manager, Burns
BLM District Manager, Prineville
BLM District Manager, Lakeview
BLM District Manager, Spokane
Project Manager, Interior Columbia Basin Ecosystem Management Project
Oregon Natural Desert Association
Oregon Natural Resources Council
Idaho Watersheds Project
Congressman Wu
Senator Wyden

L-185

RECEIVED
MAR - 2 1999
VALE DISTRICT BLM

March 1, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton,

I would like to advise that I am very much opposed to alternative "C" of the Southeastern Oregon Resource Management Plan. It would appear that alternative "C" maintains the status quo, disregarding the condition of the rangeland as well as the available science.

It is clear that alternative "D" comes much closer to meeting the ecosystem management goals. The primary concern is the difference in the river miles for wild and scenic status between the two proposals. Alternative "D" best represents the values of these high desert systems. This alternative also makes provision for new areas of critical environmental concern. I am of the opinion that the BLM could further strengthen alternative "D" and recognize the studies done to date including the reduction or elimination of cattle grazing to facilitate improvement of allotments that are in fair to poor condition. Proper management at this time could reduce the probability of listing the sage grouse as an endangered species. The reduced numbers of sage grouse further exemplifies the loss of suitable habitat over the past several decades. Alternative "D" should further be strengthened to preclude livestock grazing from riparian areas. This is necessary to provide the necessary balance of the ecosystem; at the same time protecting water quality and the water table of the adjoining lands. This will further assist in critical fish and wildlife habitat restoration.

Management over 6 million acres of public land over the next twenty years is an immense responsibility. Your careful consideration in this regard is very much appreciated.

Sincerely,

Chuck Gossett

L-186

RECEIVED
MAR - 2 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM office
100 Oregon Street
Vale, OR 97918

2/27/99

Dear Mr. Singleton,

I believe that Oregon must make a very serious effort to protect its desert wildlands the Alternative C plan is far from adequate. What will happen if grazing does cause damage? Why does the plan allow the grazing in the first place where the scientists recommend against it? I do believe that the grazing which is allowed should be closely monitored and controlled. I feel that an upgraded Plan D would be a better choice.

In the very long term, mankinds survival is dependent upon the health of the earth's ecological systems. We have difficult decisions to make. Balancing short term economics against long term ecology requires the wisdom of a Solomon. However, if the health of the earth is to be maintained it will be by one area ~~at a time~~ through adequate laws. Please make sure that the Oregon deserts will be protected and not degraded.

Sincerely
Sandy Lugh

L-187

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St
Vale, OR 97918

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Dear Mr.Singleton:

I would like to provide some comments and concerns about the SEORMP. My current understanding is that Alternative C is the BLM preference. I am concerned that this set of guidelines will not adequately protect this important part of my state, and will not ensure that my children will find a land as richly diverse as I have been able to experience.

In particular, I have seen, and continue to see almost every day in my home area, the impact that grazing has on the high desert environment and its plants and animals. I want to see greater protection for the riparian areas, especially those such as the Donder and Blitzen that have already been granted Wild and Scenic status, but lack protection appropriate to this status. I would also like grazing excluded from wilderness study areas, ACECs, and any areas judged of special importance to native wildlife.

I have spent many hours on Steens Mt. and have tried to imagine how much richer a place it would be without the ravages of grazing. I am not opposed to grazing, and I consider ranching to be a valuable feature of Eastern Oregon, but I do not think the economic benefit gained by a few justifies the continued misuse of public lands.

I think Alternative D is the most appropriate management plan, but I would like to have grazing access to Steens Mt and the Alvord limited to a greater degree.

I appreciate your consideration of these issues.

Sincerely,

Rick Goldstein

cc:Craig Hansen

L-188

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
!00 Oregon Street
Vale Oregon

Mr. Singleton:

I am writing to urge you to reject Alternative C of SEORMP. Over the past 20 years I have made many trips to this magnificent region that you manage. It amazes me that an area such as this is not managed in a manner that would enhance its beauty rather than exploit it for the profit of a very few. Last spring I had the privilege to float the South Fork of the Owyhee and was at once mesmerized by the landscape and disgusted by it's exploitation as a feedlot. I have seen many rivers across the U. S. and several other countries on different continents, but none more spectacular than the forks of and the Owyhee itself. Your agency is charged with managing a region that contains a national treasure please begin to treat it as such.

Grazing in this area is not a national priority and should be excluded from:

Wild and scenic river corridors;
Riparian areas ;
Critical wildlife and fish habitat;
Wilderness study areas; and
Grazing allotments in fair or poor condition.

Respectfully,

Craig Richter

cc: Craig Hanson
Burns District BLM

L-189

To: Ed Singleton, Vale District BLM 189

Dear Sirs & Madams,

We are writing to you about SEORMP. Please reject Alternative C and instead select Alternative D to exclude livestock grazing from wild rivers and from critical fish and wildlife habitat.

Furthermore, please improve upon "adaptive management" by instituting real guidelines, approved by expert scientists.

Please, do not trade a small economical benefit for desertification of much needed healthy streams.

Your children and their children will thank you.

- Alexander Kain
- [illegible] ERIN MIDDLETON
- [illegible] J. MICHAEL CANGEMES
- SUSAN K CRISFIELD

L-190

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Pat Doty

The Desk of Mr. Pat Doty

February 27, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office

Dear Sir;

I am writing to urge you to select Alternative D for the Southeast Oregon Resource Management Plan. As a frequent visitor to the Steens Mountains and the Oregon Canyon Mountains, I can see the damage done by overgrazing. I support on-the-ground monitoring and real standards to protect these areas.

Sincerely,

Pat Doty

Pat Doty
Concerned citizen

LEAVE NO SPECIES BEHIND

L-191

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

TO: Mr. Ed Singleton

Something of great concern has recently come to my attention, regarding an area of Oregon that I love dearly. The scenic areas of the Blizten and Owyhee Rivers are of particular interest to me, so I am writing to you in an attempt to appeal for the welfare of these Rivers.

There is a great deal of attention growing in the public about protecting fish and wildlife habitat, and more and more education about the importance of riparian areas, but often those in places of the most influence are slow to act. I hope this does not become the case in Oregon in regard to the State's natural treasures. I had the sad misfortune of observing destruction and overgrazing destroy the integrity of an important wetlands area local to Hillsboro, Ore. and I vowed never to be passive about something so important again.

I believe there are very serious flaws in the Alternative C, the plan being proposed for management of the Owyhee Canyonlands and surrounding areas. It is irresponsible and weak. I urge you to support Plan D, and support responsible land management. This important scenic area is a treasure, and I truly believe it is our responsibility to care and manage it with a focus on protecting it, not destroying it. Overgrazing strips the land of natural protection that is difficult, if not impossible to replace. I am not an activist, and I am not a vegetarian. I do value the native plants, fish and wildlife so much I cannot imagine the little value of grazing those producing livestock will get out of this area is worth the price of potentially destroying something that is unreplaceable. I ask you to please consider carefully the choices that are in your hands, and in the hands of the Bureau of Land Management .

Sincerely,

Kathryn G. Thornton

Kathryn G Thornton

L-192

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

February 28, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St
Vale, OR 97918

Dear Mr. Singleton,

I am writing you as a lover of the desert. I am writing you to urge you to reject Alternative C of the Southeast Oregon Resource Management Plan.

The problem with Alternative C is that if it is adopted there will be no livestock grazing reductions, even in sensitive and damaged areas it is supposed to be protecting. Livestock grazing reduction is essential for the health and recovery of the Southeast Oregon desert. I urge you instead to strengthen and adopt Alternative D.

Despite the economic pressure to the contrary, the long-term health of the desert demands that we reduce grazing and emphasize low-impact recreation, and implement the proposed 289 river miles for Wild and Scenic status for the Blitzen.

Thank you for your attention,

Sincerely,

Sandy Polishuk

Sandy Polishuk

L-193

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

March 1, 1999
Ed Singleton, Vale District Manager
Vsale District BL Office
100 Oregon Street
Vale, OR 97918

Dear Ed,

I believe SEORMP fails to look at the full range of alternatives as required by NEPA. There needs to be stronger grazing restrictions in 1) riparian areas, 2) critical habitat and sensitive areas, 3) wilderness study areas and 4) allotments that are in fair or poor conditions.

Let's not be in love with the cow at the expense of the environment. We have an obligation to our future to develop management practices that ensure the longterm sustainability of healthy and productive land. The other alternatives fall short.

Please, make the right decision, not the one based on political issues. You have been vested with the longterm management decisions about the lands we all care about, please make a wise, deliberate, well thought out decision. Let's protect those more sensitive areas as well.

I urge you to choose alternative D.

Sincerely,

Nancy Jane Cushing

cc: Jim Kenna, Burns District Manager

L-194

VAL

March 1, 1999

Greetings Ed,

Protection rather than degradation...

I am writing to you on behalf of the effort to adopt a strengthened alternative "D" to the SEORMP's ecosystem management goals. I believe alternative "D" needs to incorporate a more protective approach in regard to wilderness study areas, riparian areas, an critical fish and wildlife areas through the prevention of livestock grazing and the exclusion of livestock.

Thank you for your attention in this matter.

Sincerely,

Michael Steiner

L-195

MAZAMA LODGE

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager 2/28/99
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Sir:

I am writing to comment on the BLM's Southeast Oregon Resource Management Plan (SEORMP). I am the manager of Mazama Lodge at Mt. Hood, but I have spent considerable time in southeastern Oregon, both by myself and with my wife, and with groups such as the Mazamas and the Sierra Club. I strongly urge the BLM to reject Alternative C and instead choose a strengthened Alternative D that excludes livestock grazing from riparian areas, Wild and Scenic Rivers, critical fish and wildlife habitat, ACEC's, wilderness study areas, and grazing allotments labeled in "fair" or "poor" condition. I can't begin to communicate to you the dismay I feel when constantly encountering the damaging presence of cattle on public lands as I roam this area. This dismay is doubled when I know the incredible heritage of wild mustangs, such as the famous Kiger Mustangs, is constrained and actually murdered in order to run cattle in a totally unsustainable fashion on these lands. I personally would like to see nearly all the cattle removed from the lands managed by the SEORMP and this area set aside for a more natural ecology that includes mustangs, antelope, fox, trout, grouse, and even wolves that might wander in, but NOT cattle.

Furthermore, the "adaptive management," upon which this plan is heavily reliant, is no substitute for objective standards and guidelines. Without constant, on-the-ground monitoring, which is impossible given how understaffed the BLM is, adaptive management will only lead to further resource degradation. Given the peer-group pressure BLM staff is subject to (trying to enforce against buddies they grew up and went to school with in their local area) adaptive management allows for a degree of latitude that is unacceptable in a major planning document such as the SEORMP.

As currently written, the SEORMP contains alarmingly few objective management standards, making it virtually impossible to determine whether on-the-ground management is commensurate with the SEORMP's goals. Instead the BLM needs to develop objective, numeric standards and guidelines. This would prevent abuse by a "good ol' boy" network that looks the other way at abuses by neighbors.

I also want to close most of this planning area to off-road vehicle use. I want more emphasis on undeveloped types of recreation, along with less emphasis on fire suppression.

But most of all I want the cattle off all these damaged-by-cattle lands.

Sincerely,

Jason Star

L-196

Dear Bureau of Land Management:

for just a moment lets think about that title and what it truly intends. I recieved from a very active activist in the Portland area information on your plans for "management" in Southeast Oregon. Our beautiful state is just that because of its ecological diversity, from ocean beaches to mountains to deserts all within the confines of our border. I beg of you to consider the land and wildlife (the original dwellers of our state) before you decide to extend livestock grazing areas. It is sad to see what man has done to our mother all over the sake of a few dollars, but Oregon has been at the forefront of many adverse idems, So lets continue that trend. We can reverse our ways of excess and show the rest of the nation that we respect the land, our land, our state, our beautiful diverse and wildly habitated state. Cattle grazing has already caused so many natural problems in the willamette valley, why do we need to comply to "Big Business" and cause harm in another area. Remember that in politics as well as life compromise is the root of content. You can appease the "Beef" industry and the many more overwhelming lovers of our state by adopting a stronger Alternative D (ideas listed in the pamphlet)

and set a presadent (spelling please) on "land management."

The circle of life includes not only the all powerful man, but much more importantly the plants and wildlife that make up our ecosystem. I beg of you to remove the green tinted lenses of monetary decisions and realize that we are at a precipise on our planet. Our excesses in population and resource removal have the make a degression, for our own human sake, but by our human decisions the defenseless wildlife become the victims. Please consider the comments made by myself and I hope many, many others and look for a strengthed alternative of "land management" towards considering the original wildlife over our manufactured livestock.

Thanks for listening,

Douglas Quinn
Green Party Voter

L-197

Ed Singleton, Vale District Manager 2 28 99
100 Oregon St
VALE OR 97918

Dear Ed,

Concerning SEORMP.

I urge you to strengthen & Adopt Alternative D. Exclude livestock grazing from Wild & Scenic Rivers such as Owyhee & Blitzen.

Grazing is the greatest cause of desertification.

No grazing in riparian areas, critical fish & wildlife habitats, Areas of Critical Environmental Concern, wilderness study areas, and areas grazed to fair or poor condition.

Adaptive management is no substitute for real standards and guidelines. There must be constant, on the ground monitoring using adaptive management to prevent further degradation.

over

I have witnessed grazing damage to vegetation, compacted soil, riparian areas. I have seen watersheds so damaged that streams flow not with water but rather sage brush.

You must manage for healthy ecosystem, not just cow

Sincerely Zephyr Moore

ZEPHYR MOORE

Ed Singleton
VALE Dist BLM office
100 Oregon Street
VALE OR 97918

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Virginia Apgar
Physician

197

L-198

Dear Sir:

Please reject Alternative C and instead select a strengthened Alternative D that excludes grazing from
1. Wild + Scenic Rivers
2. riparian areas
3. Critical fish and wildlife habitat
4. Areas of Environmental Concern
5. Wilderness Study Areas
6. grazing allotments in fair or poor condition

"Adaptive Management" is no substitute for real standards and guidelines; without constant on the ground management may lead to even further degredation.

Catering to the livestock industry has caused permanant damage to much of the public land and its fish and wildlife.

Thank You,

Neil D Nikirk

L-199

Ed Singleton, District Manager
Vale District BLM Office
Dear Sir,

28 Feb 1999

RECEIVED
MAR - 3 1999
DISTRICT BLM

I am writing in regards to the BLM's Southeast Oregon Resource Management Plan.

I view the BLM's "preferred" alternative C as very flawed. I urge the BLM to select a strengthened version of Alternative D that includes restrictive livestock grazing from riparian areas. Also, lets charge fair market values for the grazing allowed. Please stop welfare on the range.

Thanks,
Dan DeBrito

With S.E.O.R.M.P., the BLM has an opportunity to start restoring the publics land. I urge you to reject Alternative C and instead select Alternate D and strengthen it to exclude grazing from all riparian areas, wilderness study areas, critical fish and wildlife habitat and grazing allotments in fair or poor condition. Start managing the public land for multiple use. Put deer, elk, ducks, geese, song birds, beavers, frogs etc. on an equal basis with bovine bulldozers. Wildlife was here first, lets give them back their habitat.

Many youngsters today never learn to hunt or fish because the public lands, their lands, are overrun by millions of cattle owned by private ranchers. These cattle have consumed the biomass that would normally be consumed by wildlife. Their parents can't draw out a tag, and if they do many are unsuccessful. They get discouraged and give up. No wonder so many of them end up in gangs when the most exciting thing in their life is to walk through the shopping mall and eat a hamburger at McDonalds.

Stand up to the pressures of ranchers, do what is right for our children and wildlife. My students and I will be watching.

Sincerely Yours,

Paul L. Martinson
208 Winegar ave.
Monmouth, OR. 97361
503-838-4192

copy sent to
Craig Hanson

L-200

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Dear Ed Singleton, Vale District Manager,

I am a high school science teacher. I have taken my students on field trips to Malheur, the Steens and Brownlee. I take them to the only stream in eastern Oregon that hasn't been overgrazed by livestock, Fox Creek, running into Brownlee dam. They see the cold narrow tree lined creek full of healthy trout, the willows, the wildflowers, the deer and many species of bird and other wildlife. Then I take them to Morgan creek, two miles away and they see this deeply eroded gully with no trees or wildlife just cows and dust, rocks and sagebrush. They learn that Morgan creek once looked just like Trout creek. They learn about cut banks, rills, rare violent thunderstorms and erosion.

They learn that most of the lands in central and Eastern Oregon are public lands, their lands. We drive for hundreds of miles through the Steens, Ohyhee's, Malheur etc. and we find no streams that have healthy riparian areas with abundant wildlife. They learn that the B.L.M. is slowly thinking of changing and that if it could resist the politically powerful wealthy ranchers and start managing their land ecologically, the many eroded, overgrazed, treeless riparian areas could someday look like Fox creek. Instead of seeing endless miles of cows and desolate, denuded, eroded streams void of life, they could see all kinds of wildflowers, wildlife and fish. My students are angry and shocked at what the BLM has allowed the ranchers to do to wildlife habitat all over the West.

L-201

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

February 24, 1999

Ed Singleton
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Mr. Singleton:

Your agency has a serious responsibility to protect the land described in the Southeast Oregon Resource Management Plan.

The alternatives described are not perfect but Alternative D might improve the character of the southeast landscape. First, the reduction or elimination of grazing is absolutely necessary. I have been over most of southeast Oregon since 1948 when I worked as a fishery biologist in the area until 1957. The beef cow (an alien species) and the feral horse have no place on public land in southeast Oregon. Damage has been obvious and continuous for many years, especially along riparian areas. Control must be initiated soon to protect water quality and wildlife habitat, as well as recreational and scenic values of the land.

I have seen springs and small live streams trampled to oblivion by cattle and feral horses on BLM and Forest Service land. Our land. This kind of damage must not be tolerated in the arid areas of southeast Oregon, especially at taxpayer expense.

Recreational sites must be taken back from the cows, identified and designated, with little improvement, for use by hunters, fishers, bird and animal watchers and campers. This is how our public lands should be used, with low impact on streams and riparian vegetation.

It is time for BLM to begin phasing out, or buying out, those permittees who graze in areas completely unsuitable for the purpose, or where complete rest from grazing is mandatory. Buying out ranchers could be the best use of our (taxpayers') money for the protection of water resources, wildlife resources and the land itself.

Sincerely,

Homer J. Campbell

cc: Director, BLM
BLM Regional Director

L-202

March 1, 1999

Ed Singleton, Vale District Mgr.
Vale District BLM Office
100 Oregon Street
Vale, OR 07918

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Dear Mr. Singleton,

Please accept these comments on the draft SEORMP.

As an outdoor and nature photographer, I have travelled extensively in the area covered by this Regional Management Plan, and while my observations are not scientific, they are based on first hand knowledge of what I have seen and the conclusions I have made.

Generally speaking, the amount of resource damage caused by livestock grazing of these public lands is appalling. In the past two years I have visited most of the special areas within the Vale and Burns Districts; the ACECs, the WSAs, and the unique geologic and natural features that dot the landscape. Without exception, the numbers of livestock grazing, the developments exclusively benefitting this use, and the lack of rotation and monitoring on these lands, all have astounded me.

Now I read that this management plan update calls for no reduction of livestock use for these public treasures, no protections for severely over-exploited water and riparian areas, and no curtailment of grazing for areas in extremely overgrazed condition- I'm outraged! How can we expect fish and wildlife, and natural processes to rebound and function as they should when we are giving away all the resource to an entirely inappropriate, incompatible user group, namely the subsidized public land ranching industry?

The answer is we cannot, and we must not allow this level of overuse to continue.

Until scientifically proven to benefit the recovery of depleated fish and wildlife and other natural resource values graded below "good" condition, and until area streams and rivers are certified to be non-water quality, or quantity limited, no grazing activity should be allowed on any of these lands until sufficiently recovered to allow grazing to resume.

Specifically the BLM should: withdraw grazing permits from all ACECs, WSAs and other special management areas. These areas harbor special and outstanding natural values and features, and continued

livestock grazing is incompatible with these uses and values. These areas should be rested until they recover to excellent condition, then determine if livestock grazing is compatible with maintaining and improving natural conditions for fish and wildlife, watershed health, and public recreation. Places like Steens Mountain, Jordon Craters, Diamond Craters and the Alvord Desert, riparian and upland areas in the Owyhee Canyonlands, and Trout Creek Mountains and Pueblo Mountains, Hawk Mountain, Castle Rock and the Camp Creek Group, all of these areas contain outstanding characteristics and should be managed to protect and enhance these values. All of these areas have been severely impacted and depleated by livestock grazing and must be rested into recovery. The resiliency of nature is not without limits, we must rehabilitate these public treasures.

The BLM must reject the "Preferred Alternative-C" in this draft as it does not achieve the levels of improvement in resource condition required by the BLM management plan updates.

Instead, I urge the BLM to strengthen and adopt Alternative D, as it comes much closer to meeting the SEORMP's ecosystem management goals.

Livestock must be excluded from grazing in such world-class places as those I've mentioned, plus all candidate wilderness areas and wild and scenic rivers. Adaptive management is no substitute for real protection, and these places I have visited recently are so depleated of most of their natural values that they barely function as habitat for threatened fish and wildlife species, let alone provide for recreational, hunting and fishing uses.

Roads that severely impact natural resource values, must be relocated or closed and rehabilitated. User-created roads that are incompatible with ecosystem management goals must be obliterated. The Transportation Plan for these resource areas must be completed and implemented before renewing the regional management plans, otherwise the resource will continue to be degraded by inappropriate motorized users. Plus the Transportation Plan must be made public before it is implemented so that we all have the opportunity for review and comment.

Please add my name to the list of those interested individuals who will receive the Transportation Plan once it is completed. Since I have travelled many of these roads, I have first hand knowledge on the condition and appropriateness of these roads and ways.

Thank you for considering these brief comments, and I look forward to seeing a significantly improved preferred alternative whan the final plan is completed.

cc:Craig Hansen
Burns District BLM

Sincerely,
Sandy Lonsdale
Sandy H. Lonsdale

L-203

March 1, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

I am writing in regards to the Bureau of Land Management's ***Southeast Oregon Resource Management Plan.***

I urge the Bureau to reject Alternative C and choose a strengthened Alternative D.

The area affected by the Plan is huge, so "adaptive management" cannot effectively monitor practices in the area to ensure protection of riparian areas and critical fish and wildlife habitat.

Alternative D would reduce livestock grazing, emphasize undeveloped types of recreation, deemphasize fire suppression, and restore or close sites where natureal values are jeopardized by overuse. Taking such steps is a good beginning toward the goal of protecting the 6.3 million acreas of the study area for future generations. From here, the BLM can go on to strengthen Alternative D for even better results.

Sincerely,
Paul Suter
Paul Suter

L-204

Oregon
John A. Kitzhaber, M.D., Governor

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Water Resources Department
Commerce Building
158 12th Street NE
Salem, OR 97310-0210
(503) 378-3739
FAX (503) 378-8130

February 26, 1999

Edwin Singleton
Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, OR 97918

James Kenna
Bureau of Land Management
Burns District Office
HC-74-12533 Hwy 20 West
Hines, OR 97738

RE: *Southeast Oregon Resource Management Plan/ Environmental Impact Statement*

Mr. Singleton and Mr. Kenna:

Thank you for the opportunity to review the Draft Southeast Oregon Resource Management Plan/ Environmental Impact Statement. This document offers an interesting variety of issues and assessment of the BLM lands of Southeastern Oregon.

The one main comment from the Oregon Water Resources Department concerns water rights for existing and additional uses. In a number of different sections in the EIS, additional or expanded recreational sites are proposed as alternatives. If developed as proposed, a viable source of water would be important for many of these projects.

I have included two examples to highlight these concerns. Alternative A of the recreational management alternative states that the Mann Lake Recreation and Watchable Wildlife Site would be expanded into a developed campground (3-99); other sites are also mentioned as possibilities for further recreational opportunities. Water sources developed to provide for the campground would likely require a water right, especially if used to irrigate the campground. Another example of where a water right would be needed is alternative A for the management of Wild and Scenic Rivers, which proposes to develop a water diversion to irrigate the meadows at the Riddle Brothers Ranch National Historic District (3-214). A water right is required to divert water for irrigation purposes.

Sufficient water supplies with valid water rights from the State of Oregon are necessary for both existing and proposed sites. The availability of water in much of the region covered by this EIS is limited and may hamper additional developments that are water dependent.

We are interested in the outcome of the management alternatives; please keep us informed as this process continues. In the meantime, please contact the Water Resources Department if you have questions about existing or new water rights on BLM land.

Sincerely,
Lara Burgel
Lara Burgel
Senior Water Resources Coordinator

cc: Jerry Rodgers, Regional Manager
Mitch Lewis, Watermaster, Region 10
Larry Powers, Watermaster, Region 9

L-205

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

February 25, 1999

Gary Cooper
BLM, Vale District Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Cooper

After reviewing the Draft, Southeast Oregon Resource Management Plan / Environmental Impact Statement I offer the following comments:

SEORMP Chapter 3, page 212 deals with the Wild and Scenic Rivers management. BLM objective is to protect and enhance the ORVs of the designated rivers. This plan closes the Deary Pasture to livestock grazing in all alternatives except Alternative B. It has not been proven that cattle damage the ORVs. In many cases cattle grazing actually improves wildlife habitat. It has been shown in many areas that once the cattle are permanently removed much of the wildlife will also leave.

Flooding of the Owyhee at Deary Pasture is responsible for streambank damage and prohibits healthy development of riparian areas. Livestock grazing is not responsible for this. Their removal will not improve these areas.

Removal of livestock grazing from the Deary Pasture removes a source of water from the Jackies Butte Allotment. A supplemental water source needs to be developed before cattle are permanently removed from the river at Deary Pasture.

On map LVST 1J Rome North is listed as a livestock exclusion area. It is used October 20-25 every fall by the Jackies Butte Permittees for the purpose of sorting, gathering, and holding cattle.

The plan needs to be rewritten to accommodate the needs of the livestock users in these two areas, the Deary Pasture and Rome North.

Sincerely,

Ed Dowell

Ed Dowell

L-206

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

February 25, 1999

Matt Fick

Mr. Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

RE: SEORMP/EIS

Dear Mr. Singleton:

I am writing to communicate to you my comments regarding the Southeast Oregon Resource Management Plan/Environmental Impact Statement.

The SEORMP fails to explore the full range of alternatives as required by NEPA. I urge to choose an improved Alternative D that is strengthened to exclude grazing from riparian areas, critical habitat and sensitive areas, Wilderness Study Areas, and allotments in fair or poor condition.

Thank you for your attention to my comments.

Sincerely,

Matt Fick

Cc: Jim Kenna

L-207

TO: Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon St
Vale, OR 97918

2/28/99

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

FROM: ERIK FISHER

RE: SEORMP

DEAR SIR:

I used to live in SW IDAHO, I HAVE CONTINUED TO TRAVEL INTO THE AREA OF THE SEORMP AT LEAST ANNUALLY. I BELIEVE YOUR SEORMP NEEDS SEVERAL IMPROVEMENTS:

(1) OBVIOUSLY, RESOURCE DAMAGE CAUSED BY GRAZING SHOULD INVOLVE REDUCTIONS IN GRAZING. HOW ELSE DID THE UPPER CREEK AREAS RECOVER?

(2) GIVEN THE STATE OF THE GRASSLANDS, THE BLM SHOULD SPEND MORE EFFORTS REDUCING NOT JUST INCREASING GRAZING LOADS VIA "ADAPTIVE MANAGEMENT"

(3) THE DIRECTION IS CLEAR FOR THE WILD + SCENIC RIVERS: REDUCE OR BETTER ELIMINATE CATTLE GRAZING THERE. AND WHAT ABOUT THE OWYHEE?

(4) THE STEENS SHOULD BE PROTECTED, NOT ONLY AS

2

A NATIONAL CONSERVATION AREA, BUT AS AN AREA WITH LESSER GRAZING.

(5) ALTERNATIVE D IS A BETTER ALTERNATIVE, INCLUDING ITS MORE APPROPRIATE RECOMMENDATIONS FOR WILD + SCENIC RIVER SEGMENTS + ACEC'S.

(6) THE TWO PLACES CLOSEST TO MY HEART ARE THE STEENS AREA + THE PUEBLOS: BOTH WARRANT WILDERNESS DESIGNATIONS + SHOULD BE MANAGED IN A FASHION MOVING TOWARDS SUCH UNDER THE SEORMP.

SINCERELY,

L-208

BLM
100 Oregon Street
Vale, OR 97918

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Attn: Ed Singleton

Dear Mr. Singleton:

I would like to register with you my opposition to your preferred Alternative C in the S.E. Oregon Resource Management Plan. I strongly urge you to adopt Alternative D strengthened as recommended by the Oregon Natural Desert Assn.

Respectfully,
Allan R. Sorenson

cc: Craig Hansen, BLM, Hines, OR
ONDA, Bend, OR

L-209

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

2/27/99

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton,

I am writing about the Southeast Oregon Resource Management Plan (SEORMP). Recreation is growing as our population grows. There is more and more need for quality protected areas. I have boated the Owyhee River, and it is beautiful. We need more Wild and Scenic protection for more rivers because so many people are boating, rivers will become overused. Furthermore, we need to stop grazing cattle along protected rivers and any rivers which have fish populations. Cattle hurt salmon, steelhead and native fisheries.

Therefore, I recommend that the BLM select and strengthen Alternative D. I like that 289 miles of river would be given Wild and Scenic status. I like that several new Areas of Critical Environmental Concern (ACECs) would be established. However, cattle need to be eliminated from BLM lands. It is especially important to eliminate cattle from Wild and Scenic Rivers, critical fish and wildlife habitat, ACECs, riparian areas, grazing allotments in fair or poor condition, and wilderness study areas. Last, your "adaptive management" is no substitute for real standards and guidelines plus constant, on-the-ground monitoring. Please increase environmental protection of our public lands. Thanks.

Sincerely,
Steven Tichenor
Steven Tichenor

L-210

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

2/28/99

RE: Comments on BLM's Southeast Oregon Resource Management Plan

Dear Mr. Singleton:

I am writing to comment on BLM's Southeast Oregon Resource Management Plan (SEORMP). Please include this letter as part of the permanent public record on the SEORMP.

I am concerned about the management direction BLM has proposed in the SEORMP. Southeast Oregon contains some of the most remote wild lands in the Pacific Northwest, if not the entire lower forty eight. I know from personal experience camping and hiking in the canyons of Catlow Rim and the Steens mountains, the dry lake beds of the Alvord desert, and along the Blitzen River that south east Oregon has numerous areas with clear wilderness characterisitics. BLM should protect these and other areas to ensure that Americans will continue to have an abundant legacy of wilderness to challenge us physically and sustain us spiritually in the new millenium.

Southeast Oregon is also home to numerous rare and endangered species, including bighorn sheep, pronghorn antelope, kit fox, threatened Lahontan cutthroat trout, and dwindling populations of sage grouse. BLM should protect the habitat of these and other species so future generations of Oregonians and Americans will know the joy of abundant native fish and wildlife.

Unfortunately, rather than proposing a new management direction that will protect wilderness values and the habitat of native species, BLM's proposed alternative C basically maintains the status quo by continuing to emphasize livestock grazing over all other uses and thus proposes to continue the degradation of south east Oregon\rquote s wild lands.

Alternative C should be rejected. Instead, I urge you adopt a strengthened version of Alternative D. I urge you to strengthen Alternative D by excluding livestock grazing from:

- Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;
- Riparian areas;
- Critical fish and wildlife habitat;
- Areas of Critical Environmental Concern;
- Wilderness study areas; and
- Grazing allotments in "fair" or "poor" condition.

I also am concerned about the SEORMP's heavy reliance on adaptive management. Although adaptive management may have some merit in terms of learning from previous management successes and failures, it is not a substitute for objective standards and guidelines. Furthermore, adaptive management is meaningless without constant, on-the-ground monitoring, yet BLM does not have the dollars and staff necessary to do so. Given this reality, SEORMP's heavy reliance on adaptive management is more likely to result in further resource degradation rather than protection or restoration.

Thank you for the opportunity to comment on the SEORMP.

Sincerely,
Mike Riley

Mike Rilev

L-211

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

February 28, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

RE: In favor of improved SEORMP Alt. D

Dear Mr. Singleton,

My Background:

- Rafted Owyhee River each May past 4 years
- Visited Steens, Frenchglen, and Alvord Desert 3 years ago
- Volunteer, US Forest Service, Native Grass restoration projects past 4 years

My Thoughts:

Alternative D is best option, but strengthen it with restoration and enhancement of grazing areas by careful cattle rotations, using cattle to enhance native grass restoration like The Nature Conservancy is now doing in Sycan Marsh area, and reduce cattle grazing allotments. Enlightened fire science management policies must be utilized.

Sincerely yours,
James T. Post

c.c. Craig Hansen, Burns District BLM Office

L-212

Feb. 28, 1999

RECEIVED
MAR - 3 19[illegible]
VALE DISTRICT BLM

Mr. Ed Singleton, Manager
Vale District, BLM
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

This comment on SEORMP, the Southeast Oregon Resource Management Plan, is from the perspective of one who has watched change in Oregon since horses beached seines of salmon and chain-bound-blimps of logs crossed out the Columbia bar; since production of wheat and meat was patriotic during World War One.

We know the change, but we don't adjust. The ethic of `take what's there to be had' persists without enough concern for survival of the goose, source and substance of the golden eggs of clean and sustained water, fish, clean air, grass, timber, and on thru critters, bugs, moulds, symbiotics, and all that interweave as ecosystem -- ecosystem in balance we yet don't understand well enough to manage, even when we try.

If Alternative C of SEORMP had been applied eighty years ago, then "D" might suffice now. But now the system is too fractured to recover without remedials focused on recovery. Chiefest among remedials is rest from impact by people and cattle.

After natural balance and health is restored and after we learn better how to cooperate with the natural system, we might safely continue under the likes of Alternate D. But until recovery, until we're dealing with ecosystem resilient enough to endure our good intentions, the land needs relief -- more relief than provided in Alternative D.

For recovery,

John O'Connor

John R. O'Connor

Copy: Mr. Craig Hansen, Manager, Burns District, BLM

L-213

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

February 26, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Mr. Singleton:

First of all, I want to thank you and your staff for giving me this opportunity to voice my opinion on the SEORMP. (Thank goodness for acronyms !)

After studiously reading all alternatives way into wee hours of the morning, night after night, my over taxed mind has come up with the following decisions:

1. Reject Alternative C and select a strengthened Alternative D plan that would exclude all livestock from the following:

A. All riparian areas
B. All wild and Scenic Rivers such as the Owyhee and Blitzen Rivers
C. Critical fish and wildlife habitat
D. All grazing allotments in fair and poor conditions, which would include the following:

a. The Steen Mountains
b. The Blitzen River
c. The stark but beautiful Owyhee Canyon Lands
d. Nearly 300 river miles eligible for Federal Wild and Scenic Status

You must in all earnest get very serious about protecting Oregon's magnificent desert wildlands which is the habitat of the rare kit fox, the threatened lahontan cutthroat trout, and the ever dwindling population of sage grouse, plus the bighorn sheep and antelope.

One of my many concerns is water quality. The defecation from cows as well as other animals can cause giardia and the sometimes the fatal fecal protozoan parasite which is primarily transmitted by approximately 36% of young calves. They can cause life threatening diseases, and neither can be helped by medicines!

I feel the financial loss of zero cattle, horse, sheep, llama or emu grazing would outweigh the possible law suits caused by continuing grazing which causes impure water.

I find it amazing that we use such homey words as: cow pies; horse biscuits; sheep pellets; Exotic plants and the word, may!

Lets put the pies and biscuits in the oven, the pellets in a burning heater, the exotic plants in flower pots, and the word MAY completely out of management plans.

Why is it I always read (grazing may cause riparian damage!) Who are we kidding? Ourselves?

Please adopt a stronger Alternative D management plan to help the delicate desert area survive.

Patricia Garoutte

Sincerely, Patricia Garoutte

cc: Craig Hansen, Burns District Manager
ONDA, Bend Oregon

Phone: (541) 479- 7830 e mail: debnpat@internetcds.com

L-214

Sisters Forest Planning Committee

March 1, 1999

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Re: Southeast Oregon Resource Management Plan

Dear Mr. Singleton:

The Sisters Forest Planning Committee is grass roots conservation organization based in Central Oregon. We have addressed public lands issues, including providing public comments on land management practices, for nearly 15 years. Because of our membership's increasing concern for the management of Oregon desert lands, we wish to provide comments to you on the Southeast Oregon Resource Management Plan, and to be included on your mailing list for this process.

We oppose your selection of Alternative C as the preferred alternative, primarily because it fails to address the problems of grazing by livestock. We are particularly disturbed by your agency's continued emphasis on livestock grazing over other resource values and a properly functioning ecosystem.

Also disturbing is your focus on "adaptive management" without the provision for adequate monitoring and enforcement. The SFPC's experience with such "adaptive management" is that the public agencies utilize this "method" instead of a system that involves accountability. Our experience has also been that the public agencies either do not seek or lack adequate funds to properly monitor and enforce an adaptive management scenario. In light of these failures, and because of budget shortfalls, there need to be strict standards and guidelines that clearly regulate activity and are quantitative so that they can be measured, at least by the public if not the agency.

Instead of Alternative C, please select an alternative that strengthens protection of wilderness study areas, riparian areas, the streams and rivers of the area and other sensitive habitat. The closest alternative to this objective is Alternative D, but it does not go far enough in protecting

SFPC\0220cc.ltr

these values. Also, Alternative D lacks the necessary monitoring and enforcement provisions that are necessary to implement any plan, and needs strict standards and guidelines to facilitate management and accountability.

While our organization has not taken a position of calling for a ban of livestock grazing on public lands, and while we currently believe that livestock grazing on public lands can be appropriate in certain situations, we feel that your agency's current approach to livestock grazing on public lands, as reflected in the Southeast Oregon Resource Management Plan, is outdated and seriously threatens the desert ecosystems of Eastern Oregon. Please amend your Southeast Oregon Resource Management Plan to adopt a broader ecosystem management approach that will truly protect the region's rivers, riparian areas and other sensitive sites. Only in that way can you truly preserve options for public managers and the public on these lands in the future, which should be a primary objective of yours in working on this plan.

Thank you for this opportunity to comment on your plan.

Very truly yours,

PAUL D. DEWEY
Executive Director
PDD:cc
cc: SFPC Board of Directors
Craig Hansen, Burns District Manager,
Burns District BLM Office

SFPC\0220cc.ltr

L-215

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

February 26, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton,

Regarding the SEORMP, I would like to urge you to reject alternative C and instead select a strengthened alternative D that excludes livestock grazing from: All wild and scenic rivers, other riparian areas, critical fish and wildlife habitat, wilderness study areas, and where grazing allotments are in fair or poor condition. This kind of country is really not suitable for cattle grazing.

Sincerely,

Clifford E. Anderson

Cc: Craig Hansen, Burns District Manager

L-216

Dear Mr. Hansen,

I am writing to encourage you to strengthen AND ADOPT SEORMP's ALTERNATIVE D. It is damaging to the high desert to allow cattle grazing in critical fish & wildlife habitatat. Considering that only 2% of desert raised cattle become hamburger, no one would have to do without beef if all or most high desert grazing came to a halt.

Please consider the plight of Salmon, Kit foxes bats and the entire ecosystem over that of a few cattle ranchers.

Thank you, Emily Dahmen

L-217

RECEIVED
FEB 26 1999
BURNS DISTRICT BLM

Glenn Patterson, Team Leader
Draft SEORMP/EIS
Bureau of Land Management
Burns District Office
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Dear Mr. Patterson: 2/25/99

Re: Public Review of Draft Southeastern Oregon Resource Management/ Environmental Impact Statement, October 1998, Vol.1, Vol. 2 (SEORMP/EIS)

I have been active in my concerns, as a citizen and teacher, related to BLM public lands relevant to this SEORMP/EIS for almost ten years. I have completed a recent geography graduate degree emphasizing Southeast Oregon and developed educational print, video, and related WWW site information <http://www.efn.org/~phil_k> about this great part of the planet. I have written letters to your office (District Manager, Mike Green, July 9, 1997, attached) related to the commercial intrusion by helicopters in wilderness solitude in the Andrews Resource Area (ARA). Also, I have advocated for the restraint in commercial development on Steens Mountain near Fish Lake in ARA (Burns Times Herald, July 10, 1997, attached). I hope the BLM public land concerns identified in these previous letters have been incorporated in your considerations in the Draft SEORMP/EIS by the previous direct communications to your office and public record in the Burns Times Herald.

Thus, please consider the following comments from someone who values Southeast Oregon as the "Jewel in the Crown" in the State of Oregon. I treasure the fact that there are millions of acres of dedicated public lands, the very best of which may be specifically endangered or at least not protected enough for the next twenty years, even generations to come, by the life and directions of this noted Draft SEORMP/EIS. Responding to this concern, you will find the following comments in three areas; 1, Clarification, revisions, and endorsements specifically related to Pickett Rim ACEC and the P Hill area. 2, The lack of including non-resident stakeholders in the scoping and public review prior to the Draft SEORMP/EIS. 3, The need for a stronger endorsement of National Conservation Area for Steens Mountain which includes P Hill and Pickett Rim.

1. **Pickett Rim (Area of Critical Environmental Concern) and P-Hill Area (Wilderness Study Area)**

The enclosed photographs of Pickett Rim and P Hill, about 2 miles west of Frenchglen (photographs A,C, D enclosed) area hardly reflect the human value, beauty, and wilderness solitude of this area, and the obvious importance of continuing to protect it as an Area of Critical Environmental Concern (ACEC) for

wildlife and plant species as well as Visual Resource Management Class II. Still, these photographs do reflect the following concerns about our public lands.

For instance, this area is documented in SEORMP/EIS as a primary nesting area for many kinds of birds of prey and is known as a "...high density raptor breeding habitat." (Vol. 1, Ch.2-49). Even the federally endangered peregrine falcon has been documented just 12 miles south at Catlow Rim. Yet it seems totally unclear why the BLM, in recommending Alternative C, for Pickett Rim which would; 1, eliminate this ACEC status, and 2, eliminate Visual Resource Management Status II current designation, and 3, State the rationale for this change in aforementioned status as (Vol.1, Ch.3-194):"No special management would be needed to protect the resources because most activities which would impact the relevant and important values would be eliminated or restricted with other management direction in this alternative."

It follows that numerous questions seem apparent, among those- what has changed in the Pickett Rim P Hill area that means the ACEC designation should change? If Visual Resource Management (VRM) classification II is eliminated for this area, meaning the "existing character of the landscape" can be changed, what is being proposed, what needs to be changed and why in this regard? And lastly, as a citizen reviewing the Draft (SEORMP/EIS) it is very difficult to follow and when one reads an official BLM rationale for a legal document which states the answer can be found vaguely elsewhere "... with other management direction in this alternative" is definitely obscuring any understanding by the reviewing public. This should be clarified.

Also, it seems that if one wanted to support establishing an Interpretive Center Overlook in the P Hill area (Vol. 2, page 450) it would command a view of the valley and the Steens like no other in the Andrews Resource Area (photograph B). If this area lost the status of Wilderness Study Area due to changes proposed in BLM Alternative C and lack of ACEC status, it would be difficult to maintain the "original quality of the landscape" as people will likely try to commercially develop it into something of a profit making tourist center hardly meeting the Objectives of the BLM and the management of public land for all stakeholders as identified in (SEORMP/EIS).

As you can see I strongly endorse the development of P Hill area as an Overlook Interpretive Center **concurrent** with VRM Classification II and keeping this an Area of Critical Environmental Concern.

2. **The Lack of Non-Local Stakeholders in the Scoping and Establishment of the Draft (SEORMP/EIS)**

It should be said that in most experiences with the Burns District office of the BLM, I found this office to be helpful and very responsive. In reviewing this (SEORMP/EIS) one can see that great efforts were made to identify and locate

relevant stakeholders in building this management plan for public lands. For instance, more than 120 people have attended public meetings however unless one lived in Bend or east of that fair city, there was very little opportunity for timely public review and comment. It appears there was one scoping meeting in Portland over three years ago (ten present) and no recent meetings in our largest metropolitan area or any other meetings in Salem, Eugene, Corvallis, Coos Bay, Medford, Klamath Falls or any non-Eastern Oregon location. Yet, I am sure these are many of the places where nonresidents visitors to SEORMP/EIS public lands derive from in the State. If over 4.5 million nonresident people visit Southeast Oregon, and 715,000 thousand of those visit BLM lands (Vol 1, Ch. 2-84), they must live elsewhere yet their opinions for this SEORMP/EIS do not seem represented.

Of the 52,000 non-resident people a year who visit the Steens and Malheur NWR, I am sure many derive from those urban locations previously noted though their public review was not sought. I am sure, given the public and academic interest in Southeast Oregon in these unreached urban areas, further new public information and comment would have been added to creating this Draft SEORMP/EIS. This, in turn, would have lead to a more accurate analysis of all stakeholders interest in this management plan of BLM public land. Therefore, final review of this document should include these noted geographical areas and seek out interested parties as noted for a more complete SEORMP/EIS.

3. **National Conservation Area (NCA) for Steens Mountain.**

As I understand the Draft SEORMP/EIS, the establishment by Congress of the Steens Mountain National Conservation Area will be important to protecting these public lands for the future. If 52,000 people a year are now visiting the Steens for a variety of reasons, and the projected increase in use is 4-5% a year, then action must be taken soon to insure the unique qualities of this public land and provide long term protection within this Congressional designation. (See Vol. 1, Ch. 2-78, Ch. 3-42, 217-18, Ch. 4-148-50). However, I think the proposed NCA for the Steens seems to omit a crucial area, namely the P Hill and Pickett Rim areas as noted on SEORMP/EIS BLM Map ACEC ARA Preferred Alternative Areas of Critical Environmental Concern/Research Natural Areas.

As stated in Draft SEORMP/EIS (Vol. 1, Ch. 4-150):

"Steens Mountain is a spectacular place rich with natural beauty. It is a National treasure worthy of NCA designation to protect and preserve its unique values for future generations to enjoy and appreciate. NCA designation would provide the long-term framework to protect and conserve the nationally important resources and national features in balance with continued recreational and commodity uses."

If the final BLM SEORMP/EIS plan does not include P Hill and Pickett Rim area as part of the NCA boundary, an obvious inherent great object of all of this national conservation, then the natural and valued human, wildlife, and species relation to this land will be lost. See photographs A,B,C,D, E, and F and picture a great commercial tourist development instead which would materially filter all of the meaning of this great place. As stewards of the public lands, both citizens and government officials, the choice seems quite clear. Pickett Rim and the P Hill area should be included in the proposed Steens National Conservation Area designation by Congress and protected from any commercial development.

Thank you for the opportunity to participate in the public review of the Draft SEORMP/EIS. I trust that my name and address is in the Burns District BLM database of interested stakeholders and I will be hearing from your office in the future. And, thanks again for the high level of public service you and your staff provide- we all benefit by your efforts.

Phil Kessinger
Teacher

Attached: Copy of Letter to Mike Green, BLM, Burns District Manager,7/97
Copy of Letter to Burns Times Herald, 7/97
Six Photographs of P Hill, Pickett Rim, Blitzen Valley

CC: Congressman Peter A DeFazio
Fourth Congressional District,
Oregon

L-218

RECEIVED
MAR 01 1999
BURNS DISTRICT
BLM

February 27, 1999

Bureau of Land Management
Burns District Office
att. Glenn Patterson
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Dear, Mr. Patterson

Following are our comments concerning the Draft Southeastern Oregon Resource Management Plan/Environmental Impact Statement. Many very specific comments and questions were verbally submitted during public meetings held in the local area concerning the SEORMP/EIS and those need to be summarized and noted by BLM.

Summary

The public scoping issues illustrates the lack of knowledge of many of the public about the conditions of BLM lands in the area, the process BLM uses to avoid harm and protect public lands on an ongoing basis. It is also obvious that the public does not understand the legal mandate for multiple use including providing for grazing permits. The Final RMP should include a statement explaining how many of the concerns people identified during scoping and most likely repeated during this public comment period about protecting public lands are met on a regular, in some cases daily basis.

Specifically, the BLM needs to clearly illustrate that they are fully meeting their legal mandate and they are managing in a successful and beneficial manner. The existing document does not adequately illustrate the positive and progressive management implemented in the Andrews Resource Area. Because of the successful management, the RMP/EIS should only be an adjustment of existing successful programs and to better explain the management protection, maintenance, trend and conditions on public lands and reference existing management systems when appropriate. The following points apply:

1. The conditions of riparian areas in the Andrews Resource Area are predominately good with almost all trends positive. Information in Appendix D, Table D-3, is old information and is not consistent, and does not correlate, with long term trend plot data (photo point evaluations during the period 1990-1998) or proper functioning condition assessments done during 1998. For instance, at least 12 long term plots on Kiger Creek were formally monitored, all having positive trends, all riparian areas being 85-95 percent of potential with apparent condition classes of good or excellent.. Information from permanent plots concerning trend on McCoy Creek and associated drainages indicate a positive trend on all plots with apparent condition classes one class higher than that stated in Table D-3. Two primary plots on Cucamonga Creek and tributaries also have a positive trend and should fall into the good or excellent condition.
The information in Appendix D needs to be replaced with this more recent information

and to reference both the long term monitoring plots and the proper functioning condition assessments completed during 1998. In addition, personal visits to Home, Three Mile, Mud, Ankle, Big Indian, Riddle, Deep, Yank, Drake, and Little Kiger showed obvious positive trends and higher condition ratings than what is stated in Appendix D. Personal communications with BLM personnel indicate my evaluations are consistent with monitoring information collected during the last six or eight years — BLM needs to re-evaluate monitoring data availablity and put it into the Final RMP with appropriate adjustments to the selected management alternative which will further support our other suggested changes.

2. Because almost all riparian conditions have improved for a number of years, or are rapidly improving, shouldn't it indicate that existing management systems be continued or have increased emphasis? We believe it does and it should be clearly indicated in the Final RMP.

3. Because of the improving, and generally good riparian conditions, doesn't it indicate that special management designations of RNA's, ACEC's or the proposed National Conservation Area are not necessary, and maybe counter productive, to the principle goals, objectives and legal obligation of BLM? We believe that special designations will slow up and back track on the BLM programs that have greatly improved management and ecological conditions throughout the area.

4. The RMP/EIS should reference and build on the existing environmental assessments and associated documentations of watershed, riparian and ecological management projects done in recent years. These should be included in the preferred management alternative selection. The site specific programs and projects were inter-disciplinarily evaluated and involved research and scientific studies within the RMP area. The programs included cooperative involvement and working relationships with agencies such as the USFWS, ARS, ODFW and others. In addition, full public review and NEPA and other legal compliance has been fully followed. BLM should include and reference those programs in the selected alternative supporting existing management programs unless substantive information has been collected indicating the programs were not successful. We believe recent programs implemented following the development of Environmental Assessments have been very successful particularly juniper management (cutting, thinning and burning), prescribed burning, fire management protection in cheat grass risk areas, livestock management and range projects , road maintenance projects etc.

5. Crested wheatgrass seedings should be encouraged in the RMP for rehabilitation in areas disturbed and not likely to stabilize with native species and as a strategy for preventing uncontrolled repeat burning and conversion to cheatgrass. This management program should be emphasized as a way to increase diversity and managing wildfire in many desert areas. There is absolutely no evidence that crested wheatgrass will dominate existing native plants unless in repeat tillage practices. In addition strategically located seedings greatly assist in implementing adaptive management adjustments during extreme climatical fluctuations. The sagebrush protection in seedings is not a relevant issue in most areas so more management flexibility needs to be put in the plan.

6. More flexibility needs to also be put in the plan relating to increased levels of grazing for both management and economic reasons. Livestock grazing should be increased when it is beneficial for site specific or broader purposes. Grazing is a legal use and no information has been presented showing existing grazing management is doing any harm to any specific area or broader level objectives. It is also very important for meeting the management needs of other habitat and land uses in the area. Livestock grazing can greatly reduce the spread of noxious weeds especially medusa head rye, perennial pepperweed and a number of thistle species which threaten important wetland and biological resources. In addition, the physical hoof action of grazing can greatly increase the establishment of beneficial native plants on many soils in the area. This needs to be recognized and specified in the plan to give management more flexibility for using grazing as a management tool for improving biological diversity, ground cover and native plants. Livestock grazing management is absolutely the only management tool available for managing the spread and dominance of cheatgrass especially in drier and desert areas.

7. Evaluating the establishment of a National Conservation Area on Steens Mountain in the EIS/RMP is not appropriate and should be removed from all alternative. The establishment of a NCA is a political and legislative process. Each NCA is different with different objectives so it is impossible to evaluate. Besides existing management of Steens Mountain is fully meeting the objectives and mission of BLM and public needs. Note Tables S-1 and alternatives A, D and C.

8. Table S-1. The prescribed burning limit should be much higher some years, possibly as high as 150,000 acres per year. Remember, many years do not have conditions allowing for successful prescribed burning. Burning can be correlated to fuel loads and documented air quality problems at any one time. Fuel loads dictate how much smoke will be given off. Also, remember and emphasize in alternatives A-D that other management practices like managed grazing provides a beneficial management opportunity to limit the potential, size and scope of catastrophic wildfire and its immediate and larger impact on air quality, rangeland health and biological diversity.

9. Table S-1 Energy and Minerals. These numbers are arbitrary, not justified and greatly limit future needs and opportunity in the area.

10. Table S-1 Forest and Woodlands. The numbers need to be general targets and reference the fact that an accurate inventory of juniper areas less than 40 years of age has not been made. Research in the area indicates the number of acres needing treatment during the next 20 years may be much larger so leave that flexibility in the plan.

11. Table S-1 Recreation and OHV. The EIS appears to limit the predominate recreation of hunting and extensive recreation on two track ways and roads. Closing or limiting use on those roads should be based on a documented environmental or biological need with full public notice and involvement under NEPA.

12. Table S-1 ACEC's. In general ACEC objectives, establishment and need have not been

justified. The need for establishment of any new ACEC's should specify and document a biological or environmental issue or problem that existing management is not adequate or not fully understood. It is inappropriate for the establishment to be for visual or other subjective criteria. In addition, management or land use changes should not be referenced as a part of the purpose of establishment because the need for the management change has not been validated and fully documented. If any of the ACEC's are in the preferred alternative it is absolutely wrong to also exclude grazing without documenting a science based and site-specific benefit of the change because in many instances existing grazing uses and management are fundamental to the biological needs or ecological conditions of the area.

13. Table S-1 WSR's. No adequate justification relative to characteristics, legal requirements or need on any of the alternatives. For the most part this is inconsistent with previous BLM decisions and appears to be political in purpose?

14. The assessment of the eligibility of rivers and streams in the Malheur and Jordan Resource Areas for Wild and Scenic River designation is inconsistent with listed issues concerning riparian, free of human influences, anthropogenic influences, and water quality conditions. You cannot have it both ways, existing management and riparian and water quality conditions must be good if those streams qualify or they do not qualify if restricted grazing use or management is being proposed? In the Andrews Area the situation is similar for some of the listed eligible streams with the additional issue of fire suppression altering ecological conditions to the degree of not meeting the outstanding and remarkable values. For instance, quaking aspen are a fundamental part of the scenic values of many of our streams but juniper encroachment associated with fire suppression has negated that value. The issue is being fully addressed along those same streams but it is not and cannot be addressed in the corridor of the existing Donner and Blitzen Wild and Scenic River. We agree with the preferred alternative in the Andrews Area not to designate any new WSRs because they do not meet the necessary criteria.

15. We believe the number of cultural sites is in error. BLM can better protect important cultural sites if more permanent and intensively used sites are prioritized and not mixed with temporary or indiscriminate use areas.

16. Land tenure adjustments in important areas seems to be restricted, for instance in the Steens Mountain area. We have no problem in ownership consolidations as long as land value, total private ownership and agricultural opportunity is protected or enhanced through land tenure adjustments in both Malheur and Harney Counties. The purpose for tenure adjustment and benefit to the above objectives needs to be emphasized in the preferred alternative. The RMP/EIS must be changed to encourage and allow ownership adjustments through land exchanges in all areas of the RMP to be evaluated on a case by case basis. If land exchanges are emphasized the BLM will have better working relationships with the community and a much higher opportunity for ownership consolidation for important public purposes with a lower likelihood of major developments being established on private land that are at cross purposes with existing land use of the area. Section 2-92 and Table 3-1, page 3-47. Consolidation of land

with high public values through land exchange should replace the word "retain" in all of the alternatives to reflect local ordinances, needs and economics. BLM should not be in the business to increase holdings at the expense of the private sector which limits long term needs.

17. The RMP needs more flexibility left in the preferred alternative concerning small and low impact mining activities, for instance sand and gravel activities. Road maintenance for watershed or water quality purposes are dependent upon a source of rock without fines for both maintenance and mitigation structures without excess truck and heavy equipment excessively transversing access routs and roads.

18. Concerning fire management (table 3-1 and associated text) site specific resource impact evaluations should be the basis of management policy. If BLM has cooperative agreement and life and property are not threatened and watershed and other natural resources are benefitted by the wildfire then the fire should be allowed to burn to a natural stopping place. Maximum suppression may be the emphasis in a cheatgrass risk area. Science and management criteria are readily available to make those decisions in advance of many wildfires based on soil and vegetation conditions.

19. Concerning rangeland vegetation (Table 3-1) what are natural values in the context of ecological condition? The emphasis should be on ecological condition relating to site specific and broader goals and objectives under objective 1. Under 2. there is nothing wrong with the biological health of seedings and it is a waste of time, money and resources to even worry about the biological and environmental conditions in crested wheat seedings. There is no scientific basis for emphasis on fragmentation of habitat in these areas because there is more than enough of equivalent intact systems. Concerning 3, doing a good site-specific plan following a major disturbance should dictate where seeding of non-native, seeding rates and combinations of species because this is where mosaic vegetation patterns and existing seed sources can be used to benefit multiple objectives. We support the more prescriptive post-burn management flexibility. Under 6, the at risk annual rangeland is an important issue and aggressive greenbelt establishment better protects the community health at the landscape level. Under Objective 2, the biodiversity emphasis of protecting big sagebrush is not backed by science of prevailing professional judgement.

20. Concerning Forest and Woodlands we feel it is vital for many biological reasons to aggressively manage juniper but the acreage should be higher because the age-class under 40 years of age is not inventoried.

21. Concerning Water Resources and Riparian/Wetland Areas (Table 3-1), under objective 1, paragraph 2, it is wrong to say "management actions will restore water quality etc.." because science is not available to accurately say how much we can effect water quality in any one site-specific area.

22. Concerning special status animal species in Table 3-1 less emphasis should be on landscape level evaluations and more on monitoring of conditions and the management and ecological condition of specific areas in the context of broader levels of specific species habitat needs.

23. Concerning objective 2, it should be emphasized the intensive management is critical to bighorn sheep management. It also should be noted that cattle grazing benefits the sheep.

24. Table 3-1, page 3-32, 2. Grazing exclusion of a pasture can have a negative impact, as can any grazing practice implemented in the wrong timing and duration. Exclusion can decrease the adaptive management opportunities by the fact that there is one less pasture rotation to refine the effectiveness of grazing timing, duration, rest, distribution, intensity, natural livestock movement and objective. Exclusion of grazing on some soils can increase the spread and establishment of certain noxious weeds especially in areas that accumulate excess plant litter or soils prone for frost heaving, fragmenting or puffing. These loose soil conditions and accumulated plant material is the seedbed perennial pepper weed and other noxious weeds like, as do mice and many other burrowing animals. In some situations the loose soil conditions and decrease vigor of perennial plants increase stream bank instability and vulnerable to increased sediment. Proper grazing use can enhance the leaf area and vigor of ground cover plants while firming up soil, establish seed beds and open up areas of accumulated plant litter. The preferred alternative should specify the need for exclusion, document the site-specific basis for exclusion and specify long term monitoring to determine the changes over time similar to grazed areas. Temporary nonrenewable
grazing should be allowed to become permanent in appropriate areas which provides an incentive to improve site productivity. The increase can be conditioned to long term monitoring or other site specific criteria.

25. Will a special recreation management area decrease the use of the predominate recreation on Steens Mountain and other southeastern Oregon areas, which is off highway four wheel drive use of unmaintained ways and roads? Many of these roads are private, and privately maintained roads accessing private land. Are you proposing to close or limit use when it is cooperatively agreed to by private landowners controlling access or are you going to administer restricted use other ways? Page 3-333-335. Exclusion and limited use should only occur when a documented resource need occurs or full public meetings with the average recreationalist that typically is not involved with BLM management issues. We believe the historical use to transverse old two track roads needs to be recognized in the preferred alternative.

26. We believe ACECs and RNAs are very important methods to increase management focus, research or monitoring to better understand and manage the needs of certain areas with unique biological parameters but the purposes have been diluted by BLM with many of the established ACECs relative to both purpose and management emphasis. We oppose the proposed additions because they are not consistent with ACEC legal authority and purpose.

27. The preferred alternative excessively restricts different geothermal and small rock pits that

would be very beneficial to the area, land management and the mission of BLM. Page 3-52 to 3-67.

Objectives, Rationale, Monitoring, and Management Associated With Each alternative for Each Resource

28. Rangeland Vegetation, Rationale, page 3-66, paragraph 1. We agree with this section which emphasizes vegetation management that targets watershed and diversity purposes and not PNC. It would be beneficial to emphasize healthy vegetation and ground cover. The primary source of soil organic matter in the high desert is associated with healthy grass and forb root growth and mass, not plant litter. The loss of ground cover plants associated with late seral juniper dominance is the best and most visible issue of concern but the same result of increased bare ground occurs in older sagebrush stands along with reduced vigor of grasses and forbs under the sagebrush canopy. Having plant communities with these conditions by themselves is not bad but it is not beneficial to have large contiguous areas in these decadent conditions.

29. We support the concept of **desired range of future conditions based on site potential.** The high desert is constantly changing and this system reflects evolving knowledge about combination of different habitat types and conditions which are important to diversity and wildlife throughout the area. In the preferred alternative, a higher percentage of prescribed burn areas will be necessary due to the long period without fire especially in and next to juniper areas because of the hundreds, and in some cases, thousands of young juniper seedlings per acre.

30. ESI do not include young juniper so flexibility and management language needs to be included in the preferred alternative to address this issue including increased prescribed and other treatment acres any one year and during the life of the plan. Page 3-75 and other sections.

31. Management actions concerning Special Status Plant Species need to be monitoring based with the ecological and disturbance relationship fully understood and documented prior to altering management or land use. Page 3-76 and other sections.

32. Water Resources and Riparian/Wetland Areas. The reference to ODEQ water quality is premature because the legal basis of a WQMP functioning as a TMDL has not been fully determined. In addition there is strong disagreement within the professional and scientific community concerning what parameters and characteristics need to be used as measures in terms of compliance. Note page 3-78. We agree with the language of the preferred alternative on page 3-80.

33. Concerning DRFC and monitoring, including relating to the use of PFC, land use monitoring should primarily consider those characteristics directly influenced by the land use. Natural factors should also be monitored especially natural disturbance factors and natural conditions.

34. Page 3-112. Aircraft should be allowed to land inside the Steens Mountain Recreational Lands during the whole year. At times we use aircraft for commercial and management purposes and this statement would be very detrimental to our business.

35. Appendix M — page 355. A conditioned Category B Wildland Fire Response should be added to the preferred alternative. If a wildfire starts in a prescribed burn area or in a high priority area targeted to be burned, the inter-disciplinary resource team and the fire management officer would open up the fire suppression window (higher base wind speed of 15 mph allowing gusts to 25 mph and lower humidity levels) if cooperative agreements with private landowners, livestock permittees and other directly impacted parties could be obtained and if cooperative maximum suppression lines could be determined.

36. Appendix N — page 359-370. We fully agree with adaptive grazing management being emphasized in the preferred alternative but we feel the utilization levels, stubble height levels, stated season of use and other specified criteria needs to utilize ranges consistent with the type of year. For instance, a four inch stubble height to maximize sediment filtering may be a high priority need but the utilization level of 45 percent may not be consistent with that objective because of site-specific conditions (point bar roughness and vegetation structure) and the type of year. There are several new studies indicating short stiff grass stubble filters sediments and builds banks along streams better than tall grass. This is especially true with different height and roughness characteristics. Therefor, we recommend not limited use to the early season in the riparian pastures — make it prescriptive to the objectives. We do not agree with the mandatory rest because it is not beneficial or consistent with successful adaptive management and rest should be mor prescriptive.

37. Alternative D — Impacts, page 367 Appendix N. It is inappropriate to have the last sentence or any equivalent statement in the RMP. In addition, "adverse impacts" are general, subjective and not specific enough to even characterize cause and effect relationships.

Hopefully, our comments are helpful in making the Final RMP stronger and more consistent with BLM's mission and better meet biological and local economic needs. Please call if you have any questions or need clarification or references concerning our comments.

Sincerely,

Fred I. Otley
Otley Brothers Inc.
Oregon Cattlemen's Association

L-219

Barbara J. Cannady

RECEIVED
MAR 11 1999
BURNS DISTRICT
BLM

2 March, 1999

Mr. Glen Patterson
BLM, Burns District
HC 74 12533 HWY 20 West
Burns, OR 97720

RE: Southeast Oregon Resource Management Plan / BLM Vale, Burns District

Glen:

Of all the issues addressed in today's BLM management planning, I believe the seeding of sagebrush (rather than the managed thinning of sagebrush) to be the most controversial and damaging to our ecosystem and rangeland management practices.

The Big Sage, and other sage species, thrives in the great basins of America where the ocean once covered. The lack of a more desirable seed bank causes these species to dominate the landscape. It takes 2 to 4 times as much water to produce a pound of sagebrush as it does to produce a pound of grass. Because of this competition for water, and its ability to win over more desirable plants, it has always been and should always be considered a weed.

Studies repeatedly show the importance of more desirable plant species (Western Wheatgrass, Idaho Fescus, Winter Fat, Serviceberry, Snowberry, and practically anything else) changes inversely to the sagebrush population. Indeed, the most win-win balance for more desirable herbaceous species and animal representation occur when sagebrush cover is managed down to 12-15%. In fact, an over-abundance of big sage destroys the herbaceous understory, which conceals bird nests from predators and forage for wildlife as well as domestic livestock.

If big sagebrush can be controlled to more marginal levels, grass species can create a healthier ground cover, water runoff decreases, infiltration increases and soil erosion is minimized. Better forage in thinned sites also attracts livestock and wildlife away from sensitive riparian areas.

IN SUMMARY: (CHAPTER 3 – 18)

Any intentional seeding of sagebrush should be curtailed immediately. Its prolific existing seedbank and its competitive nature for water guarantees ample survival rates for wildlife habitat.

The argument that grass needs shade from sagebrush is disproved routinely by the practical experience of anyone that has cleared brush and seen the dramatic increase in forage production. In fact, the seeding of sagebrush, rather than a more desirable species (whether native or nonnative) can only be viewed as a direct attack on commodity production, in a blatant scheme to lower pasture production (AUM's).

While one voice may not stop the train, I appreciate the opportunity to blow the whistle.

Respectfully,

Barbara Cannady

L-220

RECEIVED
MAR 01 1999
BURNS DISTRICT
BLM

February 26, 1999

BLM
Burns District Office
Hines, Oregon 97738

Dear Mr. Patterson,

Kiger Ranch, Inc. is commenting on the SEORMP/EIS Draft Plan as a private landowner, BLM permitee holder, and member of the general public as stakeholder in our public lands.

Our comments of the SEORMP/EIS Draft Plan will pertain to Steens Mountain. Multiple-use has worked for many years and with the support of landowners, BLM, and local residents should continue for many more years. By working together on all issues(wildlife, recreation, wild horses, plants, grazing, fish and water resources) of management on the local level we can continue with multiple-use to benefit the economy of Harney County,local residents, visitors, and future generations. The key is balanced management with all issues.

LIVESTOCK GRAZING

Chimney Allotment
Correction

There is now a let down fence on the upper end of the Chimney Allotment keeping cattle out of the nonuse area.

Comments

Over fifty years we have lived in the area and grazed cattle on private lands and public lands. We have seen improvements such as crested wheat fields, livestock wells, improved and new water holes, sagebrush spraying and burning and some juniper control, all to benefit wildlife, cattle grazing and our lands in general. We feel there is a big problem with junipers and will continue to work with BLM to see that everything possible can be done to control juniper take over. Being in the area as long as we have, we really see how junipers have multiplied. Juniper control is something really necessary to improve and preserve our lands. We have allowed cutting on our private lands, and supported BLM burns and cuts.

WILDLIFE

Elk are not native to Steens Mountain. Elk herds are to large in the area and should be reduced or removed.
Beaver have caused tremendous damage to creeks. Their dams have backed up water causing erosion, destroying meadows,rerouting creek channels, and destroyed many beautiful trees over the years.
Deer population has declined tremdously over the years.
Cougar are increasing in the area. This will be very devastating to the deer and antelope populations as well as to cattle ranchers.
These are issues we would like to see addresed in the future plan of Wildlife management on Steens Mountain.

Kiger Ranch, Inc. is strongly opposed to a National Conservation Area for Steens Mountain.

As private landowners we're concerned with the SEORMP/EIP Final Plan and the adverse affect it will have on our business. We encourage the BLM to truly consider private landowners,cattle ranchers and the economy of Harney County when finalizing the SEORMP/EIS Plan.

Sincerely,

Kiger Ranch, Inc.
Eugenia Otley
Eugenia Otley - Pres.

Shirley Carson
Shirley Carson

Earl Carson
Earl Carson

L-221

Feb 27, 1999

Jim Kenna, BURNS DISTRICT MGR.
BURNS DISTRICT BLM OFFICE
HC 74-12533 Hwy 20
HINES, OR 97738

RECEIVED
FEB 26 1999
BURNS DISTRICT
BLM

Mr Kenna:

Concerning the draft SEORMP/EIS I recommend the selection of Alternative D.

However some improvements such as restricting grazing in riparian areas, areas in poor condition, and areas crucial to sensitive species.

In the coming decades the protection and restoration of natural values/areas will benefit all Oregonians. In much of the west intact ecosystems and good habitat for much wildlife is only a memory. Lets not allow southeast Oregon to become that.

Thank you

Frank Cospalloto
FRANK COSPALLOTO

L-222

ROARING SPRINGS RANCH, INC.

RECEIVED
MAR 04 1999
BURNS DISTRICT

Bureau of Land Management
Burns District Office, Andrews Resource Area
% Miles Brown, Area Manager and Glenn Patterson, Planning Team Leader
HC 74-12533 Hwy 20 West
Hines Oregon 97738

Comments on the Draft Southeast Oregon Resource Management Plan/EIS:

In general I like the concept of planning for resource objectives; unfortunately, this type of planning leaves a lot of questions unanswered. These unanswered questions leave me uneasy about the outcome of many of the proposed studies and relative decisions that will come from them.

Issue 5, Special Management Areas bring about some of my greatest concern. Volume 2, Appendix N, Page 359 quotes Dr. Griffiths report of grazing pressure on Steens Mountain in the early 1900's. We know that the Steens area and most all of Southeastern Oregon received extreme grazing pressure for 60+ years. Monitoring performed by the Bureau staff has shown improvement of rangelands in most areas consistently for the last 20+ years. Livestock grazing is only a fraction of historic use with many areas already off limits to grazing. The areas we are now determining as "special" are only "special" because ranching has kept them open and undeveloped. Why the sudden rush to designate so many SMA's?

WSA's, WSR's, ACEC's, all limit management flexibility. Why continue to designate more land "special"? What law or act allows or requires ACEC designation? Why is it that sudden management changes have to take place following special designations when the unique feature existed prior to designation under prior management?

It is my understanding that National Conservation Area designation comes through Congress. Why is the proposed NCA designation a part of this planning document?

Furthermore I found it very difficult to form an opinion on the relevance of an NCA from the information provided. I would suggest pulling the NCA discussion out of this plan and come out with a new plan for NCA management when and if Congress designates the Steens as an NCA.

Many of the unique and special features that interest people are on private land. The statistics used state that the area is "768,983 acres, including about 200,000 acres of private" inside the proposed NCA boundary. This statistic really distorts the real picture as so much of the riparian and key areas are on private land. What would happen to the private land with in the boundary of the NCA? Why not limit the NCA to the high Steens gorge area and other large contiguous blocks of public land and leave the private land outside the boundary?

Volume 1, Page 2-82, Is it fact that "permits have no legally recognized value as private property"?

Volume 1, Pages 4 -16, 17, 18 Reseeding of burns with 75% nonnative and 25% native mixes do not result in a monoculture of nonnative species. Road canyon is an excellent example of crested wheat replacing cheat grass while native perennials continue to occupy their sites. Use of nonnative perrenials can actually increase species diversity of an area. Nonnative monocultures only result after intense tillage practices. Limiting the use of nonnative species on a large scale as Alternative C does would definitely increase the spread of noxious weeds and enchroachment of nondesirable annuals. Native grasses are extremely expensive and difficult to establish in these low rainfall areas.

If I read alternative C properly and it is the preferred alternative. Reading between the lines I see grazing reduced, fire suppression efforts reduced and prohibition of planting nonnative species. Will

ROARING SPRINGS RANCH, INC.

cheatgrass, medusa head, and noxious weeds provide the desired wildlife habitat, watershed conditions, and recreational scenery?

Blanket statements like found on page 18 paragraph 7 "Riparian areas are often adversely affected by livestock grazing." Are very biased and inaccurate in my opinion. With current grazing management only isolated areas are in declining condition based on BLM monitoring. How can this plan paint such a bad picture of grazing when monitoring indicates the opposite, an upward trend in the majority of cases?

Page 4-19 next to last paragraph. "As a result of optimizing livestock use of available forage, the benefits of returning vegetation material to the soil would be minimized." Standing bunch grasses in low precipitation areas take years to fall to the ground and return to the soil. In fact often the plants become weakened by the standing dead "wolfy" vegetation. After years of baking in the sun and wind little remains but the Carbon to return to the soil when the stems and leaves do fall. The best cow will only convert 10% of what she eats to her body reserves, the rest passes through her system to the soil as digested grass mixed with water. Is there scientific documentation that undisturbed bunch grasses return more to the soil than grazed plants through cow manure?

Chapter 4-22 paragraph 1 I think the South Steens in 1998 is definite evidence that decreased grazing will increase fire acreage and frequency. As more areas are rested more frequently under Alternatives C, D & E annual acreage burned by wildfire will increase substantially, not that wildfire is necessarily bad. The plan is inaccurate, leaving the agency unprepared to deal with the increased black areas.

Again reseeding these areas with 75% native species mixes greatly increases the costs and limits the success of reaching management objectives.

Page4 - 23&24 Alternative D Less juniper control and greater restriction on grazing may take the land farther from Resource Objectives rather than accelerate the rate of accomplishment. Paragraph 9 " Lighter grazing levels that emphasize resource values and authorization of no TNR use would retain additional plant litter for incorporation into the soil. Soils would be better protected from erosive overland flow of precipitation."
With limited grazing what will cause these bunch grass plants to return to the soil? Is there scientific documentation that ungrazed, burned uplands contribute less sediment than grazed burned uplands?

Page 4 - 27 Paragraph 6 " Conclusion: Exclusion of livestock from all public land would allow natural succession to improve the condition of many vegetation communities."
Which vegetation communities? Where is the scientific documentation?

VOLUME 2

Appendix D
Riparian management is key to grazing decisions for many of these rangelands. Decisions for consideration under the alternatives are based on data found in Appendix D. The riparian condition and trend in the chart appear different from files I have reviewed on South Steens streams.
Is the most recent data available listed in these tables? Was monitoring and classification information gathered from all members of the Interdisciplinary Team? If not, could that information be included and have influence on the decisions outlined in the preferred alternative?

ROARING SPRINGS RANCH, INC.

Appendix N

BLM monitoring indicates improvement in Riparian health consistently from 1984 to present under previous management. It seems Ironic to change management as drastically as is proposed when previous management was allowing improvement..

Page 367 Paragraph 6. " Any adverse impacts to public land resource values from private land management may reduce the availability of use for livestock on public land."
Could this be better quantified as to what activities on private land might adversely impact public land resource values? What public land resource values might be impacted? Is it legal to take a permit for activities performed on neighboring private lands?

Appendix T

The main purpose for including this portion in the RMP was to analyze the Lauserica fence in an EIS. With the Lauserica fence plan completed in an EA as an amendment to the AMP is it necessary to leave this Appendix in the RMP?

Throughout this appendix and the entire RMP there is the underlying tone that cows hammer creeks and that fish and cows cannot coexist. This tone bothers me because much improvement has taken place in the last 45 years really, and documented improvement in the last 15+ years. The Bureau needs to do a better job of "tooting its own horn" if you will, and recognizing the good things that have taken place since the Taylor Grazing Act was passed.

I have great concern for our local economy and loss of rural culture as these plans come out with more "special land use designations" and greater restriction on natural resource use. Grazing allows the use of a renewable resource and generates Gross National Product to our economy. It is a very sustainable contributor to the economy. Locking up large acreages from mining and other forms of natural resource use greatly limits our options in the future. I worry that the agencies are listening a little to much to the preservationist crowd and ignoring the many other public land users as more and more federal land uses are severely restricted.

Sincerely,
Stacy L Davies
Stacy Davies

L-223

RECEIVED
FEB 25 1999
BURNS DISTRICT
BLM

February 22, 1999

James Kenna, Burns District Manager, BLM
Edwin J. Singleton, Vale District Manager, BLM
Burns District Office
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Subject: Southeast Oregon Resource Management Plan/ EIS

First, let us express great appreciation for the outstanding maps that accompanied these volumes. They are remarkably readable and comprehensive.

Following are our comments on the documents:

Generally, we much prefer Alternative D which has better potential for long range resource protection.

Specifics:

1. Mineral leasing--It appears far too much area would be available for mineral leasing in Alt. C (Map MIN-6). Please concentrate mineral leasing in areas of no conflict with other resource values, e.g. wilderness, wildlife and quiet recreation. Stay out of ACECs and RNAs. Re Borax Lake: we support the 3x8 mile buffer. We understand the desire to maintain the flow of resources from public land, but wherever this may be inconsistent with the "desire to protect, restore and enhance resource values" the latter should prevail. This is necessary to assure the long term health of public land.

2. We support the recommendations of the High Desert Committee of the Sierra Club for Wilderness designation. These wilderness

areas will become more important as our population grows. Now is the time to plan for that future.

3. We support all the Wild and Scenic River and ACEC designations in Alternative D.

4. We support SRMA status for the Succor Creek area (Alt.D). That wonderful lonely cottonwood tree was surrounded by junk when we were last there---a picnic table in its shade and an interpretive sign would be so welcome.

We support Wilderness designation for Leslie Gulch and environs, a most fascinating place.

5. Domestic sheep should be phased out of Bighorn Sheep habitat. Protective management practices for these and for Pronghorn Antelope, elk and deer should be emphasized.

6. For OHVs, alternative D is best. Now is the time to be firm about limiting the destruction these machines cause. They are inimical to practically every other recreational activity and surely cause significant distress to wildlife. Limit their activity to areas where they will do the least danage until such time as they can be phased out altogether.

7. Riparian Management objectives are good, but can you achieve them? Cattle grazing should be gradually phased out of all sensitive areas until the land is restored to natural conditions.

8. The Adaptive Management approach, if adequate monitoring is funded, maintained and used, is a desirable approach. A comprehensive, well implemented monitoring program is absolutely essential for any alternative. Perhaps it should be clearly stated that unless funding is available for monitoring, there is no way to know what the state of the land is.

Alan + Myra Erwin

L-224

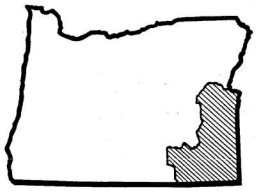
Bill Hamilton Tax Consultant

RECEIVED
MAR 10 1999
VALE DISTRICT BLM

2-24-99

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

It is very important to me and my wife that you put your support to BLM Alternative A that Excludes Livestock Grazing.



BLM is seeking input on its plan for 6.3 million acres in southeast Oregon (shaded area).

SEORMP* will guide the future of 10,000 square miles of high desert wildlands, including:

- **Steens Mountain**
- **Owyhee Canyonlands,**
- **Blitzen River,**
- **Nearly 300 river miles eligible for federal wild and scenic status, and more.**

*Southeast Oregon Resource Management Plan

Sincerely
Bill Hamilton

L-225

Paul E. Harris

RECEIVED
FEB 25 1999
BURNS DISTRICT
BLM

February 22, 1999

Bureau of Land Management
ATTN: Cody Hansen / Acting Burns District Manager
Burns District Office
HC74- 12533 Hwy 20 West
Hines, OR
97738

Dear Mr. Cody,

I am writing to comment on the SEORMP/ EIS in general and where it applies to the Steens Mt. area specifically. As an frequent visitor to the area I was disappointed in the draft statements lack of clear cut proposals and the potential of the plan to impact the publics access to the area.

The comments on the possible closure of the Loop Road in the winter concerned me as well as the comments on the over flight restrictions for helicopters. As a member of the public I would urge the road be kept open to winter activities that I may want to enjoy in the future.

I would also like to be able to use local providers of helicopter transportation to access fishing areas that would be difficult if not impossible to reach by any other means.

Thank you for you attention.

Sincerely,
Paul E. Harris

L-226

THE WILDLIFE SOCIETY
OREGON CHAPTER

RECEIVED
FEB 25 1999
BURNS DISTRICT
BLM

James Kenna
Burns District Manager
Bureau of Land Management
HC 74-12533 Hwy 20 West
Hines, OR 97738

February 25, 1999

FEB 25 1999

Dear Mr. Kenna:

The Oregon Chapter of The Wildlife Society (ORTWS) is a nonprofit scientific and educational organization of professionals in wildlife and resource management. We appreciate the opportunity to comment on the *Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement*.

Overall, the document seems fairly complete and well written and does a good job of capturing the needs of the pubic in the natural and social resources affected by this plan. The Vale and Burns districts should be commended on many aspects of the plan.

As expected the plan is very general, with few specific directions. It is written for a landscape perspective for groups of allotments rather than for each allotment. This affords a more ecologically base management style. The document is very large, and it is obvious that much work has been done on analyses, however we have several points, questions and concerns related to this document. The following are ORTWS's comments:

General

We are concerned about the age of some of the references used and the paucity of references used throughout the document to justify conclusions. For example are Thomas et al. (1984) and Vavra and Sneva (1978) still the most recent references for research. A more thorough review of pertinent literature is needed to improve the content of the plan. It also seems appropriate for BLM to conduct inventories to validate current watershed level ecologically based management.

Chapter 1

- The principle of "Adaptive Management" is a major emphasis in this plan. Although this is creative, and has great potential to be dynamic in correcting undesirable conditions, management objectives proposed are generally too vague. In other words it is not clear how or when the Bureau would alter a management pathway in order to meet an objective or how such general objectives would be measured in the evaluation stage. The key to adaptive management is to have measureable, quantified objectives and a well thought out monitoring program to measure those objectives. The timing of the adaptive management cycle should be identified. Will evaluation and course correction take place every year, every 5 years, or when? The risk is outcome based and if the outcome does not favor wildlife the problems should be identified as early as possible.

- Another critical part of adaptive management is monitoring. Will adequate funding be planned for to cover monitoring needed to fully implement an adaptive management approach?

- It is difficult to see how this plan differs from past management. It would be helpful to have a summary of monitoring data from past years to suggest the vegetative condition or trends on the range or the conditions or trends of wildlife habitats affected by management actions. It would also be useful to show the results of past monitoring data and explain how it supports the recommendations for proposed grazing levels.

- It would be very useful to have certain definitions in the document. These definitions include but are not limited to: sensitive resources, acceptable limits, cave, and desirable introduced plant species.

- Will the final EA address allotment management at the permit level? There is concern that grazing agreements may have been developed in the past without NEPA compliance and that decisions established in those agreements will not be revised by this plan.

Chapter 2

- It is not clear how many ACECs have been established primarily for plant and/or animal habitats. Furthermore it is not clear which ACECs with plant and animal primary values will have recreation, mining, grazing or some other potentially conflicting management actions as secondary objectives. Measuring "limits of acceptable change" in these habitats is not only critical to maintaining the original values, but very difficult to do without established methods. It would be useful to identify where potential conflicting management action may occur and identify specific levels of change which are acceptable to maintain the primary resource values for which the ACEC was established (see pages 2-62 to 2-69).

- The management plan explains that juniper has replaced shrub steppe habitats because of the reduction of fine fuels and the change in fire frequency and intensity. The plan attributes this condition (in part) to livestock grazing, and intends to use artificial means to reset the ecological condition. Is the replacement of the shrub steppe by juniper expected to continue at similar rates, or will livestock grazing levels be altered to ensure that the rate of re-establishment are slowed?

  In the definition of "Lotic Waters", riparian/wetland areas are functioning when all three of the following components are adequate: vegetation, land form and large woody debris.

In defining both Lentic and Lotic waters there should be some quantification of the level of function needed (quantified) for each parameter in order to define either minimum or optimum function of a system (see page 2-36).

-
- On page 2-44 "Upland game bird" species should include the native species of mountain quail and sage grouse even though they are also included as special status species. In this section there is a lot of attention given to exotic wildlife species. What is BLM policy in relation to management of exotic game species?

- The economic value of wildlife should be given more consideration in each species write-up.

- The discussion of neotropical migrant birds on page 248 should be expanded. It is now politically correct to call this a part of a larger group: "landbirds". We suggest titling the paragraph landbirds and adding the discussion that many landbirds which don't migrate to the neotropics are also declining.

- Table 2-15 lists the northern bald eagle as a documented breeder in the Andrews RA. This appears to be an error as the text on pages 2-53 and 4-79 mention that no breeding occurs within the planning area. Also, the white-tailed jackrabbit should be listed as a documented breeder (albeit very rare) in the Andrews RA and also the Yuma myotis. Other bat species which are documented as breeders in the Andrews RA include: *Antrozous pallidus*, *Myotis thysanodes, Lasionycteris noctivagans, Myotis ciliolabrum,* and *Myotis evotis.*

- We would like to see the plan address restoration of species which have been extirpated from all or portions of the planning area . Two particular species which should be considered are sharp-tailed grouse and white-tailed jackrabbit (Andrews RA). These two species were historically common in the planning area. The Malheur National Wildlife Refuge Master Plan addressed restoring populations of sharp-tailed grouse to the refuge and the northwest portion of the Andrews RA.

- The species write up section fails to provide adequate information about small mammals including bats, beaver, kit fox, bobcats, other carnivores and furbearers, reptiles, and amphibians. There could be additional information provided for species included in table 2-15. Some of these groups of species are special status species and should receive more detailed discussion in the plan.

- The discussion of Catlow tui chub on page 2-53 should be expanded to include information about the "*Catlow Redband Trout and Catlow Tui Chub Conservation Agreement and Strategy*".

- Also on page 2-53, the discussion of bald eagle use fails to acknowledge that much of the eagle use in ARA is associated with Malheur Refuge in the south Blitzen Valley.

- The bighorn sheep range map and the statement on page 2-55 that "No licensed sheep grazing permits overlap with currently occupied bighorn range" lead to confusion. Does the range shown on the map not represent currently occupied bighorn range? To err on the safe side, it is easier to move a domestic sheep allotment than to keep bighorns from going where they want to. We suggest that the Bureau consider moving sheep allotments away from present and potential bighorn ranges.

- Does the Bureau have a formula for adjusting grazing levels? If so, it should be explained in the document.

- On page 2-60, forbs were not included in a seed mix. We recommend that forbs be included in seed mixes as they are very important in the diets of a wide cadre of wildlife. This is an appropriate place to identify a proportion of the "range improvement funds" to be used for livestock grazing impact mitigation. Since wildlife generally do not fully utilize crested wheatgrass plantings, there is a need to list a seed mix for range improvement projects. There is also a need to identify a utilization level which is keyed to the survival of the plant species in each habitat, which is least tolerant of grazing pressure.

Chapter 3

- The "Desired Range of Future Conditions" should expand the forest conditions to include greater wildlife values, and to manage habitat so as to not encourage the further listing of threatened or endangered species.

- The "Implementation Through Adaptive Management" should include time frames for management actions.

- Under Alternative C on page 3-18 there is a typographical error in the reference.

- Further quantification is needed on wildlife objectives. Again, they are vague and are more like goals than objectives (see page 3-88 "Objective 1",on the subject of enhancing populations).

- We would like to see the document address how many AUMs would be allocated to wildlife under each alternative, in comparison with AUMs for livestock and wild horses.

Chapter 4

- Riparian Management prescriptions in general, are likely to need additional adjustments. Fencing of riparian areas is costly and not always effective. Pastures with riparian areas need to be managed by monitoring the utilization and condition of the riparian area rather than the utilization and condition of an upland, or crested wheatgrass seeding.

- On page 4-22, regarding reseeding wildfire sites, it states that "25 percent would receive a nonnative seed mixture". Please justify the need for use of nonnative seed as we see this as a step away from management of a landscape for native biological diversity.

- There needs to be an identification of the level and how often range will be managed for the early, mid and late seral conditions (page 4-73 under alt. C).

- The information on page 4-84 should also be contrasted with alternatives D and E. "Historic" nest sites for bald eagles and peregrine falcons should also be addressed rather that just the current nest sites of these species.

Chapter 5

- On page 5-7, organizations on mailing list should list The Wildlife Society. We assume this is the national organization. To limit confusion, this comment letter is from the Oregon Chapter of The Wildlife Society.

Appendix F

- Page 321 states white-faced ibis "only as a breeder on private land". This should actually state that most breeding within the planning boundary occurs on Malheur NWR, with occasional breeding on private lands (only one year in Harney County).

Appendix N

- Pages 363-365 each list "median stubble height....of approximately 3 inches" for Alternative C. Three inches is too short for most wildlife species and riparian shrubs would be damaged at this level of use. This level eliminates cover for small mammals and many ground-nesting birds during the nesting period and will also slow the riparian recovery process. We suggest that a figure of at least 10 inches be used as the standard for livestock removal from riparian pastures.

Thanks again for the opportunity to comment.

Gary Ivey
Conservation Committee Chair

L-227

Burns Paiute Tribe
NATURAL RESOURCE PROGRAMS

RECEIVED
FEB 26 1999
BURNS DISTRICT
BLM

2/22/99

Miles R. Brown
Bureau of Land Management
Burns District Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

Mr. Brown:

I have finished reviewing the "Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement". The following are my comments:

1. p.1-17 "The Malheur Reservation went through numerous geographic changes and was largely abandoned by the Northern Paiute in 1878 during hostilities". This statement overly simplifies the history of this period and serves no purpose in this document. It implies that the Northern Paiute left the reservation out of their own choice, which was not the case.

2. p.2-80. The tribal economy was not represented in the section on "Human Uses and Values".

3. p.2-91 "No American Indian subsistence areas have been identified". The Burns Paiute Tribe has been working with both Burns and Vale BLM on this subject. This sentence should be reworded to better reflect the working relationship the Tribe has with the Districts. Information has been provided by tribal members at meetings and during fieldtrips.

4. p.3-134. The Burns Paiute Tribe is in support of the Castle Rock ACEC nomination. This is an area used for both sacred and subsistence reasons. Comments on the nomination have been provided at the Tribal Council and Elder's meetings.

5. p.4-5. The Tribe would encourage the BLM to close both Castle Rock and the Steens to mineral development. Both of these areas are of cultural importance to the Tribe.

6. The Tribe encourages the BLM to record cultural plant distribution during project surveys. This would benefit both the BLM and the Tribe and aid in discussions on specific projects.

7. p.4-122. Cultural resources were not specifically considered in the section on "Visual Resources". The visual impact on cultural resources also needs to be considered during public land actions.

8. p.4-150. Tribal use of the area is not discussed within "Human Uses and Values". This needs to be added to this section.

As mentioned earlier, you have received oral comments from tribal members at meetings during the past two years. These comments should also be considered in producing the final RMP.

Sincerely,

L) Reed-Jerofke

Linda Reed-Jerofke
Cultural Resource Manager

L-228

Steve + Joanne Rasik

RECEIVED
MAR 01 1999
BURNS DISTRICT
BLM

Dear Cody Hansen, Feb. 23, 1999

I am writing this letter in regard to the newly released BLM management plan for Southeast Oregon.

I am of the understanding that the BLM does not want Authorized Aircraft landing on the Steens Mountain BLM land except for winter activities only. I do not understand why they don't want people to enjoy seeing the beauty of the mountain and getting into these remote fishing streams by air when it would be much more harmful to the surface of the ~~mountain~~ using 4 wheel drive vehicles, quad or motorcycles. We visit Frenchglen every summer for our vacation and have had the Wildlife fly us in with their helicopter to various fishing spots on the mountain. I don't see any harm that has ever come of this flying in to the mountain. I think if you stop it, it will Concentrate the people in more accessable areas and Cause more damage.

I grew up on the P-ranch and I enjoy taking my family to visit there every summer but I think some of the management practices of the BLM and the Fish and Wildlife service have hurt the wildlife and Caused more damage to the mountain than if they would have left it the way it was.

I am Concerned with keeping the area undisturbed and the habitat unchanged for the wildlife but there is by far less deer, ducks and geese than there was when I grew up there. I think it is due to changed management practices on the refuge and BLM land and I think that things need to be looked at from a Common sense stand point and using biological studies to see what works best for the good of all the wildlife and the enjoyment of recreation. The money generated from tourism is important to the people of the area so that should also be taken into consideration. I hope that everything is taken into Consideration before this management plan is passed.

Thank You, Sincerely,
Steve Rasik

L-229

RECEIVED
FEB 23 1999
BURNS DISTRICT
BLM

2/21/99

Mr. Cody Hansen, Burns District Manager
Burns District Office
Bureau of Land Management
HC74-12533 Hwy. 20 West
Hines, OR 97738

Dear Mr. Hansen:

This letter is being written as a letter of concern over the current BLM Draft Southeast Oregon Management Plan/Environmental Impact Statement, hereafter referred to as "the Plan." Specifically, I question the Plan's proposed action limiting authorized aircraft landing in the Steens Mountain Recreation Lands (SRMA) to the winter season and the Plan's impact on the operations of a guide service I use known as Steens Mountain Packers (SMP) of Frenchglen, Oregon.

As a native Oregonian, I place extreme value on the quality of Oregon's natural resources. I have lived in the Portland metropolitan area most of my life and am acutely aware of the negative environmental impacts which occur as a direct result of human population pressure. I worry about what lies on the environmental horizon for Oregon.

As a trout fisherman and outdoorsman, I also place extreme value on preserving the dwindling number of quality trout fisheries and natural recreation areas. I have witnessed, first hand, the total destruction of trout habitat and premium natural recreation areas west of the Cascades. Again, I worry about what lies on the environmental horizon for Oregon.

What do these comments have to do with the activities of SMP and the Plan? The answer is simple. SMP provides access to premium environmental experiences in an environmentally responsible way. I would not use them if they didn't. Environmental impact is minimized. Motorized ground transport is kept to a minimum. For fishing, a catch and release policy is followed. No trash is left behind. Laws are not only obeyed, but respected. SMP educates the public about environmental sensibility. In short, SMP acts as a counter to the negative elements of natural human behavior which takes place when the public is left to its own devices when coming into contact with environmentally sensitive areas such as SRMA.

In conclusion, I ask the BLM to give consideration to the fact that the Plan, as currently drafted, will negatively impact the activities of an entity (in SMP) which should be viewed as a partner in the quest to protect the SRMA from the ravages of the general public. If the activities of responsible guide services (such as SMP) are curtailed and the general public is left to its own devices, the Plan will insure the exact outcome it seeks to avoid. To me, it makes sense to use specially licensed guide services as partners in an effort control and manage access to one of Oregon's most treasured areas; the Steens Mountain Recreation Lands.

Thank you for your consideration.

Sincerely,

RC Krippaehne

Robert C. Krippaehne

Fn:steens/word

L-230

RECEIVED
MAR 01 1999
BURNS DISTRICT
BLM

Dear Mr. Kenna,

I am writing my comments to you in regards to the Southeast Oregon Resource Management Plan.

I moved to Burns last September because I feel strongly about the area that is covered in the Plan. This is my home now, and I intend to strongly appreciate and defend the natural wilderness areas that have touched me so deeply.

As a member of the Sierra Club Ski-desert Committee I have visited and explored many of the places that are discussed in the plan such as the Steens, Blitzen Rivers the Alvad, and other areas surrounding the steens.

I am deeply concerned about the future of the area and would like to express how I feel about a couple of the alternatives in the SEORMP.

1.) I do not like your preferred Alternative C because
* it mentions nothing about reducing the livestock that graze in this area. As far as I can see, cattle are not endangered. They are only a food industry. Like other industries, they should be contained without hurting others. Precious plant life, and beautiful streams and rivers, should be kept that way, so people and the eco system can live in its natural state without one certain business (cattle), threatening its creation.

2.) I prefer Alternative D because of its livestock reductions, protection of over-used areas, and the addition of new ACEC's. But I would strongly suggest adding to the Alternative D a stronger and more defined limit on livestock grazing and more protection of the Steens and Alvord Desert.

I love and respect this area of the country and hope the people who make long-range decisions about its beauty and sensitivity will honor the things this land is naturally trying to express.

Thank-you -

Patricia Leahy

L-231

RECEIVED
FEB 26 1999
BURNS DISTRICT
BLM

Daniel and Peggy Lee

February 16, 1999

Bureau Of Land Management
ATTN: Cody Hansen/Acting Burns District Manager
Burns District Office
HC 74-1253 Hwy 20 West
Hines, OR 97738

Dear BLM,

We are writing with concern about the newly published and released Bureau of Land Management Draft Southeast Oregon Management Plan/Environmental Impact Statement (SEORMP/EIS), and the potential impact of this plan on use of public lands in eastern Oregon. We have enjoyed the use of public recreation land in eastern Oregon for the past nearly 20 years, from Jordon Crater, the Owyhee River, Malheur National Wildlife Refuge, to the magnificent Steens Mountains. We would like to be able to continue to enjoy these great national assets, and would like to see that they continue to be protected and maintained as they have been so well in the past.

We have reviewed the plan, and have serious concerns over several of the proposed plans. In particular, we feel most strongly about the following three issues:

1. First, the statement that "Authorized aircraft landing in the Steens Mountain Recreation Lands (SRMA) would occur on BLM administered land for winter activities only" is most disturbing. To start with, this would represent a 75% reduction in flight operations currently authorized, which has several negative impacts. Perhaps the most significant impact is the resultant increase in ground traffic (motorcycles, ATVs, four-wheel drive vehicles, as well as horse and foot traffic), which will greatly increase the environmentally detrimental effects. Additionally, it would block use of public land from physically handicapped people, as well as significantly limit the places all people could visit, resulting in higher concentrations in fewer areas. Another significant impact would be a 75% reduction in air surveillance of both public and private land by the citizens most interested in their protection, the local businessmen and women. In actuality, the monitoring by local private citizens really helps BLM as a "force multiplier. Finally, the public service provided by local helicopter and airplane operators is noteworthy and irreplaceable, particularly for medical emergencies, locating downed power lines, and remote livestock support. In conclusion, year-around flight operations should continue for both local private citizens and BLM.

2. We are also concerned about the proposed designations, strategies, and actions that could effect the private lands and businesses, without the active participation and agreement with their owners. The ranchers and local personnel that live and work this land are without doubt the best to ensure the continuation of the regions natural beauty and value: they have a vested interest in preserving it. Therefore, the draft SEORMP/EIS must fully consider the impacts to the private lands and businesses to ensure that there are no negative impacts to the land's true stewards.

3. Finally, local landowners need access to their private property year around, without restriction. The statement that "such use would greatly stress deer on the winter range" is unsubstantiated and erroneous. The local landowners need to get to their property, even in severe weather, regardless of the time of year. Their occasional necessary travels will continue to have no significant impact on the wildlife or land.

Thank you for your consideration. BLM needs to work in concert with the private landowners in eastern Oregon, to preserve the national resources God provided. What is not needed or desired is overly restrictive regulations written in the name of Land Management that are contrary to the preservation of the this great land.

Very Respectfully,

Daniel Lee Peggy Lee

L-232

March 1, 1999

Edwin J. Singleton
Vale District Manager
Bureau of Land Management
100 Oregon Street
Vale, OR 97918

Craig Hansen
Burns District Manager
Bureau of Land Management
HC 74-12533 Hwy 20 West
Hines, OR 97738

Via FAX (541) 573-4411; 38 pages

Dear Mr. Singleton and Mr. Hansen:

Below are the comments of the Oregon Natural Desert Association, National Wildlife Federation, American Lands Alliance, ONRC Action, ONRC Fund, and Northwest Environmental Defense Center on the Bureau of Land Management's Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement. Thank you for the opportunity to submit comments on this important planning document. If you have any questions about these comments, please feel free to call Gillian Lyons at the Oregon Natural Desert Association at Any written response or other correspondence may be addressed to

I. Range of Alternatives

A. The BLM does not evaluate a reasonable range of alternatives in the DEIS. While the stated purposes of the five alternatives appear to be different, the management direction for the various resources in Alternatives A through D is often quite similar. Therefore, the BLM has not met the NEPA requirement to evaluate a reasonable range of alternatives. For example:

1. In Alternatives A through D, "current grazing levels (Appendix E) would be maintained" (3-94), without any evidence that the land and water are capable or suitable for maintaining current grazing levels. Alternative E would eliminate grazing. Therefore, the BLM has only evaluated two alternatives with respect to the grazing use — all or nothing.

2. The no action alternative to address noxious weeds is to "apply approved noxious

weed control methods in an integrated weed management program" (EA at 3-19). Alternatives A, C, and D would adopt the same current program as Alternative B, without any evidence that the current program is effective. Alternative E would treat only limited infested areas to protect adjacent private property. Again, the BLM has evaluated only two alternatives — all or nothing.

3. For water quality, Alternatives A through D do not differ in treatment of streams with water quality limited segments. 3-23. Alternatives A through D also allow activities to occur where water quality standards are not being met, so long as the uses allow progress toward attainment of water quality standards. 3-23. Alternative D adds "at the same or greater rate than if the use or activity were absent." This is not any different than the standard in Alternatives A through C. If uses would slow the rate of progress, then the uses would be contributing to lack of attainment of water quality standards, in dereliction of the BLM's obligations under the Clean Water Act.

II. Cumulative Impacts

Cumulative impacts must be discussed. 40 CFR 1508.25(a). Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 CFR 1508.7. Nowhere in the DEIS does the BLM assess the cumulative effects on resources of maintaining the existing grazing levels. Rather, in reliance upon "adaptive management," BLM merely sets out optimistic expectations and contingent plans. NEPA
does not allow the agency to defer or avoid taking the requisite hard look now, before the decision is made. The fact that Alternatives A through D would allow maintenance of current grazing levels without any analysis of the cumulative effects of that decision is also
representative of the shell game the BLM continues to play with regard to where it makes its grazing management decisions. Each new decision, at the planning levels all rely upon "adaptive management" at some later decision-making point. Where grazing levels are challenged at a finer scale, the BLM relies upon the RMPs to indicate that the grazing level has already been decided. Thus, the BLM cannot avoid its obligation to evaluate the cumulative effects of grazing in this DEIS.

The congressional intent of NEPA and CEQ regulations mandate consideration of all of these actions to provide a full and fair analysis of the proposed action. The draft EIS must address reasonably foreseeable significant impacts, even if information about them is unavailable. The draft EIS fails to appropriately evaluate reasonably foreseeable significant adverse effects. If the BLM's failure to address a subject comes from a lack of available information on the subject, NEPA requires the BLM to state such information is unavailable. 40 CFR 1502.22. Furthermore, if the BLM cannot obtain relevant information, it must at least include a summary of existing credible scientific

evidence and the agency's evaluation of foreseeable impact based on theoretical approaches. 40 CFR 1502.22 (b).

III. Rangeland Vegetation, Noxious Weeds, and Rangeland/Grazing Use

The primary goal of the Draft Southeast Oregon Resource Management Plan (the Plan) is "to develop management practices that ensure the long-term sustainability of healthy and productive land, consistent with principles of ecosystem management" (Chap. 1, p. 1). Other more specific objectives are to "restore, protect and enhance the diversity and distribution of desirable vegetation communities, including perennial native and desirable introduced plant species (Chap. 3, p. 16). Similarly, the objective for water resources and riparian/wetland areas is to "Ensure that surface water and groundwater influenced by BLM activities comply with or are making progress toward achieving State of Oregon water quality standards for beneficial use as established per stream by ODEQ" (Capt. 3, p. 23). These and other objectives presented in the Draft Environmental Impact Statement (DEIS) are commendable.

The purposes of the DEIS are also to describe the condition of BLM lands in the three resource areas and explain how they will be managed. The Plan, however, fails to do so in several important ways. It fails to describe the 6.3 million acres of planning area; it fails to discuss the major causes of degradation; and it fails to describe how the agency will manage these lands to achieve stated objectives. The following comments refer primarily to rangeland sections of the DEIS, but are also relevant to most of the other sections.

A. The BLM fails to disclose the assessment of acres suitable for livestock grazing. The BLM states in the DEIS that, within the 6.3 million acre planning area, 66,182 acres have been set apart from grazing allotments to improve or maintain resource values or because they were found unsuitable for livestock grazing. DEIS Table 2-18 at 2-59. Alternative A proposes allocating an additional 8,730 acres as not suitable or not available for livestock grazing. DEIS at 3-95. Alternatives C and D propose allocating an additional 8,836 acres as not suitable or not available for livestock grazing. Nowhere in the DEIS does the BLM reveal its criteria or assessment for its determination of which acres are not suitable for livestock grazing. Nor does the DEIS disclose the BLM's criteria, assessment, or determination of which acres are suitable for livestock grazing in violation of NEPA, FLPMA and the Taylor Grazing Act.

B. The BLM fails to determine which areas are "chiefly valuable" for grazing or forage before allocating those areas to grazing in violation of the Taylor Grazing Act, FLPMA, and NEPA.

C. The DEIS does not candidly or adequately describe the affected environment. Neither does it honestly discuss the causes of degraded conditions. Without a thorough discussion of the environment, neither the public nor decision makers can evaluate the adequacy of the management plans.

1. Soils (Chap.2, p. 10): The DEIS fails to adequately reveal the extent of degradation of the soils of the planning area. These soils suffer from compaction, erosion, reduced infiltration, and loss of fertility. The location, acreage, and causes of these degraded soils are either completely left out of the DEIS or minimized. Neither are the area and location of soils in good and excellent condition reported. All problems are attributed to uses 60-100 years ago, while current management practices were said to have "reduced erosion and begun the healing process". The DEIS must give evidence for these assertions since current management practices are known to degrade upland and riparian soils (see attached papers by Fleischner (1994), Belsky, Matzke, and Uselman (1999), and Belsky and Blumenthal (1997)). The DEIS must inform the reader how far current soil conditions deviate from their potential natural conditions, how far the healing process has gone, what specific activities led to the "healing", and how long managers anticipate it will take for these current activities to restore soils to normal function. Authors of the DEIS have to provide monitoring data to support their contention that the soils are improving. They've had since 1995 to collect and analyze these data, much of which are available on databases.

2. Microbiotic crusts (Chap.2, p. 10): microbiotic crusts are a major indicator of healthy rangelands. They stabilize the soil, fix nitrogen, increase soil fertility, increase growth of higher plants, and in some areas increase water infiltration into the soil. Except for one short paragraph, the DEIS ignores these biotic crusts, which are essential components of arid land ecosystems and major indicators of rangeland health. The excuse given for ignoring microbiotic crusts in the planning area was that there is little data on microbiotic crusts from the Northwest and that most studies have been taken from the Great Basin. These excuses are without foundation (see discussion and references in attached Comments on the Draft Interior Columbia Basin Ecosystem Management Plan (ICBEMP) by Joy Belsky, Oregon Natural Desert Association) or are irrelevant. Studies carried out in Texas showing the harmful effects of cigarette smoking do not have to be repeated in Arizona to be valid there. Idaho BLM experts on microbiotic crusts in the Northwest, Dr. Roger Rosentreter and Julie Kaltenecker of Boise BLM, and two scientific evaluations written for ICBEMP repeatedly stated that the microbiotic crusts of the ICBEMP planning areas must be actively managed by federal agencies and restored for the recovery of Northwest shrublands and grasslands. The DEIS must discuss the importance of the crusts, evaluate their current status over the entire planning area, give the causes of their degradation, and discuss concomitant losses of ecosystem function.

3. Rangeland Vegetation (Chap. 2, p. 13): the DEIS does not adequately describe the condition of the rangelands. We know from increases in weed cover, number of water quality limited streams, decline of native species such as pronghorn

and sage grouse, high number of sensitive species, high shrub cover, and low native grass and forb productivity that the grasslands and shrublands of the planning area are in poor condition. But this was barely mentioned in the DEIS and not at all discussed in a way for the pubic to become fully aware of current problems. In addition, all environmental problems were attributed to past heavy use. The extent of rangeland degradation and the lack of adequate recovery over the 6.3 million acres of the planning area strongly point to current management as being the problem. So does the vast range science literature (see discussions and references in attached papers by Mack and Thompson (1982), Belsky (1996), and other attached papers). The numbers of acres reported for the different vegetation types in Table 2-4 does not inform those members of the public who are unfamiliar with high desert vegetation that a large portion of these communities are extremely degraded. The vegetation types that are obviously degraded (that is, obvious to those of us familiar with these communities) are big sagebrush/annual grasslands, annual grasslands, and rabbitbrush/annual grasslands (Chapt. 2, p. 15). They cover 17% (over 1,000,000 acres) of the planning area. This widespread loss of wildlife habitat and watershed integrity should have suggested to BLM that there are severe environmental problems in the planning area. In fact, this 17% is only the tip of the iceberg. The degraded conditions over the rest of the planning area were obfuscated or completely left out. Open and closed shrub communities, as well as big bunchgrass and *Poa sandbergii* communities, were combined in Table 2-4, giving no hint that most of these lands were in poor condition. Closed shrub and *Poa sandbergii* communities represent degraded conditions; open shrub and big bunchgrass communities represent healthier conditions. By combining the different communities, the true status of the rangelands were not disclosed. The authors of the DEIS clearly knew that the planning area was in much worse condition than stated the following information:

- In 1996 and 1997, ICBEMP scientific assessments and the ICBEMP DEIS reported that 70% of the rangelands in the Interior Columbia Basin were rated as having "low ecological integrity" and only 5% were rated as having "high ecological integrity". The BLM lands in SE Oregon are included in this assessment.
- The Annual Rangeland Report for Oregon and Washington for 1992 (Table 2, Range Condition, attached) reported that less than 1% of native grasslands and shrublands in eastern Oregon were in excellent condition; 69% were in unsatisfactory condition.
- Finally, a BLM report by BLM biologist Larry L. Walker in January, 1997 (Some Major Rangeland Potential Vegetation Types and the Community Classes in the Interior Columbia River basin and Northern Great Basin) indicates that over the ICBEMP planning area, approximately 15% of public rangelands are dominated to some extent

by exotic weeds, that native perennial grasslands have declined from 17% to 3%, and that there had been major conversions of open shrublands to closed shrublands.

There is no excuse for the lack of disclosure of the extent of rangeland and soil degradation. Information for a complete analysis of the planning area was available to the DEIS planners. Of the 6.3 million acres of rangelands in the planning area, 85-90% have been mapped. The GIS Ecological Site Inventories that were started in 1976 give the condition of the vegetation and soils. The DEIS should not hide this information

4. Livestock: There is no discussion of the dominant large herbivores in the planning area – cattle and sheep. We are not informed about the number of these animals, the AUMs allocated to livestock in different areas, or how many livestock are currently grazing public lands compared to the past. Finally, we are not informed about the impacts on livestock on various plant community types or wildlife species. This information is critical for informed decisions since livestock grazing and trampling are the dominant forces degrading the shrublands, grasslands, streams, soils, and wildlife of the planning area (see attached papers and comments). No where is this disclosed.

5. Noxious weeds: Noxious weeds are a major threat to the health and sustainability of rangelands in the planning area; nevertheless, there is no description of the extent of weed infestations, how fast they are now spreading, what weeds are problematic, or the major causes of their spread. The rapid spread of exotic weeds in arid rangelands has been identified in the scientific literature as being due to (1) transportation of weed seeds into new regions and then throughout the landscape, (2) loss of vigorous native species that otherwise outcompete the weeds, (3) disturbance of the soil surface, creating a seed bed for weeds, (4) loss of the microbiotic crust, which prevents establishment of weed seeds, and (5) loss of soil mycorrhizae, which are essential for growth and vigor of native species, but not exotic weeds. There is an extensive scientific literature concluding that cattle and sheep are the major causes of weed introductions, loss of native plant vigor, and disturbances to the soil, microbiotic crust and mycorrhizae throughout the arid West (see attached ICBEMP comments by Joy Belsky and attached draft paper, Livestock Grazing is Primary Cause of Exotic Plant Invasions in Rangelands of the Intermountain West, by Jonathan L. Gelbard and Joy Belsky.). Where off-highway vehicle (OHV) use and off-trail hiking are extensive, they are also major causes of weed introductions and disturbance to the soils, microbiotic crust, and mycorrhizea. These factors must be discussed in the DEIS.

6. Vale Project: Because the plan includes the planting of non-native species such as crested wheatgrass, the DEIS must describe the costs, successes, and failures

of the Vale Project. It must also disclose the acreage that will be planted to non-native species. This enormously expensive project permanently altered the flora and fauna over vast areas of BLM lands. What is being done to restore those lands, how will new non-native plantings differ from this project so that they are less destructive?

D. The DEIS contains few objective, numerical standards for management of the rangelands and their soils.

NEPA requires that resource management plans inform the public and decision makers how the resources will be managed in the future. Descriptions of these activities are called standards. These standards allow the public to determine whether the proposed management activities are effective, equitable, legal and non-destructive.

Unbelievably, there are no numerical, objective standards for the management of rangelands, fire, soils, and other resources in the DEIS. BLM personnel have identified five sections in the DEIS that they say present the standards: (1) Management Directives in Table 3-1; (2) Detailed Descriptions of Management Directives in Chapter 3; (3) Best Management Practices in Appendix O; (4) Standards for Rangeland Health and Guidelines for Grazing Management, … in Appendix Q; and (5) Effects of Intensity and Season of Grazing in Appendix R. None of these sections contain numerical, descriptive standards. The following are a few typical "standards" from these sections:

1. The Management Directives given in Table 3-1 (Chapt. 3, p. 10-50) do not include objective, numerical standards.

   - Fire: Stating that BLM will "provide an Appropriate Management Response on all wildfires" is not a standard. BLM managers and scientists have been working on this DEIS since 1995. During that time, they could have figured out Appropriate Management Responses for different vegetation types, seasons, and management areas instead of making the public guess what they might do.
   - Rangeland vegetation: Stating that BLM will "maintain or restore natural values while providing for forage production" (Chapt. 3, p. 16) is neither a standard nor a directive. It tells us nothing on how the public lands will be managed. Most of the other directives, such as " Manage big sagebrush habitat to emphasize plant and animal community health at the landscape level", also fail to inform us how the land will be managed. Some directives are more descriptive and are closer to real standards, such as "Rest burned areas for one full year and through a second growing season, at a minimum, or until monitoring data indicate that desired vegetation has recovered to levels that are adequate to support and protect upland functions." This standard shows that the authors of the DEIS can write numerical standards when they want to. The DEIS needs to describe

management activities, where they will be carried out, the acreage to be treated, and what will occur if the objectives are not met.

- Juniper management: Stating that BLM will "design treatments to enhance resource values and maintain commodity production by emphasizing treatments in riparian/wetland, etc." is not a standard. These treatments should have been designed before the DEIS was issued so that the public could be adequately informed. Since current livestock grazing is the major cause of the continued spread of juniper (see attached paper by Belsky (1996)), changes in livestock grazing must be included.
- Water resources and riparian/wetland areas: Statements such as "Consider uses and activities occurring in surface waters and their entire associated watershed, etc." are neither standards nor directives.
- Wildlife and wildlife habitat: Statements such as "Emphasize habitat management that highlights the requirements of communities of game and non-game birds" are not standards.

2. The "detailed descriptions of management directives" given for each alternative in Chapt. 3, p. 51-228, also provide no objective, numerical standards. A few examples from this section are given below:

   - Rangeland vegetation: "Upland native rangeland communities would be managed to attain a trend toward desired future range of conditions (DRFC) based on management objectives and site potential". This so-called descriptions does not even hint at management activities. None of the other descriptions are any more informative.
   - Weed management: Statements such as "The distribution and density of noxious weeds would be reduced through the application of approved control methods in an integrated program, etc." fails to inform the public what actions will be taken to control the weeds.
   - Juniper: Statements such as "Juniper management would be implemented to maintain commodity production and enhance resource values" give not a hint of how juniper will be managed. Will they be logged, logged and left in place, logged and branches lopped, burned, grazed, etc.? Over what acreage?
   - Wildlife and wildlife habitat: The "detailed description" of proposed wildlife management was "to manage for desired future habitat conditions that emphasize structure, forage, or other riparian habitat elements important to game and nongame species of wildlife". This contains no management information.

3. The section entitled Best Management Practices (Appendix O, p. 371) was referred to as management directives, but they also provide no objective, numerical standards for most management activities. They do suggest good management practices for road design and maintenance, but contain no

directives for livestock grazing management, weed control, or other issues. For example:

   - Livestock grazing management: This section only refers to the use of adaptive management to reduce resource management conflicts and achieve multiple use management objectives (see analysis of adaptive management below). There is no description of proposed management activities.
   - Noxious weed management: This section suggests a few minor actions, such as contractors who move large equipment should clean their equipment before and after use on public land, and ranchers should consider the possibility of quarantining their livestock after use of weed infested areas. These BMPs are voluntary, will be ignored, and do nothing to stop the movement of weed seeds, damage to native grasses, disturbances to the soil surface, and disturbance of microbiotic crusts and soil mycorrhizae throughout rangelands. Without limiting the major factors disturbing soils and carrying seeds into rangelands, these BMPs are totally ineffective.

4. The section, Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands in Oregon and Washington (Appendix Q, p. 389), also provides no objective, numerical standards. This document was prepared by Oregon and Washington Resource Advisory Councils (RACs), but it contains no clear standards or management directions to guide BLM personnel on land and resource management. BLM retains its responsibility of carrying out statutory responsibilities such as NEPA and the Taylor Grazing Act. Major problems with this section are as follows:

   - Most of the document reads like a summary of an introductory range science text book and the objectives (not the standards) of every rangeland management plan that has ever been written. For example, the text states that "standards that address the physical components of rangeland ecosystems [must] focus on the roles and interactions of geology and landform, soil, climate, and water as they govern watershed function and soil stability". Someone should have explained the definition of 'standard' to the RACs! A few typical so-called standards follow:

     5) Standard 1: Watershed Function - Uplands: this standard states that upland soils [must] exhibit infiltration and permeability rates, moisture storage and stability that are appropriate to soil, climate, and landform. This is a nice objective, but it is not a standard. Calling this a standard is especially perfidious since none of these variables is known for any of the soils, climates, and landforms in eastern Oregon. It is a good way to avoid any management since managers will never be able to determine appropriate rates and characteristics under all edaphic and climatic conditions. A true standard would have to give an infiltration

rate in mm/sec (± SD) for all major soil types on all major landforms. It will take BLM years to establish appropriate infiltration and permeability rates, moisture storage, and stability for every vegetation and edaphic type. If the BLM has any intention of carrying this standard out, they need to inform us how they will do it.

7) Standard 2: Watershed Function - Riparian/Wetland Areas: this states that riparian/wetland areas must be in properly functioning condition appropriate to soil, climate, and landform. As above, this is not a standard. It is an objective. However, it is meaningless since we do not know what is the properly functioning condition appropriate to every combination of soils, climate, and landforms in the planning area. If the authors of the DEIS already know, than they are remiss in not presenting the information.
8) Standard 3: Ecological Processes: this states that healthy, productive, and diverse plant and animal populations and communities appropriate to soil, climate, and landform are supported by ecological processes of nutrient cycling, energy flow, and the hydrologic cycle. This is also not a standard. It is nice that the RAC members got an high school level introduction to range science, but they were supposed to be designing standards, not parroting old paradigms. Someone should be sued for wasting the time of the RAC members and the federal and state officials who were paid to be there.

- The RAC established "potential indicators" for each standard, but they are not true indicators. They are general characteristics of the habitat. Amount and distribution of plant litter and plant cover, soil organic matter, and thickness of the "A" horizon are characteristics of all plant communities and soils. They are not indicators of anything. Similarly, water temperature, dissolved oxygen, and turbidity are characteristics of all water bodies. A nose is a characteristic of a human. A red nose is an indicator of ill health.
- The Standards for Rangeland Health, etc., established by the RACs were also rendered meaningless by the insistence that all parts of the landscape be managed with site heterogeneity in mind. Soils, plant communities, and streams differ with soils, climates and landforms. The edaphic and biotic communities are so diverse that nearly every square meter of the 6.3 million acres of the planning area differ from every other square meter. If each meter, or acre, has to be managed differently, as suggested by the RACs, tens or hundreds of thousands of management directives must be determined. This will never happen. The DEIS effectively prevents any meaningful management since the proper functioning conditions for each combination of soil, climate, vegetation, and landform will never be known.
- Even the guidelines for livestock grazing management in the Standards for

Rangeland Health are diffuse and only restatements of the objectives. Stating that management should not increase and spread noxious weeds is not giving a directive that managers can follow; neither is telling managers to maintain or restore plant communities to promote photosynthesis throughout the potential growing season.

5. The section, Effects of Intensity and Season of Grazing (Appendix R, p. 403-413), also presents no standards that guide managers or inform the public of actual management activities. It is once again a nice summary of a chapter on grazing systems in an introductory range science. But it doesn't inform us which of these systems will be used or what will happen if the method doesn't improve key characteristics (which are not defined).

E. Adaptive Management is poorly described and designed for failure.

The Plan frequently refers to adaptive management as the way most of the 6.3 million acres will be managed (Chapt. 3, p.4-5; p.96). Although the concept of adaptive management is well accepted because it provides flexibility and allows management to change as new information is discovered, it cannot, as in this Plan, be substituted for real descriptions of management activities. The authors of the DEIS are avoiding writing true standards by saying that management will be changed if monitoring indicates it necessary.

Adaptive management requires that well developed and statistically valid monitoring programs be in place to identify the positive and negative effects of management. This requires that initial conditions be known and quantified; that a sufficient number of samples be taken to identify significant changes; that the results of different management activities be compared; that a reasonable time-line be established so that management can be changed before the resource degrades; that the data be evaluated in a timely fashion; and that management be changed when indicated.

The DEIS doesn't provide for any of these actions. It simply says that resources will be monitored and changed. There are plenty of reasons for the public to be skeptical.

1. BLM has a long history of not doing required monitoring studies. In 1992, the General Accounting Office (GAO) issued a report (GAO/RCED-92-51) on rangeland management finding that Interior's monitoring program had fallen short of agency requirements (see attached Executive Summary). It found that required monitoring was not occurring on most grazing allotments; that BLM was not making decisions with the available monitoring data; and that grazing decisions were often not adequately documented. Insufficient funds and staff for time-consuming monitoring were the reasons given for the failure of BLM's monitoring programs.
2. The DEIS provides no monitoring data to support any of its assertions in the document. It is easy to conclude they have no well designed, statistically

adequate monitoring program now. It is also easy to conclude that BLM managers in the three resource areas wouldn't know how to put one together.
4. In the past, funds for monitoring were often the first item to be eliminated from BLM budgets. Instead of halting all potentially damaging actions when monitoring funds were withheld, BLM continued with the activities. This gives the public little confidence that BLM managers are committed to monitoring and to stopping harmful activities.

According to US Forest Service scientist, Bruce Marcot (draft book chapter, attached), adaptive management has seldom been applied successfully or fully. He describes the following problems with adaptive management:

(a) Administrators seldom have the political will or explicit procedures for accepting new knowledge or for changing management activities;
(b) Managers are more concerned with the status of their careers than with the status of the land;
(c) Management options disappear before monitoring shows that a species has gone extinct or land has been degraded beyond repair;
(d) Indicator variables cannot be readily identified or measured,
(e) Monitoring may be so complex and costly that it cannot be completed with adequate sample sizes and intensity of study; and
(f) Objectives and expected effects are not clearly articulated and quantified.

There is nothing in the DEIS suggesting that these problems will not hamstring attempts at adaptive management in the planning region. (We are attaching selected references on adaptive management.)

In a discussion of adaptive management by Noss, et al. (Noss, F.R., M.A. O'Connell, and D. D. Murphy, 1997. The Science of Conservation Planning. Island Press, Washington D.C.), the authors concluded that "relatively few plans of any kind have well-developed and statistically valid monitoring programs. In few cases has monitoring been implemented adequately. In many cases recovery plans either lack monitoring programs altogether or have extremely vague requirements for how plans should be modified on the basis of data derived from monitoring. "Under these circumstances learning from experience in any rigorous way is impossible" (p. 134).

Adaptive management is effective but complex and expensive. It has to be well designed to withstand legal challenge. We are attaching an example of an adaptive management approach to establishing instream flows for spring chinook spawning. The DEIS has to include such detailed descriptions of how they plan to implement adaptive management to protect every resource in the planning area. The heterogeneity that the DEIS demands be attended to will make this implementation very difficult.

We fear that the loose description of adaptive management in a plan that presents no standards, no description of monitoring activities, no time-line, and no requirement that

management be changed is just a crude attempt by BLM to guarantee that they can continue with current activities. There is nothing in the Plan that can assure us otherwise.

We ask that all harmful activities, such as livestock grazing, OHV use, spring development, etc. be stopped until meaningful monitoring programs are in place. If there is no monitoring using a credible, statistically reliable design, than activities harmful to the environment have to stop.

F. Conclusions and statements in DEIS are not supported by the best available science.

1. Livestock grazing #1: Statements in the DEIS finding current livestock activities to have led to the healing of the environment are not only unsupported with any kind of monitoring data or peer-reviewed papers, but they are rebutted by a large scientific literature. Although it is true that some livestock management activities are less harmful than others, only the complete elimination of livestock grazing can allow resources to fully recover (Belsky, Matzke, and Uselman 1999, attached).
2. Livestock grazing #2: The preferred alternative, as well as most of the other alternatives, does not include a reduction of livestock; still, the DEIS concludes that all rangelands, soils, and environmental problems will improve. There is no evidence given for these assertions. In fact, most range scientists conclude that streams and riparian zones must be rested for 2-15 years before they can begin to improve (Belsky, Matzke, and Uselman (1999), attached). Management schemes suggested in the DEIS such as altered season of use, deferred grazing, rest-rotation, etc. have not been successful at restoring damaged rangeland ecosystems without reductions of livestock (see attached comments on ICBEMP by Joy Belsky for detailed discussion of the problems with different grazing systems, season of use, etc. and references).
3. Wildlife: The DEIS say that "elk have been shown to prefer areas that sustain periodic livestock grazing to those that receive no livestock use over a long period of time". This statement cannot be substantiated by recent peer reviewed research, which shows that (1) elk avoid cattle; and (2) cattle reduce the amount of available forage by up to 90%. Elk may prefer less fibrous grasses after they have resprouted following livestock grazing, but this grazing is harmful to the grasses (see attached paper by Painter and Belsky (1993) and there is significantly less food for the elk.
4. Weed spread: The DEIS states that integrated weed management action would slow the spread of established stands of noxious weeds and reduce the establishment of infestations. This statement isn't supported by the literature (see attached paper by Gelbard and Belsky). Only reduction or removal of disturbances will reduce the spread of weeds.

G. The DEIS doesn't analyze cumulative effects.

The cumulative affects of livestock grazing, extensive OHV use, increased recreation,

prescribed burning, etc. must be analyzed to determine cumulative effects of proposed management.

H. The costs and benefits of the different management alternatives have not been analyzed.

Continued high levels of grazing carries a financial cost to the public. These must be presented. The number of jobs created by different uses of the land, i.e. grazing vs. recreation, must be presented.

I. Proposed management will increase weed infestations.

The new White House Executive Order on Invasive Species (Feb. 3, 1999, attached) states that a Federal agency cannot carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless, pursuant to the guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species, … (Section 2, (3).) Federal agencies must also (I) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmental sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; etc. (Section 2, (2)).

None of the alternatives in the DEIS are in compliance with this new act. By maintaining high levels of livestock grazing and OHV use over nearly the entire planning area, BLM is promoting the introduction of weeds; disturbance to soils, microbiotic crust, and mycorrhizae; and preventing the recovery to the soils and native plants necessary to halt this spread (see Gelbard and Belsky (draft) and Comments on ICBEMP by Joy Belsky).

J. The DEIS has one main purpose: to continue and facilitate livestock grazing on 6.3 million acres of public land.

The strong bias towards the livestock industry over all other uses and resource values are evident:

1. There seems to be a concentrated effort in the DEIS to hide this bias. In the summary comparison of Draft SEORMP/EIS alternatives (Table S-1, p. xv), livestock grazing was the only resource use not presented. Neither is the total number of AUMs in each alternative given anywhere. In fact, there were no changes in grazing intensity proposed for any of the alternatives except Alternative E, which is a sham alternative designed to be rejected.
2. The environmental impacts of grazing were never disclosed (see above).
3. In spite of the documented degradation by current levels of livestock grazing in the planning area, the only change in grazing in alternatives A-D was to

increase livestock grazing by authorizing temporary nonrenewable grazing in areas not currently grazed.
5. Evaluation of the different alternatives (Chapter 4) states that livestock management in Alternative C will result in increased forage, with presents no evidence.
6. The DEIS says that current grazing levels will continue, even though they are causing significant environmental degradation.
7. All activities, such as reducing juniper woodlands, burning shrublands, developing springs, etc., are designed for one purpose: to increase forage for and sheep. All other species, including sensitive plant and animal species, would do much better without the livestock. In spite of this, less than 1% of the land base has been withdrawn from grazing.
8. In most of the large allotments, 95-99% of the available forage is set aside for livestock.

This isn't multiple use; it is livestock management.

K. Recommendations for a true conservation alternative:

1. All rangelands in poor or fair condition shall be withdrawn from livestock grazing until they have developed an adequate herbaceous layer and a healthy microbiotic crust.
2. All rangelands in excellent condition shall be permanently withdrawn from livestock grazing to allow baseline conditions to be studied and to act as a genetic reservoir of native species that are necessary for future reintroductions into degraded rangelands of the region.
3. All Temporary Non-Renewable permits shall be permanently withdrawn.
4. Rangelands shall only be replanted with native species.
5. Livestock grazing shall be terminated or otherwise reduced unless it can be shown that grazing does not cause the destruction of cryptobiotic crust or retard the restoration of cryptobiotic crust.
6. Livestock grazing shall be terminated or otherwise reduced unless it can be shown that grazing does not cause or contribute to the spread of invasive weeds.
7. Whenever adequate monitoring is not carried out, or evaluation of the monitoring cannot take place within a year of data collection, or managers are unwilling to change management directions based on these data, then livestock grazing must be immediately terminated.
8. Fires shall not be fought in WSAs or special management areas.
9. Prescribed burning shall occur in the summer, when wildfires normally occur.
10. Bulldozers and other large equipment that has the ability to disturb the soil and cause new invasions of weeds shall be avoided during fire fighting unless property or human lives are at stake,
11. Burned areas must be rested from livestock grazing and other activities for at least 10 years following a fire.
12. Livestock grazing will be allowed only where it has been found to be suitable and

the lands chiefly valuable for livestock grazing.
14. No grazing shall be allowed in Special Recreation Management Areas.
15. True standards having a definite time line shall be incorporated. The following are examples of simple but numerical standards that must be included in a conservation alternative:

Upland Rangeland Community Standards (derived from Desired Range of Future Conditions for Alternative 4, ICBEMP DEIS, Chapter 3, pp. 29-35)

In **dry grass potential vegetation group**, 60-80% of the area is dominated by large native perennial bunchgrasses and forbs without conifer and shrub encroachment. (See "meeting standard" below.)

In **dry shrub potential vegetation group**, 50-70% of the area in this group is dominated by large native perennial bunchgrasses and forbs with an open shrub canopy; 10-25% is dominated by native bunchgrass and forb communities without shrubs. (See "meeting standard" below.)

In **cool shrub potential vegetation group**, 60-80% of the area is dominated by large native perennial bunchgrasses and forbs with an open shrub canopy; 15-40% contains mixtures of perennial bunchgrasses and forbs without shrubs. (See "meeting standard" below.)

Meeting standard: If community or allotment is **meeting standard**, continue present management. If not meeting standard, determine if adequate progress is being made toward meeting the standard. "Adequate" progress is defined as progress that is detectable at a statistical significance level of $P<0.15$. If progress is not adequate, adjust grazing management (see "substandards", below).

Substandards:

If progress towards standards is not adequate, grazing during grass-stem elongation (boot to flower) should occur no more frequently than once out of any three consecutive years and utilization should not exceed 30% at any time. If these criteria do not lead to improvement within five years, than grazing during stem elongation will be eliminated. If there is still no progress (within three years), than area shall be closed to grazing.

Standards during Droughts:

If water-year precipitation falls to <70% of average annual precipitation by start of, or during, authorized period of grazing, then area will be closed to grazing.

If water-year precipitation falls to <85% average for three consecutive years, then area will be closed to grazing.

Riparian Community Standards (the following are derived from OR, WA, and ID's criteria used for listing waterbodies as water quality limited (303(d)) and CRITFC Technical Report 94-4, Dec. 1994, by J.J. Rhodes, D.A. McCullough, and F.A. Espinosa, Jr. For greater explanation of the following standards, see Rhodes, et al. 1994.)

Standard #1: Surface fine sediment levels must on average be < 20%, sediment delivery must average <20% over natural, and cobble embeddedness must average <30%; 90% of streambanks must be stable; temperatures must be <64°F (<56 °F during times of salmon spawning and fry emergence); and existing state and federal water quality standards for toxics, turbidity, nutrients, dissolved oxygen, and other parameters mist be met.

Meeting standard. If stream is **meeting standards**, continue present management. If **not meeting standards**, on-going activities that cause the problems will be suspended and no new activities initiated until conditions meet standards or a statistically significant ($p<0.10$) improving trend over at least 5 years is documented through monitoring and total sediment delivery from anthropogenic sources is <20% over natural.

Standard #2: Livestock will be restricted from access to spawning reaches during and after the spawning season.

Standard #3: Grazing will be eliminated from environments where it is clearly incompatible with protection of aquatic resources. (For example, grazing in wet meadows with fine-grained, non-cohesive soils and little woody bank vegetation almost always leads to stream damage.)

Standard #4: After degraded conditions have improved to the standards discussed in Standard #1 above, grazing must be tightly controlled and closely monitored. If monitoring show that conditions are beginning to deteriorate (at a significance level of $p<0.4$), than grazing must be reduced or eliminated. (See Rhodes, et al. 1994 for discussion of significance levels.)

IV. Water Resources and Riparian/Wetland Areas

There are 35 water quality limited stream segments within the SEORMP's planning area. Nineteen of these streams fail to meet water quality standards along their entire length (mouth to headwaters). In almost every one of these streams or stream segments,

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would be met. Short-term impacts may result from several surface-disturbing management activities, but most of these impacts could be minimized or eliminated through mitigation." The fact that this "environmental impact statement" makes no effort to analyze, let alone describe, what these surface-disturbing activities might consist of, is alarming. Even more distressing to us is the SEORMP's flip and casual reference to mitigation of aquatic habitat disturbances. The SEORMP fails completely in its efforts to adequately assess the plan's impacts on fish habitat, and what, if anything, the BLM plans to do to prevent the demise of native fish populations throughout the planning area.

We would like to see concrete evidence of how the BLM intends to recover at-risk fish populations and how the agency plans to prevent the demise of currently healthy populations. Vague allusions to mitigation and proper management are wholly inadequate.

VI. Catlow Conservation Agreement

The Catlow Conservation Agreement management direction explained in Appendix T is nothing more than an attempt to satisfy NEPA obligations post facto because the BLM has already signed the Conservation Agreement. Moreover, the public is not properly on notice that the scope of the RMP would include a detailed decision on where to build a particular fence. Finally, the BLM already has decided to build the Lauserica fence and Stephens Fence extension (EA-OR-026-98-033), rendering the NEPA discussion in this DEIS a thinly veiled attempt to cure the failure to comply with NEPA prior to making its final decision.

VII. Wildlife Habitat and Special Status Animal Species

The SEORMP fails to meet agency and Endangered Species Act objectives for Special Status Animal Species. Guidance set forth in the BLM manual at section 6840 emphasizes the agency objective to conserve special status animal species. The BLM manual is presently going through its first major revision since 1988, and although the revised manual is not yet completed, a significant evolving trend should be more fully emphasized
in the EIS. Jeff Aardahl, endangered plant and animal species contact person in the D.C. BLM office, stated in a phone conversation on February 17, 1999 that one of the most overreaching changes in the new manual will be an increased emphasis on BLM's duty to conserve. For federally-listed species, this duty to conserve is set forth at section 7(a)(1) of the ESA. This section epitomizes congressional intent to institutionalize caution and infuse agency decision-making with an obligation to consider the needs of specific species. The ESA provides an unqualified mandate requiring attention to micro-level requirements
of individual species.

Unfortunately, Alternative C fails to provide adequate attention to the specific requirements of individual species. The management objective related to special status

animal species for Alternative C is to "[e]mphasize management that fosters plant/animal community health, habitat integrity, and landscape-level issue resolution rather than emphasizing the requirements of individual species". (DEIS at 3-27). Failure to recognize, emphasize, and manage for the specific needs of individual special status animal species contradicts evolving guidance on the agency's duty to conserve, and is not in accordance with the requirements of the ESA.

Section 7 of the ESA also requires that the BLM consult on the action of adopting the SEORMP. Such consultation must occur before a decision is made and any modifications of the selected alternative must be disclosed to the public and the public given an opportunity to comment on the modifications, in accordance with NEPA.

VIII. Bighorn Sheep

The SEORMP fails to analyze and disclose the impacts on California bighorn sheep of all management alternatives. The DEIS says that no licensed sheep grazing permits overlap with bighorn range, DEIS at 2-55, but map WLDF-2 shows a significant amount of bighorn sheep range and domestic sheep range as "overlapping." The DEIS acknowledges that domestic sheep carry a bacteria called Pasteurella that is pathogenic to bighorn sheep, DEIS at 2-55, but it says nothing about BLM internal guidance requires the physical separation of the species, by something in the order of 15 miles, to ensure that ranging bighorn rams do not have physical contact with domestic sheep and then die or, even worst, return the herd to spread the bacteria. The FEIS should fully explain this relationship and analyze and disclose eliminating domestic sheep grazing in actual and potential bighorn sheep habitat. Moreover, the DEIS should fully evaluate and disclose whether the BLM may or should allow domestic sheep grazing in potential bighorn sheep range.

IX. Western Sage Grouse

1. Sage Grouse Status and Distribution

The distribution of western sage grouse (Centrocercus urophasianus) in western North America has been reduced since at least 1900 with extirpation of populations at the periphery of the historic range. Sage grouse no longer occur in Arizona, British Columbia, Kansas, Nebraska, New Mexico, and Oklahoma and have reduced distribution within the remainder of their original range. The historic population size of sage grouse is unknown anywhere in western North America. Populations are known to have decreased,
especially since at least 1950. Recent (1980 to present) declines are estimated to be in the range of thirty-five to eighty percent. The present size of the breeding population is estimated to exceed 140,000 individuals scattered in two Canadian provinces and eleven western states. (C. Braun, Colorado Division of Wildlife, Historic and Present Distribution/Status of Sage Grouse in North America, Western Sage Grouse Status Conference, Boise, Idaho, 14 January 1999).

2. Sage Grouse Population Viability

Factors that are important in maintaining viable sage grouse populations include size of area, quality of habitat, potential interchange (corridors), genetic diversity, and number of breeding individuals. Although 500 individuals in a breeding population may be adequate to avoid genetic drift, managers need to understand that in sage grouse populations most individuals do not breed. Consequently, a viable population for sage grouse is believed
to be at least 1,000 birds, based on estimates of productivity, survival recruitment, male mating success, and male:female sex ratio. (M. Schroeder, Washington Department of Fish and Wildlife, Population Viability and Conservation Planning for Sage Grouse, Western Sage Grouse Status Conference, Boise, Idaho, 14 January 1999). The long-term problems with small populations have been illustrated by research on greater prairie-chickens (Tympanuchus cupido) in Illinois. Because the breeding population remained below 500 for a period of at least 35 years, they were faced with declining genetic heterogeneity and productivity (Westemeier et al., 1998, Tracking and long-term decline and recovery of an isolated population, Science 282: 1695-1698).

3. Sage Grouse Habitat Requirements

Sage grouse use different seasonal habitats throughout the year, and many sage grouse populations are migratory and birds may move 100 km or more between seasonal ranges. The breeding range contains leks and provides habitat for nesting and early brood rearing. Nesting habitat has two major components: the sagebrush overstory and a grass/forb understory. Generally, a 15-25% canopy cover of sagebrush and similar canopy cover of herbaceous plants with an average height of at least 18 cm provides adequate nesting habitat. Early brood rearing habitat is occupied by hens with broods until the chicks reach 6-8 weeks of age. Its components are similar to that of nesting habitat but abundant insects are also necessary for chick survival.

Usually when chicks are 6-8 weeks old the hen begins a movement to summer range. This seasonal habitat consists of an interspersion of forb-rich areas and stands of sagebrush. Forb-rich areas are often agricultural fields, wet meadows or riparian areas.

Good winter range provides sage grouse with access to sagebrush under all snow conditions. Sage grouse only eat sagebrush during the winter and often use relatively open habitats with 10-25% sagebrush canopy cover and an average height of 25-35 cm above the snow.

The quality and quantity of breeding and winter habitat have declined during the 1980's and 1990's because of prolonged drought, fires and agricultural development. Vast areas that were once sagebrush/bunchgrass habitats are now dominated by cheatgrass with little or no sagebrush overstory making population recovery difficult. (J. Connelly, Idaho Department of Fish and Game, Population Ecology and Habitat Needs, Western Sage

Grouse Status Conference, Boise, Idaho, 14 January 1999).

4. Status of Sage Grouse in the Draft SEORMP/EIS

The sage grouse is a Bureau of Land Management sensitive species, and the Draft SEORMP/EIS acknowledges the BLM's responsibility to manage the grouse accordingly. (Draft 2-50). Under each alternative, the sage grouse is grouped with other Special Status species and vague but limited rules are laid out for their management. This is regrettable as it lacks aspiration for habitat improvement. The current planning process represents a premier opportunity to assess and adjust past habitat management and prescribe new ecosystem management strategies. Given their extensive range in southeast Oregon (the sage grouse is a documented breeder in the Andrews, Malheur and Jordan districts (Draft 2-50), and their importance to the ecosystem (sage grouse are considered a "keystone species" (Scutro, The Last Dance of the Sage Grouse, 7 Boise Weekly 32: 14), the Draft should elevate the sage grouse to a special management or indicator species equal to the California bighorn sheep. The new designation would bolster sage grouse populations and provide better opportunities for agency staff, university researchers, and the public to monitor the effects of system-wide impacts on sage grouse, including livestock grazing, fire suppression, invasive species, agriculture, development and mining.

5. Sage Grouse Habitat Management under the Draft SEORMP/EIS

Under each of Alternatives A, B, and C, the authors suggest that "[a]ll Special Status species habitats or populations would be managed so that BLM actions would not contribute toward the need to list the species as Federally threatened or endangered." (Draft 3-89). The Draft also acknowledges that sage grouse populations in the planning area are declining. (Draft v2 320). Given the extensive areas and variety of habitats needed to sustain sage grouse, it is unlikely that current/prescribed levels of livestock grazing under the Draft will allow the sage grouse to recover. Sage grouse require the same early-, mid-, and late-stage big sagebrush habitat that are ravaged by livestock grazing (see Draft 2-42). As noted above, the best nesting and rearing habitat must contain grasses and forbs at least 18 cm high, vibrant insect life, and untrammeled sagebrush for cover. Unless grazing practices are drastically revised, livestock grazing will continue to degrade these habitats, and a listing under the Endangered Species Act will be inevitable. (see Scutro, The Last Dance of the Sage Grouse, 7 Boise Weekly 32: 14).

X. Off-Highway Vehicles

Off-Highway Vehicle use in Oregon is on the rise. On p. 327 of the SEORMP's Appendices, the BLM predicts an increase in OHV use of at least 200% over the next 20 years in Oregon. The SEORMP offers a great opportunity to pro-actively address the complex issue of OHV use, especially as motorized backcountry recreation becomes increasingly prevalent and controversial. But instead of taking advantage of this unique opportunity, the BLM has shirked its duty to protect wildlife habitat by designating a

mere 22,000 acres as closed to OHV use. That's less than 1% of the 6.3 million acre planning area.

Open OHV use is simply incompatible with the BLM's stated objective of properly functioning ecosystems. OHVs are known to: disturb wildlife in all habitat types, including ground-nesting birds, reptiles, young animals, and ungulates such as deer; compact and alter soil structure, sometimes leading to a 90% loss of soil moisture -- a loss arid lands can ill-afford; and compromise the recreational experience of anyone within ear-shot of an OHV.

We urge the BLM to revisit its OHV policy. Specifically, we request that the final SEORMP reflect the following changes:

- All areas should be closed OHVs, unless posted open. The BLM lacks the resources to patrol and monitor the 99% of the planning area that, under the current draft SEORMP, is designated as either "open" or "limited" OHV usage.
- All vehicle routes should be classified as "designated," rather than "existing." This will hopefully provide the BLM with more control over the use of OHV areas, and allow for better oversight and monitoring.
- Do not cooperate in the organization of OHV events. This is an absurd and destructive use of public funds; the BLM is in no position to spend its very limited resources on planning events that benefit a minute subset of the public -- particularly when this subset is engaged in an activity that gravely threatens a resource belonging equally to 260 million Americans.
- OHVs should be restricted to small areas. No more than 1% of the planning area should be open to OHV use.

The Federal Lands Policy and Management Act specifically prohibits unnecessary and undue degradation of our national lands. To open 99% of the SEORMP's planning area to unsupervised OHV use will clearly lead to unnecessary and undue damage to a sensitive ecosystem characterized by fragile soils. Oregon's sage-steppe community is no place for OHVs to run rampant. The Vale and Burns Districts must learn from their colleagues in Utah and elsewhere; catering blindly to OHV special interest groups will only lead to compromised wildlife populations, degraded habitat, and violated environmental laws.

XI. Wild and Scenic Rivers

Alternative C would recommend that a mere 43 river miles be added to the federal Wild and Scenic River System. Meanwhile, the BLM's own assessments and inventories of potential wild and scenic rivers resulted in a list totaling 289 river miles. We urge the

BLM to recommend that each of these 289 river miles be added to the Wild and Scenic River System. The streams and stream segments represented here enjoy virtually no formal protection at the present time, and without WSR designation, many of them are at continued risk of riparian degradation, water pollution, and dewatering. As it stands, many of these waterways are struggling to support healthy fish populations and other aquatic and riparian-dependent species.

BLM's own inventories indicate that these river miles are suitable for inclusion in the WSR system. What stands between their being eligible or ineligible for inclusion is the BLM's recommendation. We hope the agency can find the will to recommend all 289 river miles – a small fraction of the planning area's total river mileage – as Wild and Scenic Rivers.

XII. Wilderness Study Areas

1. General Comments

Sadly, the BLM's track record with respect to managing wilderness areas and wilderness study areas (WSAs) is not a proven one -- far from it, in fact. The BLM in Oregon has virtually no experience in wilderness area management, so it should come as little surprise that the agency is ill-equipped -- in terms of both resources and internal philosophy -- to manage lands for wilderness values. Like the U.S. Forest Service, the BLM came of age in a context of "multiple use," and in the United States, multiple use has always been pursued at the expense of wilderness values.

It's quite likely that the only way to improve the BLM's wilderness management skills is to do so legislatively -- to change the agency's mandate in such a way that the BLM no longer feels compelled to graze WSAs and other special management areas into a state of near-oblivion. But such a shift in management priorities lies beyond the scope of the SEORMP.

2. Monitoring of WSAs

The Draft SEORMP contains no evidence that the BLM has conducted any monitoring or environmental analysis of WSAs. We urge the BLM to ensure that such an analysis is included in the Final SEORMP.

3. Grazing in WSAs

Something that does lay squarely within the scope of the SEORMP is the manner in which the BLM deals with livestock grazing inside WSAs. As has been pointed out earlier in these comments, the SEORMP's preferred alternative would not lead to the removal of one head of cattle from 10,000 square miles of BLM lands in Southeast Oregon. The choice to forgo an opportunity to actually improve the ecological condition of these lands -- especially those acres within WSAs -- is inexcusable for the following

reasons:

- livestock grazing is known to degrade both ecological and wilderness values;
- human-made structures necessary to sustain livestock grazing are known to degrade both ecological and wilderness values;
- the on-going, unabated presence of livestock grazing within WSAs and lands adjacent to WSAs will only serve to render these areas less suitable, and in some cases, unsuitable for inclusion in the federal wilderness system.

Perhaps we'd be less disturbed if the inequities between wilderness values and livestock grazing weren't quite so vast. If the BLM had allocated, for example, 50% of its Burns and Vale Districts to livestock grazing, maybe we could understand the agency's choice to leave livestock numbers completely unchanged. However, according to Table 2-18 (SEORMP, p. 2-59), the BLM has allocated 98.95% of the Burns and Vale Districts to livestock grazing -- including WSAs. This means that wilderness values are bound to be compromised by the sheer ubiquity of domestic livestock distributed across this arid corner of the state. We've seen evidence of this for decades.

WSAs are lands of national significance, not only because of their potential for inclusion in the federal wilderness system, but also because they represent some of the last vestiges of roadless wildlands and intact wildlife habitat left in the United States. These same lands are being compromised by livestock grazing, and that the draft SEORMP makes no attempt to improve this status quo is baffling. Thus, we urge the BLM to adopt an alternative in its final SEORMP that adequately addresses grazing pressures within WSAs; specifically, we request that:

- livestock grazing be suspended in WSAs where monitoring shows a decline in ecological condition;
- WSAs be managed for wilderness values first and foremost;
- structures, such as fences and water developments, be prohibited from WSAs; if livestock grazing cannot be conducted in such a way that ecological values are not compromised or degraded in the absence of such structures, then grazing must be discontinued in those WSAs.

4. Off-Highway Vehicles in WSAs

Off-highway vehicles (OHVs) should be prohibited from use within WSAs. Please see our comments specifically regarding OHVs for more details.

5. Lands Adjacent to Wilderness Study Areas

We support the BLM in its recommendation that lands adjacent to WSAs be acquired and annexed to existing WSAs. We urge the BLM to continue acquiring lands that it has identified as possessing wilderness qualities. The best scientific data tells us that "size does matter;" the agency will be far more effective in its efforts to manage for wilderness values when WSAs are expanded to accommodate wildlife and natural ecosystem functions. The studies of conservation biology and biogeography indicate that larger, contiguous tracts of protected wildlands are more capable of supporting healthy ecosystems.

We request that the BLM continue to aggressively acquire and annex non-federal lands, and that the Burns and Vale Districts actively identify additional parcels for future acquisition. Many state and private inholdings within the planning area are highly vulnerable to a range of threats, including but not limited to: livestock grazing, mineral exploitation, water quality violations, and ORV use. Pro-active acquisition by the BLM is the best way to begin the process of securing meaningful protection for these lands.

6. Restoration and Reclamation within WSAs

Thanks in large part to livestock grazing, many WSAs are degraded or home to human-made structures, such as fences and off-stream water developments. We urge the BLM to generate a list of restoration/reclamation priorities for WSAs within the planning area, and to actively pursue ecological rehabilitation of these areas. Such restoration activities should include removing permanent structures and returning said WSAs to a "primitive" state in anticipation of these areas' inclusion in the federal wilderness system. WSA restoration goals should be addressed in the SEORMP planning process.

7. WSA Release Language

We support the BLM's decision to continue to apply Visual Resource and ORV classes to lands that are released from wilderness consideration. However, we request that similar release language be drafted for mineral and energy exploration and development. Mining's impacts are at least as devastating as those of ORVs; if BLM's objective is to extend protection to areas that are recognized as possessing special, valuable qualities, regardless of their wilderness status or lack thereof, then an extension of ORV and Visual Resource release language to energy and mineral exploration and development is clearly a logical next step, and one that is in the best interest of those lands released from wilderness consideration.

8. Wilderness Reinventory

A decade has passed since the last time BLM inventoried its roadless lands in eastern Oregon. The time has come for the agency to conduct a reinventory of these lands. Such an inventory, which is provided for in the Federal Lands Policy and Management Act (Section 202), should exclude those areas already designated as WSAs and focus instead on other lands that were overlooked or deemed ineligible during the first inventory.

It is crucial that any wilderness re-inventory also assess newly acquired state and/or private inholdings. During BLM's original wilderness inventory, some potential WSAs were deemed ineligible due to management issues resulting from large private inholdings. In situations where those inholdings have since been acquired, BLM must reconsider the eligibility of those lands as WSAs. We are confident that the BLM may be able to identify additional lands that should be protected under the Interim Management Policy (IMP).

As Vale and Burns District staff are undoubtedly aware, the BLM recently completed a wilderness re-inventory in Utah. The result of this effort was a significant increase in the number of acres the BLM will recommend for wilderness status. In Utah, the BLM contracted with a team of experts from outside the agency. We recommend a similar arrangement here in Oregon. By employing outside experts, we feel the re-inventory report might stand a better chance of being honest and unbiased; we understand that it can be challenging for BLM personnel residing within the district(s) to render a candid opinion about increasing WSA acreage.

XIII. South Steens Fencing Projects

We are firmly opposed to the BLM's proposal to construct the Lauserica and Stephens fences through Home Creek and South Fork of the Donner und Blitzen WSAs. These projects will result in about 20 miles of new fences, located squarely within WSAs. These structures will drastically alter the natural character of these WSAs, and as such, may be in violation of the BLM's own Interim Management Policy.

We strongly object to the construction of these fences, and urge the BLM to abandon its plans to erect them. If the purpose of the fences is to facilitate the management of livestock within the WSAs, then we must question the overall compatibility of domestic grazing within these WSAs; that is, if the agency cannot adequately manage cattle grazing within the Home Creek and South Fork of the Donner und Blitzen WSAs, then the obvious, reasonable solution should be the removal of livestock, not the construction of fences. We implore the BLM to exercise a modicum of common sense in this situation.

Finally, we are compelled to question why, in a massive planning document rife with generalities, sweeping statements, and vague management "directives," one of the few instances where the agency decides to offer specific details about its preferred alternative appears on p. 3-27 of the SEORMP; here, juxtaposed against such general statements as, "Emphasize management that fosters plant/animal community health...," is a paragraph about the construction of two specific fences. While we are vehemently opposed to the construction of fences in WSAs (and the Lauserica and Stephens fences in particular), we only wish the BLM had seen fit to apply the same level of detail to the rest of the SEORMP.

XIV. Proposed Steens Mountain National Conservation Area

We commend the BLM for its recognition of the Steens Mountain area as a place of significant value to the American public, and we support the agency in its efforts to manage Steens for its wilderness and recreational values. We are also pleased to see that the BLM has proposed to add over 28,000 acres to the Steens Mountain Area of Critical Environmental Concern.

However, the proposed Steens Mountain National Conservation Area as outlined in Alternative C fails to truly protect this remarkable area. We request that the BLM develop a detailed plan to manage increasing recreational activity and protect the natural values which make the mountain and its environs an extraordinary place. Specifically, we urge the BLM to:

- Expand the boundaries of the proposed NCA to include the Alvord Desert; any NCA that excludes the Alvord fails to protect the whole of the Steens Mountain ecosystem. The Alvord and the Steens have been shown to be ecologically connected; together, they are the embodiment of "Basin and Range" ecology and geology.

- Phase out livestock grazing in the entirety of the Steens Mountain NCA, not just above 7,000 feet.

- Offer a thorough discussion of the various proposals for the protection of Steens Mountain. The SEORMP is an appropriate forum for a side-by-side comparison of these proposals, which include an NCA, a national park and preserve, and expanded wilderness. Without this honest, candid comparison, the public is left without the critical information we need to help the BLM make the best choice for the future management of Steens Mountain.

While we recognize the BLM has made some strides by recommending, in Alternative C, the withdrawal of lands in the Steens NCA from mineral entry, the rationale behind the recommendation is incompletely reasoned at best and disingenuous at worst. On p. 4-149 of SEORMP, the BLM states, "[The withdrawal of lands from mineral entry and leasing] eliminates the possibility of surface-disturbing activities, which would infringe on natural values. It would also maintain opportunities for solitude." If the agency's goal is to truly prevent the infringement of natural values and maintain opportunities for solitude, then the BLM will need to do much more than simply withdraw lands from mineral entry and leasing.

Livestock grazing, not mining, is the primary threat to both natural values and recreational values on Steens. To address the currently non-existent threat of mining on Steens while completely ignoring the impacts of domestic cattle is beyond cowardly; it is unacceptable. We urge the BLM to eliminate the only real "surface-disturbing activity" on Steens: livestock grazing.

In the SEORMP's conclusion regarding the environmental consequences of a Steens NCA as outlined in Alternative C, the BLM states, "The designation of Steens Mountain as an NCA would determine long-term management direction and establish a clear approach and balance of resource conservation and carefully planned compatible uses (p. 4-149)." With all due respect, this is hog wash. The SEORMP's NCA proposal in no way, shape, or form determines or establishes anything approximating a "clear approach" or "careful planning." It merely reduces the specter of a threat (mining) that is predicted to exist at some undetermined point in the future; current, serious threats (livestock grazing, recreation overuse) are entirely overlooked.

Finally, we must ask whether the SEORMP's reference to "compatible uses" can be taken at all seriously. As the BLM is undoubtedly aware, the evidence supporting the incompatibility of livestock grazing with Steens' ecological/natural values is overwhelming. We wonder if the BLM is prepared to eliminate livestock from its Steens NCA based on this proven incompatibility, or whether the agency intends to manipulate the term "compatible" to its own ends.

XV. The Owyhee Canyonlands

The Burns District has its crown jewel: Steens Mountain. The Vale District also has a crown jewel: The Owyhee Canyonlands. While the Owyhee area does not enjoy the same level of visitorship or degree of recognition as the Steens area, it is without question one of the most splendid, remarkable natural areas in the western United States. When a mainstream publication like "Sunset" magazine calls for an area's protection (in this case, national park designation), you know you've got something special on your hands.

Above and beyond the Owyhee Canyonlands' exquisite beauty lies its habitat and wilderness values. Here are some of the largest contiguous roadless lands in the continental U.S. Here, also, is excellent habitat for Bighorn sheep, Western sage grouse, and raptors. Here are some of the most rugged, remote wildlands, offering a degree of solitude found in very few other places.

We urge the BLM to consider a national designation for the Owyhee Canyonlands. As in the case of Steens Mountain, such a consideration must weigh the range of proposals carefully. These proposals, like those for Steens Mountain, include an NCA, national park, and national monument. The BLM is truly fortunate to have such gems as Steens and Owyhee in its custody; we hope the agency will rise to the challenge of protecting these unique, spectacular areas, and that it will do so in ways that are protective of natural values and considerate of the 260 million Americans who co-own these landscapes.

XVI. Military Overflights in the Owyhee Canyonlands Area

Incremental military expansion is occurring in airspace over wild lands throughout the West, from Colorado to Arizona to the Enhanced Training in Idaho (ETI) Bombing

1. Soils (Chap.2, p. 10): The DEIS fails to adequately reveal the extent of degradation of the soils of the planning area. These soils suffer from compaction, erosion, reduced infiltration, and loss of fertility. The location, acreage, and causes of these degraded soils are either completely left out of the DEIS or minimized. Neither are the area and location of soils in good and excellent condition reported. All problems are attributed to uses 60-100 years ago, while current management practices were said to have "reduced erosion and begun the healing process". The DEIS must give evidence for these assertions since current management practices are known to degrade upland and riparian soils (see attached papers by Fleischner (1994), Belsky, Matzke, and Uselman (1999), and Belsky and Blumenthal (1997)). The DEIS must inform the reader how far current soil conditions deviate from their potential natural conditions, how far the healing process has gone, what specific activities led to the "healing", and how long managers anticipate it will take for these current activities to restore soils to normal function. Authors of the DEIS have to provide monitoring data to support their contention that the soils are improving. They've had since 1995 to collect and analyze these data, much of which are available on databases.

2. Microbiotic crusts (Chap.2, p. 10): microbiotic crusts are a major indicator of healthy rangelands. They stabilize the soil, fix nitrogen, increase soil fertility, increase growth of higher plants, and in some areas increase water infiltration into the soil. Except for one short paragraph, the DEIS ignores these biotic crusts, which are essential components of arid land ecosystems and major indicators of rangeland health. The excuse given for ignoring microbiotic crusts in the planning area was that there is little data on microbiotic crusts from the Northwest and that most studies have been taken from the Great Basin. These excuses are without foundation (see discussion and references in attached Comments on the Draft Interior Columbia Basin Ecosystem Management Plan (ICBEMP) by Joy Belsky, Oregon Natural Desert Association) or are irrelevant. Studies carried out in Texas showing the harmful effects of cigarette smoking do not have to be repeated in Arizona to be valid there. Idaho BLM experts on microbiotic crusts in the Northwest, Dr. Roger Rosentreter and Julie Kaltenecker of Boise BLM, and two scientific evaluations written for ICBEMP repeatedly stated that the microbiotic crusts of the ICBEMP planning areas must be actively managed by federal agencies and restored for the recovery of Northwest shrublands and grasslands. The DEIS must discuss the importance of the crusts, evaluate their current status over the entire planning area, give the causes of their degradation, and discuss concomitant losses of ecosystem function.

3. Rangeland Vegetation (Chap. 2, p. 13): the DEIS does not adequately describe the condition of the rangelands. We know from increases in weed cover, number of water quality limited streams, decline of native species such as pronghorn

subject to escalating military activity.
7. Determine means to minimize negative effects of military training activities in southeast Oregon over the life of this plan.
8. Aggressively pursue minimizing negative effects - through MOUs or legal action if necessary.

For example, instead of burying its head in the sand and ignoring the whole array of military training impacts in its development of the SEORMP, BLM should have actively acquired data on past, current, and predicted military activities, and assessed direct, indirect and cumulative impacts of military training activities on vegetation, wildlife, water quality, recreational use, and cultural resources on public lands. Following reasoned analysis, BLM should seek MOUs or other agreement with the Air Force, and/or assert its legal duties under FLPMA, to cease use of chaff, flares, supersonic flight over areas with critical wildlife resources, or specially designated management areas - such as WSRs, where recreation is a high priority. BLM must also institute adequate monitoring of overflights and military activities, so that deleterious activities can be curtailed before significant environmental harm occurs.

Our members who use public lands for recreational, spiritual and aesthetic purposes are annoyed, and our recreational experiences are destroyed by loud plane noises, a sky filled with a sea of contrails, and chaff particles littering the earth. We are concerned about pollution and health risks associated with exposure to military training activities while we are recreating in southeast Oregon.

The open high desert sage-steppe and canyonland country of southeast Oregon is a landscape where the intrusion of military and civilian overflights is maximized. Recreational experience of the rich scenery, wildlife, vegetation and cultural resources is impaired by intrusive noise and overflights. Above the canyons on the plateaus it is possible to see hundreds or thousands of square miles of open landscape. Overflights and training activities are particularly intrusive here.

Into this wildland setting, the Air Force in the AFI and ETI proposal has interjected composite force training (multiple warplanes of multiple types) of up to 85 or more different warplanes maneuvering throughout designated Military Operations Areas (MOAs). Composite force air campaigns would proceed in intensely orchestrated waves of attack two or three times a day for three to five days a month. Composite wing training activities will result in almost 1000 sonic booms a year down to 10,000 ft. Above Ground Level (AGL) in a 3.2 million acre training complex over southern Idaho, northern Nevada, and eastern Oregon. Eastern Oregon lands -- including the Owyhee Wild and Scenic River, and several WSAs -- will be subject to management guidance under the SEORMP. These lands will be, and are being, significantly affected by military training activities.
Pre-composite wing training activities in this 3.2 million acre training complex averaged two sonic booms per month above 30,000 ft AGL.

Composite force training deposits up to 100,000 bundles of aluminum-coated fiberglass chaff litter per year throughout the MOAs, with each bundle containing between 500,000 and 3 million fibers. Incendiary flares are ignited throughout the MOA. Each flare discharge may deposit up to two ounces of metal debris onto public lands and waters. Flares may also start wildfires in remote areas. A recent Air Force plane crash near the West Little Owyhee River resulted in significant disturbance to soil and vegetation associated with salvage activities.

There are serious potential and real environmental impacts from military training activities -- including effects on wildlife, wilderness study areas, and recreational use in the region. The Paradise MOA lies in the area defined as ETI "Region of Influence 3" in the AFI EIS. The SEORMP fails to acknowledge this, Oregon BLM failed to even provide comments on the ETI proposal. Oregon BLM has fled from any analysis of impacts of the ETI as a reasonably foreseeable event-- (now mandated by Congress), and ongoing activities of composite force training authorized in the AFI EIS.

Increased overflight and noise, including sonic boom activity, together with chaff and flare use, will cause stress to wildlife populations, including sage grouse and bighorn sheep. Wildlife responses to aircraft overflight include: Various fright reactions (panic, fleeing), which vary with species, season, reproductive status, previous exposure to aircraft, aircraft type, distance from the aircraft, and other factors.

Low altitude flight such as occurs in some southeast Oregon MTRs, could cause wildlife to avoid the disturbed areas; sensitive wildlife can be affected adversely by low flying aircraft, particularly at times when they are sensitive to disturbance.

In the Special Nevada Report of September 23, 1991, the Air Force as a co-author stated: "Possible effects of aircraft activities that concern wildlife biologists include sound pressures generated by sonic booms, and death of embryos after panic causing abandonment of the colony or physical damage to eggs. "Also, "it is reasonable to assume that for wildlife populations, negative effects are correlated with the intensity and frequency of noise events. Special Nevada Report at 8-47, -55.

"Major areas of uncertainty with regards to generalized noise effects on wildlife include: 1) the effects of long-term exposure to moderate or intermittent noise; 2) the probability that wild animals experience the same adverse physiological effects as laboratory animals , and the ecological consequences of adverse physiological changes, masking (interference with signal communication and detection), and altering behavioral patterns. (EPA, 1980).

The BLM failed to even identify these areas of concern in development of the SEORMP. Species such as bighorn sheep and sage grouse require a finely tuned ecological balance. The high number of military sorties, sonic booms, and composite force exercises planned annually could effect Oregon populations of sensitive and rare wildlife species.

The AFI EIS, though sweeping a wide array of public concerns under the rug, does admit: "increased use of military airspace could result in startle effects on some species sensitive to noise [including] bighorn sheep, "more overflights would pass over sensitive areas", and "some increased incidence of solitude or loss of primitive recreation locations along the [MTRs] would occur". The Air Force has not adopted any formal mitigation measures to prevent or reduce adverse noise impacts in Oregon. The Air Force continues to use a faulty NOISEMAP analysis for determining noise levels over wildlands. This model applies HUD guidelines for noise in urban settings as standards for noise over public lands. The Air Force ignores peak or episodic noise annoyances and thresholds, and averages sound over periods of time.

The Air Force itself is well aware that the models it uses to further its plans for activities in southeast Oregon are flawed. The 1996 Final Report on "Requirements Analysis for Noise" from the U.S. Air Force Human Systems Center, Environmental Planning Directorate, Brooks AFB, Texas states: "Because training operations may overfly lands used for outdoor recreation, the Air Force requires the ability to predict the effects of aircraft noise on the outdoor recreationist ...today ... no useful quantitative information of any kind exists." AF analyses are particularly untrue for wildland settings, and other sensitive environments, where "startle effect" and "loss of solitude" are important considerations. The AFI EIS states: "The startle effect and loss of solitude at primitive recreation locations would increase and may present a threat during recreational activities."

Chaff may be used throughout the Paradise MOAs in eastern Oregon. Our members have found chaff littering the ground within the Owyhee Wild and Scenic River corridor. (K. Fite, pers. comm.).

There are important land management policy considerations and conflicts concerning military use of chaff on public lands. BLM has reported that "[c]haff is being dropped on public lands without authorization." BLM, Final Report: Military Use of Public Lands Workshop - March 4 &5, 1997 at 19 (May 1997). According to the BLM, chaff is litter and BLM has recommended several measures in this Report including:

1. Establish policy guidance that states: The droppings of nonbiodegradable chaff on nonwithdrawn lands constitutes littering and potential public health, safety and environmental hazards and will not be authorized.

2. Notify the services that the disposal of nonbiodegradable chaff on public lands is limited to withdrawals consistent with that use.

The 1998 GAO report on chaff, prepared at the request of Senator Reid of Nevada, states about the military's own studies: "Studies carried out by DOD and others, including some carried out years ago, continue to create questions in the public's mind about the health and environmental effects of chaff... 9 of the 10 reports [reviewed by GAO] cited gaps in

information on potential effects. Six of the nine made no recommendations but cited missing data, suggested additional studies on long-term monitoring, or cited possible long-term chronic effects."

BLM fails to even mention chaff use in southeast Oregon, let alone address the substantial concerns with chaff use and resultant contamination of public lands, and its impact upon wildland settings, including WSAs, Wild and Scenic Rivers, and other areas with special
recreational or wildlife values.

The cavalier attitude taken by the AF in the AFI EIS and ETI EIS (both subjects of various legal challenges) can not be carried forward by BLM. The Air Force in the AFI admits: "impacts associated with military overflights on these specific lands include noise, visual intrusion, and potential impacts to air quality".

The BLM must prepare an adequate assessment of direct, indirect and cumulative impacts of military training activities in southeast Oregon.

Recreationists, already subject to exotic vegetation following in the wake of overgrazing -- such as the whitetop in the Owyhee River WSR, and who must often camp in the stench and unpleasantness of livestock waste here, also are being subject to visual marring of scenery with contrails, and aural intrusion of sonic and subsonic activity while recreating in the Owyhee WSR corridor and associated WSAs. The end result can only be a highly degraded recreational experience. Military training and other overflights will have cumulative impacts to recreational milieu of southeastern Oregon public lands.

The cumulative, possibly synergistic, effect of all the potential stresses on wildlife and potential impacts to recreational users must be assessed. Wildlife -- subject to stresses caused by expanded military training and overflight activity -- plus having to cope with ongoing degradation and destruction of habitat caused by livestock grazing – are also being dealt a double blow. It is necessary that the BLM analyze the most prudent management policy towards livestock grazing, to reduce the weight of cumulative impacts to wildlife populations. BLM must fully analyze elimination of livestock grazing from those areas of high wildlife and recreational value subject to impacts from military training.

Further, BLM must, as part of its planning process, develop long-term monitoring of impacts to recreational users. BLM must work to avoid or minimize impacts of military training and overflights to public lands. For example, prohibit chaff releases to prevent accumulation in water bodies within sensitive wildlife habitat, special recreational areas, and monitor accumulation which does occur.

Increased numbers of sorties, or large-scale training exercises which will result over a broad area of public lands as a consequence of ETI will increase the incidence of startle effect and loss of solitude at primitive recreational locations along training routes. BLM

has ignored every aspect of this in development of the SEORMP as a long-term plan. BLM has shirked its duties as stewards of these public lands. BLM has failed to protect lands under FLPMA, and the nonimpairment mandate. BLM proceeds to allow impairing activities to occur.

The IMP determination must be made by first ensuring that an activity conforms to the existing management and framework plan for the affected area. BLM must also review the proposed activity through an environmental assessment or environmental impact statement to determine whether it will be nonimpairing and to ensure that approval of such activity will not create a situation in which the cumulative effect of existing uses and the new proposed uses would impair the suitability of the area for designation as wilderness. NEPA documentation for a proposed activity in a WSA must consider under the nonimpairment standard whether: "the addition of this proposal produces an aggregate effect upon the area's wilderness characteristics and values that would constrain the
Secretary's recommendation with respect to the area's suitability or nonsuitability for preservation as wilderness." 44 Fed. Reg. At 72023.

The AFI proposal, amplified by ETI, results in multiple warplanes (between 50 and 80) flying at supersonic speeds down to 10,000 ft. AGL and dropping hot flares, firing debris and chaff over and on to WSA lands and waters. Pre-composite-wing activities consisted of subsonic training overflights of two to four aircraft or less with no chaff, flares, debris dropping. There has been no valid assessment of overflight and other activities of past and ongoing AFI activities, and new ETI actions on southeastern Oregon public lands. BLM has also shirked its NEPA and FLPMA obligations in additional ways: Unique ACEC Resources must also be considered, and conflicts between military activities and the WSAs, ACECs, and other areas must be addressed.

A complete analysis of the concerns raised above must be included in SEORMP FEIS sections including Air Resources, Recreation, Special Management Areas, Wildlife, and Cultural Resources. Changes must be made to SEORMP alternatives which reflect this analysis.

XVII. Land Exchanges/Acquisition

The DEIS states that "Zone 1" land contain significant visual, wildlife, watershed, vegetative, cultural and other public resource values, thus they have been identified for retention in public ownership. App-337. Yet, the DEIS would allow land within Zone 1 to be exchanged for other Zone 1 land with "higher" resource values. App-337. Public land within Zone 1 should be retained. If private land within Zone 1 should be acquired, the BLM should do so without disposing of very important Zone 1 land, regardless of their relative values. The DEIS also states that private land within Zone 1 represents potential acquisition priorities. This does not go far enough. Rather than sitting back and waiting for potential acquisition or land exchanges to present themselves, the BLM should take an affirmative approach to acquire these important and critical lands.

Regarding the adequacy of NEPA analysis and disclosure, the DEIS is inadequate under NEPA as a programmatic for the Donner und Blitzen WSR and Owyhee WSR because it is far too geographically broad and completely lacks the analysis, consideration, and disclosure required in an EIS for a river management plan or its revision. In particular, the BLM has had two successive seasons since the federal court enjoined grazing on public lands along the Donner und Blitzen WSR, and will have one more before the FEIS is performed and a ROD can be issued, during which the BLM should affirmatively gather the data necessary to inform itself and the public of the ramifications of alternative management strategies for the river. Indeed, the DEIS discloses that for certain areas, "data is currently too incomplete to make an accurate assessment" of riparian conditions. DEIS App. N at 360. Reviewing such data gaps in the EA prepared for the Owyhee WSR management plan, the Oregon federal court held that that violates NEPA, because the BLM cannot make affirmative management decisions in compliance with substantive federal law when it doesn't know the condition or trends of the lands it intends to manage.

Similarly, the DEIS states that all riparian sites along the river must have "adequate cover and height of vegetation along the banks and overflow zones to promote natural stream functions," DEIS App. N. at 361, but fails to analyze or disclose what adequate cover and height might be.

The DEIS states that the BLM intends to employ adaptive management strategies including timing, seasons of use, intensity, and frequency, DEIS App. N at 361, but fails to analyze or disclose what any of those broad parameters might or does mean along the river itself.

The DEIS acknowledges that mountain sagebrush are a part of the Donner und Blitzen WSR, and that many are "stressed, dead, or dying," DEIS App. N. at 361, but fails to analyze or disclose anything about the casual relationship between livestock grazing and the mountain sagebrush and its condition.

For the Blitzen Pasture, the DEIS discloses "guidelines" specific to each alternative that prescribe management options that fail to directly restore or protect and enhance the river's values. DEIS App. N at 363, First, alternative C fails to state where the proposed fences would be located. Second, alternative C fails to define what "early season" means. Third, the DEIS fails to analyze or disclose whether "trailing" will or will not inhibit the benefits of full rest or exclusion. Fourth, the DEIS fails to analyze or disclose the range of naturally high water, or whether a proposed three-*inch* flood zone might reveal or disclose anything about a natural hydrological cycle. Fifth, the DEIS fails to analyze or disclose what "median stubble height" means; it fails to analyze or disclose what the "most palatable species" in the Blitzen Pasture are; it fails to analyze or disclose what relationship there might be between "median stubble height" and the "most palatable species" in the pasture and, if there is any relationship, how any such plant species will be fully protected and enhanced by a standard such a stubble height, and how any other plant species will fare.

For the Little Blitzen Meadows of the Fish Creek/Big Indian Allotment, the DEIS acknowledges that some young and seedling trees are "developing," but fails to analyze or disclose whether that it due to the rest of the meadows from prolonged cattle grazing. DEIS App. N at 364. Alt B for the pasture discusses utilization standards, but the standards are too general and unspecified to restore the vegetation in the pasture, and the DEIS fails to disclose any relationship between the standards and the particular vegetation in the pasture. Alt. C discusses stubble height and a flooding zone of three inches, but fails to analyze or disclose any relationship between stubble height and the plants and plant communities that exist in the pasture, the origin of a three-inch flood zone as an appropriate management standard, or whether there is any relationship between a three-inch "flooding zone" and the natural hydrological flow and fully protected and enhanced values in the Little Blitzen River.

The analysis, consideration, and disclosure on water quality issues on the Donner und Blitzen WSR is inadequate. The DEIS acknowledges that federal law requires the BLM to meet state water quality standards. DEIS 2-30. And the DEIS acknowledges that at least the South Fork Blitzen and Little Blitzen are "water quality limited" for the parameter of temperature. But the DEIS fails to consider and disclose that the designation of a stream as "water quality limited" means that techniques such as "best management practices" have been determined to be inadequate to achieve water quality standards. Rather, for these streams, the BLM must consider, analyze, and disclose new and proven management techniques to restore water quality, including the rest of riparian pastures until streams achieve standards.

Thank you for your thoughtful consideration of our comments on the Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement.

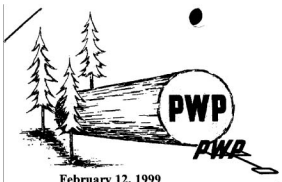
Sincerely,

/s/

Joy Belsky, Oregon Natural Desert Association
Gillian Lyons, Oregon Natural Desert Association
Pete Frost, National Wildlife Federation
Mark Salvo, American Lands Alliance
Doug Heiken, Oregon Natural Resources Council Fund and ONRC Action
Mark Riskedahl, Northwest Environmental Defense Center

enc. Appendices (via regular mail)

L-233



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FEB 18 1999
BURNS DISTRICT BLM

February 12, 1999

U.S. Dept of the Interior
Bureau of Land Management
Glenn Patterson
Burns District Office
HC74-12533 Hwy 20 West
Hines, OR 97738

Following comments are on behalf of Prairie Wood Products, (PWP), and Grant Western Lumber Company, (GWLC). PWP and GWLC are primary forest products manufacturers in Grant County and rely upon public timber for the majority of raw materials. As such, the management of public lands is vitally important to us for a long-term, sustainable and dependable supply of timber.

Thank you for the opportunity to review the draft of the Southeast Oregon Resource Management Plan, EIS. We encourage your agency to effectively manage all timber stands by means of timber harvest. Removing inferior trees is the logical approach to ensure forest health. To achieve dominance of healthy Ponderosa pine, Douglas fir and Western Larch it is necessary to remove undesirable trees which are finished growing, due to maturation, disease or physical defects. To make harvests worthwhile, trees need to be of adequate size. Currently the timber industry is experiencing difficulty obtaining a substantial amount of trees over 15" dbh.

Existing roads need to be utilized when possible rather than constructing new road systems.

We look forward to discussing options which are advantageous to all of us working toward healthy forest management. Please consider the local economy in your decision making process.

Sincerely,

Renee' Overton

Renee' Overton

L-234

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MAR 01 1999
BURNS DISTRICT BLM

Bureau of Land Management
Vale District
100 Oregon St.
Vale, OR. 97918

2/28/99

Burns District
HC 74-12533 Hwy. 20 W.
Hines, Or. 97738

Re: Southeastern Oregon Resource Management Plan and Environmental Impact Statement. - October 1998 Draft. Document.

I have the following comments pertaining to the above draft document; the majority of which are in regard to the Wild Horse Program. I believe that this document, in general, does a good job of providing for the proper and effective management of wild horses.

Chapter 2: Affected Environment

Page 2-13, 7th Paragraph - The statement that " The impacts of historical livestock grazing were thus concentrated at low elevations." seems to ignore the extremely heavy grazing by sheep on such high elevation areas as Steens Mtn. The impacts of that use upon the vegetation and wildlife of these areas needs to be taken into account.

Chapter 3: Alternatives

Rangeland Vegetation
Page 3-16, Objective 1, Part 2, Alt.C . - Even under this alternative, which provides for both natural values and commodity production, this proposal strikes me as being unreasonable. Where non native seedings are in good to excellent condition, why is there a need to take steps to increase vegetative diversity within them? Why not leave well enough alone and continue to make use of these seedings to improve the surrounding native vegetation.

Wild Horses
Pages 3-30 & 31, Part 2 - Alternative A,D and E do not appear to meet the requirements of the stated objective. In the cases of A and E they also do not meet the requirements of the Wild and Free Roaming Horse and Burro Act.

Same pages, Part 4 - There is no real difference between references to water developments in Alternatives A and C. I believe also that a statement could be added in each case as follows: -- to provide for water developments to assure a reliable water supply during drought years.

Pages 3-92 & 94 - This section raises the same concerns of legality and the need for water during drought, as are discussed for the chart on pages 3-30 & 31. Also, under Monitoring on page 3-92, in addition to horse counts for numbers, ages and sex distribution should also determined

Chapter 4 - Environmental Consequences

Page 4-98 ; Alternative A - The discussion concerning the favoring of Special Status Plants as well as Big Horn Sheep doesn't seem to be quite appropriate under a commodity production emphasis alternative, since neither of them would presumably be given greater consideration than wild horses. The discussion however does raise some questions in my mind as to whether any studies have been done to determine what impacts wild horse use has had on these plants over the period of their coexistence. It also raises questions as to whether Big Horn Sheep and Wild Horse habitat competition should be better considered prior to the reintroduction of the Big Horn Sheep into HMA areas.

Page 4-100; Alternative B - Where it says " AMLs should be managed much the same as Alternative A, except less emphasis is placed on providing livestock forage over wild horse forage." It should say No emphasis.

Thank you for considering my comments.

Sincerely,

Victor E Pritchard

Victor E Pritchard
SEOR RAC Member

L-235

February 28, 1999

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MAR - 5 1999
VALE DISTRICT BLM

Mr. Gary Cooper
Bureau of Land Management
Vale District Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Cooper:

As a former wildlife biologist for 27 years for the BLM in the Burns District I feel well qualified to comment on the draft. Many of my previous comments over the last two years were ignored, but I am again providing these comments for BLM and the public's information. My comments are specific to the Andrews Resource Area and do not include the Vale District portion.

General Comments:

This draft is a excessively wordy, repetitious document that is confusing and difficult for the reader to follow. Seldom can one determine what is planned for a given geographic area or a grazing allotment. The Three Rivers RMP EIS did provide that sort of detail and initially was to be a pattern for the Southeast Oregon EIS, but these drafts got more vague and watered down as they progressed. The skipmy use of literature cited reduces the credibility of much of it, particularly in Chapter 4, Environmental Consequences, Appendix N, Donner and Blitzen River Plan Revision, and Appendix T, Catlow Conservation Agreement Management Direction and Analysis.

Specific Comments:

P. 2-40
Thousands of dollars have been spent on inventory of redband trout habitat in Steens Mountain. Why was this data not used in the draft? Riparian habitat and fisheries habitat are not the same. Considering the status of Catlow redband trout and that the BLM paid for inventory of all of it on public land, I would suggest including it in the revision of the draft.

P. 2-82
Why wasn't a range of AUMs for livestock included by alternative? The reader has no way of knowing what this figure is. You could have used a three or five year average listed by resource area and provided this information easily. It is referred to without giving a number at numerous places in the text. In this way the reader could compare what has been allocated to livestock,

1

wildhorses, and wildlife.

P.3-4
Adaptive Management: This is a bureaucratic term that leads into non-specific proposed actions which are difficult and sometimes impossible to analyze. The lack of specificity is a major flaw in this document. The timing of management actions, identification of what the proposed actions even are and numerous items for a proper analysis are missing. After observing adaptive management in action in the Andrews Resource Area, I found that it frequently ignores resource damage due to improper grazing management, and does not follow constraints that are often part of the proposed action in NEPA documents. Adaptive management is so vague it is very close to a license for BLM to do anything they want to do when they deem it appropriate.

P. 3-21
Acreage figures for prescribed burning of juniper, big sagebrush, and aspen mountain brush are not specific enough. For example, in Alternative C, 260,000 acres of juniper are planned for treatment. How much is planned for the Andrews Resource Area? The title of this section is "Detailed Descriptions of the Alternatives (p. 3-9), but it isn't detailed at all. The acreage of proposed sagebrush control isn't even included in the section on rangeland vegetation (p. 3-16 to 3-19) so the reader has to find this elsewhere.

P. 3-66 to 3-69
All of the alternatives prescribe deferment of grazing following prescribed burning. This is sound management as plants and soil on newly burned areas are subject to damage during that period. In 1998 resource damage occurred as cattle were allowed to graze the large area that was prescribed burned in the South Steens area in 1997. If the two year deferment is needed why wasn't this done in South Steens in 1998?

P. 3-71
Alternative C, first sentence: What happens on the remaining 30 percent of the sagebrush habitat? Thirty percent of that total is a huge area. These percentages are pertinent to the other alternatives.

P.3-120
Alvord Peak ACEC: My previous comments on former drafts indicated that part of the reason for designation of the Alvord Peak ACEC was the minerals activity that has occurred there. This has not been included in your narrative. See 1982 Land Use Plan, RPS, draft, Andrews Grazing Management Program EIS (draft) 1982, and

ACEC files. Of the two wildlife ACECs designated in 1982 by BLM, both of them are to be dropped in this draft. These designations should be retained.

P. 3-193
Pickett Rim ACEC: The narrative in this section understates the significance of this area as a wildlife resource. This is a deliberate understatement of wildlife values so that the Pickett RIM ACEC can be dropped from designation. However, the significance of the Pickett Rim ACEC, when added to the proposed North Catlow Rim ACEC, is accurately stated on page 420 of the appendix, paragraph 7, "The Catlow Rim provides as dense a breeding population of golden eagles as anywhere in the western United States."

P. 3-209
North Catlow Rim ACEC: In addition to my comments above I would add that this area has outstanding wildlife resources with a substantial population of bighorn sheep, deer winter range, abundant chukars, outstanding riparian and wildlife values in Three Mile and Home Creek canyons, plus Catlow Redband trout.

P. 3-205
Catlow Redband Trout ACEC, Alternative C: The rationale for this is inaccurate for Home Creek and Three Mile Creek below Catlow Rim. This is fenced federal range. This was never analyzed in detail in this draft. Under "adaptive management" would lower Three Mile Creek be grazed by ten cows or a thousand cows?

P. 4-15
The assumption that 10 percent of the juniper would remain untreated: These figures do not match with Alternative B (80,000 acres) and are inconsistent with Appendix p. 373 (50% juniper cover).

P. 4-21
Conclusion that juniper would decline slightly: I don't think 80,000 acres of juniper control is a slight decline; if you use your figures that there are 350,000 acres of juniper, then this is almost 23 percent.

P. 4-20
No mention of impacts on fish in Alternative A, but it was referred to in B and C.

P. 4-16 through 4-23
Wildlife impacts are very skimpy or absent in this section.

P. 4-21 through 4-23
Alternative C: This level of juniper control plus the level of sagebrush control that is planned would not meet wildlife needs. Numerous species would be adversely affected. These include mule deer, Rocky Mountain elk, and sage grouse, but there are also many other species, such as Preble's shrew and sage thrasher that would decline. It isn't only the 610,000 acres of brush and tree control that impacts them but also the wildfires and brush control that occurs on private property. On November 17, 1997, after the Environmental Consequences was prepared, I was first notified that of the 610,000 acres to be burned, 440,000 acres would be in the Andrews Resource area. The 440,000 acres in Andrews is not stated in the draft. Since much of the Wyoming big sagebrush is prone to cheatgrass infestation following burning, most of the burning would be above the mountain big sagebrush. Wildlife needs would not be met at this level. The impact analysis is inaccurate and inadequate in this section and P. 4-66 through 4-97. There is an abundance of literature available to provide an improved analysis.

P. 4-23 and 4-36
Alternative D: At these levels of brush control wildlife needs may be met if constraints protecting key habitats are followed. Again, part of this depends on how much of the total would be in the Andrews Resource Area, and a more detailed breakdown on acres to be treated is needed.

P. 4-60, paragraph 5
33 miles of fish habitat negatively impacted by wildhorses: Where are the miles for the other alternative? How many miles are impacted by cattle?

P. 4-80, last paragraph, sentence 3
Impacts would occur where juniper is "normally patchy, rare, or absent." This is an inaccurate statement.

P. 4-81, paragraph 5
This paragraph concerning adverse impacts from wildhorses on water for wildlife is true. It is also true that in some areas, Fields Basin for example, BLM allowed cattle to drink dry water used by bighorn sheep, mule deer, sage grouse, antelope and other wildlife during drought years.

P. 4-92 through 4-97
The type of detail provided for bighorns is needed for other species. How would the reader know what the impacts are on these other species based on what is in the draft?

P. 4-98
How many AUMs are allocated to wildhorses?

P. 4-105
Domestic sheep AUMS are how many?

P.4-105
What is the estimate on increased TNR by alternative? How much has been allocated and where during the last three years in the Andrews Resource Area?

P. 4-107, paragraph 10
Permitted AUMs are how much by alternative? Five percent of what? How would the reader know this without a number?

P. 4-120
Where is the analysis of snowmobile impacts on wildlife or the impact of the authorized helicopter skiing on deer and other wildlife wintering on the Steens?

P. 4-140, paragraph 2, first sentence
Meadows are not rare on Steens Mountain. They are present at numerous places on private and public land. Perhaps a better word than "rare" could be found.

APPENDICES

P. 51, element 4, second sentence
Evaluation of riparian condition and water quality within 5 to 10 years.

In 1982 the BLM published the draft Andrews Grazing Management Program EIS, a proposed Land Use Plan, and other documents that highlighted where riparian problems were. These documents and the inventories that preceded them cost taxpayers thousands of dollars. Many of the changes planned as a result of these documents were never implemented on streams with poor riparian condition, such as portions of McCoy Creek and upper Riddle Creek. Now BLM comes up with another schedule of studies that may take 5 to 10 years to implement change. Management on these problem areas needs to occur now, not in another 5 years or more. See Element 6 for what the time frame should be (which is before the next grazing season).

P. 315, paragraph 3, second sentence
This is inaccurate. Golden eagles remain on the nest until mid-summer before fledging.

P. 315-317
This section needs to include salt desert shrub, stream side riparian, meadows, wetlands, mountain brush, aspen, subalpine, and natural grasslands.

P. 319
Add 6 species of bats to the list. These are on file in the Burns District BLM office or with the Oregon Heritage Program.

P. 332
Add stipulations for helicopter skiing authorized on Steens Mountain.

P. 360
Proposed Management: The grazing use proposed by alternatives is vague and needs to be revised. The intensity of livestock use is one of the two most important factors in determining the success of livestock grazing (timing of grazing is the other), Clary and Webster 1989. No livestock numbers are proposed in any alternative for either the Fish Creek-Big Indian Allotment nor the South Steens Allotment. Are we talking about 100 cows, 1,000 or 4,000 cows in pasture? The numbers of cattle have a strong influence on the intensity of grazing.

P. 361, paragraph 6(2)
Bank Damage: In 1998 BLM authorized livestock use in the Home Creek area during a wet spring with one of the wettest June's on record. This section of stream is in poor condition. Bank damage was severe with bank caving, hoof punching and trampling. How do you propose to control this in the future?

P. 361, second paragraph from the bottom
South Steens Allotment: Within the Environmental Consequences section there should be additional discussion about the effects of the prescribed burning program on riparian areas as the present discussion is almost nonexistent in any detail. Within the 400 acres cited in the text there have been serious adverse impacts due to prescribed burning that have happened to woody riparian species along the upper mile of the South Fork of the Blitzen River, a very degraded section of stream with inadequate shade for ameliorating peak water temperatures during the summer. The proactive vegetation restoration cited at numerous places in the draft burned out willows that are used by macro invertebrates which are the primary food source for redband trout and used by insectivorous songbirds that heavily use riparian areas. Willows and junipers in this area are the primary source of woody shade for this section of stream. The action of burning riparian areas

was contrary to constraints in the South Steens AMP Environmental Analysis that were aimed at improving the woody cover along steams. Deliberate burning of riparian areas and/or the upland cover adjacent to it by BLM occurred two years, in 1996 and 1997.

P. 362
In the South Steens AMP Environmental Analysis the proposed utilization level for the South Fork Blitzen River was 45 percent on the herbaceous riparian vegetation. In a draft I reviewed on March 25, 1998, the herbaceous riparian stubble height had dropped to 4". I cited four wildlife biologists besides myself that did not believe 4" was adequate for wildlife needs. These were Fred Taylor (Burns BLM), Gary Ivey (then with USFWS), Dr. David Dobkins (Bend, Oregon), and Terrell Rich (Boise BLM). These people collectively have over a hundred years of experience in wildlife management. Now the stubble height standard is 3". This will not meet wildlife needs and will not meet the "enhance and protect" standard for wildlife on scenic rivers. In addition to the impact of cover removal on wildlife there is also trampling, disturbance due to livestock grazing and grazing encourages cowbird parasitism. Cover should be 12" of stubble height minimum. These comments are applicable to all pastures grazed in the Blitzen Wild and Scenic River and Catlow streams area where there is stream side riparian habitat.

P. 366
Blitzen Pasture, last sentence under Impacts: The three weeks cited where wildlife cover would be inadequate would be at a critical time as reproduction and nesting is occurring. This period is longer than three weeks. See scientific literature.

Blitzen Pasture, Alternative A: The fisheries discussion is inadequate. The effects of a closely cropped riparian area, for example, with a 3" stubble height, and its effect on macro invertebrates is not discussed. Almost every aquatic macro invertebrate is dependent on terrestrial habitat for reproduction as part of its life cycle and many utilize the riparian area extensively (Erman, 1984). Closely cropped riparian areas are inferior for the reproduction of many species.

The effect of increased turbidity due to livestock in streams and due to bank shearing is not discussed adequately. There is considerable information in the scientific literature on this. Trout are primarily sight feeders and turbid water impacts them. Also, turbidity affects reproduction and the macro invertebrates discussed above. An abundance of macro invertebrate data has been collected by BLM over the years for steams in the wild and scenic river area and results should be included. Macro

invertebrates are also part of the wildlife present in the area and obviously some of them are Special Status Species in the EIS area.

P. 367
Alternative C: Severe trampling may occur when cattle graze a short reach of stream as proposed with the division fence. This can have adverse effects on riparian areas and the wildlife using them. As demonstrated on Home Creek in 1998, BLM is reluctant to have cattle removed due to bank damage once they are in a pasture. Should cattle be in this area when wet weather sets in, damage is likely to occur.

The second factor previously cited (referring to Appendix P. 360) that has a strong influence on the success of grazing systems for successful riparian restoration is timing of grazing (Clary and Webster 1989). The proposed use past mid-July is unwise and it is pushing the later end of the period when one is likely to get significant regrowth. Research by Dr. Tony Svejcar and my self in the South Steens area during two excellent growing seasons found little regrowth in August. These four study areas included two sites within the Blitzen Wild and Scenic area. These results are also supported by those reported by Sheeter and Svejcar (1997), Clary (1996), and Dovell (1996).

P. 368
Alternatives C and D: Impacts for C and D are not similar to that of B. B has a 45 percent level on the herbaceous and C and D have a 3" stubble height, far less than that of 45 percent. B is preferred over C and D for riparian recovery.

P. 377
Riparian salt desert shrub and other habitats should be added.

P. 418
The trend was not up on Home Creek in the Steens Pasture in 1998. Livestock use was severe. BLM knew that severe cattle use was occurring in the Home Creek riparian area and cattle were not removed until the damage had been done. This was the second year out of five that the 45 percent utilization standard was ignored by BLM. If the changes needed on the Home Creek riparian area are to occur, then a different management philosophy is needed than presently exists. Severe use plus heavy trampling on muddy soil left this proactively managed stream in sorry shape by the fall of 1998.

P. 422
A division fence is needed to improve much of Home Creek as riding to herd cattle out of the riparian area and poor use supervision has had limited success. This could be either the Home Creek Fence or the Lauserica Fence. The Stevens Fence is not needed and would be another hazard for bighorn sheep using the Catlow Rim area.

P. 423
Environmental Consequences

General Comment: Unless there is proper use supervision none of these grazing proposals will be successful. The degraded conditions present are clearly the result of improper livestock grazing and this steam should have five years of complete nonuse prior to commencement of a grazing system. If it absolutely must be grazed to squeeze in AUMs for cattle, then July 30 is too late. Cattle should be off of this area by June 15, and more rest than one out of four years is needed. Data collected by Dr. Svejcar and me in 1997 and 1998 found at least four to five times more regrowth of herbaceous riparian vegetation occurred in mid-June than in mid-July, and those studies were on better condition riparian sites at higher elevations than most of Home Creek in the section discussed in the draft. Also, those studies were completed in excellent water years which would favor more regrowth. During drought years getting livestock off the riparian area of Home Creek should be by mid-May.

GENERAL COMMENT ON THE DRAFT

The preferred alternative can only be determined by a complete revision of the draft as there is a need for a more detailed and accurate description in many major sections. There are many of the preferred alternative sections lacking in scientific credibility and many that ignored data available to BLM. Oregon Department of Fish and Wildlife needs to be more involved in these decisions as BLM's role in impacting wildlife habitat can have dire and long term consequences on wildlife managed by ODFW. In general I would support Alternative D as it has more emphasis on natural values. However, Alternative D would not control livestock adequately on much of Home Creek and would not maintain ACEC designation for the only two ACECs that were designated for wildlife in 1982.

I hope my comments will be given serious consideration for your

next revision of the draft.

Sincerely,

Guy Sheeter

Guy Sheeter

LITERATURE CITED

Erman, Nancy, 1984. The use of riparian systems by aquatic insects. California Riparian Systems-Ecology, Conservation, and Productive Management. Univ. Of California Press, Berkeley, CA, P. 177-182.

Clary, W.P. and B.F. Webster, 1989. Managing grazing of riparian areas in the intermountain region. Gen. Tech. Rep. INT 263, USDA Forest Service, Int. Res. Stat, Ogden, UT.

Clary, W.P., 1996. Riparian plant regrowth - maybe not as much as you think! Proceedings 49th Annual Meeting Society for Range Management, P. 13-14.

Sheeter, G.R. and T. Svejcar, 1997. Stream side vegetation regrowth after clipping. Rangelands 19(1) P. 30-31.

L-236

RECEIVED
MAR 03 1999
BURNS DISTRICT
BLM

February 26, 1999

Mr. Glenn Patterson
Bureau of Land Management
Burns District Office
HC 74-12533 Hwy. 20 West
Hines, Oregon 97738

Dear Mr. Patterson:

I am responding to your draft of the Southern Oregon Resource Management Plan/Environmental Impact Statement. I wish to commend you and your colleagues for your detailed and thoughtful analysis. I am a long-term resident of Oregon (60 years) and have sustained a continuing interest in changes occurring in our state and need for land use review.

As a teacher of courses concerned with Oregon, I have devoted considerable time to visiting and photographing every region. I have also watched the onslaught of tourism, which of course, brings benefits as well as challenges. Based on my experience in Oregon and elsewhere (I am giving a presentation soon on tourism in Ireland), can appreciate the delicate governmental decisions required to maintain livability while serving the needs of visitors.

Your alternative: Protect natural values while providing for commodity production appears to be the best choice. An option which doesn't chase existing ranchers to the welfare rolls while preventing the kind of commercial development that virtually destroys the features found so attractive to visitors in the beginning. Therefore, you should restrict any new commercial development with all your might.

Keep up the good work.

Sincerely,

Gary H Searl

GH Searl (Joe)

L-237

RECEIVED
FEB 26 1999
BURNS DISTRICT
BLM

Joshua L. Warburton
President

Western Heritage Enterprises
P.O. Box 36[illegible]
Oregon 97720
[illegible]-542-37[illegible]5
"Mesteno"

To: Burns District, BLM: Attn Glenn Patterson
From: Josh and Denise Warburton
Subject:Response To SEORMP?EIS

Attached is our response to your draft RMP/EIS for Southeastern Oregon. We thank you for the opportunity to participate in this critical process for the future management and protection of our public land resources. If you have any questions pertaining to the information given, please feel free to contact us at 542 493-241 5.

Sincerely:

2/25/99

2/25/99

SOUTHEASTERN OREGON
RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT: SEORMP/EIS
COMMENTS AND RECOMMENDATIONS

TOPICS

I. Proposed National Conservation Area (NCA) for the Steens Mountain and it's related systems; (reference Chapter 3-42).

Issue: The issue is whether or not to designate, preferably through Congressional action, the Steens Mountain complex with special status. It has long been recognized through previous initiatives and planning that the Steens Mountain is worthy of special attention and possibly designation. It is one of the most diversified representatives of the Great Basin Physiographic Region and offers essentially all the life zones or habitat types within a relatively small area. The proposed area, coupled with the adjacent Malhuer Wildlife Refuge, would offer a holistic system under special status, from the snow capped subalpine zone to the closed basin at the end of the natural systems. In addition, current access via the Loop Road, allows one to experience this diversity by conventional highway vehicles. It is essentially available to all publics.

The areas ecological and scenic attributes are also sensitive and warrant special consideration and management. In addition, the broken land pattern offers many opportunities for land tenure adjustments which would facilitate more effective management of public lands as well as private holdings. Providing special status such as a National Conservation Area (NCA), would give the area the national attention to proceed with an aggressive land tenure adjustment program as well as adequate maintenance of existing public service facilities.

Recommendation: It is recommended that the BLM pursue the designation of the area, primarily as proposed, through Congressional action. Adjustments in boundaries and specific management prescriptions should be developed with diversified public involvement, not restricted to land owners within the proposed area.

II. Land Tenure Policy Change, (Ref. Appendix L; p. 337). Zone 1: Retention/Acquisition.

"Zone 1 land has been identified for retention in public ownership. These are also areas where emphasis will be placed on acquisition of land containing high public resource values through such methods as exchange, purchase, donation or public agency jurisdictional transfers. Zone 1 land may contain significant visual, wildlife, watershed, vegetative, cultural and other public resource values and are generally well blocked. ***Land within Zone 1 may be exchanged for other Zone 1 land with higher resource values.***"

Issue: Currently policy direction as set in the Andrews MFP/EIS, provides retention of all lands designated as Zone 1 lands. This direction was established to protect those high value resource lands which were identified by the various publics through the plan completed in 1987. It was, at that time, identified by various interests that any lands having ***"high public resource values"*** should be **retained** and not disposed of. This rational is based upon the fact that there is a wide diversity of values associated with public lands, as identified by the Federal Land Policy and Management Act of 1975 (FLPMA). These values share in importance when managing the public land resources, and only those values which have special status, i.e. federal or state listed species, special status waterways or lands would receive higher consideration.

Therefore, to trade one value off for another at the discretion of the bureaucracy, without the extensive input of the public provided by a formal RMP amendment and EIS, would not meet the intent of NEPA. Also, it would not provide for the long term protection of those resource values identified and recognized by the public in this RMP/EIS process. In addition, the policy change refers to trading for ***"higher resource values"*** within the Zone 1 category. This allows for too much subjectivity and discretion on the part of the decision maker. What is high for some may be of little or no interest to others.

To dispose of any public lands with high public resource values would be a permanent loss, not only to those publics currently sensitive to those values, but for generation yet to come. Any loss of a public resources results is a net loss to the public and a negative impact to the system in which that resource occurs.

-2-

II. Land Tenure Policy Change, (Ref. Appendix L; p. 337). Zone 1: Retention/Acquisition.

"Zone 1 land has been identified for retention in public ownership. These are also areas where emphasis will be placed on acquisition of land containing high public resource values through such methods as exchange, purchase, donation or public agency jurisdictional transfers. Zone 1 land may contain significant visual, wildlife, watershed, vegetative, cultural and other public resource values and are generally well blocked. ***Land within Zone 1 may be exchanged for other Zone 1 land with higher resource values.***"

Issue: Currently policy direction as set in the Andrews MFP/EIS, provides retention of all lands designated as Zone 1 lands. This direction was established to protect those high value resource lands which were identified by the various publics through the plan completed in 1987. It was, at that time, identified by various interests that any lands having ***"high public resource values"*** should be **retained** and not disposed of. This rational is based upon the fact that there is a wide diversity of values associated with public lands, as identified by the Federal Land Policy and Management Act of 1975 (FLPMA). These values share in importance when managing the public land resources, and only those values which have special status, i.e. federal or state listed species, special status waterways or lands would receive higher consideration.

Therefore, to trade one value off for another at the discretion of the bureaucracy, without the extensive input of the public provided by a formal RMP amendment and EIS, would not meet the intent of NEPA. Also, it would not provide for the long term protection of those resource values identified and recognized by the public in this RMP/EIS process. In addition, the policy change refers to trading for ***"higher resource values"*** within the Zone 1 category. This allows for too much subjectivity and discretion on the part of the decision maker. What is high for some may be of little or no interest to others.

To dispose of any public lands with high public resource values would be a permanent loss, not only to those publics currently sensitive to those values, but for generation yet to come. Any loss of a public resources results is a net loss to the public and a negative impact to the system in which that resource occurs.

Recommendation: Retain current policy to identify public lands with high public resource values and retain them in public ownership. Reevaluate proposed land classification Zone designations to insure that lands with Zone 1 designation have high public resource values.

III. Areas Of Critical Environmental Concern (ACEC): Reference Chapter 3-125 and 193).

Pickett Rim ACEC

Issue: De-designation of public lands supporting sensitive and critical public land resources.

The area known as Pickett Rim, located to the west and south of the historical settlement of Frenchglen, was identified during the Andrews MFP/EIS as having high wildlife values, specifically raptor nesting and roosting habitats and big game critical winter range. The area supports nesting, roosting and feeding habitats of sensitive birds of prey including the federally listed Golden Eagle, Ferruginous Hawk, Prairie Falcon, Red Tail Hawk, Turkey Vulture, Great Horned Owl and potential habitat for the threatened Peregrine Falcon. The area was also historical Peregrine Falcon habitat, and at least two unconfirmed sightings of Peregrine Falcons were made during the springs of 1987 and 1988 respectively in the ACEC area.

Recommendation: The area currently under the Pickett Rim ACEC designation should be expanded to extend down the Pickett south to the south boundary of Secs. 9, 10 & 11. and extend north approximately 1.5 miles north of Frenchglen to north boundary of Sec. 34 & 35; and to the Malheur Wildlife Refuge (MWR) boundary to the east (see Exhibit A).

This expansion of the current boundary would then include the feeding and tree nesting habitats of raptors and also the critical deer winter range which borders the MWR. This new boundary would then provide the "flag" for sensitive wildlife habitats to assist in the BLM in meeting their legal mandates to protect an manage high value public land resources (See Exhibit B, photos).

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IV. Viewing Area/Interpretive Site; P-Hill.

We support the proposal for a viewing/interpretative site for the Steens Mountain/Blitzen Valley ecological systems. There is excellent interpretive and educational material available on this complex and complete natural system provided by the BLM and the Malheur Wildlife Refuge. However, there is no single site available to the public with reasonable access, which allows one to view this natural wonder from a promontory advantage. P-Hill, however does provide that location, one which the entire west slope of the Steens Mountain fault block can be seen towering above the productive Blitzen Valley which it feeds below. This site offers one of the most spectacular promontory points available anywhere in the Great Basin region. One can visually experience the entire range of life zones within the Great Basin from one location.

Recommendation: It is recommended that the site located approximately 3/4 mile east of Frenchglen, and south of Highway 205, be designated for the specific location of a viewing/interpretive site for the Steens Mtn./Blitzen Valley complex. This location, as it overlooks the Blitzen Valley, could also provide effective interpretation of Peter French and the era of history associated with early settlement and pioneering efforts and the importance of winter range for mule deer, (Refer to Exhibit A and C).

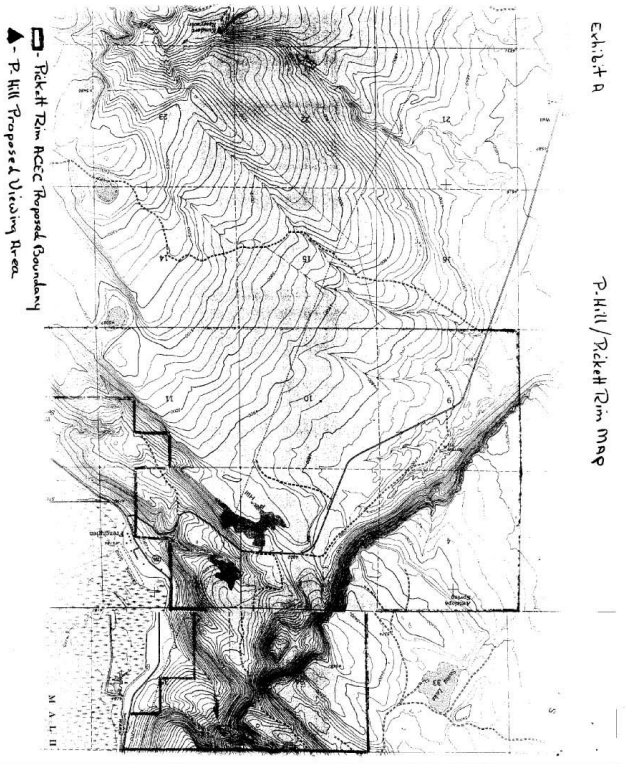

EXHIBIT B:

PICKETT RIM ACEC:

Critical Mule Deer Winter Range

Critical Raptor Nesting and Feeding Habitats

EXHIBIT C

P-HILL VIEWING AND INTERPRETIVE SITE

Looking North Through Blitzen Valley

Looking East Across Blitzen Valley to Steens Mountain

L-238

238

RECEIVED
MAR 01 1999
BURNS DISTRICT
BLM

February 25, 1999

TO: Tom Dyer
Burns District Manager
Bureau of Land Management

FR: Jim and Liz Wassom

RE: Southeast Oregon Resource Management Plan Comments

Liz and I are both school principals, Liz in the Lake Oswego School District and I'm in the Tigard-Tualatin School District. We are also recent land owners in the Andrew's Management area.

Liz and I reviewed the Southeast Oregon Resource Management Plan for fundamental fairness in the treatment of land owners, business owners, and the public. At first blush, I found the document to be vague and over broad. Therefore, it is difficult to put an arm around what the outcome might be when the plan is implemented. It seems to me BLM has extraordinarily broad power to implement whatever and whenever they want as the plan does not include activities that have clarity. I suggest BLM develop a comparison document that outlines status changes from current status to the SORMP draft.

What is the proposed plan's impact on business? I'm not sure, but I've found one significant example that would have a serious impact on a friend's ability to make a living. The example that concerns me is regarding the statement that says a helicopter cannot fly over the Steens Mountains area for the four summer months. The example causes me to question what else is in the document that will have a deleterious effect. My 82 year old father-in-law had a stoke and I use a friend's helicopter to fly him into the area for fly fishing. Liz and I both use the service for sight seeing and fly fishing. I've seen aircraft landing on Loop Road, yellow buses, and Winnebago's in the area. I've observed 4-wheel drive vehicles and motorcycles, plus noisy young children. I question the fairness of isolating and identifying one mode of transportation and banning it from business use. I would hope for a win/win situation and possibly the Federal government could save some money by establishing business partnerships with the helicopter owners and could utilize helicopters in safety, flyovers, and spotting in the Steens area.

I've looked at a map produced by the BLM that identifies habitat for Big Horn sheep near Frenchglen. Is it a strategy to close the North Loop Road to everyone, including owners, during the winter months? My hope is that BLM does not propose expanding the Big Horn sheep into the Frenchglen area.

In Plan B the considerations for the Indian lands and Snow Mountain are religious but also spiritual. Plan C shows that little or no Native American recognition is included. Based on my readings, The Steens (Snow Mountain) was considered spiritual, therefore should receive weight in plan C.

If it is the long term intent of the BLM policy to move land owners and businesses off Steens Mountain, policies must be thoughtful, gracious, and generous. This transition must honor owner's property rights and business rights. BLM must integrate their plans with owners considerations. Business partnerships must include appropriate and timely easement and appropriate permits, etc.

I have a concern that the documents may represent a conspiracy of statements that collectively may not be unlawful but are harmful to the purpose of business and could ruin family businesses. The plan, as I see it, would create a policy that would run in a circle. The more advertising BLM and the government does to create tourism and tours, the more possible problems arise as visitors are in the Steens Mountains. However, as more policies are put into place, more restrictions will be in place for the public, business, and landowners.

I am not sure of the impact on myself and friends regarding the proposed National Conservation Area. I suggest BLM provide all land owners and business owners in the proposed NCA with a copy of NCA-HR-100-24. Also, include positive and negative impacts the proposal may have on public, landowner, and business use. It is simply difficult to ascertain what useful purpose a designation of NCA would be.

Does BLM personnel policy and/or government statue or law allow an ex-Burns BLM director potential or real financial gain as an outcome of the proposed Southeast Oregon Resource Management Plan being implemented? Did "insider" knowledge base and information base provide a business advantage over other citizens? Was he BLM director during business planning and land acquisition?

In conclusion, I believe that this plan has more clearly as its goal the elimination of <u>any</u> access either harmful or benign by non-government persons rather than the goal of preserving and sustaining this valuable resource. They are assuredly <u>not</u> one and the same goal. Open minded and creative planning <u>could</u> enhance the prudent use of Steens Mountain by all constituencies.

cc: Elaine Zielinskim, BLM
Oregon/Washington State Director

L-239

John & Cindy Witzel

RECEIVED
FEB 16 1999
BURNS DISTRICT
BLM

February 10, 1999

Bureau of Land Management
ATTN: Cody Hansen/Acting Burns District Manager
Burns District Office
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Dear Mr. Hansen, Acting Burns District Manager:

Thank you for sending us a copy of the Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement (SEORMP/EIS). We appreciate the opportunity to review it and submit our comments during the public comment period. We hope our comments are helpful and provide some suggestions on resolving what undoubtedly are issues. The following comments on the Draft SEORMP/EIS reflect views from one entity, ourselves, but are submitted as three distinctly different stake holders:

1. As members of the general public being stakeholders in our public lands;
2. As business operators on public land; and
3. As private landowners and business operators within the planning area.

We apologize for the lengthiness of our comments. However, the length is necessary due to our multiple interests and the incompleteness of the Draft Plan.

The Plan itself is merely a collage of patter which gives no clear guidance or direction and therefore is not a plan all. Its incompleteness will be its first failure. By not including precise actions, strategies, and timelines, it is impossible for anyone (the general public, private land holders, and BLM managers) to determine if the selected goals and/or objectives can be reasonably or feasibly met. Further, one cannot know what all of the possible foreseeable adverse impacts of these proposed actions are without more detail and analysis. The BLM must give the public the opportunity to analyze all aspects of a goal, objective, strategy, or action along with all potential consequences there of. Without this opportunity, the public process is not served, the Plan is biased and leading and therefore, fatally flawed. With all information regarding an issue made available, the public response and public direction to BLM may be entirely different.

➢An example of this within the Plan is the following:

What are the actual or potential impacts to private properties and businesses within or adjacent to the Planning Area?

When the BLM considers new proposed designations, strategies, or actions with the knowledge that private lands make up 25% of the lands within the Planning Area and are a significant part of the economic back bone of our County, State, and Country, adverse effects of these proposals to the resources of these lands, uses, values, and businesses have far reaching impacts economically and otherwise. These effects are not just direct to the landowner, but due to the trickle down effect would

be widespread and compounded. It has been said by some BLM public employees that they do not want to get into these issues. We feel that a full analysis of the specific goals, objectives, strategies, and actions must be done as these are very significant issues to those most directly effected and to the public at large.

Private landowners have a right to know of any adverse effect that may be imposed upon them from our public neighbors and BLM's management decisions. As well, the public must be informed of what impacts the BLM's chosen goals, objectives, and actions may have upon their private neighbors. Private landowners and managers are held accountable and responsible for unnecessary impacts to public and private lands, and so shall the BLM be held accountable for unnecessary adverse effects to private lands and businesses. As members of the public, we do not feel that the majority of the public would be supportive of our entrusted land managers (BLM) detrimentally imposing upon the other landowners and managers of the area. The public is one landowner of the area with BLM as their land managers. There are many other private landowners and managers of the area with numerous private entities being the majority. Therefore the Draft SEORMP/EIS must include as an issue "Impacts to private lands and business".

The inclusion of this issue and its analysis may substantially change the preferred goals, objectives and actions within the SEORMP/EIS from their draft form today. The BLM, as responsible managers, should take measures to eliminate or minimize adverse impacts to the effected parties through mitigations with the effected parties. In addition, BLM bureaucrats, politicians, or special interest groups should not be the judge of what are acceptable impacts. That is like letting the wolf decide whether he should eat the little pig or not. As self described by the BLM, private lands are a part of the Draft SEORMP/EIS planning and BLM management areas. BLM must manage the surrounding public lands around this fact as private land managers do having both public and private neighbors.

➢Another example of adverse effects to public services, private lands and businesses which could be avoided if all aspects of the Plan were carefully and specifically planned and evaluated is the following proposed action:

"Authorized aircraft landing in the Steens Mountain Recreation Lands (SRMA) would occur on BLM administered land for winter activities only." Vol. 1, Ch. 3, Pg. 112

This described action would exclude landings at all other times of the year including spring, summer, and fall. The proposed action appears to be a political action in nature for we as helicopter operators in the area have not been informed or made aware of any problems or resource degrading effects that these landings might generate, scientific or otherwise. This action should not be taken and should be removed from the plan as a proposed action as it would have a far greater adverse effect than a positive effect for the following reasons:

1. It discriminates against one particular type of motorized vehicle in an area and at a time when all other motorized vehicles are allowed including: ATV's (Quads, Motorcycles, etc.), 4 wheel drive vehicles, and all others which undisputably have the potential for greater surface disturbance than the skids of a helicopter. Either the area is motorized or not.

2. The action discriminates against the members of the public whom specifically choose to utilize this type of vehicle for access and recreation.

3. This action will adversely effect local, county, and state business and thus effect the

economy by eliminating a current and future publicly demanded service which brings in dollars from outside the area. This action would not only effect the helicopter operator itself but may also negatively effect hotels, restaurants, ranchers, outfitters, gas stations, fuel suppliers, aircraft maintenance service providers, and many other services and businesses that a participant may patronize while they are here. The mere operation of our helicopter is driven by the public's request and demand for the service.

4. This action makes it difficult or impossible for other businesses to operate or complete a task. In addition, this may promote the use of a more environmentally detrimental means of accomplishing the same task (i.e.-using ground vehicles which actually cause surface disturbance particularly when ground conditions may be wet, soft, or otherwise sensitive). Helicopters are utilized for many purposes by many businesses in the area to both help them accomplish their management objectives as well as assisting BLM management in meeting their goals. To help meet the non-impairment criteria of the wilderness study areas and protection of resource values by the dispersal of livestock salt away from roads, streams and other sensitive areas; fencing patrols, repair, and construction which would otherwise be accomplished by ground vehicles creating new roads or trails.

5. This action would mean the termination of our existing SRP stipulations for providing helicopter services to this area to meet the public demand. We believed that in October of 1998 we had resolved this issue with BLM. We have followed the stipulations of our permit and have had no violations there in. There are no reasonable grounds for which this permit should be terminated.

6. This action discriminates and/or refuses a means of access for those who may be physically challenged or limited by other constraints.

7. This action reduces BLM's options for means of dispersal of public land recreation users (i.e.-concentrates fishing and camping pressure to certain heavily used areas). Most recreation area managers view dispersal of use as a positive effect.

8. This action makes search and rescue; fish, wildlife, livestock, observation land surveys; and fire operations even for private lands difficult and cumbersome if not impossible to complete.

9. This action encourages increased use of ground vehicles and creates more surface disturbing activity.

10. This action will not prevent helicopter overflights by us or anyone else. In fact they may increase. We have somewhat steered away from aggressively doing many scenic overflights in lieu of just using our ship to service our camps and accessing fishing areas as well as assisting ranchers in their operations. The proposed action would economically mean that we would have to do more scenic overflights to make up the difference in revenue.

More importantly it will not prevent the BLM from using their contract helicopter, which happens to be the ship most often in the air and touching down on public lands, and which may have the potential for creating the most impacts to the area. According to the Plan, the BLM can continue to do whatever it wants for administrative purposes.

11. BLM has no means of effectively enforcing this action. Aircraft use, helicopters included,

from within and outside the area will continue. The only enforcement will be on those like ourselves who have taken the time and went to the expense to operate under BLM permit. Others who are now unregulated will continue to be.

12. BLM would lose revenue by this action. Ten percent of our gross revenue in 1998, for which BLM gets a percentage, came directly from permitted helicopter operations (i.e.-fishing trips, etc.). This action would reduce that revenue to us and BLM to zero.

13. There would be less public land monitoring. As we are performing operations on public land, we are constantly on the lookout for illegal or undesirable practices which may be taking place on public lands such as off road vehicle use in WSA's, NWSRC, poaching, etc. BLM should realize the subsequent benefits of having our helicopter operating in the area at all times of the year. What no one can know for sure, is what illegal or undesirable activities may be curbed or curtailed because of this presence.

The negative impacts of this proposed action would have a far greater adverse effect on life, the majority of the public in general, the economy, and our natural resources when compared to what might be the "imaginary gain" for a few who might have a negative experience with some noise. We say "imaginary gain" because we feel that the proposed action will not achieve the goal of eliminating the noise or make a measurable difference when all other motorized motor vehicles including helicopters are still touring the area. If complaints were received for noise regarding helicopters in particular, it may well not have been ours but others, even BLM's own, yet we are to be penalized.

For all of the above stated reasons, this proposed action should not be taken. We understand and agree on possible concerns of what the future could bring. None of us would want to have a Grand Canyon scenario here but neither is it necessary to go to the other extreme. We believe that there is middle ground when all interests are considered. We see the employment of the following stipulations as being serviceable and reasonable:

1. Aircraft landing during all times of the year shall meet the current non-impairment criteria for wilderness study areas (WSA), whether on WSA's or not, in the SRMA.

2. During periods when the Loop Road is open, landings shall be avoided in or on heavy use areas such as the Loop Road, developed campsites, or staging areas.

3. During periods when the Loop Road is open, no low level flights or landings on public lands in the following areas: the upper Kiger Gorge, upper McCoy Creek Canyon, Wildhorse Canyon, Big and Little Indian Gorges, Little Blitzen Gorge, and the East Escarpment.

4. Reasonable exceptions could be included such as for emergency purposes.

➢Another example of an unclear action within the Plan is the following:

The Draft SEORMP states that "there would also be seasonal vehicle limitations on Steens Mountain Loop Road" Vol. 1, Ch. 3, Pg. 112 and "all access to winter sports areas along the north segment of the Loop Road is excluded during severe winters when such use would greatly stress deer on the winter range." Vol. 2, Pg. 232 Because these statements are in the context of being additional burdens on top of the federal road closure notice of September 18, 1980, which allows for landowners to access their property for legitimate business purposes even though the Loop Road is closed for the winter, we assume that this

new action, though it is unclear, will have direct adverse impact to private lands, businesses, and a landowners right to access their own property. This action would also eliminate the public's existing opportunities to access, recreate, and enjoy the private lands of the effected area. If the comments made within the SEORMP/EIS as stated or elsewhere, are intended to supercede the Road Closure Notice or impair a landowners legal right to access one's property, then it needs to be stated within the Plan as an adverse impact to private lands, private land uses, private land values, and recognized as an adverse impact to local economies. This road was there and used by landowners long before BLM took over jurisdiction and improved it.

We do not feel that it is within BLM's legal standing to restrict or control access to private lands. Therefore to clarify this issue and prevent misunderstandings and/or misinterpretations of which we have experienced in the past, BLM needs to include specifically within the Plan the exclusions and exemptions that apply to private landowners.

➢Another concern is the recent and rapid influx of requests for new Special Recreation Permits (SRP) by those wishing to be outfitters in the area.

These requests are mainly due to the new Oregon Department of Fish and Wildlife Outfitter/Guide Tags for big game hunting in the area. The last two years we have seen individuals from outside the area draw ODFW Outfitter/Guide Tags for the units on the Steens, and then go to the BLM and demand a SRP for the area. These outfitters obviously show no prior business planning and by permitting them, neither does BLM. In permitting outfitters in this fashion, the BLM management is money driven rather than by resource management strategies to meet objectives with some quality and performance control. As the popularity of the Steens continues to increase due any special designations that may be applied to the area, there will also be an influx of requests for all types of SRP's. Because of this, we feel it is important that BLM include in their planning strategies of today guidelines surrounding management of commercial outfitters and the issuance of SRP's. We have been in the outfitting business here for many years and have a good understanding of how to operate and provide a variety of services to the public while minimizing our impacts on the resources of public and private lands. This is accomplished through excellent participant orientation, education, and supervision, as well as, the knowledgeable dispersal of use throughout the area and operating within and beyond what BLM requires in regards to outdoor etiquette and avoidance of sensitive areas.

The utmost SRP goal is to provide services to the public while protecting our natural resources. This cannot be done if there is economic instability within the system or among providers. BLM can foster service quality and resource protection by creating a stable economic and operational environment for service providers that are capable of doing so.

It takes a lot of extra effort and expense to do a good job in protecting our natural resource values. The operation must be economical to do so. Poor economics means poor performance. Unlimited permitting will lead to too many outfitters. Too many outfitters will lead to poor services provided and resource abuse due to just shear numbers, amounts of use, and poor economics. The Steens is a relatively small area and can easily be overtaxed. We feel that the currently permitted outfitters do a good job caring for our resource values, and are capable of meeting the public's demand well into the future. Therefore in the best interests of all, we feel that the BLM should certainly include within the Plan a means of establishing good outfitter operational guidelines, thoroughly analyze how many outfitters should be permitted to service the need, and limit SRP issuance if, when, and where necessary.

RONALD S. YOCKIM
Attorney at Law

RECEIVED
MAR 02 1999
BURNS DISTRICT
BLM

(541) 957-5900
FAX (541) 957-5923

February 26, 1999

James Kenna, District Manager
Bureau of Land Management
Burns District Office
HC 74-12533 Highway 20 West
Hines, Oregon 97738

Re: Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement

Dear Mr. Kenna:

On behalf of the Harney County Court I have reviewed the Draft Southeast Oregon Resource Management Plan Environmental Impact Statement and present the enclosed comments. The Harney County Court appreciates the time and effort that your staff have expended in developing this document and in providing them with periodic briefings as to your progress.

On the critical issue of the Steens Mountain Habitat Natural Conservation Area the Harney County Court is particularly concerned about the lack of detailed information on the impacts. Absent this information and the potential for further reductions in grazing and recreation, as well as increased management costs, we suggest this item be deleted from the Plan.

If you have any questions on these comments, please don't hesitate to contact either myself or the Court.

Sincerely,

Ronald S. Yockim
RSY/bg
Enclosure
cc: Harney County Court

COMMENTS OF THE
HARNEY COUNTY COURT

on the

DRAFT SOUTHEAST OREGON RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

1. The "Purpose and Need" section of the Draft Southeast Oregon Resource Management Plan/Environmental Impact Statement ("DEIS") states that the Southeastern Oregon Resource Management Plan/Environmental Impact Statement ("SEORMP/EIS") is designed to "ensure that public land is managed for multiple-use and sustained yield in accordance with the Federal Land Policy and Management Act (FLPMA) of 1976." The primary goal of the plan is to develop management practices that ensure the long-term sustainability of healthy and productive land, consistent with principles of ecosystem management. (DEIS 1-1).

As a general rule the role of the "Purpose" statement in a NEPA document is to set forth the object or goal to be attained, along with the factors which will be used at the time of decision to choose between alternatives. It serves a critical gatekeeper role in that it sets forth the evaluation criteria to judge between alternatives. However, in this case the stated purpose is too broad and offers only limited ability to choose between alternatives.

It is only after an in depth review of the DEIS that we find the actual goals or objectives. Rather than disperse them throughout the document (i.e., p. 3-1 and the objective statements in Section 3), we suggest the specific goals and objectives be expressly set forth in Section 1.

We further suggest that the goals as stated on page 3-1 be included in the "Purpose and Need" section of chapter 1. This would allow a concise and quick reference at the start of the document rather than the reader having to page through to later chapters.

2. While the stated overarching goal of the plan is to develop management practices that ensure the long-term sustainability of the land consistent with ecosystem management, we suggest that to be consistent with the FLPMA, the goal for planning purposes be restated as management on the basis of "multiple use and sustained yield." (42 U.S.C. 1701(a)(7)). By singling out sustained yield as the primary goal it appears that the decision has been made not to manage for multiple use as required by the FLPMA. We suggest the primary goal be restated to include multiple use.

3. We note that the DEIS relies heavily on the concept of "ecosystem management" however does not clearly define what this concept is other than to describe it as a hierarchal planning process (3-6). We suggest that a clear definition be included in the document as well as identification of specific goals and objectives relative to this management technique.

4. It is fundamental that the local government and citizens be included in any ecosystem management program. The document should clarify how the BLM will incorporate the local citizens and government into ecosystem management. Further it should detail how social and economic sustainability is an inherent part of ecosystem management.

5. Among the "Program Planning Criteria" is the statement that vegetation will be managed to provide for biological diversity at the landscape level to protect and restore native perennial and desirable nonnative perennial species. . . ." (1-12). This biodiversity prescription appears to be a limitation that is not present in the FLPMA. We are concerned that it is intended to serve, or may result in an untended restriction on the FLPMA policies to "provide food and habitat for fish and wildlife and domestic animals . . . and that the lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands. . ." (43 U.S.C. 1701(a)). We suggest that the vegetation management criteria be expanded to clarify the FLPMA requirements and that biodiversity and restoration of native perennial species is not at the cost of achieving the FLPMA multiple use goals or outputs.

6. We suggest that the plan clarify that investments in crested wheatgrass (*Agropyron cristatum*) and other range improvement projects will be maintained. We are particularly concerned with proposals to increase the population and density of Big Sagebrush (*Artemisia tridentata*) within the crested wheatgrass seedings. These seedings and other rangeland improvements were made in response to federal policies mandating the BLM actively improve and increase the carrying capacity of the rangeland. We suggest that the plan clarify that the investments made by the BLM, county, and permittees will be maintained.

7. We note that among the "Program Planning Criteria" for "Special Status Species" is the statement that "BLM is mandated by law to assist the conservation and recovery of species listed as Threatened or Endangered or proposed for listing under the Endangered Species Act (ESA)" (emphasis added). However this is a misstatement of law since the ESA does not set forth a statutory

mandate to assist the conservation and recovery of proposed for listing species. While 16 U.S.C. 1536(a)(1) requires each agency is to utilize their authority to conserve endangered and threatened species, the same is not true for proposed species. Under 16 U.S.C. 1536(a)(2) when dealing with a proposed species the agencies are to confer - however they are not limited on the commitment of resources or activities as with listed species. We suggest that the criteria statement be corrected to accurately reflect the ESA limitations.

8. Since grazing on the public lands is regulated both by the FLPMA and the Taylor Grazing Act, we suggest that the livestock management "Program Planning Criteria" be expanded to include the right and responsibilities imposed by the Taylor Grazing Act.

9. We note the plan proposes that the use of surface disturbing equipment in suppressing wildland fires is to be restricted in Wilderness Study Areas ("WSA's"), however we review of the Wilderness Act and the legislative history supporting the various additions thereto, clarify that mechanical or mechanized suppression and presuppression activities are not totally precluded. For example we note that the use of motorized equipment is available for emergency purposes (See Central Idaho Wilderness Act of 1980, House Report No. 96-1126, June 24, 1980). Likewise we note the Committee on Interior and Insular Affairs in 1977 specifically addressed this issue and reported:

> "Section 4(d)(1) of the Wilderness Act permits any measures necessary to control fire, insect outbreaks or disease in wilderness areas. This includes the use of mechanized equipment, the building of fire roads, fire towers, fire breaks or fire pre-suppression facilities when necessary,a and other techniques for fire control. In short, anything necessary for the protection of the public health or safety is clearly permissible."

(House Rep. 95-540, 95th Cong. 1st Session)

We suggest that the plan be modified to treat wildfire suppression and prevention, insect and disease, and other emergency actions in the same manner as would be allowed in a designated wilderness.

10. We appreciate your inclusion of noxious weed control as one of your "Program Planning Criteria." The presence of noxious weeds on federally managed lands is a growing problem in Southeast Oregon and is in immediate need of control. We suggest that the BLM incorporate an aggressive weed control strategy.

11. On page 1-15, is the statement that the "BLM and U.S. Forest Service (USFS) strive to achieve similar resource management

goals on adjoining lands." This statement leads to a number of issues relative to organic acts and the different management philosophies imposed by statute. We suggest that this statement be clarified or deleted.

12. We note that the plan incorporates a reference that the FLPMA requires consistency with local land use plans and then notes that the planning area is "zoned exclusive farm use." This appears to be the only statement relative to consistency with local plans.

Notwithstanding the recognition of plan consistency, we note the issue of consistency is far more complex than merely stating that the area is zoned as "exclusive farm use" zone. By limiting the consistency review to the zoning issues, the plan overlooks the local policies adopted to implement the goals that are found in the Harney County Comprehensive Plan. All aspects of the land use plan and zoning ordinances are applicable to the consistency review.

Along with identifying the local goals, policies and ordinances affecting land use, (43 C.F.R. 1610.3-1(c)(2)), the BLM must also ensure that its activities are as "consistent as possible with existing officially adopted and approved resource related plans, policies or programs of . . . local governments that may be affected. . . " (43 C.F.R. 1610.3-1(c)(1))by the agency activities.

In addition to insuring consistency, the regulations also require the BLM to coordinate with the local governments in the planning efforts.

> "In addition to the public involvement . . . the following coordination is to be accomplished with other Federal agencies, State and local governments, and Indian Tribes. The objectives of the coordination . . . assure that consideration is given to those plans that are germane in the development of resource management plans for public lands; assist in resolving, to the extent practicable, inconsistencies between Federal and non-Federal government plans; and provide for meaningful public involvement of other Federal agencies, State and local government officials, both elected and appointed, and Indian tribes in the development of resource management plans, including early public notice of proposed decisions which may have a significant impact on non-Federal lands." 43 C.F.R. §1610.3-1(a)

We also note that the CEQ regulations require that as a means to " . . . better integrate environment impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to

which the agency would reconcile its proposed action with the plan or law." 40 C.F.R. 11506.2(d) (emphasis added)

The consistency review involves more than simply the local land use zoning, it also involves identification and consistency with the local land use regulations that impose environmental restrictions which are applicable to both private as well as federal lands (See California Coastal Zone Commission v. Granite Rock Co., 1075 S.Ct. 1419 (1987). These environmental restrictions are incorporated into the Harney County Comprehensive Plan and the policy statements therein.

The statutory requirements for coordination and consistency are well established and in this case require more in depth discussion than presented in the draft.[1] We suggest that the plan discussion relative to local planning be expanded and incorporate all of the comprehensive plan zoning, policies and goal requirements.[2]

13. We note that Draft SEORMP is being tiered to the Draft Eastside EIS. We question the legal sufficiency of tiering to a draft document. We therefore suggest that the plan discuss the legal authority and implications for tiering to a draft EIS.

14. The DEIS states that it is consistent with the scientific and management philosophies developed for the Draft Eastside EIS. Since the ICBEMP planning effort is not complete and these "philosophies" may change, we suggest that the specific "philosophies" be enumerated in this document to allow for complete disclosure and knowing public review and comment.

15. To provide an appropriate landscape picture of the historic uses of the planning area, we suggest a more detailed description of the landscape during the period prior to the Taylor Grazing Act be incorporated into the plan.

16. The DEIS includes a proposal to designate the Steens as a National Conservation Area ("NCA"); however, the proposal as set forth in the draft does not provide the public with sufficient information to knowingly comment. This is a particularly glaring defect considering the ramifications of a NCA designation.

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[1]. As noted supra, one area of potential conflict is the siting of recreational facilities in a manner inconsistent with the land use plan.

[2]. We note that the statewide goals are discussed in Appendix B, however this discussion does not cover the local comprehensive plan implementation of the goals.

Here again, the Energy and Mineral Resources Alternative chosen must be D in order to withdraw the greatest amount of acreage from use. Throughout Chapter 4 coverage of special status animal species, mining and geothermal activity is shown to be the biggest threat.

Alternative C for Special Status Animal Species is a case in which the status quo is being maintained [since it is identical to B] in giving "equal status to game and non-game species". We believe Alternative D is the appropriate choice because it does not mention the game vs. non-game status. It seems like a grotesque contradiction in terms to discuss hunting and fishing endangered species. This dichotomy should not be part of this section. Perhaps hunting and fishing contributed to the decline of a species. So why would we then spend resources that favor those species, just so they can be hunted and fished again?

Which BLM biologist still thinks that monocultures work [item # 2, Alternatives A and B of both Special Status Animal and Plant Species]? How can we even consider, in this day and age, the idea of focusing on one species? You can not "restore the health of forest, rangeland, aquatic, and riparian ecosystems [Goal #1, 3-1]" that way.

It is not clear why California bighorn sheep given such prominence in having their own separate objective. In Oregon, it only has a List 4 [watch] status. This species is considered so important that Alternative D even proposes eliminating some domestic sheep permits. We support this provided that these permits are not replaced with cattle grazing permits. (And, we have to ask, how important would a special status species have to be to eliminate cattle grazing permits? While it seems the logical step in many places, it is rarely chosen.)

WILD HORSES

Alternative D is supported by the Sierra Club because we believe it best meets the management objectives and the requirements of the Wild Horse and Burro Act. Oregon BLM as a whole, and the Burns District in particular, has done a great job with its wild horse program. You have done your best to mitigate resource damage, disperse use and resolve resource conflicts. It if our hope that the wild horse gathering funds will become (and stay) available so that the objectives for wild horses can be met.

RANGELAND AND GRAZING USE

It is the Sierra Club's belief that domestic livestock grazing should take a secondary place in resource allocation. Vegetation should be allocated to wildlife on a priority basis. Stubble heights must be readdressed to make this happen. Please see our Rangeland Vegetation comments.

Alternative D is supported by the Sierra Club although aspects of Alternative E have appeal. Resource values must be emphasized as stated in Alternative D. We are supportive of using administrative solutions to resolve resource conflicts. Abandoning and rehabilitating project sights that do not enhance resource values are commendable goals that should be pursued immediately. Such efforts would make great volunteer projects.

statement of resource values, management strategies, and boundaries - as defined by the resource values - be articulated and made available to the public for review and comment.

After reviewing the various national conservation areas we have serious concerns about a proposed designation in the absence of a very clear identification of purposes and management activities. Until this information is developed, the public does not have an opportunity to knowingly review and comment on the proposal. We therefore suggest that this concept be deleted from the Southeast Oregon Resource Management Plan.

17. We note on page 3-46 & 3-223, the reference that all American Indian traditional use areas are to be retained in Federal ownership. If this statement is intended to withdraw these sites from mineral entry under the mining laws, then we suggest the plan clearly state this intent and comply with the FLPMA requirements for withdrawals.

18. We note that on page 4-109, the statement that permitted AUM's would remain constant or decrease as much as 10 percent. Yet on page 4-153 the draft states that Harney County will see a reduction of 10,925 AUM's representing 1.5% of the current levels. We suggest that the actual AUM impacts be clarified.

We are also unable to reconcile these reductions with the references in the Eastside DEIS (1-180) that the agencies expect the number of cattle grazing on public lands to decline by approximately 1% per year for the next 20 years. Likewise we can not reconcile this reduction with the projections in Rangeland Reform '94 DEIS which indicated that there would be a decreasing trend of 6% per decade on BLM.

The Rangeland Reform reductions were attributed to agency decisions on both carrying capacity and resource protection, as well as operator decisions based on personal or business considerations. Notable the projected decreases were expected to occur <u>without</u> programmatic changes in the federal grazing program such as proposed in the Eastside DEIS.

With the series of changes being proposed for grazing levels, we suggest that to avoid any confusion that the cumulative and connected impacts of these various programs be reviewed and discussed in more detail.

19. It is difficult to determine the cumulative and connected impact of the increases to the ACEC's. Of particular concern is the cumulative reduction in grazing AUM's resulting from all of the additions. We suggest the impact on individual range operations as well as the cumulative impacts be described in more detail.

20. We are further concerned about the increased restriction on road maintenance in the plan. We suggest that the plan give further attention to increased road maintenance costs and insure that proper flexibility is provided to allow for efficient and economical road maintenance.

21. We suggest that prior to developing new recreation areas that attention be given to public safety issues. We note that several popular recreation areas are in fire prone and other hazard areas that make rescue particularly difficult and expensive. Since the local law enforcement agencies incur significant expense in these rescue efforts, we recommend close coordination with these agencies before any new or expanded recreational programs are established. We also note that the Harney County Comprehensive Plan and zoning ordinance place restrictions on new recreational development on the Steens Mountain. We suggest that the SEORMP incorporate provisions that insure recreational developments are consistent with the local comprehensive plan and zoning.

22. We support the management approach taken in the Draft SEORMP to emphasize adaptive management and afford management flexibility. We suggest that the plan be clarified to explicitly state that this management approach places more emphasis on the NEPA documents and public involvement at the site specific action level.

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RECEIVED
MAR 01 1999
BURNS DISTRICT
BLM

Oregon Chapter of the Sierra Club

March 1, 1999

Mr. Gary Cooper
Vale District Office
Bureau of Land Management
100 Oregon Street
Vale, OR 97918

Mr. Glenn Patterson
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

RE: *Southeast Oregon Resource Management Plan*

Gentlemen:

The Oregon Chapter of the Sierra Club's High Desert Committee submits these comments for your consideration. As always we appreciate the opportunity afforded us to comment on the management plans for our public lands.

GENERAL - LAYOUT

We appreciate the list of acronyms and abbreviations, as remembering them all can at times be quite daunting.

The index could have been better. The way in which you chose to present the information caused pieces of data about each subject to be scattered throughout the document under different topics, rather than all in one section. So it is very difficult to bring all the pieces together. Readers are forced to take notes as they go along and wait until they have read every word of the document before they know for sure whether something has been missed or not. A detailed index with the location of all appearances of a word, along with references to other pages on the same subject would have helped a lot. The web site enabled use of Acrobat Reader, but the version it used was not the current one, and some of us could not get it to function as a search vehicle.

Most of us felt that if you had given a chapter for each resource, and taken each one from beginning to end [affected environment to environmental consequences] it would have been easier to read. People are more interested in some resources than others, so this would have allowed them easier access to the information of importance to them. In the future you may also want to consider having a smaller summary book, with references to the substantiating data in other book[s].

Page headings should include the topic being discussed on that page. Repeating the chapter and SEORMP is not very useful. The only way you can figure out where you are at in the appendices is to look for the page in the table of contents.

GENERAL - CONTENT

This is the first EIS we have read that so frankly discusses the damages to ecosystems caused by grazing. The BLM has come a long way in the last few years. Traditionally all other resource uses seemed to be free game, but grazing was a taboo subject. We want to complement you for the courage to recognize the impacts of cattle as well as all other resource uses, so that mitigation and restoration processes may begin.

The mass of resource material found within these pages is impressive and useful beyond the purposes of making these comments. We appreciate that.

You state that Alternative E was given only for comparison purposes and is outside current law. In reading the environmental consequences [Chapter 4] projected if Alternative A were chosen, it seems quite clear that in many cases the outcomes would be violations of existing laws such as The Wilderness Act and the Endangered Species Act. To give balance you should have made the same disclaimer about A as you did E.

In general, we feel there was not enough differences between the alternatives. Specific cases will be noted below. In most cases we believe Alternative D is the choice that will best serve the needs of the environment. We would encourage you to look at this as Affirmative Action for the environment. Commodity users have had their way with these resources for over 100 years, and this has resulted in almost complete destruction of the original ecosystem. We do not wish to put these people out of business, but it is time to give more weight to the needs of the environment. Recovery under Alternative A would take more than our lifetimes. Alternatives B and E are not options. Alternative C is improvement over the status quo and we appreciate that; but please consider moving to D in as many resources as possible.

The Sierra Club is extremely concerned about accountability. Where are the specific criteria by which you and others can determine whether the objectives of this SEORMP have been met? Adaptive management sounds great in theory, but the flexibility it is based on provides too much individual discretion. We still vividly recall the incident in the Trout Creek Mountains a few years ago where the rangecon used his discretion to allow cattle to stay on the mountain long past the end of the grazing season which caused years of restoration work to be undone in a matter of weeks. If you want us to go along with allowing managers to decide which dates to take cattle on and off based on the weather and all the salient factors, we need to have some very specific criteria to judge the results of their decisions at predetermined intervals. Otherwise, you are asking each affected interest to trust that personal bias and/or the other affected interests are not unduly influencing managers.

The Desired Range of Future Conditions is certainly not giving us any confidence. It is supposed to be a "...vision of the long-term condition of the ecosystem" projected "50 to 100 years if management objectives are achieved [p.3-2]." "However, this planning document only identifies management for the 20-year life of the plan. The long-term vision may not be completely achieved under any alternative during the life of this plan [ix]."

It would seem that this is enough hedging to enable you to be a little more forthright and aggressive in your "vision" of the future. Yet the DRFCs themselves contain many qualifiers such as "most", "nearly all", "maintained or improved", and "acceptable". Are we expected to get excited and share a vision that tells us we may visit the area in 50 to 100 years and find "Plant communities not meeting DRFCs show upward trends…[middle of paragraph 4]"?

These DRFCs seem like a red herring. If you want to give us a vision, make it something to look forward to during the life of this plan. If you want us to go along with adaptive management, give us something concrete to judge your actions by along the way.

AIR RESOURCES

The Sierra Club supports the increase in use of prescribed fire as outlined in Alternatives A-D. Additionally, we urge the BLM to proceed with prescribed natural fire plans, which would allow natural fires to be left to burn unless human life or structures of significance are threatened.

ENERGY AND MINERAL RESOURCES

Under Alternative B, current situation, 153,047 acres are closed to energy and mineral leasing while the so-called environmental alternative, Alternative D, closes only 61,100 acres? Although we support Alternative D in general under the Energy and Mineral Resources category, we do not support adding 91,947 acres into mineral entry. We support the increased buffer zones where given around special features.

The Sierra Club strongly supports applying the NSO stipulation on the 367,300 acres cited in Alternative D. We applaud the BLM's efforts to protect our wild and scenic river suitable streams, the Succor Creek SRMA, culturally significant sites, WSAs and special status plant sites from the disturbance of energy and mineral exploration and development.

We agree with the closing of 327,000 acres for mineral development "unless site specific analysis indicated otherwise" but are concerned about the referenced site-specific analysis. We would appreciate additional information on what such analysis will entail, what resource staff will be included, the planning process used and what interests will be consulted. We particularly want to see wilderness, wildlife, plant and archeological clearances on such areas out of our concern for these sensitive resource values.

FIRE

The Sierra Club supports Alternative D as it emphasizes use of wildland fire. Additionally, we support the use of prescribed fire to meet resource objectives as they relate to vegetation objectives for wildlife and a return to native plant communities. Please refer to comments under Air Resources.

RANGELAND VEGETATION

Objective one provides the same status, or rights, for "desirable introduced plant species" as for perennial native plant species without definition of what such plant species include or appropriate justification for this elevated status. It is the Sierra Club's opinion that such introduced species, while they may be important as cover or forage production, are not on the same (high) level as native plant species and we believe that a distinction in status should be made.

We appreciate Alternative D's emphasis on natural values but disagree with this emphasis being contingent on being "consistent with other management objectives". It is the Sierra Club's belief that natural values should be the lead that other values tier to. Natural values are the most important value and should be honored as such, not simply valued when they work in conjunction with other values.

We would believe the first allocation on forage must be given to wildlife. This would require a drastic increase in stubble height, to 12 inches in riparian areas for example, which we believe is warranted and justified by information given to us by the two districts' wildlife biologists.

We are in full support of resting burned areas for two growing seasons "at a minimum and until monitoring data indicate that desired vegetation has recovered to levels that are adequate to support and protect upland functions." We ask that no exceptions be granted.

The current cooperative noxious weed program as supported in Alternatives A-D is commendable (but you could do a better job of funding it). As you know, the Sierra Club participates in and supports such cooperative efforts and would like to see the BLM enter into more joint efforts.

FOREST AND WOODLANDS

Objective one is commendable except for the last sentence: "Provide for timber production where feasible and compatible with forest health." The Sierra Club supports a zero-cut on all federal lands except where removal is necessary to retain forest health (removal of infested or diseased trees). The Sierra Club supports Alternative D.

SPECIAL STATUS PLANT SPECIES

Since most of us do not know Latin, it would be much easier to read Tables 2-5, 2-6, and 2-7 if the plants were arranged alphabetically by common name instead of scientific name [like Table 2-15].

The biggest threat to special status plants as described in the Environmental Consequences Chapter [4-38] is "locatable mining activities, including mineral exploration and development" which "would continue to have a long-term adverse impact [4-38]." The only protection available is implement Alternative D, which will double the Alternative C acreage withdrawn

from mineral activity [375,977 vs. 178,571]. Other significant threats come from grazing and OHV use, which would be minimized by Alternative D.

Alternative D is clearly the choice for Special Status Plant Species if the goal as stated on page 3-1 is sincere: "Contribute to recovery and de-listing of threatened and endangered species." All the other alternatives are set up simply to avoid making things any worse than they are. At least Alternative C recognizes the need for the entire ecosystem to be healthy instead of working for the dominance of one species at the expense of others.

WATER RESOURCES AND RIPARIAN AND WETLAND AREAS

One of the most astounding documents in the RMP publication is Table 2-10, which lists the water quality limited streams. At a quick glance, it would appear that a vast and appalling majority of the major streams in the resource areas have some parameter, which prevents them from meeting state water quality standards. Major causes of degradation are listed as removal of riparian vegetation, animal waste, and erosion associated with grazing, mining, forestry and road construction, along with problems associated with water withdrawal and stream bed alteration. Far less than half of the stream miles studied met standards. It would seem only obvious that substantial effort should be made to manage these waterways in a fashion, which will in no uncertain terms lead to improvement of the water quality.

In the preferred Alternative C the BLM recommends an approach, which would "allow progress toward the attainment of State water quality standards". While this approach could benefit streams, "allowing" progress does insure that progress will in fact happen. Progress will only be as rapid or non-existent as managers choose. Since current management practices seem to leave so many streams non-compliant, we feel that stronger wording is required to insure progress toward and eventual achievement of state standards. Managing for a measurable "upward trend towards attainment" of standards allows for minor incremental changes to be considered satisfactory management. Commodity management has failed up to this point to have much positive effect on the plethora of non-compliant streams listed.

On page 2-31 the 1996 DEQ list of "water quality listed" waters is referred to as the "current" one. Since the 1998 one is now out, will the information be revised for the final decision? Somewhere it should be acknowledged that streams with no information on them are not listed; thus the statistics are weighted to appear better than they are.

Alternative D would only allow activities and uses if they "allow progress ... at the same or greater rate than if the use or activity were absent". It seems only obvious that to improve the quality of water in streams, activities and uses should be employed or allowed which will have the most beneficial effect rather than allowing improvement to be a remote possibility. The idea of uses and activities "promoting" improved water quality seems to be the logical direction if the goal of such improvement is truly desired.

We desire improved water quality and riparian habitats and believe that such healthy habitats are crucial to an ecosystem where water is in short supply. We therefore strongly support Alternative

D in this issue, the only alternative which will insure such improvement on the 25 or so streams which comprise most of the major drainages in the region.

FISH AND AQUATIC HABITAT

Similar wording is used in the proposals to manage Fish and Aquatic Habitat as is used in the Water Resources and Riparian section of the proposal. Again, Alternative C uses the term "progress toward" goals while Alternative D uses the term "promote". While we agree with the idea of watershed management proposed in both alternatives, the stronger wording in Alternative D is necessary to insure that healthy native fisheries are maintained and restored. Again, it does not seem wise to manage such vital resources in any manor which would not "promote progress" toward attainment of important goals such as habitat diversity and water quality. To only "allow for progress" leaves a huge loophole where we need to insure the health of fish and their associated aquatic habitats.

We support Alternative D, and believe strongly in the active promotion of ecological health rather simply allowing for the possibility for progress.

WILDLIFE AND WILDLIFE HABITAT

The plan lacks specific management plans for wildlife and none of the alternatives goes far enough to protect wildlife in general. Alternative D is the best of the options offered in the plan. This Alternative proposes some good ideas; grazing system modifications, exclosures, connected wildlife habitat in rangelands and forestlands, but it does not go far enough. Wildlife should be given priority over livestock. Forage should be allocated to wildlife first, and livestock should be tolerated only where available forage exceeds the needs of wildlife. We are disappointed that no alternative emphasizes wildlife needs over livestock needs.

None of the alternatives goes far enough to protect wildlife from off-highway vehicle use. Alternative D is certainly the best alternative, and protects wildlife in some key areas, but it does not go far enough in restricting use on existing roads and designated routes. Seasonal restrictions are important but are not sufficient to meet the need of nesting wildlife, such as sage grouse. More areas critical to wildlife need to be completely closed to off highway vehicle use.

Hunting on Steens Mountain raises safety concerns that are not completely addressed in the plan. It is well documents that Steens Mountain is crowded with sightseers during deer hunting season, which raises numerous safety issues. Over crowded conditions also ruin the wilderness/recreation experience of both sightseers and hunters who are trying to avoid each other. We encourage the BLM to work with ODFW to limit tags and restrict use on many roads in the Steens during dear hunting season.

SPECIAL STATUS ANIMAL SPECIES

Table 2-5 shows the Oregon status of Special Status Plant Species, but Table 2-15 does not show the same for Special Status Animal Species. Why?

Here again, the Energy and Mineral Resources Alternative chosen must be D in order to withdraw the greatest amount of acreage from use. Throughout Chapter 4 coverage of special status animal species, mining and geothermal activity is shown to be the biggest threat.

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RECREATION

Alternative C allows for the establishment of new recreation sites and areas to meet increasing visitor demands. Visitors will come regardless; consequently, we support the establishment of new recreation sites as a way of protecting the wildland and wilderness values we cherish. However, undeveloped types of recreation should be encouraged and the BLM, in its role as protector of the resource, should be a leader in leave no trace education efforts. Tourism opportunities diversify the economic structure of the counties and should be encouraged where consistent with resource objectives.
We question how the BLM can suggest that any SRMA could include a WSA and then describe the directive under Alternative A "... to enhance tourism and recreational opportunities...Commercial recreation opportunities would be optimized [p. 3-99]." Under the discussion of the Pueblo Mountains SRMA the area's WSA status is not mentioned, and in fact you propose that, "...special recreation permits/commercial uses would be increased [p. 3-100]." How does this not violate the spirit of The Wilderness Act?

Except for the specific reference to Alternative C, we support the implementation of Alternative D.

OFF HIGHWAY VEHICLES

In Oregon we are fortunate that until now OHVs have not been much of an issue. However, the trend in other states, Utah and Montana for example, indicates that motorized recreation has become perhaps the biggest threat to our public lands. The Sierra Club is concerned that this trend will soon manifest itself in Oregon. Indeed, the BLM expects a growth rate in OHV use for the next 20 years between 200-500%! (Appendices, p. 327). The SEORMP is a timely opportunity to prepare for pressure on our ecosystems from increased OHV use.

All areas should be closed to OHVs, unless posted open. It is not realistic to assume that there will be enough available funds to provide for regular patrols to check on use and possible abuse on large open areas. The policy of areas open to OHV use unless they are posted closed cannot be enforced. In the middle of nowhere, abusive OHV users ride past these signs and are rarely caught in the act. National OHV magazines encourage riders to explore remote trails, wash bottoms, canyons, etc. For now Utah is the prime target, but before long Oregon's potential will be discovered as well. Already in 1970 the Public Land Law Review Commission, charged by Congress with the task of assessing the state of our public lands, warned that "off-road vehicle use is becoming a threat to the physical environment in many public lands areas."

It is therefore critical to severely limit the areas to which these vehicles have access. The potential for visual (dust), air (exhaust) and noise pollution are enormous when OHVs are allowed to travel over large unrestricted areas. They also leave crushed vegetation and tracks everywhere. OHVs run over small animals, cause widespread soil erosion, pollute streams, erode stream banks, introduce exotic, weedy plants, and provide easy access for poachers and pothunters. Archaeologists testify that cultural sites accessible to OHVs are more commonly looted. Unless visitors are deep in a wilderness (study) area, chances are they will be exposed to

the noise of an OHV. The noise generated by an OHV can carry several miles in a quiet natural environment and therefore their impact is compounded manifold.

Open OHV use is not compatible with the BLM's emphasis on properly functioning ecosystems. Management activities should consider the long-term preservation of the native vegetation. OHVs should be restricted to some designated roads and trails. Allowing them on "existing" roads will encourage cross-country travel, which creates new trails, which then become existing trails. Routes that are now little more than ruts would quickly turn into major thoroughfares for cross-country machines.

Wash bottoms are critically important to the desert ecosystem since they contain much of the wildlife to be found in the desert. They form cool oases of lush green vegetation. Their trees and shrubs are crucial sources of food, shade, and shelter for many birds and animals, and they provide much-needed rest areas for migrating animals. Their banks are extensively used by burrowing animals, and their moist soils provide ideal conditions for the incubation of reptile eggs, which in turn provide food for other species.

OHVs disseminate weeds and compact soils. Compacted soils prevent water infiltration, creating run-off, erosion, and sedimentation if close to a creek. As much as 90% of soil moisture is lost as a result of OHVs compacting and altering soil structure. Sites containing rare plants should be excluded from any OHV and snowmobile use. Areas with erodable soils, sensitive plants, unique plant communities, and high archaeological values should be protected from wide spread or massive surface-disturbing activities and from recreational developments or staging areas. OHVs can also spark wildfires.

OHVs and snowmobiles disturb wildlife, causing the waste of precious energy needed to survive winter. Protection of winter habitat for bighorn sheep and mule deer should be a priority. In the spring and the summer OHVs disturb the birthing and rearing of the young. OHVs also impact upland bird habitat, which should be avoided especially during the nesting period. Not only the health of wildlife habitat should be considered, but also its diversity and connectivity. Studies have shown that OHVs have dramatic effects on larger mammal species. Deer, for example, alter their feeding and behavior patterns when disturbed by OHVs, and such disturbance has been documented to cause decreased reproduction rates the following year. On study plots in the Mojave Desert, one expert estimated that there was more than a 75% loss of reptiles, birds and small mammals in areas used by OHVs as compared to less disturbed control areas.

The BLM should not provide for organized OHV events. These are high impact events that significantly affect the public resource. Public funds should not be used to restore the land after such an event. Commercial high impact events should be organized on private lands. BLM should not spend its scarce people and dollar resources on planning that benefits small, special interest groups who exploit and damage public property. Land use decisions should be favorable to healthy ecosystems, including soil, water, and vegetation, and encourage uses that preserve the enjoyment of wildlife, scenery, camping, and hiking. FLPMA strictly prohibits unnecessary and undue degradation of our national lands. Regulations also prohibit using an OHV in a manner that causes "significant, undue damage to or disturbance of the soil, wildlife, wildlife habitat, improvements, cultural, or vegetative resources." OHV use must be strictly controlled so that the

BLM can adhere to the SEORMP objective (1-11): Principles of ecosystem management, as well as a continuing commitment to multiple-use and sustained yield, will guide land use decisions in the planning area.

The Sierra Club is specifically concerned about OHV use in Succor Creek, and at Anderson Crossing. Succor Creek is an extremely scenic and sensitive area, and the noise and dust caused by OHVs would preclude more quiet types of recreation. At Anderson Crossing we have observed OHVs circulating in the creek bed and in the adjacent riparian area. Designated OHV routes should be limited to the uplands to avoid siltation of the creek beds and the destruction of riparian vegetation.

We support the recommendation that if a WSA should not be designated as wilderness, the OHV use designation would remain the same.

All above comments with respect to OHV also apply to snowmobiles. Allow them only on roads, and then only when the road can be found. No helicopter recreation should be allowed on Steens Mountain. Sightseeing flights should be restricted in number.

VISUAL RESOURCES

The Sierra Club supports the implementation of Alternative D. Visual resources should be managed through natural processes as much as possible; however, we believe that Alternative E does not leave sufficient room for manual intervention when (infrequently) needed.

ACEC/RNA

Your recommendation to nearly double the number and acreage of ACECs under alternatives C and D is an outstanding feature of the SEORMP. This is a major step forward in assuring adequate community cells for special status species. You are to be commended for consulting with the Oregon Natural Heritage Plan.

We are concerned however that you were not using the 1998 ONHP for guidance. In one place [2-71] you refer to the 1995 ONHP and in another [2-17] you mention using the 1993 ONHP. The 1998 ONHP is only mentioned in References. Are you going to go through the document and make sure the most updated information has been accounted for? A specific example is the Harney Lake RNA, which is discussed in the 1998 ONHP but not in the SEORMP.

We also want to make sure of quality as well as quantity. On page 109 of the 1998 ONHP, in commenting on BLM ACECs, it says, "Elements contained within ACECs are not considered adequately protected in this plan, but may be so considered in the future if and when site-specific management plans are sufficiently restrictive to warrant it."

Perhaps one reason the ONHP is less than enthusiastic is the VRM designations proposed. Page 3-125 states that the purpose of an ACEC/RNA is "to maintain and promote natural values and processes." In Appendix J, VRM Class I is given to "preserve the existing character of the landscape. This class provides for natural ecological changes..." This seems to match much

better than Class II, yet in surveying Table 3-9, only 2 of the 44 ACECs proposed in Alternative C have Class I ratings; under Alternative D only 14 of 45 proposed ACECs are given Class I. Most have Class II ratings and a few have Class III. VRM Class I rating also would specifically limit OHV use to "designated routes [3-109]".

Another reason might be seen in Table 3-2. Total acreage within ACECs closed to mineral leasing is far lower under C and D than under B. Your preference is to reduce protection for ACECs to NSO, and even then less than half of total ACEC acreage receives that degree of protection? Of the choices given, D has to be preferred because at least most of the acreage will receive NSO status.

OHV restrictions in many ACECs are another question mark. As shown in Table 3-9, restrictions drop to Limited in Alternatives C and D, from Closed in Alternatives A and B. Again, another action that on the surface doesn't seem to make sense. Is it because boundary roads are now going to be inside the ACEC and their use requires the lower designation? Do those roads have to be kept open just because they have been? This should be explained and justified. Nothing is said about protecting the areas that are closed now. The very nature of OHVs makes them a substantial, destructive threat to plants and soils; and there is very little that has been, or reasonably can be done enforcement-wise to keep them from blazing new trails. The further the point of access is from the sensitive sights the better.

In descriptions of the Leslie Gulch ACEC [3-128], there is no mention of the crypto-biotic crust that is there. It is our understanding that the occurrence of this organic colony is quite rare and could justify RNA designation. Is this incorrect, or is its occurrence there not known currently to BLM staff?

What science backs up the mineral leasing buffer zones chosen for Borax Lake under Alternatives C and D? No reasons are give on Page 3-55. Our choice will be to go for the greater amount of Alternative D. The survival of these fish is be more important than the a few kilowatts of geothermal energy. Anadarco is still fresh in our memories.

When you propose to drop, or not choose, an ACEC under Alternatives C or D, yet keep it under Alternatives A or B, this goes against common sense. The mitigating actions you refer to in the rationale should either be summarized there or references given to the specific pages where the mitigating actions are discussed. The Owyhee River ACEC being dropped cannot be justified due to the protections offered by its WSR designation. The Sierra Club believes that overlapping designations are often needed to protect each of the special resources within a given area. WSA status, especially when not recommended, is inadequate justification for dropping ACECs such as Alvord Peak. That ACEC should be kept for scenic value as well as for protection of bighorn sheep. Both should have been listed under Alternative D and both ACEC designation should be retained.

Grazing is the other threat to ACECs; and it continues without check under every Alternative except D. How can you accept Alternative C for this resource when your own analysis shows that "the impacts from livestock grazing would be the same as Alternative A [adverse]" and justify it by saying adaptive management will be used to make changes as needed [4-131]? If

your existing data tells you that grazing will continue to negatively impact ACECs, why not reduce the grazing now by choosing Alternative D? What would you hope to discover in a "process which would identify the practices that would provide the best mitigation"

WILD AND SCENIC RIVERS

In the Preferred Alternative, C, there are a total of 4 rivers and about 43 miles of river proposed as suitable for wild and scenic designation. In Alternative D over 30 rivers and nearly 300 miles of streams are proposed for designation, essentially all the streams that were found eligible. Unfortunately, between these two drastic all or almost none proposals there is no middle ground offered for consideration.

This discrepancy in offerings brings to question the validity of the process by which these streams were studied and evaluated. The fact that no streams at all were recommended by the Andrews Resource District in itself seems negligent, as if someone simply stated from the get go that no streams will be found to be suitable for the preferred alternative in this resource area. The Sierra Club finds the fact that obvious candidates such as Wildhorse or Home Creek were passed over in the Preferred Alternative mystifying. This apparent situation begs the question of why so few streams were found eligible and the most obvious answer would be fear of regulation and potential law suits over mismanagement. Is there a concern that designation would preclude unwise developments or inappropriate grazing practices? This situation would only give more credence to the notion that these streams need further protection if they are to maintain their special values. Many streams were deemed non-suitable because current management meets their supposed needs for protecting resources, but current management is temporary and will change with staff and philosophy. Because of the obvious leaning toward non-recommendation, we also question whether portions of streams deemed not eligible may in fact fit the criteria for suitability.

It seems only obvious that long-term protection of the special values and resources of many of these streams is in the best interest of the public. Such long-term protection is best afforded by the Wild and Scenic Rivers Act. The Sierra Club recommends that a more realistic effort toward responsible stewardship be considered with regards to the number of streams recommended for wild and scenic status. Such designation should not be considered as a hindrance to management but rather as a mandate to manage for the unique and special values these streams possess. Below are streams given a tentative classification that should receive designation by resource area. They are listed in a very rough order of merit.

Malheur RA
Dry Creek
NF Malheur River
Owyhee River
Malheur River
Cottonwood Creek-M1
Jordan RA
Antelope Creek- J19
Whitehorse Creek
Doolittle Creek
Cottonwood Creek J5
Willow Creek
Little Whitehorse Creek
Oregon Canyon Creek
McDermitt Creek
NF McDermitt Creek
Andrews RA
Wildhorse
Home
Kiger
McCoy
Big Trout
Big Alvord
Little Cottonwood A25
Van Horn
Mud
Pike

allow Oregon environmental groups to present their own plan for the Steens Mountain area. We would welcome the opportunity to make a presentation to State Director Elaine Zielinski and enter into meaningful dialogue regarding permanent protection for Steens Mountain.

No discussion of any of the many other national designations was included in the SEORMP, such as National Park, National Monument, or National Scenic/Recreation Area. An unbiased description of these alternatives along with their possible impacts on the Steens would have been appropriate in this document.

We noted that other important and special areas were not considered for national designation. The Sierra Club believes that all such areas should be studied for national designation for protection of their outstanding natural values as well.

HUMAN USES

In the area of Human Uses, Alternative D is the best management plan. Alternative D best maintains the area for recreation and natural preservation.

It is unclear why with Alternatives A-D mineral development emphasizes commodity extraction. In A, the majority of new sites expected to develop would replace existing sites that become depleted. Why, as is the case with logging and grazing, is the number of new sites not gradated between the different alternatives? Mineral extraction is not an activity with negligible impact. The only alternatives here are current management, which "emphasizes commodity extraction" (Alternative A), or "no new mineral developments allowed" (Alternative E).

The assessment of psychological impacts on people in the area is useful but seems one-sided. No consideration is given to these impacts other than to estimate demoralization from less ranching. No negative impacts of commodity extraction, such as having to deal with waste from abandoned mines; air and water pollution from combustion, logging, increased tourist traffic, and construction; etc. are mentioned.

The plan offers a much better analysis of the impact on humans in terms of economics than quality of life. But even in terms of economics, any economic benefit of increased tourism and recreational use is not estimated. The emphasis in this section is very definitely on ranching. Ranching operations are considered in depth but the other activities are not.

Management Alternative D most appropriately balances the different uses humans have for this area and the Sierra Club recommends its implementation.

CULTURAL RESOURCES

We commend the BLM for having the good sense to restore the requirement of archeological clearances when fence building. The removal of this requirement was incomprehensible in light of the importance of the region's cultural and historic values, making your reversal on this issue totally appropriate.

** TOTAL PAGE.15 **

The Sierra Club supports Alternative D with the addition of the requirement to "develop a cultural resource monitoring plan to evaluate the success of cultural resource protection measures associated with BLM projects" (page 3-44) as outlined in Alternative C.

The BLM's efforts to properly consult with the tribes to ensure that their interests, traditions and religious uses are considered in this and future management plans pleases us because it honors the cultural values and gives us hope that other important resource values will eventually, properly elevate in status.

LAND AND REALTY

The Sierra Club supports blocking up public land by sale or trade to create management effencies when the parcel of land disposed of by the BLM lacks significant resource value, such as a crested wheat grass seeding. Split estates cause problems for all parties and should be a priority in land issues resolution.

We support Alternative D because it properly addresses the realty issues of ownership (sales, trades and acquisitions) and adequately addresses the utility and transportation corridor issues, which seem to be uncontroversial since Alternatives A, C-D are essentially the same on most issues.

We again thank you for the opportunity to comment on this RMP/EIS and hope that you find our comments helpful in your deliberations. Please reply to the above address.

Sincerely,

The Oregon Chapter of the Sierra Club
High Desert Committee

Jill Workman

Jill M. Workman
Committee Member

L-242

February 28, 1999

RECEIVED
MAR - 4 1999
VALE DISTRICT BLM

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

Re: Southeast Oregon Resource Management Plan

My wife and I have visited the Steen Mountains twice in the last three years and have enjoyed the stark, open beauty of the area. It is wonderful to get away from the cities and be able to enjoy the vistas and fresh air of that region.

I have been informed of your Southeast Oregon Resource Management Plan and the impact it may have on your agency's six million acres in this area. I am told that your preferred Alternative C is very weak in its efforts to control livestock grazing and the damage it can cause when it is unregulated. The concept of "adaptive management" seems absurd on the face of it; it seems to be a sort of a blank check for the leaseholders to do about what they want. Also, the recommended 43 miles of desert rivers for Wild and Scenic River status is far too little.

I urge the BLM to approve and implement an improved version of your draft plan's Alternative D. It is high time that the BLM used ecological bases for land management. Livestock grazing cannot continue with the feeble controls once thought sufficient. Long-term land protection depends on going along with nature and not with just the current political and economic powers of the region. And, when it comes to economics, tourists, visitors, birders, hunters and the like will be bringing more and more dollars to that region, as long is it remains worth visiting.

Sincerely

Bruce Kennedy

Copy: Burns District Manager Craig Hansen

Bruce XX

L-243

RECEIVED
MAR - 4 1999
VALE DISTRICT BLM

Ed Singleton
Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, Oregon 97918

Dear Sir,

I am writing to voice my extreme concern for proposals known as the Southeast Oregon Resource Management Plan. I strongly urge to adopt the plan known as Alternative D. This is the only plan that restricts in any way the grazing of cattle on dessert grass lands. Please save this area. Stop the grazing of cattle on public lands.

The Salmon are dying. Many species are troubled. Southeast Oregon needs to be kept wild. We need areas that are undeveloped they enhance our state. Species like the kit fox, big horn sheep, and Townsend's big –eared bat are in danger if we don't keep these lands as pristine as possible. Please accept Alternative "D." Strengthen our existing laws. Keep our desserts and mountains wild.

Sincerely,

Kea M. Grulich

Kea Marie Grulich

L-244

SCOTT FERGUSON, P.C.
Licensed Tax Consultant
Enrolled to Practice before the IRS

RECEIVED
MAR - 4 1999
VALE DISTRICT BLM

March 1, 1999

Ed Singleton
BLM, Vale District
100 Oregon Street
Vale, OR 97918

RE: SEORMP

Dear Ed and the BLM,

PLEASE adopt a strengthened Alternative D that would greatly restrict (possible exclude) livestock grazing from possible wilderness areas, rivers designated as Wild and Scenic and other areas where the long-term health of the ecosystem is affected. PLEASE!

These are hard choices, obviously. Short-term real life consequences and long-term ecosystem impacts.

When you think of how your children's children's children would view your decision how does that affect your perspective?

I visit this area of our state often and have made economic investments there. I do so because of its beauty and uniqueness. PLEASE maintain this.

Sincerely,

S Ferguson

L-245

February 24, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

RECEIVED
MAR - 4 1999
VALE DISTRICT BLM

RE: SE Oregon Resource Management Plan (SEORMP)
Management Plan "Alternative C" vs. "Alternative D"

Dear Mr. Singleton,

I write as a concerned citizen of Oregon. Although I live in the Portland area, I frequently venture to eastern Oregon where I also own property. The beauty of the Wild & Scenic areas of Eastern Oregon are beyond human description.

It has come to my attention that in your efforts to adopt appropriate ecosystem management principles to maintain and manage these Wild & Scenic areas, you have settled on a so-called "Alternative C" as your choice for future management decisions.

Alternative C fails to call for any reductions in livestock grazing and, in fact, allows 3000 cattle to continue grazing along the Wild & Scenic Blitzen River – contrary to your own scientists' recommendations. The already endangered Steens Mountain National Conversation Area would also have continued grazing under this alternative.

Of the 289 rivers eligible for Wild & Scenic status, Alternative C only nominates 43 for this designation. How can a plan such as this comply with the stated SE Oregon Resource Management Plan (SEORMP) when it fails to adhere to obvious ecosystem principles?

It's my further understanding that there is another Alternative (D) on the table that comes closer to meeting SEORMP management goals. As part of Alternative D, livestock grazing would be reduced, restoration of overused sites would begin, and all 289 eligible river would be proposed added to the list of Wild & Scenic Rivers; thereby, further protecting their futures. I haven't even touched on the specific wildlife that would be seriously affected if we don't take stronger protective action in these scenic areas.

It seems like a "no-brainer" to me that protection of Oregon's pristine areas should be of the utmost importance to all of us. If we continue to overuse these sensitive areas, what legacy does that leave for our children? What will they think of us then? Will we be remembered as the generation that let nature slip through our fingertips?

Please, Ed - if the BLM intends to protect the 6.3 million areas included in the SEORMP, it MUST at a minimum, adopt Alternative D as a management plan. Even better would be to re-write Alternative D to strengthen the BLM's commitment to protecting these unique and beautiful locations in Oregon for future generations.

Sincerely,

E.J. Gambee

cc: Craig Hansen, Burns District Manager
Burns District BLM Office
HC 74-12533 Hwy 20, West
Hines, OR 97738

L-246

RECEIVED
FEB 22 1999
BURNS DISTRICT BLM

400 S.W. Madison
Madras, OR 97741
February 22, 1999

BLM, Burns District
Atta: Glenn Patterson
HC 74-12533 W. Highway 20
Hines, OR 97738

Dear Mr. Patterson:

Enclosed is a letter I recently submitted to the Vale District BLM with some of my thoughts on the Southeast Oregon Resource Management Plan (SEORMP).

I urge you to adopt Alternative D only with some additional improvements like reduced grazing in riparian areas. I have seen some good and poor redband trout habitat in the Blitzen River system, Home Creek, and Trout Creek and know that we can do so much better. Certainly with the court rulings concerning the Wild and Scenic Blitzen there shouldn't be any plans to allow any grazing at all along it!

I also favor designating Steens Mountain, a favorite area of mine for 32 years, a National Conservation Area with no grazing.

Thank you for your time and attention.

Sincerely,

Walt Wolfe

Walt Wolfe

L-247

BLM
Cody Hanson/Glenn Patterson 3-1-99
Burns Dist. Office
Hines OR
FAX # ~~541-573-7600~~
541-573-4411

Mr. Hanson:

As private landowners on Steens Mt., the questions we come away with after scanning the SEORMP/EIS are: 1) How will our ability to access our private land for personal or business reasons be effected?

2) Does the current SEORMP/EIS contradict the 1980 Federal Road Closure Act which allows landowners personal and or business access?

We cannot conceive of governmental control over our rights to access private land.

As far as preservation of cultural values and treasures on Steens Mt: How will the history of the cultures other than Native American be preserved? Basque sheepherder carvings on Aspen trees, log cabins built by Irish or other descent, stone boys – the proposed draft in regard to fire suppression would allow these historical treasures to burn up and be lost without a trace.

How do you propose to acknowledge other history besides Native American?

Thank you for the opportunity to respond.

Sincerely – Harland Jan Yriarte

L-248

Craig Hansen, Burns District Manager
Burns District BLM Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

248

RECEIVED
FEB 20 1999
BURNS DISTRICT BLM

Dear Craig Hansen, It has come to my attention and "dozens of friends and relatives of mine that the "Alternative C", the Preferred alternative, of the Southeast Oregon Resource Management Plan is Flawed. The Alternative C fails to reduce the number of Cows allowed to pollute streams and damage a fragile arid environment.

My experience in the Southeast corner of the state is always tarnished by Cows that flatten stream banks, leaving cowpies floating in what used to be clean water. The obvious difference to an overgrazed land is the recovery of the Hart Mountain Antelope refuge. Here I can spend time Botanizing the vast wild flowers and experience a sense of wild Country in balance with Humans. All because the Cows have been limited or removed from graying. Alternative C does not protect the Public's land from damage to riparian areas, the Wild and Scenic Blitzen and Owyhee rivers.

I know first hand the difficult and Challenging position of Combining the Public and Private interests on land management. I work for the Willamette National forest and it is difficult to defend an agency whose lost trust with embattled parties over logging on Public land. Please drop "Alt. C" and select a Strengthened "Alt. D" and re-instill the public trust and bring back a sense of Balance in the use of Such beautiful Country in Southeast Oregon.

over →

Thank-you for considering my hand-written letter and my personal experience.

The land will only reflect the kind of people we are.

Yours Sincerely,

Thomas W. Baxter

Thomas W. Baxter

L-249

Vale District MB Oregon <or030mb@gwportland.orso.or.blm.gov> on 03/02/99 10:17:31 AM

To: Edwin Singleton/VLFO/OR/BLM/DOI, Gary Cooper/VLFO/OR/BLM/DOI
cc:

Subject: Comments on the SEORMP -Forwarded

Mr. Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale OR 97918

Dear Mr. Singleton:

I am writing to you to comment on the Southeast Oregon Resource Management Plan. I like to make two points:

* Please reject the BLM's preferred alternative, Alternative C. Instead, I urge you to adopt a strengthened Alternative D that would exclude livestock grazing from:

Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers;
riparian areas;
critical fish and wildlife habit;
areas o critical environmental concern;
wilderness study areas; and
grazing allotments in fair or poor condition.

* In my view "adaptive management" is not a real substitute for real standards and guidelines. Without constant, on-the-ground monitoring, adaptive management may only lead to further degradation.

My wife and I have visited the Vale and Burns districts quite a few times. The area is magnificent and strikingly beautiful. However, the damage from overgrazing was extremely evident to us on several visits. In particular, on one drive on the east side of the main Owyhee River, south of U.S. 95, there were miles and miles of land that had so many hoof prints that there was virtually no grass left. The ONLY thing noticeable was hoof prints. It was very sad. Grazing must be reduced!

Thanks for listening!

Kalman Brauner

Kalman Brauner -
Boeing Commercial Airplanes Group - Information Systems Architecture

L-250

3-1-99

Ed Singleton
Vale District MGR
Vale District BLM
100 Oregon ST
Vale OR 97918

RECEIVED
MAR - 3 1999
VALE DISTRICT BLM

Dear Mr. Singleton,

I am writing to encourage you to strengthen and adopt S.E.O.R.M.P.'s ALTERNATIVE D.

It's important to protect the high desert's wildness and not let its ecosystem be destroyed by grazing cattle. Desert raised cows comprise a small percent of the total number of cows in Oregon. Please help to stop their grazing in this fragile ecosystem before it is too late.

Thank you,

L-251

MAR - 1 1999
VALE DISTRICT BLM

2635 Cresta de Monte
Eugene OR 97403
2/25/99

Vale District Manager
Vale District BLM
100 Oregon St,
Vale OR 97918
re: Protection + Restoration of High Desert Areas.
Dear Manager Ed Singleton,

As a hiker, and bird-watcher the natural environment and wilderness areas of the Steens and Owyhee are of great value. Please consider our family and others like us when devising the management plans (SEORMP) for Steens, Owyhee, and Blitzen river.

We urge you to strengthen and adopt Alternative D. It is important to limit and/or protect grazing of cattle in this area to allow habitat restoration and prevent degradation of streams for fish reproduction. These areas belong to all of us. Thank you for consideration of Alternative D.

Sincerely, Elayne Ryan

L-252

2.18.99

Craig Hansen Burns Dist. Mgr.
Burns District BLM Office
HC 74-12533 Hwy 20 West
Hines, Or. 97738

RECEIVED
FEB 20 1999
BURNS DISTRICT
BLM

Dear Craig,

I've been told I should write you about the different plans for the Southeastern Oregon Resource Management Plan.

In my view only alternative D comes closest to protecting the ecosystem, because it reduces livestock grazing when in effect, we should be eliminating livestock totally from specific lands.

Migration is necessary for these wild species. I'm glad to see someone is thinking big. Their health & habitat will be limited by use and what we allow to happen to these lands.

Cattlemen will have to cut their herds and graze on their own land. Lumbermen have had to learn a new trade. Times change, and a new sensitivity to our health & well being is now being realized as we remain connected to the earth and its pristine beauty.

I am a proponent for alternative D until something more expansive comes along.

Thanks for listening

Carol Jacquet

L-253

RECEIVED
MAR - 1 1999
VALE DISTRICT BLM

Mr Singleton — 2-27-99

I have lived most of my 59 years in Oregon - except for military service.

My view is that the livestock business has been able to destroy much of the land and water that I love. My son and I hunt + fish - we have seen this damage over and over in many areas of the state.

Please ① Reject Alternative C

② Select a strong Alternative D.

Thank you
Larry Sleszler

L-256

RECEIVED
MAR 04 1999
BURNS DISTRICT BLM

Southeastern Oregon Resource Management Plan
Bureau of Land Management / Vale and Burns Districts

Comment Response Card

Please take a few minutes to provide your input concerning the information discussed in this document. We are interested in your ideas and look forward to hearing from you. Please print clearly and include your name and address at right. Mail your comments by March 1, 1999 to one of the addresses listed below.

(Name) Allan Otley
(Street address) 1999
(City) (State) (Zip)

Comments: ERROR: Riddle Creek is not part of the Harney-Malheur Lake drainage. Water from ~~Riddle~~ Creek flows into Dry Lake Reservoir, (man made). Irrigation water for Barton Lake Ranch is taken from Dry Lake Reservoir. The excess water from flood irrigation flows into the Diamond Craters. The 1996 riparian condition and trend for Riddle Creek as poor and static may be outdated. BLM reported Riddle Creek to be in good condition in 1998. Much of Riddle Creek is fenced. In 1999 BLM will fence another two and one half miles of the stream. I have lived here for 55 years. Fish were plentiful then and remain the same today. Presently, private and public grazing lands are very much multiple use with big game and bird hunting, fishing, hiking, photography, camping and other sports. Presently, lands in the Andrews Resource Area are mostly rest and rotation in the cattle grazing allotments.

I prefer Alternative B, continue present management with no change. Energy and mineral resources need to be developed. Prescribed burning must continue to restore the aquifers in juniper infested areas, thus improving the vegetation.

No National Conservation Area for the Steens Mountain. Many thousands of acres of private lands and private ranch homes lie within these once proposed boundaries. Often set-aside areas attract too many people. All this land is presently open to the public. Continue multiple use in the Wilderness Study Area of the Andrews Resource Area.

Thank you for allowing me to comment on this SEORMP.

Sincerely,
Allan Otley

MAIL TO:
Gary Coeper
BLM, Vale District Office
100 Oregon Street
Vale, Oregon 97918
(541) 473-3144

or

Glenn Patterson
BLM, Burns District Office
HC 74-12533, Hwy 20 West
Hines, Oregon 97738
(541) 573-4400

256

L-258

EUGENE (GENE) D. TIMMS
HARNEY, LAKE, MALHEUR, KLAMATH COUNTIES
DISTRICT 30

REPLY TO ADDRESS INDICATED:
☐ Senate Chamber, Salem, OR 97310-1347
☐ 1049 N Court, Burns, OR 97720

OREGON STATE SENATE
SALEM, OREGON
97310-1347

RECEIVED
MAR 04 1999
BURNS DISTRICT BLM

February 26, 1999

Bureau of Land Management
ATTN: Cody Hansen/Acting Burns District Manager
Burns District Office
HC74-12533 Hwy 20 West
Hines, OR 97738

Dear Mr. Hansen:

I am writing in regard to The Plan that will guide natural resource management on BLM-administered land into the 21st Century.

The provisions in this Plan is much too obscure for private landowners to depict the effects and impacts this may have on them. By not including precise action strategies, and timelines, it is impossible to determine if the objectives can reasonably be met.

"Authorized aircraft landing in the Steens Mountain Recreation Lands would occur on BLM-administered lands for winter activities only " is nonsensical. This action will cause much hardship in many different aspects of their lives.

You must give the public the opportunity to analyze some of these actions. Reconsideration should be used in reasoning this Plan.

It is only fair that you reach for more of a midway.

Sincerely yours,
Gene

Eugene "Gene" D. Timms
Oregon State Senate
District 30

L-260

March 3 1999

Ed Singleton Dist Mgr.
Vale, B.L.M.

ROBERT L & AIMEE L BUCKMASTER

RECEIVED
MAR - 8 1999
VALE DISTRICT BLM

Dear Mr. Singleton,

In reviewing the Southeast Oregon Resource Management Plan ie. SEORMP I wish to make comments. Our family has found much pleasure in traveling to and seeing the beauty of Southeastern Oregon. I wish to request that the protection of those wonderful wild desert lands would be better served with the adoption of Alternative "D". There is not enough remote, roadless areas left for the wildlife of that area. The ancient grazing laws and mining laws have done so much damage for such a small amount of money. Alternative E sounds good but would not allow for any added wild and scenic river designations or any restoration of ecosystem and recreation damage. Please do all that can be done to save the area contained within the Owhee river drainage. A natural desert is a clean, wild desert. Thanks you,

Aimee Buckmaster

L-261

BERT FINGERHUT

RECEIVED
MAR - 8 1999
VALE DISTRICT BLM

3/3/99

Dear Mr. Singleton,

I am writing about the SEO RMP. While from Colorado I have recreated a lot in this area.

I think alternative C is a mistake and I support alternative D. I would strengthen the RMP to fully protect areas around streams from grazing as these areas could possibly become wilderness someday.

Thank you,

Bert Fingerhut

L-262

Walt Weber

RECEIVED
MAR - 8 1999
VALE DISTRICT BLM

March 1, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon St.
Vale, OR 97918

Dear Mr. Singleton:

I would like to comment on BLM's SE Oregon Resource Management Plan (SEORMP) and BLM grazing management in general. Although most of my fishery management career was spent on the Oregon coast, I did spend 6 years in Central Oregon and have been exposed to grazing issues through field trips, professional societies (American Fishery Society) forums, scientific publications, media articles and personal recreation activities.

My experiences have led me to the general conclusion that wherever grazing is permitted; be it on private, BLM or USFS lands; the riparian area, the stream and the fish resource are degraded. Although BLM and USFS are purported to be multiple use land managers, it seems that grazing is allowed to adversely impact the other uses. Range and riparian vegetation studies identify a high percentage of grazed public lands to be in a degraded condition. Granted, much of the serious damage occurred many years ago which explains why "cowboys and land managers" can plead that the watershed is in the same condition today that it was years ago. Relatively little has been done on private or public lands to reverse the degraded condition despite an obvious need to do so. It appears that on public lands the range managers are too close to the cattle industry and don't have the willpower and/or manpower to initiate and maintain proper management. The minimal grazing fees paid by grazers may be one reason that restoration and monitoring is underfunded. Additional funding by congress could have provided funds for such activities but it is my feeling the grazing program should be self supporting.

Riparian areas recovery response to elimination of grazing is amazing. Although it may take many years for a complete recovery, the initial response is rapid. Camp Cr. and Bear Cr. (Crooked R. watershed) and the lower Deschutes R. are examples of recovering riparian areas. Contrast the Deschutes R with the mainstem John Day R. where grazing continues. BLM is to be commended for their participation is these recovery projects. The Deschutes National Forest has been particularly progressive in grazing management in sensitive areas. They have gone as far as to obtain ownership to critical areas within their boundaries(Big Marsh) that were being overgrazed. Once restored, a watershed may not only be a productive fish and wildlife area but may provide increased livestock forage also. At that point a carefully monitored adaptive management plan could represent true multiple use.

L-263

It is obvious there is potential for solutions to recovery of overgrazed areas. However, BLM has been unsuccessful in implementing and monitoring limited grazing systems or other forms of adaptive management. It does not appear that grazers are going to voluntarily adopt grazing protocols that would permit riparian zone restoration on public or private lands (apologies to those few ranchers that are progressive enough to do this on their own). Given the history of BLM grazing management it appears that the only realistic solution to riparian area protection/restoration is a total removal of grazing from these sensitive areas.

Based on the above comments, I am opposed to BLM's adoption of Alternative C for the SEORMP. This alternative fails to reduce livestock grazing and calls for "adaptive management" to control ongoing grazing abuses as well as restore degraded riparian areas. It continues to allow grazing along the Wild and Scenic Blitzen R. and within the Steens Mountains National Conservation Area. This represents BLM's "business as usual"management and is a documented failure.

I am hoping the BLM will do the right thing for a change and adopt a strengthened Alternative D which would eliminate grazing along all rivers, streams and wetlands along with reducing grazing in upland allotments in less than good condition and in areas of critical environmental importance. My comments apply to other BLM managed lands as well. The John Day R. riparian corridor is a classic example of terrible multiple use management.

I appreciate the chance to comment on this issue. If you should have questions, please feel free to contact me. Please keep me informed as to which alternative is selected and the rational that supports the selection.

Sincerely
Walt Weber
Retired ODFW Fishery Biologist
1970-1997

cc: Craig Hansen, BLM-Burns
Paula Burgess, Governors Office
Oregon Natural Desert Association
U.S. Sens. Wyden, Smith
U.S. Reps. Blumenauer, DeFazio, Hooley, Walden, Wu

L-264

BETSY TOLL

RECEIVED
MAR - 8 1999
VALE DISTRICT BLM

Feb 25, 1999

Ed Singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Sir,

Concerning the Southeast Oregon Resource Management Plan: I urge you to **drop Alternative C** as the preferred alternative, and instead **choose a strengthened Alternative D.**

The Alternative C management option is seriously flawed in the following ways. Alternative C:

- fails to call for any livestock grazing reductions, even when resource damage occurs, and allows 3,000 cows to continue grazing along the Wild and Scenic Blitzen River, contrary to agency scientists' recommendations;
- nominates only 43 out of 289 river miles that are eligible for Wild and Scenic River status;
- proposes a Steens Mountain National Conservation Area, without making any changes to grazing management there;
- leaves 3.8 million acres – a majority of the planning area! - open to off-road vehicle use, closing less than 1% of the area (22,000 acres) to ORVs;
- relies on controversial "adaptive management," a tool the BLM has used in the past to justify allowing livestock operators to graze beyond the limits of the their permits; and
- fails to satisfy the SEORMP's stated intent to adhere to ecosystem management principles.

I urge the BLM to **choose a strengthened Alternative D** that excludes livestock grazing from Wild and Scenic Rivers, such as the Blitzen and Owyhee Rivers; Riparian areas; Critical fish and wildlife habitat; Wilderness study areas; and Grazing allotments in "fair" or "poor" condition. Alternative D would:

- allow for reductions in livestock grazing levels;
- emphasize undeveloped types of recreation, and close recreation sites where natural values are jeopardized by overuse;
- de-emphasize fire suppression;
- add 26 new Areas of Critical Environmental Concern, totaling 191,000 acres;
- propose 289 river miles for federal Wild and Scenic River status.

To protect these 6.3 million acres that include wild places such as Steens Mountain and the Alvord Desert, for the health and well-being of our grandchildren and future generations, it is imperative that you choose a strengthened Alternative D.

Sincerely,

Betsy Toll

Cc: Jim Kenna, Burns District Manager, Senator Ron Wyden, Senator Gordon Smith

100% recycled, dioxin-free paper.

264

L-266

RECEIVED
MAR - 9 1999
VALE DISTRICT BLM

3/3/99

Dear Vale District Manager,

Thankyou for the opportunity to comment on your draft EIS. Please consider my comments, even though they will arrive a few days after March 1, 1999. I am on a detail to Redding, CA & am not able to regularly check my mail in Willow Creek to which your EIS was mailed, hence I had much less than 120 days to review the document.

Also please note the address I've shown above and send all future correspondence there as I will be able to deal with it in a more timely manner.

I am much more familiar with the Vale District than Burns, however some of my comments would be relevent to Burns District as well. Since you sent a joint letter, I am assuming that you will share these comments with the Burns District. Please consider the following thoughts:

Pages 2-37 to 2-39 - The discussions of riparian condition & trend does not well discuss the potential for upward trend, nor a potential or realized rate of change related to trend change. Further, you provide overall totals of riparian trend on page 2-39, but do not have data on 77.1%. This is a critical gap. Also, I believe Appendix D numbers starting on P.29 should be separately reported according to the allotment

(2) and pasture that overlays a given reach of stream. I am familiar with a number of cases where condition & trend varied by allotment & pasture, since the specifics of management, and site specific potential varies.

Appendix D, Table D-2, starting on P29 has some ommissions & errors related to fish. Oregon Canyon & Ten mile Creeks were thought to contain hybridized Lahontan cutthroat/hatchery fish, so that the genetics there are more unique than in hatchery fish. That could be further discussed on P. 2-51 in Volume I. Further table D-2 does not in Line Canyon, nor disclose that LCTR exist there, though you do mention this on P. 2-51. LCTR are not clearly displayed present in certain stream reaches in Alvord Lake Basin. The lack of trend data on 77.1% of your riparian areas is a little troubling, but lack of trend data on streams with LCTR seems to be in conflict with the Endangered Species Act. If you don't know the trend, how can you manage to conserve these populations?

As I mentioned earlier, condition & trend should be listed separately according to allotment and pasture. Lack of this approach reduces the ability to review the actual condition & trend & make informed comments & decisions that effect TES fishes.

I believe Table D-2 has further ommissions & errors related to redband trout, but without access to the BLM data, I am hard pressed to point them out now. The RAIDS database & maps I completed 8 years ago should be reviewed & I would hope new redband inventory has been conducted as well.

(3) Related to TES fishes, I feel the need to reiterate & emphasize that discussions of riparian condition & trend should better disclose & discuss the potential for upward trend, the potential rate for trend change, & the realized rate for trend change. Management of TES fish should be clearly aimed for conservation & recovery of these species, rather than a static to slowly upward trend.

More clarity in this regard would benefit the BLM image & public relations. In a number of cases I saw that rapid improvement was not possible, with or without grazing, yet vocal publics were giving the impression that the riparian areas you manage could only recover in the total absence of grazing.

Wildlife biology is not my specialty, though I do return every few years to the Vale District to hunt, so I am very interested in the management of wildlife habitat. I have noted site specific conflicts between grazing & wildlife around the district, yet I don't see that fully discussed nor disclosed in this document. Grazing can in some instances benefit wildlife, but it also result in competition & reductions of wildlife abundance that reduces numbers of harvestable game. I hope that the final EIS could help the readers & decision maker get better information on this subject.

L-267

(4)

I am glad that the APHIS program is continuing. Numerous hunters & wildlife & range managers support the need for prudent work to sitespecifically control the population & effects of predators.

I hope that (both before & after this EIS is complete) the BLM & ODFW can coordinate together to review game harvest proposals so that herd management options well match the needs of wildlife herd management & the needs & prefevences of the various publics. For instance the ODFW 265D Bully Creek antlerless elk rifle hunt has been set for mid September for the last few years. This timing unnecessarily overlaps archery season, causing a public safety conflict since camoflayed bow hunters may be mistaken for elk by anxious rifle hunters. Further, it results in reduced satisfaction for archery hunters. Both hunts could be accomodated by scheduling to keep them separate.

Again, thankyou for the opportunity to comment on your EIS & different facets of BLM land management.

Sincerely,

Lee M. Morgon

RECEIVED
MAR 10 1999
VALE DISTRICT BLM

March 8, 1999

Ed Singleton,
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

Re: SEORMP

I urge you to reduce cattle grazing and choose Alternative "D" for the management of Oregon high desert. Promote the natural values of the land and resources.

It is important to protect the rivers and riparian areas. Protect the fish and wildlife habitat and wilderness study areas.

Cattle are the wrong species of animals for the high desert lands of eastern Oregon. Cattle do serious damage to the land, waters and vegetation.

Although not being discussed here, I really do believe that the ultimate goal for the Oregon high desert should be to phase out, or buy out the cattle allotments of the region.

In any case, please reduce the adverse impacts of cattle grazing on the Oregon High desert.

Sincerely

R. Marriner Orum

R. Marriner Orum

L-268

RECEIVED
MAR - 8 1999
VALE DISTRICT BLM

Beardsley Graham, P.E.
Consultant
Life Fellow IEEE
Registered Professional Engineer
Listed in: Who's Who in America; American Men of Science; Who's Who in Engineering; Who's Who in the West.

1 March 1999

Ed singleton, Vale District Manager
Vale District BLM Office
100 Oregon Street
Vale, OR 97918

Dear Mr. Singleton:

I remain appalled that BLM cannot or will not understand that cattle, an intrduced exotic species in the High Desert, continue their riparian depredations. Regarding SEORMP I urge you to reject Alternative C and select a strengthed Alternative D!

I was involved in California's Desert Reclamation efforts and having camped throughout Oregons's High Desert land I can only hope that it will be preserved. Please, those of us who love the land the way it is/was need help!

Sincerely,

Beardsley Graham

cc: Craig Hansen, Burns District Manager
BG:bma 3/4/99 9:19 AM
f:BLMSEORMP0403

L-270

John Perry/Dottie Perry

RECEIVED
MAR 15 1999
VALE DISTRICT BLM

March 9, 1999

Ed Singleton
Vale District Manager
100 Oregon St.
Vale, OR 97918

cc: Craig Hansen, Burns District Manager
cc: Oregon Natural Desert Association

Dear Mr. Singleton:

In gathering data for The Sierra Club Guide to the Natural Areas of Oregon and Washington, I spent many weeks in Southeast Oregon, studying the area and talking with members of your staff. Having several family members in Oregon has meant frequent trips there.

Thus I have read with interest and concern your Resource Management Plan for the area. The decision, as you well know, will shape the area for generations to come. It will express BLM's governing philosophy.

I am greatly disturbed that Alternative C should be designed Preferred. It represents a huge concession to livestock interests and acceptance of continued resource degradation.

Such concessions to timber interests cost the Forest Service dearly. No longer able to have confidence in the Service, many organizations, citizens, and newspaper now support the proposal that all logging on public land be stopped. Cattlemen, a tiny fraction of the voting population, could be overwhelmed by a similar movement to prohibit grazing.

Alternative D is clearly the best of the lot, but it, too, yields too much to grazing interests. Certainly all grazing should be halted in riparian areas, in CEC areas, in wilderness study areas, and where overgrazing has already damaged the range. This is commonsense managent - assuming the regulations are enforced.

This is a watershed decision for BLM. It will tell us whether you can be trusted to manage our lands.

Sincerely,

Date: March 15, 1999

RECEIVED
MAR 1 9 1999
VALE DISTRICT BLM

To: Mike Golden, Chairman
SEORAC

From: Tom Harris, Member
SEORAC

Subject: **Comments on SEORMP**

The broad scope and scale of this RMP does indeed require some separate and individual comment as explained by Mike Golden. The possibility of consensus on many issues is there but the time factor for discussion is not given the broad cross-section and limited meetings of the committee.

This RAC has not been afforded the formal designation of an OHV Representative which is unique and unexplainable. We have, however, dispersed and commercial recreation positions. For purposes of comment on the RMP it would be difficult, I think, to separate the two since the areas of concern are the same.

The focus of my concerns are:

Reasonable Access - The needs for backcountry access seem to be lost in the hurry to comply with road density reduction and transportation plans. Recreation consideration shouldn't wait until all other resource considerations are satisfied. Good resource planning is like a good receipe, recreation may be akin to a dash of salt to the RMP but the end product will suffer for the lack of it.

While it is true that most denials for access are based on real ecological concern, it is just as true that many of these concerns have remedial answers other than closure. There is adequate engineering information in the text of existing CFR's and regulations to address trail deficiencies. The argument of lack of personnel and funding shortages have some answers in partnerships, volunteers and the availability of gas tax dollars through Oregon's All Terrain Vehicle Account Allocation Committee. These assets are ignored frequently enough to make one wonder if the recreation specialists are fully apprised of these tools.

Education - Elementary education is the real answer and BLM and USFS does more to combat ecological ignorance than our school systems by sponsoring educational programs. My main point, however, here is not elementary but college level education. At a northwestern college this year 20 resource bound students were asked their opinion of motorized recreation - **ALL** replied that it should not be allowed. This negative bias is showing up in decisions everywhere as young people assume their role in resource agencies. The opponents to motorized use would call that a victory but they are wrong. By not addressing viable, environmentally friendly alternatives, we sponsor improper use and vandalism. That there are ignorant users is presently a given, but ignorant decisions lend little to the planning process. The agencies should look into the educational format of these institutions of higher learning and demand changes. You need a better product. The need to emphasize education at all levels should be in the document.

Land Use Classification - BLM and USFS use ***Closed, Limited*** and ***Open*** as land use designations. The Closed and Limited are self-explanatory. It is the ***Open*** designation that needs our attention. There are sub-paragraphs that modify this designation but those sub-paragraphs are not explained adequately to the public. The sub-paragraphs explain that you may leave the trail if you do not run over vegetation, endangered plants and cultural resources. If you were a botanist or an archaeologist, traveling at even four miles an hour would require some expert field calls. The overriding threat, then, is the ***Open*** classification. To those of us who worry about "ghost trails", erosion and a proliferation of unsightly trails, it is a planners nightmare.

Glenn Patterson of the Burns office accurately reminded me that the "Designation problem is bigger than the RMP". This is a problem that is shared agency-wide by both USFS and BLM. This doesn't prevent us, however, from taking the first step to correct it; that of formally recognizing it in the plan.

The Sonoma-Gerlach and Paradise-Denio DEIS (Sept. 1998), page 3-54 states in reference to the ***Open*** designation: "This designation puts approximately ten million acres at the discretionary use of OHV enthusiasts who wish to travel cross-country from one destination to another." Only the acreage changes in the SEORMP. I would submit that 4 million acres is just as significant and just as threatened. Shouldn't a similar statement appear in the SEORMP?

Not only should the ***Open*** classification be dropped, or significantly changed, but we should be involved in an aggressive plan to provide adequate, environmentally sound trail alternatives for multiple use that includes motorized.

Motorized Recreation Planning - Most resource experts, whether botanist, biologist, archaeologist, have a singular thrust, while the recreation planner is often dual duty with some other agency entity. It would be difficult to assume that this planner would be skilled at all the different aspects of recreation, i.e. hiking, equestrian, ATV/MC/4WD, skiing and snomobiling. In the past there has been "master performers" within the agencies where expert peer advice could be obtained. They could even be "borrowed". Unfortunately, the master performers are disappearing through cutbacks and retirement. Worse, they are not being replaced. Except for an occasional knowledgeable champion, we are often left with someone who knows too little about the recreational needs in his area.

An unfortunate truth that compounds the problem is, users historically do not have a good communication ethic and are probably not going to change. The agency needs to be aggressive and develop an outreach that would encourage the development of mini-symposiums comprised of all users. There is a wealth of information, suggestions and partnerships out there. I would start with known organizations and develop from that core group. The alternative is to make decisions without informed input and the planner, user and the environment suffer.

Trail designation with seasonal closures and permits do require more work than closures but are infinitely more effective. That there will be resistance to seasonal closures and permits is academic. A good example is planning for the hunting disciplines. Limiting the hunter numbers has preserved the experience and lessened the impact. Permitted use also has the advantage of accounting for use numbers. With the casual OHV user, you presently have no idea of how many or when. Planning has a need for numbers as they are relative to impact. Shouldn't we be planning for this advent, rather than make those eventual knee-jerk decisions that satisfy political whimsy and little else?

My criticisms generalize rather than name page and paragraph, for the most part. Usually specific criticisms fall flat at this point in the process. My point in generalization is that if the points I have described had been considered and exercised there would be a substantial reduction in the need to criticize. The deficiency is not so much what has been accomplished in the RMP but what has been omitted in the process.

Some specific comments are:

Of the three proposals that have been offered for Steens Mountain the National Conservation Area is the best, allowing for planned activity with controls. The National Monument and National Park concepts are far too exclusionary.

The Economic Impact Reference studies conducted by Ashley 1993 and Johnson 1995 are considered inaccurate. Where motorized use (OHV) is addressed there are no breakdowns as to type of vehicle and pertinent expenditures are flawed by omission. There is a new study being accomplished by Dr. Rebecca Johnson of OSU for Oregon State Parks and Recreation.

Volume 2, Appendix H, Recreational Opportunity Spectrum, Semi Primitive Motorized, page 3-59 states "Challenge and risk opportunities are not very important, although testing of outdoor skills may be." Challenge and risk opportunities are indeed important although the frequency should be minimal and the design environmentally well founded.

TH:ph
cc:Steve Ellis, Designated Federal Official SEORAC
BLM-Lakeview District
HC-10 Box 337
Lakeview, OR 97630

Gary Cooper
BLM-Vale District
100 Oregon Street
Vale, OR 97918

Glenn Patterson
BLM-Burns District
HC74 - 12533 Hwy 20W
Hines, OR 97738

Scott Moore, Outdoor Recreation Planner
Andrews Resource Area
BLM-Burns District
HC74 - 12533 Hwy 20W
Hines, OR 97738

L-272

Defenders of Wildlife

RECEIVED
MAR 22 1999
VALE DISTRICT BLM

Memo

To: Gary Cooper, Vale District BLM
Glenn Patterson, Burns District BLM
From: Bruce Taylor, Defenders of Wildlife
Date: March 17, 1999
Re: draft Southeast Oregon Resource Management Plan

The following are some brief comments on the draft plan. I realize that the deadline was March 1, but I only received a copy of the draft last week after talking to Gary. I had submitted comments on the scoping process in November 1995 and asked to be added to the mailing list at that time in my capacity as executive director of the Oregon Wetlands Joint Venture. Apparently neither the Joint Venture nor Defenders of Wildlife's West Coast Office ever made it onto the list. Given Defenders' extensive work with BLM on the Oregon Biodiversity Project, we would appreciate your consideration of these comments.

Areas of Critical Environmental Concern. The plan appears to do a good job of identifying sites for potential designation as ACECs. The plan recommends sites within all of the "conservation opportunity areas" identified in the Oregon Biodiversity Project's analysis, usually for the same reasons.

Although the proposed ACEC designations are much narrower in scale than the conservation opportunity areas, they generally seem to target the same resource values we identified in our broader-scale analysis. One major exception is in the Bully Creek area, where aspen habitats in shrub steppe mosaics were one of the features that led us to select this area. BLM is proposing several ACECs in this general area, but none of them appear to include these habitats. Whether this is an oversight on BLM's part or a weakness in the data we were working with, I don't know.

Alternative D in most cases provides for significantly larger ACEC designations than those proposed in the preferred alternative. The more expansive designations would have significant benefits for biodiversity management with relatively minor impacts on other resource uses.

The management prescriptions for ACECs under Alternative D are also clearly preferable, in that they tend to give greater weight to protection of resource values. The preferred alternative generally attempts to minimize impacts of the ACEC designation on existing uses such as livestock grazing.

Alternative D clearly establishes a higher standard for maintenance of existing uses, and presumably it should lead to more rapid recovery of riparian habitats.

Recommendation: Adopt Alternative D for Water Resources and Riparian/Wetland Areas.

Juniper control. The preferred alternative calls for treatment to control juniper on 260,000 acres, an aggressive program that would require extensive use of prescribed fire. Alternative D would treat 175,000 acres, relying mostly on wildfire. Old growth juniper stands would be preserved under both alternatives.

Lower livestock grazing levels envisioned under Alternative D would result in retention of more fine fuels (grasses and forbs), which would allow fire to control juniper through more natural processes. Juniper control would only be done to protect or enhance resource values, not to maintain commodity production. Given the continuing debate over the propriety of widespread juniper control efforts, Alternative D appears to be a more cautious (and reasonable) approach.

Recommendation: Adopt Alternative D for Forests and Woodlands.

Off-highway vehicles. The preferred alternative would leave more than 60 percent of the planning area (4,473,603 acres) open to unlimited vehicle use. Another 38 percent would be subject to some restrictions. Only 17,631 acres would be closed to motorized vehicles.

Under Alternative D, almost 30 percent of the planning area would be open to unrestricted vehicle use. About 70 percent would be restricted. Alternative D clearly would reduce risks to biodiversity values associated with off-highway vehicle use.

Recommendation: Adopt Alternative D for Off-Highway Vehicles.

Recommendation: Adopt Alternative D for Areas of Critical Environmental Concern.

Steens Mountain National Conservation Area. The preferred alternative recommends congressional designation area of a 768,983-acre national conservation area on Steens Mountain. The Alvord Basin should logically be included but has been excluded from the proposed boundary. Wilderness study areas and proposed and existing ACECs in this area provide a solid foundation for management for biodiversity values. Debate should probably focus on whether the plan's generic management standards are adequate to address biodiversity conservation needs in this area. Application of Alternative D management strategies to the national conservation area would substantially improve prospects for long-term conservation of biodiversity values.

Recommendation: Adopt Alternative D for Steens Mountain National Conservation Area, with inclusion of Alvord Basin.

Livestock grazing. Over the entire planning area, the preferred alternative (Alt. C) could result in reductions of as much as 10 percent in current animal use-months. Alternative D could result in reductions of as much as 20 percent from current grazing levels. Reductions would result primarily from efforts to meet objectives for riparian habitats, wild and scenic rivers, ACECs, and special status species.

Under current management, only 66,000 acres out of the planning area's 6.3 million acres are not allocated to livestock grazing. (Another 26,000 acres are excluded from grazing under past agreements to protect specific resources within existing allotments.) BLM's preferred alternative would remove an additional 8,836 acres from the existing grazing allocation.

The preferred alternative generally takes a cautious approach toward any changes in status quo. Virtually all of the planning area is currently available for grazing and will remain so under almost all of the alternatives. Reductions in grazing would generally benefit biodiversity values. Although Alternative D would not directly reduce the acreage allocated for grazing, it would apparently reduce negative grazing impacts more quickly, and to a greater extent, than the preferred alternative.

Recommendation: Adopt Alternative D for Rangeland/Grazing Use.

Riparian habitats. The draft EIS indicates that more than half of riparian habitats in the Andrews Resource Area is in poor or fair condition. More than three-quarters of the other two resource areas have not been evaluated. Under the preferred alternative, livestock grazing and other uses that affect riparian values could occur if *they allow progress* toward attainment of state water quality standards. Under Alternative D, livestock grazing and other uses that affect streams would be *allowed only if they would promote or have no effect* on restoration of water quality.

L-273

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

Reply To
Attn Of: ECO-088

MAR 17 1999

Ref: 95-077-BLM

RECEIVED
MAR 22 1999
VALE DISTRICT BLM

Glenn Patterson
USDI Bureau of Land Management
Burns District Office
HC 74-12533 Highway 20 West
Hines, Oregon 97738

Dear Mr. Patterson:

The EPA has completed its review of the **Draft Southeastern Oregon Resource Management Plan Environmental Impact Statement** (EIS) pursuant to our responsibilities and authorities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The draft EIS evaluates five alternatives for managing resources in roughly 6.3 million acres administered by the Bureau of Land Management (BLM) in southeast Oregon and identifies Alternative C as the agency-preferred alternative.

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

Our major concerns with the draft Plan/EIS are related to 1) the lack of clarity in the management direction presented in the Plan, 2) the absence of a systematic monitoring strategy for evaluating Plan effectiveness, 3) the lack of a road management element in the Plan, and 4) the need for further discussion/evaluation of the proposed strategies for juniper management and the use of nonnative plant species. We recommend that these issues be addressed in the final Plan/EIS.

Enclosed please find our detailed comments, which elaborate further on these issues as well as other areas of concern that we believe need to be addressed in the final EIS. We are interested in working closely with the BLM in resolving the issues we have identified above and in our enclosed comments. I urge you to contact Bill Ryan of my staff at your earliest opportunity to discuss our comments and how they might best be addressed for the proposed plan. Bill can be reached at (206) 553-8561.

Thank you for the opportunity to review this draft EIS.

Sincerely,

Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosures

cc: Gary Cooper, BLM-Vale District

Printed on Recycled Paper

EPA Comments on the
Draft Southeastern Oregon Resource Management Plan (SEORMP)
Environmental Impact Statement (EIS)

The Plan as a Comprehensive Management Tool

Our review of the SEORMP reveals what appears to be a very fragmented, and unclear, management approach for the planning area. The plan identifies existing or yet to be developed plans that would be used to manage activities in the Malheur, Jordan, and Andrews Resource Areas, with no indication of how they relate to, or are consistent with, the goals and objectives identified in the proposed Plan. For example, page 1-13 indicates that noxious weeds would be managed using the Northwest Area Noxious Weed Control EIS developed in 1985, yet no information is provided to indicate how that plan, developed 14 years ago, is consistent with the goals and objectives of the SEORMP. Similarly, the draft EIS states that livestock forage allocations will not be revised by the SEORMP, but no discussion is provided indicating whether or not the present allocations are consistent with the goals of SEORMP. The Plan states that a road management plan would be developed, but also indicates that no specific transportation management decisions would be made in this plan (those would apparently be made at the project planning level).

We believe that the SEORMP (Plan), as the overarching management direction for the Malheur, Jordan, and Andrews Resource Areas, is intended to ensure that management activities would be conducted in a consistent manner for the entire 6.3 million acre planning area. Consequently, we believe that the Plan should act as a "road map" for clearly understanding how resource management is to be conducted within the planning area. To achieve that goal, we recommend that the Plan/EIS be revised to:

- Clearly identify (in a single location) all plans and directives, including dates of issuance, currently being used to manage resources/activities within the planning area.
- Include an assessment/discussion of the extent to which current management activities in the planning area (as defined in existing plans and programs) are consistent with the proposed Plan.
- Include clearly defined steps (including time frames) to be taken to ensure that current management plans/activities found to be inconsistent with the Plan are revised to comply with the direction of the Plan.

We believe that this information will provide the public and the decision makers with a clear understanding of where current management direction is defined, an understanding of what direction requires revision, and a clear description of the steps required to ensure that all existing direction is updated to be consistent with the direction of the SEORMP. We believe that inclusion of this information in the Plan/EIS will make the Plan a more meaningful and useful management tool.

Monitoring of Plan Goals and Objectives

It is critical that a management plan such as the SEORMP includes clearly defined goals

(broad statements that describe desired conditions to be achieved in the future), objectives (time-specific statements of measurable planned results that respond to the goals) and a monitoring strategy that would allow for meaningful evaluation of the relative success of Plan direction in meeting the defined goals and objectives. It is important that Plan-level monitoring be designed to ensure that information/data directly related to the Plan objectives is gathered and reported in a systematic and predictable fashion. This would include evaluation of whether management direction presented in the Plan has actually been implemented (implementation monitoring) and the effectiveness of the management direction in achieving Plan goals and objectives (effectiveness monitoring). A monitoring strategy that systematically evaluates and reports Plan implementation and effectiveness is critical for the successful use of the proposed adaptive management strategy for the planning area.

We are concerned that the monitoring strategy presented in Chapter 3 of the SEORMP does not ensure that information directly related to Plan objectives would be gathered or that a systematic, predictable strategy would be applied for the entire planning area. Furthermore, the proposed Plan does not indicate how results from the various monitoring activities would be reported to allow for a meaningful evaluation of the Plan in its entirety. As an example, page 3-74 of the SEORMP indicates that Objective 2 for Forest and Woodlands is (in part) to "restore the productivity and biodiversity in juniper and quaking aspen woodland areas." For that objective, the proposed monitoring approach is that "an interdisciplinary team would develop appropriate monitoring on a case-by-case basis for each action proposed for juniper or quaking aspen management." This approach concerns us for a number of reasons. First, it fails to reflect a strategy for evaluating the objective on a planning area-wide basis. The Plan contains specific objectives related to juniper and aspen management for the planning area, yet proposes no Plan-level evaluation of those objectives. Second, it would not ensure consistent evaluation of the objective as each interdisciplinary team could conceivably conduct their evaluations in different manners. Third, the monitoring approach is neither systematic nor predictable. Finally, the approach presents no clearly-defined reporting mechanism to be used to evaluate the implementation and effectiveness at the Plan level.

We recommend that the monitoring component of the Plan/EIS be revised to include a systematic monitoring strategy, applicable to the entire planning area, that would result in the predicable collection and reporting of information that is directly related to Plan goals and objectives. Elements that we believe should be integrated into the monitoring strategy include:

- Plan implementation monitoring elements (how well is the Plan being implemented?).
- Plan effectiveness monitoring elements (are objectives being met with management directives?).
- Descriptions of the systematic monitoring approach to be applied to the planning area (how frequently and where would monitoring be conducted?).
- Mechanisms to be used to gather information (are there standard operating procedures that would be applied throughout the planning area?).
- Mechanisms for reporting monitoring activities and evaluation of results relative to Plan goals and objectives (will there be an annual Plan-level monitoring report?).

Roads

The SEORMP indicates that a transportation management plan would be developed to address impacts associated with the construction and use of roads, yet this plan would make no specific transportation management decisions. Roads are significant contributors to the degradation of the ecosystem as they result in negative effects on hydrology, sediment delivery to streams, habitat fragmentation, water quality and aquatic habitat, biodiversity, and predation (to name but a few). Therefore, we see the management of the roadway system within the SEORMP planning area is a critical element in achieving many of the objectives and management directives presented in Chapter 3. Without an analysis of future road management practices, we find it difficult to determine the overall cumulative consequences of implementing the proposed Plan. Consequently, we recommend that transportation planning and direction be included in the SEORMP, along with an evaluation of the anticipated consequences.

Relationship of Management Directives and Analysis Assumptions

We found it very difficult to determine the specific management direction that would be applied to the planning area with implementation of any of the project alternatives. Chapter 3 presents broad, general discussions of how resources are to be managed, with little specific direction as to how this would be accomplished. It appears that the assumptions presented in Chapter 4 for assessing the impacts of each alternative represent more specific descriptions of the management direction. Given that the direction presented in Chapter 3 defines how resources are to be managed in the project area, we recommend that the assumptions presented in Chapter 4 be included explicitly into the Management Directives included in Chapter 3. This would ensure that the assumptions used to analyze impacts are directly linked to management direction.

Juniper management, grazing, and impacts

The proposed Plan/EIS indicates that western juniper woodlands have expanded into areas historically occupied by shrub steppe communities and that treatment of juniper stands would be undertaken to restore the diversity and distribution of desirable vegetation communities. Alternative C (the preferred alternative), which is designed to "protect natural values while providing for commodity production," would treat up to 260,000 acres of juniper woodlands. The same level of treatment is prescribed for Alternative A, which is intended to "emphasize commodity production." It is not clear, based on the very general discussion of the management directives presented in Chapter 3 of the Plan/EIS, just how different these alternatives are with respect to juniper management and rangeland/grazing use. Chapter 4 indicates that the assumptions used in evaluating the impacts of these alternatives vary only in the percentage of acres seeded in native and nonnative plant species. We recommend that the Plan/EIS be revised to clearly include the following:

- An evaluation of ecological impacts of removing juniper. The draft Plan/EIS presents little discussion of the plant and animal communities occupying current juniper woodlands, or the impacts to those communities with the proposed treatments presented in the Plan.
- It appears that juniper treatments would result in increased rangeland within the planning area. The Plan/EIS should discuss whether this increase in rangeland acres would result in

increased grazing and its associated environmental impacts.

- The Plan/EIS should include a clear definition of what an old growth juniper woodland is composed of, along with a map depicting the locations of the old growth woodlands found within the planning area.

Use of Nonnative Plant Species

The draft SEORMP/EIS indicates that management of rangeland vegetation would include seedings that include nonnative plant species and that nonnative species may be used when better adapted to out-compete established annual species. We believe that the Plan/EIS should be revised to more clearly describe the rationale for using nonnative plant species and the ecological effects associated with their use. We recommend that discussion related to the use of "desirable" nonnative plant species be revised in the Plan/EIS to answer the following questions:

- What nonnative species would be introduced, and what makes them "desirable?"
- What native species would be displaced, and why would they be considered less "desirable" than the introduced nonnative species?
- How is the strategy to introduce nonnative species consistent with the Invasive Species Executive Order issued in February 1999 (enclosed)?
- What are the impacts of nonnative species on native plant communities, wildlife, and natural ecosystem processes? To what extent would nonnative species out-compete and replace native species?
- Are the nonnative species necessary to meet specific commodity/grazing objectives? If so, why? If not, why is their use necessary?

303(d) streams

Table 2-10 of the draft EIS identifies water quality limited streams (those not currently meeting State of Oregon Water Quality Standards) that are located within the planning area. In order to make it easier for reviewers to translate this information to the planning area, we suggest that a map which identifies the water quality limited streams be included in the final Plan/EIS.

Wildland/Prescribed Burning and Air Quality

We recommend that the Plan be revised to incorporate the direction contained in EPA's *Interim Air Quality Policy on Wildland and Prescribed Fires*, issued in May 1998. This policy, developed in consultation with the U.S. Department of 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 pollutant emissions.

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