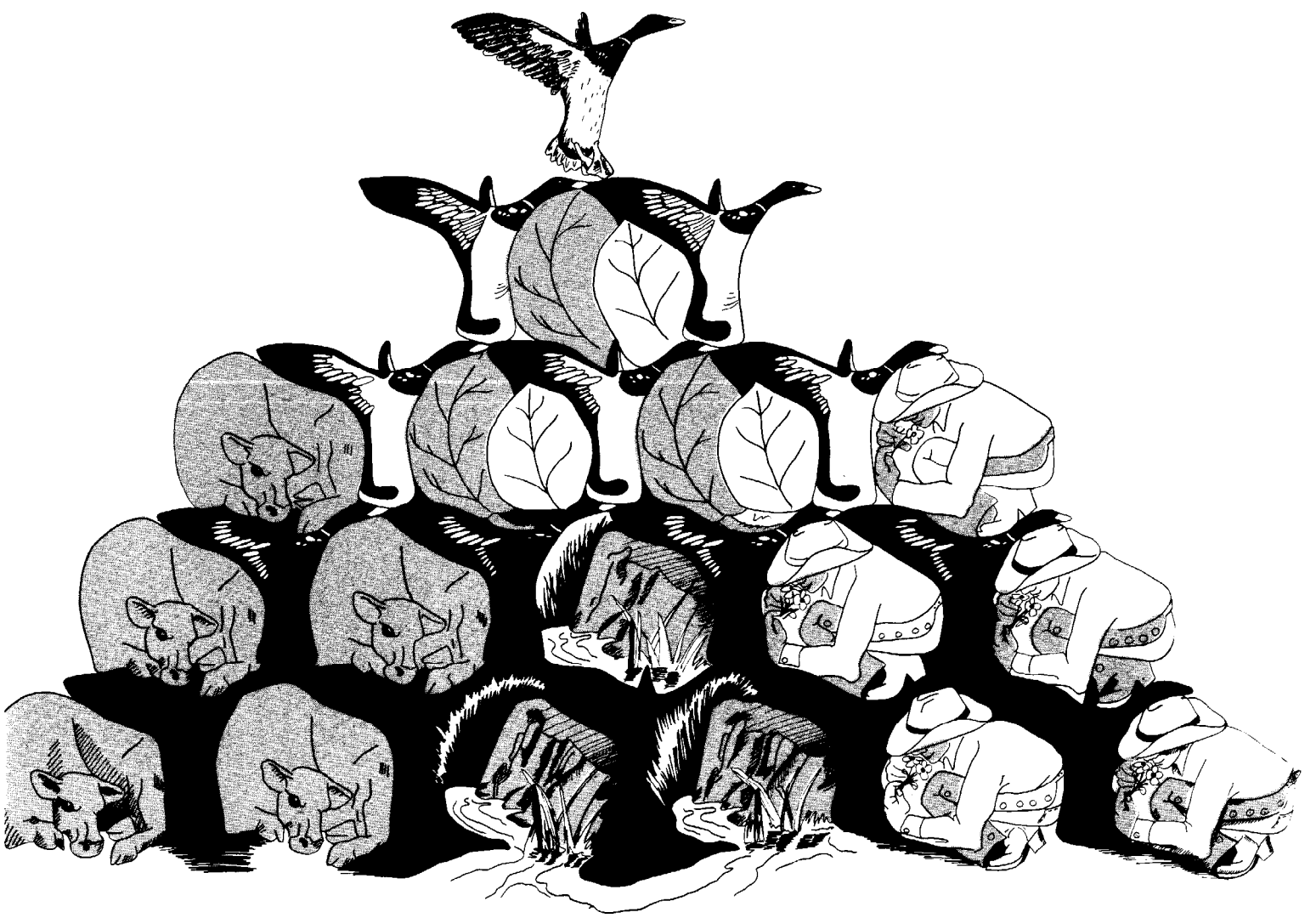
U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management

FINAL

Prineville District Office
PO. Box 550
Prineville, Oregon 97754

Brothers Grazing Management Program

Environmental Impact Statement



IN REPLY REFER TO

United States Department of

LAND MANAGEMENT

District Off ice
P.O. Box 550
Prineville, Oregon 97754

The Brothers Grazing Management Final Environmental Impact Statement (EIS) consists only of the comments and responses to the draft EIS and a listing of text revisions. There fore, this final EIS must be used in conjunction with the draft EIS which was distributed in May, 1982.

This EIS is not a decision document. The decision document, called the Brothers Kangeland Program Summary (RPS), will be prepared in consultation with affected ranchers and issued in early 1983. If you wish to comment on the prospective decision, please submit your comments by November 1, 1982, to: Bureau of Land Management, P.O.Box 550, Prineville, Oregon 97754.

Management actions to be taken in the Brothers EIS area will be based on the analysis contained in the EIS, investment (benefit-cost) analysis of proposed rangeland improvements, and comments on both the EIS and the Brothers Land Use Plan. In addition, management feasibility and policy and legal constraints as well as additional data available will. be considered.

Thank you for your interest in public land resource management programs in the Brothers area.

Gerald E. Mngnuson
District Manager

Present 74,769 Livestock ~~Present~~ Proposed 83,087 Dams → 132,795
Wildlife 5,331 → 7,427

Increase diversity 8%
Improve H. 55%

80 wildlife grizzlers
120 nesting sites

Department of the Interior

Final

Environmental Impact Statement

Brothers Grazing Management Program

Prepared by
Bureau of Land Management
Department of the Interior

State Director

BROTHERS GRAZING MANAGEMENT

Draft ( ) Final (x) Environmental Impact Statement

Department of the Interior, Bureau of Land Management

1. Type of Action: Administrative (x) Legislative ( )

2. Abstract: The Bureau of Land Management proposes to implement livestock grazing management on 1.1 million acres of public land in central Oregon. Grazing management is proposed on 1,065,574 acres; 2,003 acres are proposed for exclusion. Implementation of the proposed action includes allocation of vegetation to livestock, wildlife, and nonconsumptive uses; establishment of grazing systems; and construction of rangeland improvements. Vegetation condition would improve and forage production would increase. Overall watershed conditions would improve. Big game populations are expected to increase to ODFW management objective numbers. Habitat for fish and wildlife in riparian areas would improve.

There would be an initial increase in allocation to livestock of 9,780 AUMs in 66 allotments and a decrease in allocation to livestock of 1,462 AUMs in 18 allotments for a net increase of 11 percent. In the short term, one operator would have losses exceeding 10 percent of annual forage requirements under the proposed action. Direct and indirect community personal income would be increased by approximately $405,600 annually in the short term and $1.5 million over existing conditions in the long term.

3. Alternatives analyzed:

a. Proposed action
b. Optimize livestock grazing
c. Continue present management
d. Optimize wildlife and watershed values
e. Eliminate livestock grazing

4. The draft statement was filed with EPA on April 29, 1982 and was available to the public April 30, 1982.

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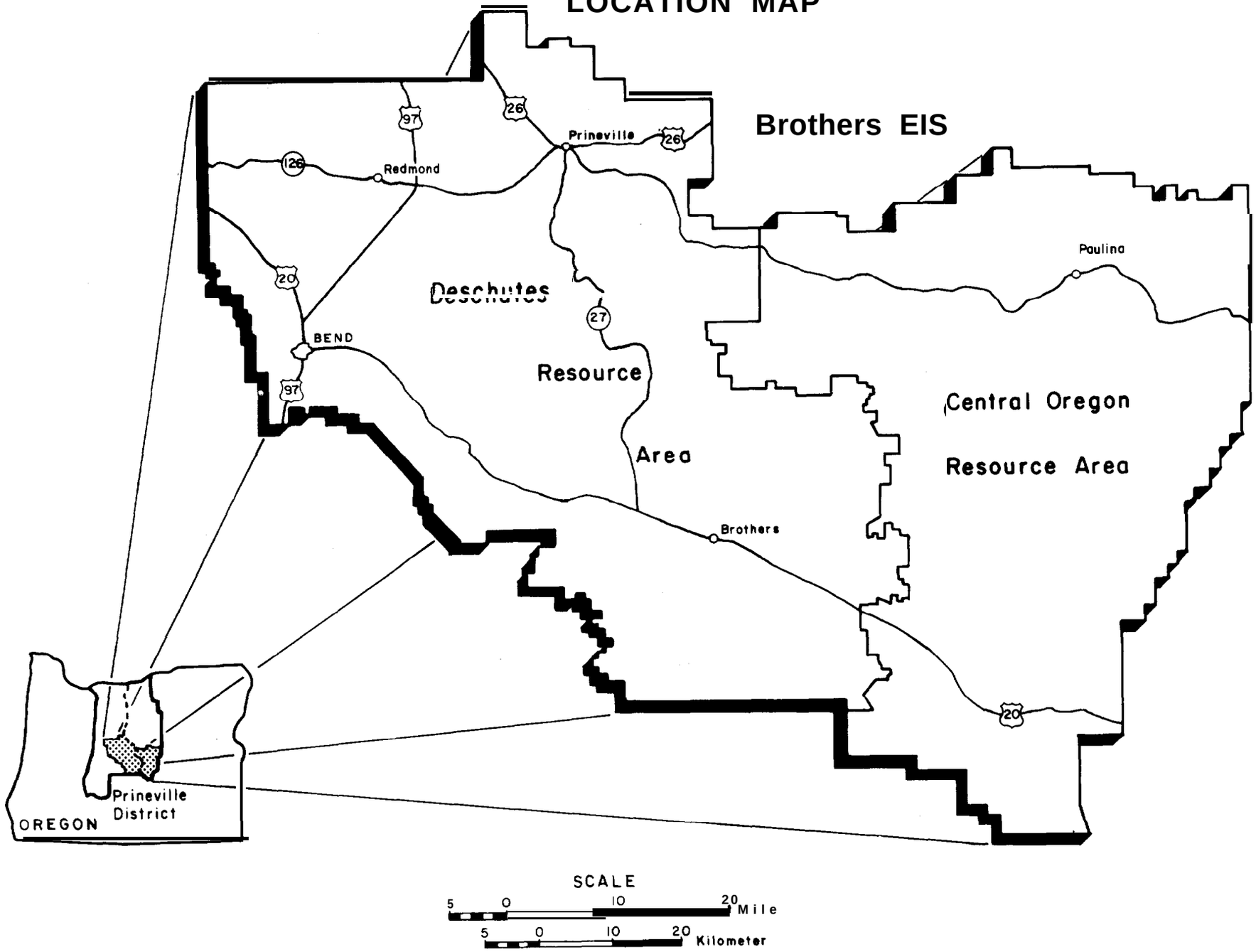
LOCATION MAP



SUMMARY

This environmental impact statement (EIS) describes and analyzes the environmental, social, and economic impacts of implementing a livestock grazing management program in the Brothers area of central Oregon. The proposed action, developed through BLMs planning system using public input, is the preferred alternative. Four other alternatives also are described and analyzed.

The proposed action consists of forage allocation, implementat ion of grazing systems, and range land improvements on 177 grazing allotments covering 1,067,577 acres of public land. The object ive of the proposed action is to maintain or improve ecological condition on al.1 allotments. The proposed actions spans a 20 to 25 year period; up to 10 years for implementation and 10 to 15 additional years to achieve management objectives.

Existing forage production totals 89,104 AUMs. Under the proposed action, initial forage allocation would be 83,087 AUMs for livestock, 5,331 AUMs for wildlife, leaving 686 AUMs not allocated. The allocation to livestock constitutes an 11 percent increase from the 1981 active grazing preference of 74,769 AUMs.

Livestock grazing would be increased initially by to reflect current forage production. Increases for individual. allotments range from 6 AUMs to 1,095 AUMs. Implementation of grazing systems and rangeland improvements would result in future forage production of 177,357 AUMs. It is anticipated that this would be allocated to livestock (132,795 AUMs) and wildlife (7,427 AUMs). The remaining 37,135 AUMs of forage production would not he al located.

Rest rotation grazing would be implemented on 400,942 acres, deferred rotation on 593,725 acres, rotation on 5,755 acres, short duration on 37,144 acres, winter grazing on 14,478 acres. Livestock grazing would be excluded on 2,003 acres. An additional 13,530 acres would remain in rest status.

Proposed rangeland improvements include: 391 miles of fence, 13 springs, 7 wells, 467 miles of pipeline, 25 reservoirs, and 2 waterholes. Vegetation manipulation is proposed for 266,709 acres and would consist of brush control on 110,121 acres, juniper control on 97,733 acres, and preparation for seeding on 58,855 acres by spraying, cutting, burning, or plowing. In addition 80 wildlife guzzlers, 55 miles of stream rip-rap, 620 stream structures, 15 acres of stream debris removal, and 120 bird nesting sites would be constructed as interrelated rangeland improvement measures.

Four alternat ives to the proposed act ion were analyzed and are summarized below.

Alternative 1. Optimize Livestock Grazing: In the long term, this alternative would provide 123,911 AUMs more than the existing situation from implementat inn of the fol lowing improvements: 124,550 acres of seeding, 289,500 acres brush control, 97,733 acres of juniper control, and 470 miles of pipeline. There would be no additional protective fencing in riparian

areas. There would be 40 wildlife guzzlers, 14 miles of stream rip-rap, 155 stream structures, and 60 bird nesting sites constructed. The initial allocation of forage for livestock would be 9,004 AUMs greater than the existing allocation. The anticipated future available forage production of 214,015 AUMs would be allocated to livestock (201,777 AUMs) and wildlife (7,427) with 4,811 AUMs remaining nonallocated.

Changes in grazing systems would be similar to the proposed action.

Alternative 2. No Action: With this alternative, there would be no change from present management conditions. Forage production would be allocated at existing levels to livestock (74,769 AUMs) and wildlife (5,331 AUMs), with 9,004 AUMs remaining unallocated. Wildlife allocations are projected to increase to 7,427 AUMs and unallocated forage is projected to increase to 51,115 AUMs due to improving trend and productivity. No new range improvement projects or changes in grazing systems would be undertaken.

Alternative 3. Optimize Wildlife and Watershed Values: Initial livestock forage allocations would be 26,256 AUMs fewer under this alternative than the proposed action. This alternative is projected to provide 75,964 fewer AUMs for livestock than the proposed action by eliminating livestock from allotments within deer and antelope winter ranges as well as sage grouse nesting areas. In addition, no livestock grazing would be allowed on any riparian area or on any area with critical or severe soil erosion hazards. Rangeland improvements would include 349 miles of fence, 3 springs, 10 reservoirs, 5 waterholes, 58,204 acres of brush control, and 68,028 acres of juniper. control. There would be 100 wildlife guzzlers, 69 miles of stream rip-rap, 775 stream structures, 15 acres of debris removal, and 150 bird nesting sites constructed under this alternative.

Rest rotation grazing would be implemented on 219,127 acres, deferred rotation on 242,883 acres, rotation on 98,987 acres, deferred grazing on 29,881 acres, early spring grazing on 56,740 acres, spring-summer grazing on 60,426 acres, spring-summer-fall grazing on 7,885 acres, spring-fall grazing on 9,246 acres, and winter grazing on 17,299 acres. There would be 293,919 acres where livestock grazing would be excluded and 18,586 acres in rest status

Alternative 4. Eliminate Livestock Grazing: This alternative would eliminate all livestock grazing from public lands (except during trailing). No range improvements would be constructed.

The major environmental consequences analyzed in this document are summarized below.

SOIL

The rate of soil erosion over the long term would decrease under all alternatives. Alternatives 3 and 4 would show the greatest reduction. Short-term erosion rates would increase under the proposed action and alternative 1 due to temporary reductions in residual ground cover.

WATER

Under all alternatives, there would not be a measurable effect on mean annual water yield. Water quality would improve under the proposed action and alternatives 3 and 4. Water quality and channel stability would not change significantly under alternatives 1 and 2.

VEGETATION

The grazing systems and rangeland improvements under the proposed action and all alternatives would change ecological condition upward, and hence, increase available forage production. Through fencing and/or exclusion of livestock, riparian vegetation would show a significant upward change in ecological condition under alternatives 3 and 4; there would be some upward change under the proposed action. Upward change in ecological condition of riparian vegetation under alternatives 1 and 2 would be limited to areas presently fenced from livestock, except for changes resulting from improved grazing systems under alternative 1. Plant diversity would increase under the proposed action and alternatives 3 and 4, but would decrease under alternatives 1 and 2. Residual ground cover would increase under the proposed action and alternatives 3 and 4. No change would occur with alternative 2. With alternative 1, residual ground cover would be slightly decreased.

The standard procedures and design elements of rangeland improvements would prevent impacts to plants of special concern during construction or implementation of these improvements.

WILDLIFE

Habitat diversity would have the largest increase in alternative 3 (17 percent). Alternative 4 and the proposed action would increase diversity 12 percent and 8 percent, respectively. Alternatives 1 and 2 would each decrease diversity 1 percent.

All alternatives would show some improvement and some decline in condition on crucial deer and antelope winter ranges. Alternative 3 has the largest improvement while alternatives 2 and 4 have the smallest improvement. The largest decline in crucial deer winter ranges would occur under alternatives 2 and 4. Alternatives 1 and 2 would result in the most acres declining in condition on antelope crucial winter range. Rangeland improvement projects under alternative 1 would have the largest negative impact on crucial winter ranges due to the reduction of juniper and sagebrush needed for forage and cover.

Wildlife habitat condition in all stream riparian areas would improve in alternatives 3 and 4. The proposed action and alternatives 2 and 1 would improve habitat by 55 percent, 33 percent, and 21 percent, respectively. All reservoir riparian areas would also improve under alternatives 3 and 4. The proposed action and alternatives 1 and 2 would improve habitat by 7 percent.

Fisheries habitat would improve on all streams with alternatives 3 and 4. The proposed action would improve 50 miles of fish habitat while 16 miles would improve under alternative 1. Alternative 2 would improve fish habitat on 25 miles and decrease fish habitat on an additional 20 miles of stream.

RECREATION

tmplementation of the proposed action or any of the alternatives would not affect long-term visitor use levels more than + 3 percent. Implementation of alternative 2 would have no effect on recreational activities. The proposed action and alternative 4 would result in visitor use increases in most activities. Alternative 3 would create increases in recreation use in all activities while alternative 1 would result in decreases in all activities.

CULTURAL RESOURCES

tmplementation of the proposed action and alternatives 1, 2 and 3 would have the potential for impacting unidentified cultural sites and the integrity of some known sites. Alternative 4 would have no impact.

VISUAL RESOURCES

Kange improvements under the proposed action and alternatives 1 and 3 would create visual contrasts in the short term that would diminish over the long term. Under alternatives 2 and 4, visual quality would not change significantly from present condition.

SPECIAL MANAGEMENT AREAS

The Horse Ridge Research Natural Area would not be affected by the proposed action or any of the alternatives. There are no existing or proposed Areas of Critical Environmental Concern (ACEC) in the EIS ar'ea.

SOCIOECONOMICS

Increases in forage availability for BLM permittees would occur under the proposed action (11 percent) and alternative 1 (23 percent). A decrease in available forage for BLM permittees would result under alternatives 3 and 4. Under alternative 3 this would amount to a net loss of -2 percent. While Forage losses under alternative 4 would be 100 percent of BLM-produced forage, there would be a decrease of 11 percent of overall forage needs for operators.

Ranch values would be increased by $3.4 million under the proposed action and by $6.5 million under alternative 1. Alternative 2 would have no impact on economic values. Alternatives 3 and 4 would reduce ranch values overall by $.9 million and $2.9 million, respectively.

The increase in local personal income and employment would be the greatest under alternative 1 and the proposed action.

Decreases would occur under alternatives 3 and 4. Alternative 2 would have no impact on social conditions or economic values.

CONSULTATION AND COORDINATION ON THE DRAFT EIS

The draft Brothers Grazing Management Environmental Impact Statement (Interior DEIS 82-10) was filed with the Environmental Protection Agency on April 29, 1982; the comment period ended June 30, 1982.

Informal public meetings were held in Prineville, Oregon, May 25 and Bend, Oregon, May 26.

Comments that presented new data, questioned facts or the adequacy of the impact analysis, or raised questions or issues bearing directly on the draft EIS were responded to in this final EIS. Several reviewers made resource management recommendations. These recommendations, as well as all public input, will be considered before the District Manager makes the final decision and the Rangeland Program Summary is published.

A total of 27 letters were received in response to the draft environmental impact statement and are reproduced in this final EIS. These are listed in the order received.

Responses to Comments

All comment letters received were assigned an index number.

1 Lawrence E. Nielson, PH.D.
2 E. Charles Meslow
3 R. Marriner Orum
4 Craig R. Miller
5 Harney County Planning Commission
6 City-County Planning Department, Crook County and City of Prineville
7 Jeffrey Crook
8 Lane County Audubon Society
9 Pine Mountain Cattle Company
10 Wildlife Management Institute
11 Pacific Northwest 4-Wheel Drive Assoc.
12 Bureau of Reclamation
13 David L. Bowman
14 Frank Lowe
15 United States Forest Service
16 Deschutes County Planning Department
17 Lake County Planning Department
18 Sierra Club...Oregon Chapter
19 Soil Conservation Service
20 Intergovernmental Relations Division, Executive Department
21 The Wilderness Society
22 National Park Service
23 Central Oregon Conservationists
24 Pat Miller
25 U.S. Environmental Protection Agency
26 Oregon Wilderness Coalition
27 U.S. Fish & Wildlife Service

ORO50-1

Lawrence E. Nielsen, Ph. D.

Science Consultant and Lecturer

3208 Way, Phone (503) 548-536

May 15, 1982

Mr. Gerald E. Magnuson
Bureau of
Box 550
Prineville, OR 97754

Dear Mr. Magnuson:

I have read the "Brothers Grazing Management Program--Environmental Impact Statement" with considerable Interest. I very much prefer Alternative 3. which optimizes wildlife and watershed values.

On Map 4, I see large areas proposed for Juniper control and seeding. I am opposed to this in the large area southeast of Redmond, in the large ares southeast of Powell Buttes. and in the area around the GI Ranch. My famlly and frlends use these areas quite frequently during the fall. winter, and spring months for recreation. An important reason for opposing the juniper control and seeding is that these activities would undoubtedly destroy traces of historical pioneer roads
1-1 I throuah these regions. For example, there are Huntington's Road and others through the area south of the Redmond Airport. The Prineville-Silver Lake Road went throuph the area southeast of Powell buttes. Three or more pioneer roads went throuqh the GI Ranch area. These include Steen's Wagon Road and the Yreka Trail. I have been researching these pioneer roads for 5 years and have found many interesting traces of them. These traces and artifacts should not be disturbed by juniper control and seodlng. Care should be used before removing any old junipers. Many of then are bearing trees or have initials and dates carved on blazes. We have found blazes dating back to 1869 on junipers.

I have another comment which related to the above report. The public lands belong to all of us. Pees for livestock grazing should he raised to realistic values so that the ranchers pay
1-2 for the grass and any improvements made for their benefit. The public should not subsidize the ranchers. I believe I know something about ranching; I lived 25 years of my life on a 20,000 acre ranch in eastern Oregon.

Sincerely yours.

Lawrence Nielsen

1-1 The historical features of these areas have been recorded in Prineville District inventory files. As stated on page 18 of the draft EIS, there would be a cultural resource clearance prior to project work. Areas where there are visible remnants of these roads would be excluded from project work.

1-2 The Public Rangelands Improvement Act (PRIA) of 1978 established the grazing fee formula for livestock grazing on public lends and directed the fee issue to be evaluated by December 31, 1985. A study, currently underway, is being conducted by the Forest Service, the Bureau of Land Management, and Colorado State University, with a review by private appraisers. The study will evaluate the current fee formula, investigate comparable private lease rates, and recommend a fee schedule for 1986 and subsequent years.

8035 NW Oxbow Drive
Corvallis, OR 97330
May 18, 1982

Gerald E. Magnuson
Prineville District Manager
Bureau of Land Management
P.O. Box 550
Prineville, OR 97754

Dear Mr. Magnuson:

Thank you for the opportunity to comment on the Brothers Grazing Management Program, Draft EIS.

I reviewed the Draft EIS with special emphasis on riparian zones. The Draft EIS correctly emphasizes the importance of this zone to fish and wildlife.

I have one question, one comment, and a suggestion.

Question

2-1 I With over 100 Public Stream Miles (Appendix K), I do not understand how there can be only 407 acres of riparian (stream) vegetation (Table 9).

Comment

The proportion of EIS area in Riparian Vegetation is miniscule. To correctly put amount of riparian habitat in perspective (for instance p. 41), it amounts to less than 1/10 of 1 percent of the public land in EIS area. (743 of 1,067,577 = .0007).

Suggestion

Table 22 indicates that under the proposed action, 31% of stream riparian vegetation would remain in only fair or In view of the scarcity of riparian habitat as a resource and in view of its documented importance to wildlife and fisheries, I suggest that at least the 407 acres
2-2 I of streamside riparian vegetation'receive the protection of Alternative 3.

Thank you for the opportunity to comment.

Sincerely,

E. Charles Meslow
Wildlife Biologist

ECM:ah

2-1 Inventories which were conducted on the 100 miles of stream included measurements of the length and width of all existing riparian habitat. Most of the streams inventoried contained riparian zones less then 20 feet wide. This condition is typical throughout eastern Oregon and is a result of irregular flows, irrigation withdrawal, livestock grazing, and erosion.

2-2 The analysis of the proposed action revealed that the goal of a minimum riparian condition of 60 percent of vegetation potential would not he met on 31 percent of stream riparian vegetation.

The Rangeland Program Summary, to be in 1983, will address this issue and outline a decision regarding future management.

OR050-3

2389 Floral Hill Drive
Eugene, OR 97403

May 24, 1982

Mr. Gerald Magnuson
District Manager
Bureau of Land Management
P.O. 80x 550
Prineville, OR 97754

Dear Mr. Magnuson:

The E.I.S. for the Brothers grazing management program appears to be thorough, concise and well prepared.

'The guiding principles for management of the range should be like the guiding principles of the Forest Service. Multiple use management to serve the greatest good for the greatest number in the long run. Following that vein I make four brief suggestions.

(1) Alternative III should be followed, i.e. optimize watershed and wildlife values. I believe that there would be more overall benefit from recreation and downstream water quality than squeezing a few more AUM from the range.

(2) It is most important to maintain biological diversity of plants and. animals. Avoid large scale range conversion projects to single species of grass because it works against the principles of maintaining diversity.

(3) Provide increased protection and improvement to riparion habitat. I don't believe that cattle should have unlimited use of the water courses. It appears that most of the streams are unprotected from cattle.

3-1 (4) Range improvement work for the benefit of the rancher should be cost justified. The public really does not benefit by the government subsidizing the livestock industry. Only a small portion of the nations meat comes from the public range. It is not critical that the range be developed to full meat producing capacity.

In Summary I think that the greatest benefit to the people will be to maintain the range in as near a natural condition as possible.

I appreciate the opportunity to comment on the E.I.S. I hope this will be of some help.

Sincerely,

R.

3-I The rangeland investment (benefit-cost) analysis will be one of the major factors considered in the decision on which improvements to construct and in setting the priority for specific project implementation. Other factors to be considered may include present and projected ecological condition of the area, interagency coordination needs and the project benefits for protection of life or property, protection of cultural resources, improving or monitoring habitat for threatened or endangered species, improvement of critical watersheds, etc.

Craig R. Miller
P.O. Box 6376
Bend, OR 977%

ORO50-4

Bureau of Land Management
Prineville District
P.O. Box 550
Prineville, OR 97754

28 May 1982

Re: Comment on Brothers Grazing Management Plan Draft Environment Impact Statement

Dears Sirs:

I an writing in regards to the Brothers Grazing Management EIS. To intelligently consider the alternatives presented it is necessary to go back to first principles. Life is sustained by its surroundings--the environment. Quality of life is directly dependant upon the integrity of its environment. It necessarily follows that measures which optimize environmental well-being will ultimately result in the greatest possibility of m's well-being. BLM policy implicitly recognizes this in FLPMA when it states that "management activities will strive to protect scientific, scenic, historical, ecological, environmental, air and atmosphere, water and archaeological values". Optimum quality of human life, and therefore environmental quality deserves to be priority number one in determining management aim.

Historically livestock grazing, on public lands has benefitted a very few select individuals at the expense of environmental integrity and taxpayer's money. BLM lands, contrary to popular thought, is a valuable ecosystem and not a stockyard. Therefore grazing on public lands should be subservient to and not supersedant over optimum environmental quality.

The term "rangeland improvement" is a misnomer in that it refers not to improved environmental integrity but rather improved livestock feeding grounds. Spraying chemicals, building resevoirs, constructing pipelines and plowing results in environmental harm, But most serious and blatant among the "improvements" is seeding of crested wheatgrass which is nearly sterile in terms of wildlife habitat (see Table 11 of EIS) and vegetation composition. These activities would more accurately be called Why does BLM seem determined to plant crested wheatgrass on early-seral rangeland rather than native grasses which not only
4-1 I would improve cattle forage, but more importantly the overall ecological condition of the land? Why does BLM seem bent on whose health effects are poorly understood but almost certainly deleterious, when
4-2 I burning will do better (e.g. favor establishment of forbs thereby enhancing environmental Quality)?

One of the most disturbing aspects of the proposed alternative is its posture on riparian zone management. Channel stability, plant diversity and water quality can all attain virtually 100% of their potential by simply excluding cattle from a minuscule 0.27, of total lands being considered. Such improvement met with "consistent public support" with a complete absence of unfavorable-response. Such improvement might potentially result in surface water quality actually becoming fit for again. Optimizing riparian habitat has everything to gain and nothing to lose. And yet the propose' alternative would have a bare 36% of stream riparian habitat reach climax condition and
4-3 a measly 3% of reservoir riparian habitat reach climax condition: As to why this should be proposed escapes me. (After all, who is against optimized
I riparian habitat?)

Now let us Proposed Alternative to Alternative 3 (optimize wildlife and watershed). Alternative 3 is seen to have significant advantages in the following areas: energy consumption, water surface runoff, water quality, plant diversity and ecological condition, residual ground cover, rangeland improvement costs, riparian habitat, channel stability, fish habitat, wildlife habitat, recreation opporhmities, visual impact, cultural site impact, paleontological resource impact and wilderness values! In fact there seems to be only one apparent areawhere the Proposed Alternative beats Alternative 3, and that is in forage allocation. The differences even here could be minimized by redesignating the 260,000 acres committed to rotation, deferred, early mer, spring/summer/fall and spring/fall grazing systems mtirely to the rest rotation and deferred rotation systems. The differences could be reduced still further by seeding early seral lands with native grasses and allowing 467,669 acres in to advance to, and be maintained at late-seral and climax conditions. Such actions would also have the indispensable benefit of improved environmental quality. alternative would cater to the single use of forage production of cattle at the expense of taxpayer's money (an issue not addressed in the EIS socio-economic implications) and environmental well-being as BLM lands have for so many years of past mismanagement. such single use mentality (as well as sacrifice of optimum environmental quality) is contrary to stated and good management principles.

On page 65 of the Brothers Grazing EIS the statement is made, "For purposes of this analysis it is assumed that few recreationists will be disturb&by
4-4 I livestock grazing···." This simply is an incorrect assumption. Those individuals particularly their activities in wilderness areas are adversely affected. Not only do cattle disturb and interfere with primitive and unconfined recreation and solitude, they contradict the very essence of wilderness experience. Cattle detract from the naturalness of an area, attract flies and are generally considered a nuisance by campers and bikers, Attempting to find a camping spot free of cow dung can be a real challenge on BLM lands.

In summary my recommendation is to select Alternative 3 (optimize wildlife and watershed values) with the following exceptions or changes:

1. Seed early-seral condition rangeland with native grasses.
2. Eliminate grazing system detrimental to environmental integrity as discussed,
3. Eliminate stream rip-rap and strew structure construction except where cattle exclosure is proven not to adequately enhance riparian habitat.
4. Exclude cattle all pending and eventual wilderness areas.

Specific aspects of alternative 3 which are particularly commendable are:

1. sagegrouse nesting and booming area protection
2. protection of all riparian habitats to achieve 100% of their vegetative potential
3. relatively few destructive "improvements"
4. protection of

Sincerely,

Craig R. Miller

Craig Miller

6

4-1 I" low rainfall areas such as the Brothers EIS area crested wheatgrass has prove" to be a reliable species providing dependable ground cover and forage for both wildlife and livestock. In situations where seeding is recommended, the plant composition is such that any perennial bunchgrass, whether native or introduced, will improve forage and watershed conditions. Crested wheatgrass is proposed because it can withstand earlier grazing use and allow a higher utilization level than native rangeland.

From a" ecological standpoint, it would be more desirable to seed native species. At this time seed availability and cost are prohibitive. Infrequent seed crops, the expense of harvesting, and less than optimum germination contribute to this prohibitive cost.

4-2 The Prineville District is committed to using fire as a management tool wherever possible. However, we also recognize that some areas do not have sufficient understory vegetation to carry a fire. Therefore, spraying would be more appropriate.

4-3 Reservoirs are man-made structures originally desigoed to provide livestock water in areas away from riparian zones. Where possible we would fence reservoirs and pipe the water to a water tank. However, established reservoirs lack this potential.

See comment response 2-2.

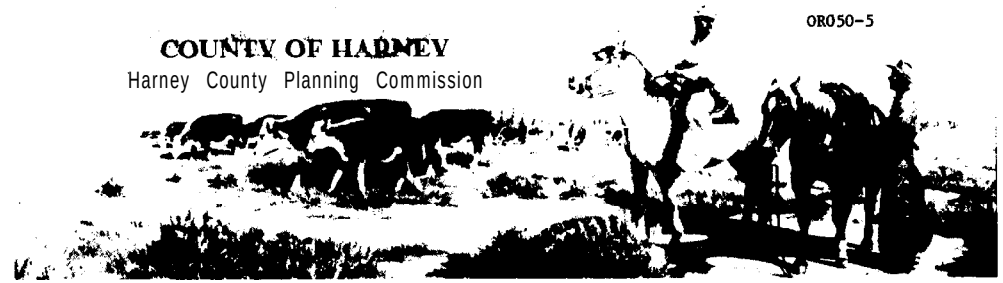
4-4 This assumption is based on research studies conducted by Meganck and Gibbs and Downing and Clark and listed in the references cited section.

The Wilderness Act of 1964 specifically permits continuation of livestock grazing in wilderness areas, where established prior to the effective date of the Act.

OR050-5

COUNTY OF HARNEY

Harney County Planning Commission



PLANNING OFFICE P. O. BOX 1147 BURNS, 573-6655

June 7, 1982

Ms. Jonne Hover
Bureau of Land Management
Prineville District
P. 0. Box 550
Prineville, Oregon 97754

Dear Ms. Hower;

I have reviewed the Brothers Grazing Management Program Environmental Impact Statement and have found no violations with the iiarney County Comprehensive Plan.

Sincerely,

Carol J. Smith

Carol J. Smith, Coordinator
Harney County Planning Department

LIVESTOCK RECREATION WILDLIFE LUMBERING

OR050-6

CITY-COUNTY PLANNING DEPARTMENT
Crook **County &** City of **Prineville**
Bill
Courthouse
Prineville, Oregon **97754**
(503)-447 3211

June 8, 1982

Prineville District Manager
Bureau of Land Management
P.O. Box 550
Prineville, Oregon 97754

RE: Draft Environmental Impact Statement
Brothers Grazing Management Program

Dear Sir:

We have reviewed the Draft Environmental Impact Statement for the Brothers Grazing Management Program and offer the following comments.

For the most part, the proposed action is consistent with the policies set forth in the county's Comprehensive Plan. There are, however, several inconsistencies which shall be addressed below.

We note that under the proposed action "the objective . . is to maintain or improve ecological condition;" that " the rate of soil erosion over the long term would decrease; . . . water quality would improve:" and that there would be an increase in wildlife habitat-diversity and available forage production for livestock. Furthermore, the proposed action from the standpoint of recreation, "would result in visitor use increases in most activities." We find these consequences of the proposed action to be consistent with the of the Comprehensive Plan as follows:

* Rangelands shall be preserved and maintained for rangeland uses compatible with multiple resource management (p.49).

* Multiple resource management implies simultaneous utilization of rangeland resources to result in a harmonious combination of the variety and uses of products the land is capable of yielding on a sustained basis.

Uses include livestock grazing, recreation, wildlife, watershed, and wood products. Multiple resource management does not necessarily imply all uses being made simultaneously on one localized site. Management to promote dominant use of rangeland for special purposes may be required for specific locations when compatible with land capability. However, multiple products and uses should be the output for extensive areas of rangeland (p.164).

The final decision process for the allocation of rangeland resources should consider the specific policies outlined in the Comprehensive Plan which apply to the Brothers Management Area. The following areas have been identified as natural areas: Gerry Mountain, Powell Buttes. West Buttes, G.I. Ranch, and Twelvemile Creek. It is the policy of the county that for these areas, "agriculture, grazing, forestry, parks and recreation uses shall be considered consistent with natural/scenic values dependent on resource carrying capacities" (p.117). Furthermore, "three areas of Crooked River, namely the 'palisades' below Bowman Dam. North Fork and South Fork shall be protected" (p.117)

Protection of riparian areas would result in improvement to the resource as documented in the Draft EIS:
"Through livestock exclusion and rest the ecological condition of riparian vegetation would improve by two classes in the long term." (BLM 7.57).
"Livestock exclusion and rest allow all riparian plants to complete their annual growth cycle and to increase in vigor and reproduction." (BLM p.56).
"Fencing of riparian areas to exclude livestock would significantly improve riparian ecological condition, therefore improving channel stability and water quality." (BLM P.54).
Concerning water quality problems, 'a contributing factor is lack of sufficient riparian vegetation to shade the stream and stabilize the stream channels." (BLM p. 29). Although there is nothing specifically set forth regarding riparian areas, the county's Comprehensive Plan contains the policy that "fragile soils and geologic formations subject to high erosion shall be protected. Development, off-road vehicle use, recreation, and overgrazing shall be discouraged." (p. 149) As the Draft EIS notes: "Consistent public support was expressed for protection and increased management of riparian habitat Livestock operators did not express concerns regarding a significant impact to their ranching operations." (BLM p.81). Under the Agricultural Findings section of the Comprehensive Plan it is stated that "problems of water quality and quantity are inseparable . and improved land use and resource planning and management are an essential ingredient to the maintenance and improvement of water quality and quantity" (p.46). Streambank erosion problems are particularly evident along Camp Creek and Sear Creek. From Table 9 in the Draft EIS, Present Ecological Condition, it can be seen that over 702 of stream riparian areas are in poor to fair condition.

While under the proposed action the riparian exclusion area has been increased from 32 to 169 acres. this is only slightly over 40% of the total stream riparian area. We believe that the critical situation existing along some of the streams warrants total protection, and feel that the EIS should specifically locate any proposed fencing of riparian areas. Without a map indicating
6-1 proposed riparian exclusion areas, we cannot accurately address the environmental consequences of this aspect of the proposed action

Finally, we note some inconsistencies in comparing the wildlife habitat map of the Draft EIS (Map 7) with the Wildlife Resources map in the Comprehensive Plan (attachment). Areas mapped for crucial deer winter range tend to correspond fairly well, the two notable exceptions being along West Fork Camp Creek and east of Hampton Butte. areas listed on the Comprehensive Plan map but not
6-2 on the Draft EIS map.

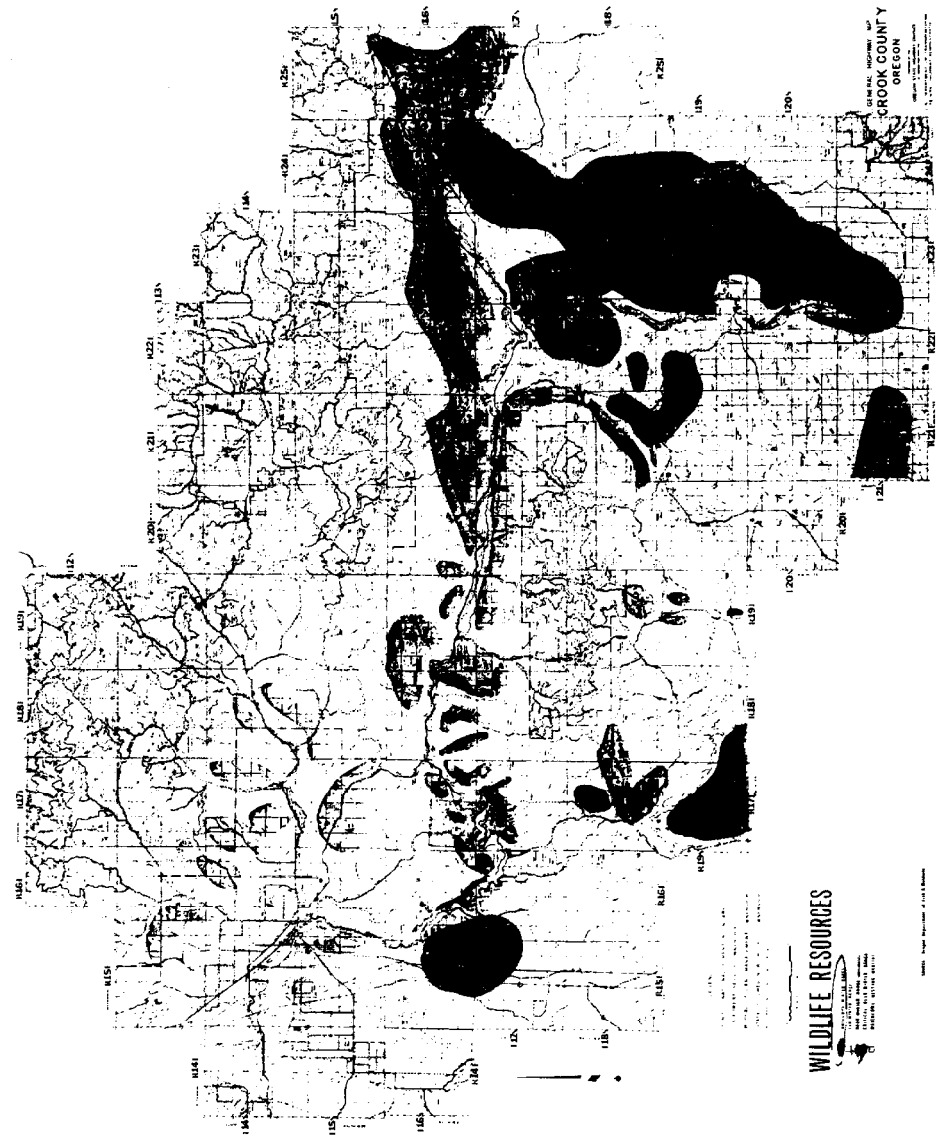
Several areas appear on the Comprehensive Plan map as crucial antelope winter range that are not mapped in the Draft EIS. These include areas southeast of Powell Buttes. northwest of Brothers. and northeast of Gerry Mountain.

We appreciate this opportunity to be invloved in the Bureau's planning process. and will strive to maintain a high level of co-ordination and cooperation in the planning and management of Crook County's natural resources.

Sincerely,

Bob Kuhlken
Planner

BK/dam
Attachment
Crook County
file



6-1 Riparian areas are displayed on map 3 in the draft EIS. The map scale used in the draft EIS prohibited the display of proposed riparian fences. Maps of the proposed riparian fences are available for review in the Prineville District office.

6-2 All data used in the development of the crucial deer winter range map was developed in cooperation with the Oregon Department of Fish and Wildlife. Areas referred to by the writer do not meet the definition of crucial winter range habitat listed in the draft EIS glossary. However, they are known as wintering areas for mule deer end antelope.

OR050-7

G. Magnuson - Dist. Manager
BLM -
Prineville OR. 97754

6-3-82

Re: Brother Land Use Plan
Grazing EIS -

Dear Sir,
I am an Oregon attorney, ornithologist, fisherman, backpacker and conservationist who would like to comment on the EIS.
1. I approve of the reduction in timber allocation on the marginal lands, p. 7, - the benefits to wildlife, stream buffer zones, particularly on the N.F. Crooked River are proper, although I think they should be removed from the timber base entirely.
2. I strongly disagree with the recommendation to not include the N Fork (OR-5-31) in wilderness designation. I was in this area over the Memorial day weekend, and feel the primitive atmosphere, opportunity for solitude, and wildlife and watershed values should be protected through a wilderness designation, and BLM recommendation.
I do not feel the inholdings would seriously affect manageability or travel through the area. The area is rich in riparian habitat, wildflower species, and bird nesting habitat.
I would support any appeal to oppose the deletion of the area from WSA status.
What is projected management plan for N. Fork WSA if it is not recommended for wilderness designation? 7-1

Alternative Selection -

I feel the Preferred Alternative should have a greater share of the Alt 3 - amenities. The range land needs to be upgraded, the riparian habitats definitely need to be protected to the greatest extent possible, and wildlife and recreation must be accorded an equal share with grazing in a truly "multiple use" approach.

Alt 1 & 4 are unreasonable and not likely to be even legal, i.e. eliminate grazing. I feel that this range, as does most of our BLM lands, shows serious signs of over grazing, and that any increase in grazing over current levels is unwise, and unrealistic of other resources are to be protected. That is why Alt. 3 is most prudent as well a practical, to reduce grazing by 7,938 AUMS, and eliminate livestock—wildlife competition on winter range.

Most importantly grazing elimination on any riparian area, or cultural historic area, would protect sensitive vegetation, protect the currently developed streamside habitat, improve fishery habitat, and increase stream flow and water quality through reduction of livestock damage. I do not oppose most water developments or guzzlers because they normally benefit wildlife and livestock.

7-2

(3) I feel more alternatives of a medium amenity nature should have been proposed, since it is clear, to me that ~~most~~ both Alt. 1 & 3 have many detractors, and would not be selected by BLM. I do feel Alt. 3 is the best offered, but expect the final refined Alt. to look most like Alt. 2, with, hopefully, some improvements as outlined above.

(4) A closing note on N. F. Crooked River — I disagree that the "warts" are such a detraction as to cause an unnatural nature — also the "canyon" shape of the area has a positive nature to allow screening of groups from each other and adds to the feeling of separateness and solitude. There is a quality experience to be had here, and you should be considered upon decision on it. What is your detractive management for the area?

Sincerely, Jeffrey Crook

27691 SE Haley Rd
BORING OR. 97009

Other Concerns:

7-3 (1) More information and decisive steps must be taken to reduce abuse to public lands from ORVs. This is not sufficiently addressed in the plan. This includes all riparian zones, which have enough other impacts to deal with. The use of ORVs should be limited to maintained roads, and any areas opened to ORVs for general use should be screened and inventoried to be sure no other resource will be negatively affected. Any areas open to ORVs use should be fenced or able to be monitored for abuse, fire danger, and trespassing by BLM officers.

(2) I do not expect the Alt. 3 goal of designation of WSAs "all" for recommendation to Congress. However, I believe N. Crooked River OR-5-31, S.F. (OR-5-33), Sand Hollow OR-5-34, and Gary Nitz (OR-5-35) should be recommended.

7-1 If designated by Congress as a wilderness area, the North Fork Wilderness Study Area would be managed in accordance with related decisions in Land Use Plan. Detailed alternative management plans will be analyzed in the draft statewide wilderness EIS to be published early in 1984.

7-2 This comment apparently addresses alternatives discussed in the Brothers Land Use Plan and not considered in this grazing management EIS. See Appendix A of the draft EIS for alternatives considered but not analyzed in this EIS.

7-3 Management of ORV use on public lands is beyond the scope of this EIS. Specific ORV management recommendations are contained in the Brothers Land Use Plan (published Feb., 1982) and Millican Valley ORV Management Plan (Published Dec., 1978). Copies of these documents are available for review in the Prineville District office.

OR050-8

LANE COUNTY AUDUBON SOCIETY

AN OREGON NATIONAL AUDUBON SOCIETY

P.O. BOX 5086 • EUGENE, OREGON 97403

June 15. 1982

Mr Gerald E Magnuson
District Manager
Bureau of Land Management
Prineville District Office
P.O. Box 550
Prineville, OR 97754

Brothers Grazing wanagement Program
Draft Environmental Impact Statement

Dear Mr Magnuson,

We have reviewed the DEIS. We suggest that the following issues have not been sufficiently described or discussed in the draft.:

1. **Juniper elimination.** Elaborate, but somewhat confusing justification is given for eliminating junipers. The DEIS claims
8-1 not only cattle, but other animals benefit from increased pasture. It is hard to see thia effect in the text or tables. Would there not be serious losses, for example. of cavity-dwellers? More specific information is needed, for the tables lump together the various species and there is over-lapping of hsbitat categories. The effects of cover loss on animals other than deer would be desirable.

8-2 An explanation of why natural fires no longer remove Juniper would be useful.

2. **Riparian zones.** These zones are less than 1% of the public land in the DEIS area. In Table 9, only 29% of the stream riparian areas rated good/excellent; only 7% of the reservoirs are g/e; yet. in some of the Alternatives, protection is not extended to all riparian zones. It is not clear how the se-
8-3 lection is made for protection or what the future of non-protected areas would be.

8-4 When the DEIS talks about riparian zones, benefits are considered for all wildlife. On the other hand, when range "improvements" are discussed, the term wildlife seems to mean big game. The interchangeable uses are confusing.

3. **Effects of conversion to crested wheatgrass.**
a. on big game. On p. 64 of the DEIS, we read "The shift of spring use by livestock to crested wheatgrass seedings from native range would increase the
8-5 availability and big game use of grasses and forbs in both seeded and native pastures..."

8-5 cont. This statement needs some amplification in view of the fact that deer eat browse (bitterbrush and willow) primarily. The A4 does not seem to be the type that deer need.

b. on non-game animals. It is very difficult for the reader to figure out exactly what is happening to particular species by reading Table 24 or the extensive Appendixes. The PEIS should
8-6 indicate the % of total populations which would be lost by conversion for each affected species. sage is an imoortant food for pronghorn, deer, sage grouse, rabbits; sage sparrows, sage thrashers and Brewer's sparrows depend upon sage habitat. Lizards depend upon sage for cover and shade.

We also know that seedings have low habitat
8-7 diversity, yet cwg is given credit for increasing diversity. There wes no discussion of seeding native grasses. 2,4-D is a controversial chemical. Some discussion of this is warranted.

8-8 4. **Why increase grazing allotments?** As many allotments went unsold in 1981. some justification is needed for increasing them. The birthrate is decreasing, population increase due to illegal immigration is about to be controlled, red meet is consumed less es food habits change.
Our ranchers are not feeding a hungry world. The USA is an importer of beef from poor countries like Costa Rica, while exporting beef to rich countries like West Germany and Japan. 7% of the beef consumed in the USA is imported, but 97% of the beef raised in USA is raised on private lands.

5. **Economic significance of public land.** Kissing from the document are costs to the taxpayers for "improvements" as well as those for current management expressed as total, or
8-9 per cow, or per operator. How much money was taken in? How much flowed out? The decision document may weight costs and benefits. but the facts should be set out in this document. There should also be a comparison of grazing costs and fees between BLM lands and other grazing lands.

The DEIS specifies that 119 operations, involving 670 people, and an unspecified number of jobs (187 of which would be lost in Alternative 4) are supported by the grazing program in the Brothers erea. How meny of these jobs would
8-10 be BLM jobs?

6. **Improvements.** The use of the term "improvement" is confusing. Sometimes, it is used to indicate vegetation's moving up en ecological class scale. Sometimes, it refers to altering en ecosystem (which may or may not be an improvement).
Cn repeated readings, it does seem clear that all of the improvements except fencing out cattle from streams increase grazing..

a-ii

The DEIS first states (p. 3) that the range is much improved since grazing was reduced in the 50's and 60's. But, Table 9 shows that only 24% of the EIS area is in good or excellent condition. Moreover, half is said to be beyond reviving by natural methods. Isn't it more likely that it would take more time than the BLM is willing to wait?

8-12

"Watering facilities are proposed to improve distribution of livestock". (p. 18) There is no need to claim, as further discussion maintains, wildlife benefits also. Deer, for example, do not benefit from artificial waterholes. On the contrary, native animals survive until waterholes bring the cattle which trample the food supply and cover. For example, big horn sheep were everywhere in the arid west until the cows came.

Our reaction to the proposed action. A program to restore land would reduce grazing pressures until the land can be seen to be improved. -This might be slow, perhaps even hundreds of years. When range is degraded, "improvements" should not be substituted for grazing reductions. "Improvements" at the public expense increase the subsidy to cattlement and cause a loss of other uses of the land, which belongs to all the public.

There should be no piped water, no foreign grasses and no planned devastation of junipers. All riparian zones should be fenced. Further deterioration of the range (deterioration for all uses, not just grazing) should be prevented, even if more than 10% of the ranchers' grazing needs in Springtime cannot be met. There should'be no forced production of forage; that might mean short-term dollar return to a few would be sacrificed for a restoration of all uses.

Very truly yours.

Jane Rodin
President

Sydney Herbert

Sydney Herbert
Conservation Committee

8-1 Any habitat alteration will benefit some species while being detrimental to others. The removal of juniper can increase edge effect and, consequently, habitat diversity while at the same time adversely affecting those species in the area dependent on juniper.

Table 24 shows the acres of proposed habitat changes due to rangeland improvements. Under the proposed action, 27 percent of the juniper habitat type is identified for habitat alteration.

See text revision for page 18.

8-2 Natural fires no longer remove juniper for two reasons. First, in many areas fire is suppressed for the protection of other values such as air quality or as a result of urban expansion in and around Bend and Redmond. Second, a lack of understory vegetation in much of the juniper community keeps natural fires from spreading.

8-3 See comment responses 2-2 end 4-3.

8-4 Rangeland improvement projects affect many species including big game. However, because of the economic importance and anticipated interest in big game species, they were stressed in some areas of the document. Table 24 and Appendix M in the draft EIS address all wildlife species that would be affected by rangeland improvement projects.

8-5 Studies on mule deer show a dietary preference for green grasses and forbs of approximately 85 percent in the spring, 70 percent in the summer, 35 percent in the fall, and 20 percent during the winter. (See references cited section, draft EIS, for works by Klebenow, Knowles, Komberec, and Leckenby.) Therefore, browse is particularly important during half of the year. Management to increase available green forage is critically important to big game for rebuilding lost fat reserves, fawn development, and milk production.

8-6 To estimate the percent of the population that could be lost would require extensive sampling and data collection on the total population for all 337 species. Appendix M in the draft EIS provides a comparison between habitats for each of the wildlife species in the area. Table 24 of the draft EIS allows a comparison of species gained or lost.

8-7 Crested wheat grass was not analyzed in the EIS as increasing diversity. Refer to the first paragraph on page 59 of the draft EIS for this discussion.

See comment responses 4-l end 4-2.

a-a Although the proposed action and alternative 1 call for initial increases in forage allocated to livestock grazing. the actual livestock use in the Brothers area could be substantially less than that projected in tke draft EIS. The BLM sets the maximum allowable use (AUMs) on allotments within the area baaed upon forage surveys, monitoring studies, past use, knowledge of the area, and multiple use considerations. The individual permittee determines, within those limits, the actual amount of use during the grazing period.

Actual grazing use will vary depending upon individual livestock operations, market conditions, economics, and other factors beyond the control of BLM. For example, in 1981 74,670 AUMs of livestck forage were available for sale and only 65,169 AUMs (87 percent of the available) were actually sold. Individual allotments in any one year will vary from total non-use (no grazing) to full use within BLM established limits.

a-9 Project costs will be displayed in the HPS. see comment responses 1-2 and 3-1.

8-10 None of the 178 jobs projected to be lost if alternative 4 were implemented are BLM jobs.

a-ii Unless there is a natural seed source, vegetation in early-seral condition will not improve within a reasonable time-frame through grazing management or exclusion alone.

Studies by McLean and Tisdale (1972) end Owensby etal. (1973) showed that at least 20 and as much as 40 years of complete rest would be required for early-aeral ecological condition to completely recover. Management objectives would not be realized within the planning period of this document without vegetation treatments.

Also, see text revision for pages 128 and 139.

8-12 The addition of artificial watering facilities has been beneficial in increasing distribution and populations of big game species, including big horn sheep. The Oregon Department of Fish end Wildlife actively supports the addition of watering facilities as an important wildlife management tool for both game and nongame species.

0xX0-9

Pine Mountain Cattle Co.
23595 HWY. 20 ■ BEND, OREGON 97701 ■ (503) 388-2450

June 16, 1982

Mr. Gerald E. Magnuson
District Manager
Bureau of Land Management
District Office
P.O. Box 550
Prineville, Oregon 97754

Dear Mr. Magnuson:

We, of the Pine Mountain Cattle Company, have received the draft of the Brothers Grazing Management Program, and in accordance with your request, would like to advise you that after reviewing the five alternative range management programs, we agree with the proposed action recommended under Appendix B, page 83.

We feel that the 740 AUM's could be reached in a little less time than you are recommending. However, since the BLM portion of our total range program is rather minor, we don't feel it is critical, presently, to have the time frame shortened. However, we would like to be in the position to review it with your people.

9-1 The other factor that is important to remember is that in practically every instance, deeded land is interspersed with BLM land without the benefit of fencing for some of the very small parcels.

I would like to compliment those responsible for the environmental impact statement because I feel that there was, obviously, a great deal of effort put into the project, from which this very valuable information was received. Please advise us if you need additi.al information.

Sincerely,

Lloyd W. Powell

LWP:ey

9-1 Small, scattered parcels of private land are sometimes included in RLM-managed The amount of this interspersed private land varies throughout the district.

OR050-10

Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave.. D.C. 20005 • 202/347-1774

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
JACK S. PARKER
Board Chairman

June 15, 1982

Mr. Gerald E. Magnuson
District Manager
Bureau of Land Management
Post Office Box 550
Prineville, Oregon 97754

Dear Mr. Magnuson:

The Wildlife Management Institute is pleased to comment on BROTHERS GRAZING MANAGEMENT PROGRAM, ENVIRONMENTAL IMPACT STATEMENT.

We have had the opportunity to review several Grazing Management plans prepared under the new allotment classifications of M, I, and C. The Brothers plan prepared prior to this classification is much better for wildlife than the new system which, in effect, writes off much habitat.

10-1 We are concerned about initial forage allocations, up 11 percent for livestock. Will the wildlife increase be sufficient for long term needs, not only in quantity, but in quality? Also, a" explanation is needed why 37,145 AUM is not now used. (p iii)

10-2 The acreage of livestock exclusion is shown, but not miles of fence on riparian areas. We lack confidence that grazing systems alone can improve the critical riparian habitat to the degree projected, especially the shrubs. More fencing and/or a better description of planned management is needed.

10-3 How can you state what grazing systems will be followed when AMP's are not prepared or negotiated with the permittee?

Deer winter range will improve on only 13,000 more acres than the present program. This is not enough improvement. (Table 26) Alternative 3 should be the goal on winter range.

10-4 Who will do the monitoring? Who will write AMP's? There is no assurance, that in a declining economy, money and personnel will be available to do the monitoring on which the plan's success depends. (p 21)

some specific comments follow:

10-5 Page 4, The decision. Again the BLM may use another alternative or combination in the final decision. We object. The decision should be close to the preferred alternative in the final EIS or another public review is needed.

10-6 Page 10. Why is some forage now unallocated?

10-7 Page 18, Design elements. What will be the size and distribution of seedings and spray areas? This is give" after a fashion on Page 31, hut there is no location. We would like to see the pattern of present and planned range improvements since these are the things that change diversity.

10-8 Page 42. Priorities in management and conflict resolution on critical winter range should be established.

10-9 Page 43, Recreation. Is not the redland black obsidian from Glass Butte rare?

Page 56, Right Column, 4th Paragraph. This statement on grazing and riparian areas is good. It substantiates our earlier remarks.

10-10 Page 57. Rangeland improvements will allow cattle grazing in areas the animals currently do not reach. This is often detrimental to wildlife. This should be pointed out in the water development paragraph on Page 61:

Page 75, First Paragraph. Improvements on 25 percent of the area will be detrimental to cover. This should be mitigated.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole

Daniel A. Poole
President

DAP:lbb

10-l The increase for wildlife species is based on the recently established Oregon Department of Fish and Wildlife management objective numbers Competetive AUMs allocated to big game are based on projected long-term population levels and on the seasonal dietary needs.

The 37,135 AUMs referred to on page iii of the draft EIS are AUMs projected for the long term in the proposed action and would be allocated to further protect the watershed resource and wildlife habitat values.

10-2 A tote.1 of 70.9 miles of riparian fence would be constructed under the proposed action as shown in Appendix D of the draft EIS.

While all BLM riparian areas would be excluded from livestock under alternative 3, fences may exclude more then just riparian areas. This includes ocher critical wildlife habitat or critical soils and therefore, cannot be quantified as miles of riparian fence. A total of 96 stream miles would be excluded (Tables 20 and 25 of the draft EIS), along with 336 acres of reservoir riparian vegetation (Table 22 .of the draft EIS).

We agree that grazing systems alone will not significantly improve riparian habitat, except with some early, short duration, and rotation systems (page 56 of rhe draft EIS). Since rest rotation and deferred rotation are the predominant grazing systems proposed under alternative l (Table 4 of the draft EIS) we project that 21 percent of the stream riparian vegetation will improve (Table 22 of the draft EIS) under this alternative, less than with alternative 2. The projected improvement of 55 percent with the proposed action is due mainly to additional exclusion.

10-3 The grazing systems proposed reflect the best judgement of the specialists involved, but it is true that modifications may occur. Following the District Manager's decision, which will be published in the Rangeland Program Summary, consultation will occur between the BLM, Che livestock operator, and ocher interested parties before a" AMP will be developed on a given allotment. Coupled with the fact that some proposed rangeland improvements may not be cost-effective as determined by a rangeland investment (benefit-cost) analysis, the grazing systems may be different than originally proposed. Any changes of this nature would be addressed in the Rangeland Program Summary document.

Once an AMP is implemented, intensive studies will be used to monitor changes in ecological condition. If these studies show implemented grazing system is not meeting the objectives of the AMP, then a change in grazing system may be indicated. Again, this would be addressed in an RPS update document.

10-4 Monitoring is a" integral part of BLMs program. BLM technical specialists, in cooperation with the livestock operator and other interested parties, will write AMPs and will monitor the condition of the rangeland to determine if management objectives identified in the AMP are being met. If management objectives are not being met, as indicated by the monitoring programs, grazing systems end period of use would be revised.

10-5 Regulations covering the procedural implementation of NEPA specifically require that the decisionmaker consider a full range of alternative; prior to a decision on Che proposal (40 CFR; Part 1505). This will be done. Under NEPA the decision may fall anywhere within the range of alternatives analyzed in the draft EIS. If the decision would deviate substantially from the preferred alternative in its allocations among competing resources, another public review will be furnished before the decision is made final.

IO-6 The unallocated forage referred co in paragraph 2, page 10 of the draft EIS is mainly on land where grazing does not now occur, primarily for lack of a permittee. The rapid suburban expansion of the Bend-Redmond area has fragmented many grazing allotments leaving isolated, unfenced public land in the midst of many small, privately-owned parcels. Grazing on this public land is no longer feasible in many instances.

Also, see comment response R-g

10-7 The exact location of rangeland treatments will be determined following site-specific consultation with resource specialists and modified according to resource values involved. Map 4 of the draft EIS shows potential treatment areas. A" environmental assessment which will specify the treatment area and method will be prepared prior to any treatment.

See text revision page lg.

10-8 Criteria for management on crucial areas have been established and are listed in text revision for page 18.

10-Y Redland "mahogany" obsidian found et Glass Butte is indeed rare. It would not, however, be significiantly affected by vegetation allocation or grazing systems. No rangeland projects are proposed for the area where this obsidian has been found.

IO-10 Some proposed water developments would result in livestock use of currently ungrazed areas. However, as pointed out on page 61 of the draft EIS, we feel that wildlife will benefit through increased availability of water, additional habitat, and improvement of existing habitat through better livestock distribution

ORO50-11

PACIFIC NORTHWEST 4-WHEEL-DRIVE ASSOCIATION

OREGON — WASHINGTON — IDAHO

Bureau of Land Management
Prineville District Office
P.O. Box 550
Prineville, Oregon 97754

Dear Mr. Magnuson:

I thank you for the quick response in my request for the material on the Brothers Grazing Program. I have spoken with the Region 6 Director of our Association. He had received a copy of this draft: he is familiar with the area and feels that the proposed action on this issue is to us as a user group. I will then accept his recommendation and agree on behalf of the Oregon members of the Pacific Northwest 4-Wheel Drive Association to endorse the proposed notion.

Sincerely Yours,

Mary Zentner

OREGON EXECUTIVE V.P.
Mary Zentner
Rt. 1 Box 74 543-2342
Scappoose, OR. 97056

ORO50-12

United States Department of the Interior
BUREAU OF RECLAMATION
PACIFIC NORTHWEST REGION
FEDERAL BUILDING & U.S. COURTHOUSE
BOX 043-550 WEST FORT STREET
BOISE, IDAHO 83724

IN REPLY REFER TO: PN 150
772.-

JUN 16 1982

Memorandum

To: Prineville District Manager, Bureau of Land Management, P.O. Box 550, Prineville, Oregon 97754

From: Regional Director, Boise, Idaho

Subject: Review of Draft Environmental Impact Statement, Brothers Grazing Management Program, Bureau of Land Management, Oregon

We have reviewed the subject statement and have no objection to its content. Thank you for the opportunity to comment.

For the Regional Director

John R. Woodworth

Regional Environmental Officer

4450 Pearl
Eugene, OR 97405
June 16, 1982

Prineville District Manager
Bureau of Land Management
P.O. Box 550
Prineville, OR 97754

Dear Sirs:

In response to the Brothers Grazing Management Program EIS, I must first say that I'm very pleased with the information provided and the form of the study itself. As a user of public lands, it is very encouraging to see the BLM moving so clearly toward multiple use land management. There are a few areas I would like to comment on, mainly the management of riparian areas, cultural and historical sites, monoculture seedings, the proposed action and alternatives, and the need for a complete cost-benefit analysis released for early comment.

13-1 In these times of tight fiscal management throughout the federal government, I think that a thorough cost-benefit study should be made and opened to early comment before any further action is taken so that we have an adequate information base to make decisions from. In a process such as Brothers, where you are preparing to invest a great deal of energy to replenish overgrazed land, such a study would be very helpful in planning for maximum returns to the public. The numerous benefits of a multiple use management plan should be clarified before any decisions are made.

As a hunter, fisherman and biologist, I am very concerned with the management of riparian areas. As you know, erosion is a continuing world-wide disaster. The destruction of wildlife habitat and subsequent loss of species is another major problem facing us. The progressive action you've taken toward protecting areas such as Camp Creek is thus very encouraging and I urge you to protect all of the riparian areas in the Brothers area from the disastrous effects of even limited grazing. Our wildlife in general are in trouble, but waterfowl and sensitive fish are in terrible shape and need all the habitat possible.

A very serious blunder that people are making all over the world is the switch from diverse ecosystems to vast monocultures which require high energy input, and are increasingly susceptible to parasites. While using fire and mechanical

means (rather than dangerous herbicides) to clear Juniper and Sagebrush is a great idea, I can't emphasize strongly enough my opposition to the seeding of exotic species such as crested wheatgrass. Aside from the fact that it is a non-native monoculture, the EIS shows just how drastically such seedings affect wildlife. I feel that replanting native bunchgrasses that would be useful to varied wildlife as well as cattle 13-2 would be a much more intelligent strategy.

As a resident of several Western states, I've been fortunate enough to find several artifacts and undisturbed historical sites on public lands. We have a rich heritage of both Native American and European Settler backgrounds, and I trust that when you make any *decisions* you will consider the uniqueness of these resources and their importance to students and laypersons now and hundreds of years in the future.

Considering the management of the various resources I've mentioned, and the relatively small amount of forage that would no longer be available to the area's individual livestock operators, I can only request that you move toward Alternative 3 or a management strategy similar to it. The close proximity of the Brothers area to urban areas, as well as the many educational and recreational opportunities the area offers indicate that the wildlife, watershed, scenic, and cultural-historical resources maximized in Management Alternative 3 are increasingly valuable to the majority of the public now and will be more so in the future. Furthermore, soil compaction and erosion, wildlife and ecosystem destruction, and visual, historical, and-cultural resource destruction are all problems mainly created (in this case) by overgrazing. I cannot see any sense in further altering the landscape at great public expense in order to produce more AUM's for even more grazing. This is just moving a step further from a stable system. Overgrazing is responsible for the present poor condition of public lands; more grazing is not, for the present, any part of a viable rehabilitation program.

I hope you will consider this as you continue the excellent work you've started in the Pineville District.

Sincerely,

David L. Bowman

DLB:pd

13-1 The primary purpose of this analysis is to determine environmental impacts that would occur under different rangeland management alternatives. Range investment (benefit-cost) analysis will be conducted for rangeland projects in each allotment. This analysis will be displayed in the decision document, the Rangeland Program Summary.

See comment response 3-1.

13-2 See comment response 4-1.

OR050-14

Dear B.L.M.

There are 11 allotments I have knowledge enough of to make a comment about.

5074 and 5080. My observations of cattle use in these two allotments leads me to believe
14-1 that watering sites need to more available.

5074 is collecting windblown soil from agricultural lands to the west. This soil collects moisture which causes juniper to rot. This intern makes more rodent habitat. Juniper control here will also reduce the rodent population that appears to exist here. 5080 could use a good burn just to reduce the extreme Brush regeneration that has occurred here. The small local deer population here might benefit some.

5213 5214 – Deer + Antelope use have increased in the areas of juniper control. Although there are more deer the deer harvest is of smaller younger animals because of greatly reduced cover.

5206 5208 5210. I like the proposed action I think it is a good idea to preserve habitat for winter deer range. 5206 + 5208 have resident populations of deer that may be larger than you have anticipated. Horse Ridge is becoming a juniper forest. 25 years ago there was much less juniper on the North Side.

If a fire got started in it, the rate of spread transportation system and time from report to initial attack are factors that indicate you are taking a huge risk trying to preserve that much juniper on an unbroken slope.

A land scape architect could plot out some clear cuts that would reduce that kind of risk as well as diversify the habitat. Deer used to winter heavily in the area of Hwy 20 near Horse ridge. It was a dangerous area for winter travelers and many deer were lost to collisions. This still occurs – but not so often. The enhance ment of quality for winter range on Horse Ridge has kept many deer up on Horse Ridge rather than moving to cover north across Hwy 20 each year.

5235 5237 5238

The area of the Dead Wilson fire in the Moffitt range is a good example of what your range burns will look like.

Since the fire I have noticed the deer have doubled and antelope use of the area is nearly year round. Last year there were sage grouse using the burn area. Of course there were more rabbits coyotes fox + bobcats. I base my opinions upon the frequency of sightings in the area since the fire.

3

5237 + 5238 have brush that stands 5 feet high on most of it. and appears much the same as the dead wilma fire area before it burned. If you can do for these areas what Dead Wilma did for the Moffit go for it. The Dead Wilma area is a good place to see watchable wildlife because they appear to desire the habitat that was created.

5234 is a very high, cold range that contains a light gray clay ash. It appears to have been over grazed in the past in some areas. One characterist unusual to other areas is that animal tracks and even beds are eroded by wind very easily here. Some cow trails are eroded to nearly a foot deep. I dont think graying should be developed here without considering the loss or perhaps learning how to minimize this erosion.

4

In all your graying plan appears to provide for wildlife and enhances the quality of habitat. As a life-long resident of Central Oregon I feel my concerns and needs have been provided for in your plan to develop and use the high desert.

14-2 I would like to see the final EIS include information as to what percentage of juniper will be removed from juniper control areas, and state how the control is to take affect.

Some places could use clear cutting in my opinion while other areas should have only a percentage of juniper cover removed to preserve presently desirable conditions.

Sincerely Frank W. Howe

28

I approve of your plans on 9 of the 11 allotments I am familiar with. One subject that is not explained well enough in my opinion is that of juniper control.

I approve of juniper control but some areas only a certain percentage of it should be removed to preserve escape cover for deer, etc. Also the way control is taken - wood cutting, piling & burning, thinning. I do not approve of clearing cutting and letting it lay unused it is a waste of material.

14-3 If your proposed plan could tell how much juniper is to be removed (%) and how it will take place. I personally would approve of much more juniper removal than you proposed.

I think other reviewers of this plan may feel the same as I do. They don't want to see a resource going to waste like in the Bear Creek Area.

As a deer hunter - Your plans will increase my chances of getting a deer but in my opinion with the reduced escape cover on many ranges the deer will not live to be as old. Therefore may end up being small on the average and less developed. The season may have to be slotted and stalking at close range may become a quality of the past in some instances.

14-1 Under the proposed action, 4 miles of pipeline and 3 miles of pipeline with watering troughs, are proposed for allotments 5074 and 5080, respectively. The proposed water source is private wells adjacent or within the allotments.

14-2 Detailed information will be available when site specific plans are prepared. As you suggested, some areas may be cut more heavily than others, depending on the resource values in a particular allotment.

14-3 Table 21 on page 55 of the draft EIS gives a general idea of how much juniper will be removed in relation to the total amount. There are presently about 383,500 acres in the EIS area classified as juniper. Under action approximately 26 percent of the existing juniper in the EIS area would be removed. As stated on page 18 of the draft EIS the proposed control methods include burning, cutting, and chaining. The method of control will be identified on a site-specific basin during environmental analysis.

ORO50-15

United States Department of Agriculture | Forest Service | Pacific Northwest Region | 319 S.W. Pine, P.O. Box 3623, Portland, OR 97208

1950

June 21, 1982

Prineville District Manager
Bureau nf Land Management
P.O. Box 550
Prineville, OR 97754

Dear Sir:

Thank you for the opportunity to review the Impact Statement far the Brothers Crazing Management Program.

We have no substantive comments to offer in our area of expertise or jurisdiction.

Sincerely,

for JEFF M. SIRMON
Regional Forester

FS-6200-11(8-80)

ORO50-16

Deschutes County Planning Department
COURTHOUSE ANNEX, ROOM 102 • PHONE 388-6556
BEND,

June 25, 1982

Gerald E. Magnuson
District Manager
Prineville District
Bureau of Land Management
P.O. Box 550
Prineville, OR 97754

Dear Mr. Magnuson:

A review of the Draft Brothers Grazing Management Program EIS has been completed by our office.

We find the Preferred Management Alternative outlined within this document to be consistent with the resource policies of the Deschutes County Comprehensive Plan.

Thank you for the opportunity to review this management program.

Sincerely,

John E. Andersen, Planning Director

Jordan B. Maley, Local Coordinator

JBM/jm
cc/file

OR050-17

Lake County Planning and Building Office
LAKE COUNTY COURTHOUSE LAKEVIEW, OREGON 97630

June 24, 1982

Gerald E. Magnuson
Prineville District Manager
Bureau of Land Management
P.O. BOX 550
Prineville, Oregon 97754

Dear Mr. Magnuson:

This is in response to your draft Brothers Grazing Management Program Environmental Impact Statement, 1982. The Statement has been reviewed in conjunction with Lake County's Comprehensive Plan.

Those federal lands in Lake County administered by the Prineville District, Bureau of Land Management, are limited to the extreme northeast corner of the County.

The area is planned Range and is zoned, Agriculture Use. The County's Range Plan classification "designates areas suitable for and desirable to be maintained for grazing and other activities related to livestock operations, and associated employment and food production, all of which are important factors in the economic well-being of the region. Range areas are comprised primarily of public or private, improved or unimproved rangelands, and may include forested acreages and/or cultivated farmlands. Ranch improvements, water development sites, wildlife and various other types of recreation, for instance, hunting, hiking, etc., and aggregate and mineral extraction, are often associated with range operations. It is intended that Range-designated areas will have the same degree of protection from encroaching incompatible uses as Agriculture-designated areas." (Page 6, LAKE COUNTY COMPREHENSIVE PLAN, May, 1980). The proposed action would be within the intent of the County's Plan.

The County's rangeland inventory shows an existing 124 AUMs on these federal lands. Map 4, Potential Rangeland Treatment Areas, would indicate that some brush control and/or potential seeding is planned for the area which should improve or increase useable rangelands in this area.

Other inventory includes a natural area, U.S. Highway 20 Exclosure, which is recognized for grasslands and appears to coincide with an existing livestock exclusion area (Map 3). The Exclusion area designation in addition to Bureau policy would provide protection for this natural area. While not on the County's inventory, natural area inventory completed by the Nature Conservancy also lists Glass Butte and the Glass Butte area as natural areas.

Agriculture, grazing and recreation uses are considered consistent with natural, scenic and open space values dependent on resource carrying capacities.

A timely conversion of forage to deer, elk and antelope use as proposed is consistent with Plan policy.

Other inventory discussions in the Statement, i.e. endangered plants and wildlife species, cultural resources, paleontological resources, etc., do not provide site locations to determine impacts to known sites. Bureau planning processes and legal requirements of Federal law will require the Bureau to identify these resources and mitigate impacts as land disturbfng activities are undertaken. Such mitigation will address County Plan policy whith provides protection for these resources.

Thank you for the opportunity to comment on the Statement.

Very truly yours,

Janine Cannon
Planning Director

JC:sw

ORO50-18

SIERRA CLUB
2637 S.W. Water St. Portland, Oregon 97201

June 28. 1982

Gerald E. Magnuson
District Manager
Bureau of Land Management
P.O. Box 550
Prineville. OR 97754

Dear Mr. Magnuson:

Thank you for this opportunity to comment on the Draft Brotners Grazing Management Program Environmental Impact Statement, I found tne EIS to be clearly written, in particular, I appreciated tne maps and tables comparing the proposed action and alternatives, However, we have comments on several of the sections.

Wilderness

18-1 The Grazing EIS treats the Wilderness EIS process in a cursory manner. We would like to see addressed now the two relate. In particular, there are major rangeland improvements proposed for tne Wilderness Study Areas (WSA), including pipelines, fences, etc... It is not enough to state that the Interim Management Guidelines will be followed. There should be a discussion of exactly how proposed rangeland improvements, as well as changes in forage allocation and grazing systems, will impact the WSAs.

Wildlife

We commend the stated intent of BLM to protect and monitor riparian systems. We also emphasize how critical it is that this monitoring program is implementd and changes made in the grazing systems as warranted.

Considering the expected increase in forage production and proposed ranqeland improvement projects. it will be crucial to the health of wildlife in the area that thfs monitoring program be carried out.

18-2 We would like the EIS to address the expected carrying capacity of the range under each alternative, for wildlife and grazers. This should be part of a discussion on how wildlife habitat will be protected, not simply numbers of animals.

Rangeland Improvements

The "standard procedures" are generally good, though again, we are they be consistently and continually carried out. This section should also be integrated with the Wilderness EIS process.

Benefit/Cost Analysis

18-3 The benefit/cost analysis is not complete. It only shows the benefits and costs to those who operate ranches on BLM lands. It does not discuss issues such as the cost of grazing in riparian areas and consequent necessary mitigation, soil erosion. or on wilderness characteristics. Nor does it adequately discuss the cost of range imp rovements proposed in the EIS. This section should be more comprhensive.

Visual Resources

18-4 The discussion of visual resources is inadequate. Moreover, we believe there is too much land included in VRC III and IV.

Thank you for considering our comments. We look forward to hearing from you and participating further in thls process.

Sincerely,

Mary Kyle McCurdy

Mary Kyle McCurdy
BLM Issues Coordinator
3235 N.E. 23rd Avenue
Portland, OR 97212

CC: Don Tryon, SAGE
Oregon Wilderness Coalition
Portland Audubon Society
The Wilderness Society

18-1 The Brothers Land Use Plan identifies management decisions for all uses of RLM-administered lend except grazing management and wilderness. Grazing management alternatives are addressed in this document and decisions will be included in the RPS. Wilderness alternatives will be analyzed in a wilderness EIS scheduled for publication in 1984.

By policy, no changes in forage allocation and grazing systems can be made which would impair WSA suitability for designation as wilderness. There are no significant impacts to wilderness from forage allocation or changes in grazing systems within WSAs in the Brothers EIS area.

18-2 It is the responsibility of the Oregon Department of Fish and Wildlife (ODFW) to manage wildlife numbers and populations. The BLMs role is to manage habitat for wildlife. If, in the future, ODFW determines to change these management objective numbers the BLM will re-evaluate forage allocation.

18-3 Economic analyses are not complete at this time.

Mitigation costs are included in each range investment (benefit-cost) analysis.

See comment response 3-l.

18-4 Visual resource management classes have been established in accordance with BLM guidelines. Site-specific information is available for review in the Prineville District office.

OR050-19

United States Department of Agriculture
Soil Conservation Service
1220 S. W. Third Avenue
16th Floor
Portland, Oregon 97204

August 2, 1982

Gerald E. Magnuson, District Manager
Bureau of Land Management
P. O. Box 550
Prineville, Oregon 37754

Dear Mr. Magnuson:

We have reviewed the Draft - Brothers Grazing EIS.

The questions we had, and points of clarification have been discussed with you and members of your staff by telephone. We therefore have no further comments to offer.

Thank you for the opportunity to review this document.

Sincerely,

JACK P. KANALZ
State Conservationist

Oro50-20

VICTOR ATIYEH
GOVERNOR

Executive Department

155 COTTAGE STREET N.E., SALEM, OREGON 97310

July 1, 1982

Mr. Gerald E. Magnuson
District Manager
Bureau of Land Management
P.O. Box 550
Prineville, OR 97754

Subject: Draft Environmental Impact Statement for Brothers Grazing Management Program
PNRS # OR820504-008-4

Thank you for submitting this draft Environmental Impact Statement for State of Oregon review and comment.

The draft was referred to the appropriate state agencies. The Department of Fish and Wildlife and the Parks Division offered the enclosed comments which should be addressed in preparation of your final Environmental Impact Statement.

We will expect to receive copies of the final statement as required by Council of Environmental Quality Guidelines.

Sincerely,

INTERGOVERNMENTAL RELATIONS DIVISION

Kay F. Wilcox
A-95 Coordinator

KW:mh
Enclosures

OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division
155 Cottage St NE, Salem, Oregon, 97310
Phone Number: 378-3732

PNRS STATE REVIEW

Project #: OR 820504-008-4 Return Date: JUN 11 1982

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week Prior to the review date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

( ) This project has no significant environmental impact.

( ) The environmental impact is adequately described.

(X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

( ) No comment.

Remarks

20-1 The recreation element is incomplete or at least misleading. Other "public" recreation areas besides Chimney Rock Recreation Area which have been developed are:

Ochoco Lake State Park - 9.8 acres - campground picnic area boat launch lanes

Prineville Reservoir State Park 365 acres - campground picnic area - boat launch lanes

Antelope Reservoir - USFS - campground, picnic tables boat launch

Ochoco Nat. Forest - perimeter of Brothers area has an additional 123 campsites at 14 developed sites

Agency P.R.D. By Alan Cook 378-6378

34

OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEAR I NGHOUSE

Inter overnmental Relations Division
155 , Salem, Oregon, 97310
Phone Number: 378-3732

INTERGOVERNMENTAL RELATIONS DIVISION
JUN 30 1982

PNRS STATE REVIEW

Project #: OR 820504-008-4 Return Date: JUN 11 1982

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

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ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

( ) This project has no significant environmental impact.

( ) The environmental impact is adequately described.

(X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

( ) No comment.

Remarks

Comments Attached.

Agency Fish & Wildlife By

VICTOR ATIYEH
GOVERNOR

Department of fish and Wildlife

506 S.W. MILL STREET, P.O. BOX 3503, PORTLAND, OREGON 97208

June 24, 1982

Gerald E. Magnuson
Prineville District Manager
Bureau of Land Management
P.O. Box 550
Prineville, OR 97754

Dear Mr. Magnuson:

The Oregon Department of Fish and Wildlife has reviewed the Brothers Grazing Management Program Draft Environmental Impact Statement. The Department's comments and recommendations are listed below:

Sagebrush and Juniper Control

20-2 Juniper control and sagebrush spraying, unless properly designed, could be detrimental to wildlife by removing important values (i.e. thermal cover, hiding cover, travel lands edge effect, etc.) Sufficient detail is not given in the DEIS that will allow as assessment of these activities as to their impact on wildlife.

Livestock Exclusion in Crucial Areas

20-3 The DEIS states (Chapter 2, Page 11, Alternative 3) "Livestock use would be eliminated from allotments within deer and antelope winter ranges as well as sagegrouse nesting areas. "This practice is not necessarily a good management practice for wildlife. Grazing to reduce aftermath and provide green feed can be more beneficial than non-use, particularly on deer and antelope range. Rather than eliminating livestock use in this alternative, we recommend grazing systems designed to benefit wildlife forage.

Riparian Vegetation

The DEIS notes the importance of these areas by stating "Riparian habitat is used by more thrn 85 percent of the wildlife species found in the EIS area."

20-4 Table 6, page 16, states that rotation grazing is probably the least damaging to riparian woody plants. However, the proposed action lowers rotation acreage from 121,164 to 5,755. Riparian vegetation will suffer increasing impacts from grazing due to the increase in AUM's and the change rrom rotation to rest rotation grazing.

Table 4, page 13; the proposed action has 169 acres of stream riparian habitat listed for exclusion presumably by fencing. This action is encouraged and we recommend an increase in fencing of this critical riparian habitat.

Forage Competition

20-5 The draft EIS suggests (page 64) that spring, spring/fall, and spring/summer grazing systems would result in forage competition between big game and livestock and short duration grazing would result in spring competition between big game and livestock. Alternative 3 (Wildlife) shows 134,297 acres (Table 4) in these grazing systems. Although this is not the preferred Alternative, why were so many acres given to livestock AUM;s if this is in direct conflict with wildlife?

ORV Use

20-6 Page 1 of the Summary states: "Allow off-road vehicle use on public lands unless unacceptable adverse impacts would occur to other multiple use values." What criteria of yardstick is used in defining unacceptable impacts?

The Department is concerned about ORV use around Prineville Reservoir because of the fragile nature of soils, their slowness to revegetate and steepness of slopes. Runoff from these disturbed soils also carry clay particles that remain in suspension in the reservoir and Lower Crooked River, resulting in poor fish productivity.

We recommend ORV use be prohibited in the Prineville Reservoir area

We ask for close and continuing involvement between your office and our field staff in preparing the final EIS and in implementation of the Management Program.

Sincerely,

John R. Donaldson, PhD
Director

JRD:kes:

20-1 As used in the EIS, public land refers only to BLM-administered land. State and other federal recreation areas would not be impacted by BLM grazing management. Therefore, they were not discussed.

20-2 See comment response B-1 and text revision for page 18

20-3 We agree that livestock grazing can be beneficial to many species of wildlife. The removal of livestock in alternative 3 was from crucial winter range areas and not from spring, fall, and summer areas.

20-4 One allotment in the EIS area with 26 acres of riparian vegetation is grazed under a rotational system. Although the proposed management for the allotment is rest-rotation, all 26 riparian acres would be excluded under the proposed action.

20-5 The grazing systems you referred to do not conflict with big game as much as your comment indicates. Alternative 3 proposes 293,919 acres of exclusion, much of which is big game habitat where forage competition is now occurring. All areas of significant value for wildlife (wintering areas, riparian areas, sage grouse nesting areas) are proposed for exclusion under alternative 3.

20-6 This quote is taken from the Brothers Land Use Plan summery, not the Brothers Grazing Management EIS summary.

The criteria used to define acceptable adverse impacts are contained in the BLM's ORV management guidelines, available for review in the Prineville District office.

ORO50-21

THE WILDERNESS SOCIETY

Northwest Representative
(206) 624-6430

June 30. 1982

Mr. Gerald E. Magnuson
District Manager
Prineville District
Bureau of Land Management
P. O. BOX 550
Prineville, Oregon 97754

Dear MT. Magnuson:

We appreciate the opportunity to comment on the Brothers Land Use Plan and Grazing EIS. We have comments on several topics listed below.

Wilderness Program Recommendations

21-1 We believe all the wilderness areas in the Brothers area are suitable for designation. While some boundary modifications may be advisable, the inventory process assured that all areas qualified for wilderness designation. We find it inexplicable that exclusions, such as those proposed for Gerry Mountain (5-35) are proposed. Outside sights and sounds are not a basis for deleting a wrtion of an area. Neither are grazing improvements a justification when they were not found to be disqualifying during the inventory, assuming that illegal impairment has not occurred since the inventory.

We are also troubled by deletions for manageability. Management being the task of the BLM, not a" inherent quality of the land, there should be a description of the difficulties involved and of attempts to resolve them. The mere existence of inholdings should not be taken as a reason to disqualify a" area as unmanageable.

Economic Analysis

21-2 It is essential for informed evaluation of alternatives and of specific proposals, such as those for 391 miles of fences and 467 miles of pipelines, that complete economic analysis be given. The budgetary implications of a projected increase of 78 percent in AUMs by the year 2000 are substantial and obviously imply a high level of investment and maintenance, and of demand for AUMs. The basis for these projections should be open to examination, particularly since in 1981 the number of AUMs offerred exceeded the number sold by 9,501.

A" alternative should have been added proposing improvements in range conditions by reducing AUMs where it would be most productive to do so. Such a" alternative would have taken account of the stringent Federal budget situation and of the decline in demand for AUMs and for beef.

Reduction in Allowable Cut

We support the proposed reduction in allowable and the rationale behind it.

Protection of Riparian Zones

We are very concerned about the generally fair or poor stream quality in the Brothers area and wish for substantial improvement of riparian zones. However, we are skeptical about the financing of the required fencing and pipelines. We would like to see a" analysis of achieving riparian improvements by reducing AUMs, and thus reducing the miles of fencing needed.

Sincerely,

Jean C. Durning
Northwest Representative

cc: Terry Sopher
Don Tryon
Don Geary

21-1 see comment response 18-1.

21-2 See comment responses 3-l and 13-1

Recycled

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:
1202-03 (PNR-RE)
DES 82/10

June 30, 1982

Memorandum

To: District Manager, Bureau of Land Management, Prineville, Oregon

From: Acting Associate Regional Director, Recreation Resources and Professional Services, Pacific Northwest Region

Subject: Draft Environmental Impact Statement for the Brothers Grazing Management Program

We have reviewed the subject document and have the following comments concerning impacts on the National Park System, recreation resources, cultural resources, and wild and scenic rivers.

Impacts on the National Park System

It appears, on the basis of the material provided, that no existing or presently proposed units of the National Park System will be affected either directly or indirectly by the proposed action.

Recreation Resources

The proposed action, and three of the four alternatives, would not cause major adverse impacts on recreation activities in the project area (page 66). Fencing has the potential to create the most significant impact on off-road vehicle driving, rockhounding, hiking, and hunting. However, the improvements in habitat for wildlife resulting from a reduction in livestock forage allocations or changes in grazing system would have a positive effect on wildlife populations, which would also result in a positive effect on hunting, fishing, and wildlife viewing opportunities.

Alternative 1 is not preferred, as it would have an adverse impact on all existing recreation in the project area (page 66).

Cultural Resources

Historic and cultural resources must be identified and protected by the applicant. See Title 18, Code of Federal Regulations (CFR), Part 4.51.

The procedural guidelines to be followed in assessing cultural resources are found in 36 CFR 800, "Protection of Historic and Cultural Resources." We are pleased to note that you have consulted with the Oregon State Historic Preservation Officer (SHPO) (page 44). Althouoh there are no cultural sites in the Brothers EIS area listed on the "National Register of Historic Places," Meek's Immigrant Road and two archeological districts were identified as potentially eligible for the National Register (page 44).

22-1 We also note that Alternatives 1, 2, 3 and the proposed action would have potential for adverse impacts to cultural resources. Although a sample survey has been conducted, no mitigation plan is outlined for protection of cultural resources and the sites identified as potentially eligible for the "National Register of Historic Places." A mitigation plan, developed with the SHPO, should be outlined in the final environmental impact statement. The plan should also include a statement concerning cultural resources that may be discovered unexpectedly during construction (i.e., will construction cease until a qualified archeologist can determine the significance of any cultural materials discovered?). See 18 CFR, 4.51(f)(4)(ii).

The National Park Service is available to provide limited assistance and advice in evaluating any cultural and historic preservation aspects of the project area and assist in the coordination of cultural and historic proposals with Federal, state, and local agencies.

Rivers Inventory

The Deschutes and Crooked Rivers, which cross public land within the EIS area, are included in the Nationwide Rivers Inventory. The inventory identifies the Nation's remaining free-flowing rivers and river segments that meet the criteria for wild and scenic and recreational rivers according to the standards established under provisions of the National Wild and Scenic Rivers Act. It is stated on page 65 that "neither the proposed action nor any alternative would have a significant impact on those segments of the Crooked or Deschutes Rivers contained in the nationwide rivers inventory." If it is later determined that these rivers would be adversely affected by the proposed project, mitigation measures should be implemented to minimize the impacts.

Frederick J. Bender

Frederick J. Bender

22-1 As stated on page 18 of the draft EIS, the PMOA signed with the SHPO will be followed. Tbis mew outlines specific procedures for mitigation and is available for review in the Prineville District office. It is standard to avoid adverse impacts to cultural resource sites.

ORO50-23

Central Oregon Conservationists
369 W. Fifth Street
Prineville, Oregon 97754

June 29, 1982

Prineville, BLM
Gerald E. Magnuson
P.O. Box 550
Prineville, Oregon

RE: Comments on Brothers Grazing Management Program Draft Environmental Impact Statement.

Dear Mr. Magnuson:

Your Grazing EIS is a very readable document which, in relatively few pages, provides the reviewer with a wealth of comprehensible information. In my experience most EIS's are significantly influenced by the professional history of the Team Leader. Brian Cunningham has, to his credit, avoided that pitfall. Generally, your EIS is less pretentious than most and compliments the integrity and experience of your staff.

I have discussed several aspects of your planning effort with members of your staff and will keep comments fairly brief here.

In the introductory letter the BLM should point out that in thier organization an EIS is not a decision document. Most organizations do not follow that format.

Chapter 1: You should provide more in-depth discussion of your legislative mandate. Your obligations under NEPA, FLPMA, Taylor Grazing and PRIA should be explicitly expressed as planning criteria and the planning effort should carefully articulate throughout the document.

23-1 Table 2 is a good example. You should do a similar table for federal mandates. It is easy to accept the need for planning based on your discussion. It is-not easy to accept the proposed action.

23-2 On pg 2 you state that the purpose of the proposed action is to implement planning decisions. This is not consistent with your previous comment that an EIS is an analysis document. Any discussion of implementation should be reserved until the decision document.

23-3 Your comment that lands, minerals and timber resources are not affected by livestock grazing is not true. Much of the lands program exists for the purpose of rationalizing the rangeland program. Range and timber mgt. have always conflicted.

23-4 You should broaden your discussion of wny only 11% of forage within the area comes from BLM land. You should include a more in-depth historical discussion of grazing within the area, especially the adjudication process of the 50's and 60's.

23-5 Just penciling out some of the rangeland "improvement" figures in the summary it appears to me as though you are willing to invest about four million dollars to return about two million on the investment over the next twenty years. I sincerely hope your B/C data will justify the investment.

23-6 Tables 4 and 6: The information justifying different grazing systems for the different alternatives is vague and spread throughout the document and appendix. You should include a short explanation of tables 4 and 6.

23-7 Figure 1: Isn't winter grazing in error?

23-8 Concerning ODFW MOs for big game. Your planning efforts are long term. ODFW objectives could theoretically change dramatically for some species--pronghorn and elk for instanc . Will your PA be flexible enough to address significant shifts in the MOs or will your planning effort lock ODFW into a ceiling despite public demand? Your alternatives should discuss wildlife habitat in terms of carrying capacity. It makes littlesense to discuss fencing winter range unless we know what that project can do for us.

Generally, we oppose the use of chemical agents for brush control purposes. In addition to the obvious reasons, wind drift has always made it difficult to control application patterns and it is more difficult to create edge effect and irregularity.

23-9 Map 4: Some of the area E of Redmond and Bend scheduled for seeding and juniper control is actually indigenous juniper, harsh and rocky. You should take a very close site specific look at any areas prior to treatment. Concentrate your efforts on invader juniper and leave old Growth alone.

Use native seed whenever possible. Create a demand and seed producers will respond. As long as you are happy with crested wheat that is all that will be available.

23-10 Monitoring: It seems to us that more Mgt. always requires more monitoring. I have gotten used to seeing water troughs without rocks, ramps or float boards (whatever happened to the overflow pond8 for wildlife?) fences that can't be opened or closed, salt'and water in the bottom of the draws, exclosure fences down or cut, salt in camping spots, trespass cattle, variances, rest rotation without the rest, contractor mistakes, the list could go on. Don't authorize a program unless you can monitor it. Period.

In many instances you are proposing livestock increases in allotment8 with sensitive soils. Two examples:

23-11 AUMs short term to 1,009 long term
5140 800 AUMs short term to 1,400 long term

WHY?

Table 8 is very good, educational.

23-12 Figure 3 deserves quantifying scales and further explanation.

23-13 The wildlife discussion on pgs. 42 and 43 could use some expansion and clarification. The paragraph on impairment to de r populations is an example. Surely not all of those factors have equal impacts. Also, the population figures are somewhat meaningless without a discussion of what crucial winter range will support.

23-14 I note that only 87% of available 1981 AUMs were actually sold. How do you justify recommending significant increases in AUMs available when the current demand doesn't absorb current supply. The national demand for beef is decreasing and forage production is increasing on private lands with less capital investment.

Table 16 is very informative.

On pg 49 you point out that personal income from grazing PD is only .2% of the local area personal income. I rest my case.

23-15 On pg. 52 you state that "No impacts would occur to endangered or threatened species. they are dropped from further discussion." But your comments on pg. 60 PLANTS OF SPECIAL CONCERN directly contradicts that statement.

23-16 I Pg. 61 next to last paragraph. I fail to see the relationship between habitat diversity and fences/big game mortalities.

Your Social Conditions comments on pgs. 50 and 71 are relevant but totally inadequate. Lets face it, the only justification for your PA is to provide direct benefits to the few people around here who have BLM grazing permits. The least you can do is justify that proposal. Economically, grazing public lands is relatively insignificant. you should attempt to justify your PA on social grounds.

23-17 I Pg. 52: Your discussion of energy investment is not correct. You suggest that continuing the current mgt. program and no grazing will consume the same amounts of energy. Not true.

I don't approve of the assumptions on pg. 52. They remind me of the planner who was lost in the woods one night and said. "assume a flashlight." Besponsible planning has to be predicated on realistic assumptions. I don't mind your using the assumptions for purely analytical reasons. But don't give us a mgt. decision based on those kinds of assumptions.

Table 24 is good. Lets get away from the crested wheat syndrome.

Table 25 and the fisheries discussion is simple and short but good.

I haven't read the paper by Meganck and Gibbs but the one by Downing and Clark doesn't address some of the nertinent narameters. Like most studies it addresses things the way they are rather than the way they will be and also fails to disaggregate. The fact'ia that in some areas and for some activities livestock grazing has significant recreation impocts and in other instances it does not. You state that most hiking accurs in the WSAs. In my experience, livestock grazing does conflict somewhat with hiking. You apparently don't agree or don't care because you are proposing increases in use in almost all of the WSA allotments.

I don't agree with all of the conclusions on 'Table 23. Alt. 4: Hunting should be +L. Not because of changes in game populations but because of the overall improvement in the quality of the environment. Also, Hiking/Camping should be +H. tie can discuss this in person.

23-18 I Wilderness: There should be a map with range improvements and livestock use keyed to it. Whether or not these areas are designated for wilderness they will receive more recreational use and deserve special consideration.

23-19 Your Socioeconomic discussion is inadequate. You have almost no socio comments and your economics is interesting but incomplete and of little value. Why include esoteric information but not basic cost data on rangeland improvements, or costs of forage, or management of the range program. You have promised a rather detailed discussion of benefits and costs of your rangeland alternatives. If you don't provide that information we will appeal the EIS.

I have always felt that agencies should include labor and time under irreversible and irretrievable commitment of resources.

I like the a pendix. Good, solid, compact data.

There are a few sections of NEPA which encourage broadness of scope, specifically Sec. 102 E. I am discoura ed by the lack of discussion concerning the livestock industry in general.

The BLM approach to range mgt. has always been most discouraging.

It seems to me as though this EIS doesn't deal with many of the truely nertinent questions.

1. Is there going to be any demand for all the beef you intend to have produced on this public land?
2. Does intensive beef production on the land in question represent good business?
3. Are you going to have the money and manpower to administer your prefered program?

23-20 I We can all answer some of those questions. While USDA nutritionists encourage us to consume less red meat, USDI range managers "urge" us to raise more cows. While you cry about budget cuts, you propose spending over four million dollars on rangeland "improvements" which will never be amortized by forage sales. Historically, the Bureau has done a poor job of monitoring its programs. Now, without the prospect of increases in budgets or manpower, you expect us to believe you can monitor much more sophisticated intensive mgt. programs.

23-21 I

Your PA is ill conceived. You are proposing a program that you can't afford and you can't manage. Worse yet, you are giving the ranchers a stick to beat you with. Propose a more modest and balanced program. Hold livestodk levels down to at least current conditions and decrease over time if necessary. Cultivate a broader constituency by addressing the needs of recreationists and down stream water users. Spend your money on riparian recovery, improving the condition of poor quality range. Use mechanical means and fire to get a handle on invader juniper end sage. Don't expect to undo 100 years of bad management in 25 years. Experiment. Fence off a couple of sage grouse and pronghorn critical areas and monitor the results.

We want to see a prefered alternative which improves the quality of water, wildlife habitat, range and recreation; reduces soil erosion and provides for the needs of diverse user groups; a PA that is realistic, manageable, equitable, balanced and fiscally responsible.

You are both the planners and managers of the lands in question. If you do your jobs right you won't have to excuse poor range use on Congress, OMB, recaloitrant or environmentalists.

I hope that these comments are of *some* assistance. If you wish to discuss eny of the issues in more depth please contact me.

Sincerely,

Don Dryon

Don Dryon
for: COC

23-1 All alternatives are consistent with all requirements of federal laws pertaining to federal land management listed in Appendix 1 of "Summary of Land Use Alternatives for the Prineville District Brothers Planning Area", published Sept., 1981.

23-2 See text revision for page 2.

23-3 The draft EIS analyzes impacts of implementing a proposed grazing management program. Impacts to the lands and mineral programs from grazing management is insignificant. In the Brothers EIS area, seven allotments currently have both timber production and grazing in them. Impacts were not felt to be significant.

23-4 Further discussion of historical grazing use within the EIS area was not felt to be relevant since the document analyzes the effects of different proposals for grazing management on the existing rather than the historical situation.

23-5 see comment response 3-1.

23-6 Tables 4 and 6 are summary tables of material presented in chapter 2 of the draft EIS.

23-7 See text revision for page 15.

23-a see comment response 18-2.

23-9 All juniper control projects will be identified and designed on a site-specific basis. If potential for improvement in ecological condition doesn't exist, the project would not be Implemented.

23-10 Monitoring, including increased supervision, is an integral part of BLMs management.

23-11 The. increases referred to are potential long-term increases based on a projected increase in available forage -- a result of improved grazing management and rangeland improvements. Livestock grazing should have little or no detrimental effect on these soils as long as forage utilization is less than 60 percent (see page 52 of the draft EIS).

The proposed grazing system for both allotments is deferred rotation (Appendix C of the draft EIS) which has a targeted average utilization of 55 percent (Table 6 of the draft EIS). In addition, all riparian areas within these two allotments are now, or would be fenced under the proposed action, to further enhance watershed values. Alternative 3 would remove cattle from critical areas of each allotment and also reduce the livestock forage allocation.

23-12 See text revision for pages 14 and 38.

23-13 The factors listed were not intended to be displayed as equal items affecting wildlife populations. They were given as a summary of concerns which were beyond the scope of the document. Refer to comment response 8-8 for a discussion on grazing capacity.

23-14 See comment response 8-8.

23-15 The comment on page 52 referred to animal species, not plants. See text revision for page 52.

23-16 The sentences were two separate thoughts and have been separated in text revision for page 61.

23-17 The text you refer to is speaking of energy required to construct rangeland improvements. No new improvements are proposed in either alternative 2 or 4.

23-18 Maps with rangeland improvements and livestock use in each WSA are contained in WSA casefiles, available for review in the Prineville District office.

23-19 The level of social analysis relfects the data available. A rangeland investment (benefit-cost) analysis of prospective rangeland improvement programs will be provided in the Rangeland Program Summary.

23-20 See comment response 8-8.

23-21 See comment response 10-4.

ORO50-24

June 28, 1982

Bureau of Land Manegment
Prineville, Oregon

I . . writing in regard to the Brothers grazing manegment program. Having ranched at Paulina and at Powell Butte I to see the B.L.H. do more brush spraying of crested wheat. At Powell Butte . . graze the pipeline 5117 allotment, where created wheat has been seeded. It has more than any other thins. Mom crested wheat needs to the type of soil and moisture. It cannot be grazed in the fall, . . it dry, for cattle to do good.

The BLM . rancher, and try to make the range better. Office personel, and not enough in the field. I am for multiple use and should use public land. It is depressing to try and keep fences up and have the public cut fences, leave gates open, dump dead stock and debrie on BLM lands. I would like to se. wildlife on the range.

In conclusion, I would like to see the range improved, so more cattle could graze, and it would be of benefit to everyone.

Sincerly

41

ORO50-25

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF: M/S 443

JUL 1 1982

Gerald E. Magnuson, District Manager
Prineville District Office
Bureau of Land Mangement
P.O. Box 550
Prinevflle. Oregon 97754

RE: Brothers Grazing Management DEIS

Dear Mr. Magnuson:

The Environmental Protection Agency (EPA) has completed its review of the Draft Environmental Impact Statement for the Brothers Grazing Management Program. EPA's review of the DEIS is based on likely effects of BLM's alternative range management proposals and grazing plans in the context of EPA authorities and responsibilities in specific program areas. In general, the DEIS is quite thorough in its presentation of the proposed and alternative actions, and in its analysis of the consequences of selecting and implementing dfferent actions.

Water Quality

The general objective of the Brothers Grazing Management plan is to achieve change in range resources and productivity in a manner which maintains or improves water and other natural resources. However, the consequences for water resources in the region are likely to be substantial and occur over time as the plan is implemented. Therefore, EPA has the following recommendations:

-- The importance of water quality maintenance should be reinforced in BLM's decision making and plan implementation to assure that water quality requirements will, in fact, be met. An appropriate way to accomplish this is through closer ties with the "208" water quality management process administered by the Oregon Department of Environmental Quality.

-- Implementation reviews should be conducted in cooperation with DEQ at least annually to evaluate adequacy and effectiveness of site specific monitoring and other management tools for meeting water quality objectives.

-- Memoranda of Understanding should be evaluated and revised as appropriate to assure consistency between water quality management and proposed grazing and range management objectives.

Chemical Treatment

Chemical treatment is proposed to control sagebrush on approximately 61,000 acres (p.53). EPA recommends that the Final EIS discuss controls to prevent adverse consequences from herbicide spraying, measures to mitigate
25-1 potentially harmful consequences to wildlife and water quality, and alternative methods of vegetation control.

Assumptions

The analysis of range management actions, environmental consequences and mitigating measures is based on several assumptions (p.52) including adequate funding and staff to plan fully. EPA recommends that tne Final EIS discuss contingent ranae and grazing aanaaenent actions
25-2 which may he needed at reduced resource levels, and estimate-the consequences of reducing the level of range nanagenent effort or extending the proposed efforts over a longer time period.

Other Developable Resources

The DEIS does not discuss other resources which may affect inplenenting the proposed grazing management proqram as designed. Are there any such resources, such as minerals or non-mineral energy resources, in the study
25-3 area? If so, EPA recommends that a discussion of these resources and the consequences of tne program for them should be included in the EIS.

EPA has rated this DEIS LO-1 [LO -- Lack of Objection; 1-- Adequate Information]. We appreciate the opportunity to review this report; should you want to discuss EPA's recommendations, please contact Mr. Dick Thiel, our Environmental Evaluation Branch Chief, at (FTS) 399-1728.

Sincerely,

John R. Spencer
Regional Adminstrator

Enclosure

cc: Oregon Dperations Office

25-1 See text revision.

BLM Manual 9220 provides guidelines for use before, during, and after herbicide application. Such precautions as avoiding drift, leaving buffer zones between water and the sprayed areas, and the use of certified pesticide personnel are routine. In addition, monitoring of water sources, both above and below ground may be required depending on the site.

Alternative methods of brush control are discussed on page 57 of the draft EIS. While fire may be more desirable as a management cool, the use of fire is not always a better alternative. see comment response 4-2.

25-2 The range of alternatives from no project8 in alternative 2 (no action) to the highest number of projects in alternative 1 (optimize livestock grazing) was considered to be a reasonable range. Alternative 2 analyzes the "worst case" situation it no funding for improvements were available.

25-3 See text revision for page 2.

OR050-26

Oregon Wilderness Coalition

Main Office, 271 West 12th Avenue, Eugene, Oregon 97401 (503) 344-0675
Metro Office, Dekum Building, 519 SW 3rd Avenue, Suite 706, Portland, Oregon 9,204 (503) 224-0201
Eastern Oregon Field Office, Box 9, Prairie City, Oregon 97869 (503) 820-3714

July 8, 1982

Gerald E. Magnuson, District Manager
Prineville District
Bureau of Land Management
PO Box 550
Prineville, Oregon 97754

Dear Mr. Magnuson,

Thir constitutes our comments on the Brothers Grazing Management Draft Environmental Impact Statement. Our comments in writing will be rather brief since members of our staff end board did discuss our concerns in great detail with you and members of your staff in Eugene on May 12.

While, we believe it is the best Draft EIS ever issued by the Bureau, the document still is not adequate. In general our concerns can be broken into two major areas.

26-1 The first is the lack of economic information. While the draft goes into massive detail about the impacts on permittees, it is seriously devoid of any analysis of the proposed action's impact on the regional or national economy. We discussed this in great detail at our meeting and it is our understanding that this concern will be addressed in the final EIS. For example, OWC believes the document should describe exactly how much each livestock AUM and permittee are being subsidized by the BLM.

26-2 Secondly, while we were most pleased to see a no grazing alternative in the document, we believe the treatment of it was biased end unfair. Because the document only addresses livestock grazing (and not the other resource programs of the Prineville District), it appears that livestock grazing is highly beneficial for watershed, wildlife, recreation, cultural and other resources This simply does not square with the facts.

26-3 It appears to be the case for two reasons. First, since the draft only addresses the livestock grazing program, it assumes that the Bureau will have no other resource management programs under a no livestock grazing alternative. That is highly unlikely. Second ly, the draft assumes that installation livestock facilities which are usable to wildlife and beneficial to other resources to be benefits for that resource program. While in some cases such projects are beneficial to activities other than livestock grazing, they are at best only partial mitigation for the damages to those other resource8 by the grazing of Livestock.

26-4 If the livestock was not there, the developments would not be necessary or even beneficial to wildlife, or what have you. It is patently unfair and biased to for the Bureau to take credit for enhancing other resources, when in fact. they are simply mitigating some of the damage caused by its livestock program.

We look forward to seeing the fine1 Environmental Impact Statement. We sincerely hope that it will not simply be a listing of the changes made by the agency of the draft document. The BLM's issuing of such documents, we think, is strong evidence that the Bureau still looks at the EIS process as something to be completed and forgotten. In such a final form, the final document is clearly not intended to be used by managers as a guiding document. The Forest Service uses the Final EIS as the centerpiece of their management program.

Sincerely yours,

Andy Kerr
for James Monteith
Executive Director

JM/ak

cc : Central Oregon Conservat ionints

We are not so poor we must destroy nor so rich wc can afford to. —NEWTON DRURY

26-1 The EIS analyzes the environmental, social, and economic impacts on the Brothers area resulting from implementation of several alternative grazing management program. Impacts of the Brothers grazing management program on the regional and national economy is not significant. It is beyond the scope of the document to speculate on possible federal subsidies to the livestock permittees, or any other interest in the area.

2 6-2 We did not intend to give the impression that livestock grazing is beneficial to all resources, and do not think that the document would support this contention. It is readily apparent from Table 7 Summary, on pages 22-23 of the draft EIS, that the proposed action is not as beneficial to riparian vegetation, upland habitat diversity, fisheries, water quality, water quantity. channel stability, cultural and paleontological resources. recreation visitor use, visual contrast. and wilderness as either alternative 3 or alternative 4. In fact, many of the benefits derived under the proposed action, especially as related to riparian vegetation/habitat, are due to proposed exclusion of livestock grazing on these areas.

26-3 Other resource management programs would continue. 'his EIS only analyzes impacts of grazing management programs.

26-4 We assume the developments you refer to are water facilities. The practice of fencing new reservoirs and piping the water out the bottom of the dam has been beneficial to many wildlife species. It allows for riparian production and yet concentrates livestock away from the water source. Pipelines and trough systems have a much lower benefit to species other than big game.

see comment response B-12.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
Portland Field Office
727 N.E. 24th Avenue
Portland, Oregon 97232

Reference ES

July 9, 1962

MEMORANDUM

To: Prineville District Manager, Bureau of Land Management
P.D. Box 5513, Prineville, Oregon 97754

From: Field Supervisor, Division of Ecological Services
Portland Field Office

Subject: Review of Draft Environmental Impact Statement for the Brothers Grazing Management Program

We have reviewed the subject Draft Environmental Impact Statements (DEIS) and provide the following comments for use in preparing the final statement.

Our primary review comments concern measures that should be taken to preserve, manage and enhance riparian habitat which the DEIS correctly identifies as being critically important to fish and wildlife. The DEIS further identifies riparian habitat as making up an infinitesimally small part of the land base (less than 1%). Therefore the preferred alternative should incorporate exclusion of grazing in riparian areas. Further, construction of the maximum number of stock dams within feasibility should be considered to increase the riparian habitat base. 27-1

We have conferred with the Oregon Department of Fish & Wildlife (ODFW) and believe carefully timed livestock grazing on critical winter deer and antelope range can benefit both livestock and wildlife. It may be possible to incorporate into the preferred alternative increased livestock grazing on some land while totally excluding it on riparian areas resulting in greater benefits to both livestock and wildlife resources. 27-2

We believe grazing management, especially as it relates to preserving and enhancing riparian habitat, is important enough to request close coordination between your agency, ODFW and the Fish & Wildlife Service.

Please contact David M. Sill of my staff at your earliest convenience to facilitate further coordination. (503-231-6179 or FTS 429-6179).

Russell D. Peterson

Russell D. Peterson

cc:
ODFW, Portland
ODFW, Prineville

27-1 see comment response 2-2.

27-2 See comment response 20-3.

TEXT REVISION

Page 2. Purpose of and Need for Action, paragraph 2. Replace the last two sentences with, "Lands, minerals and nonmineral energy sources, and timber resources on BLM-administered lands are also part of BLMs responsibility. None are affected by implementation of a livestock grazing program in the Brothers area and are not considered in this document.

Replace the first sentence of paragraph 3 with, "The purpose of the proposed action is to manage, protect, and enhance the rangeland resource."

Page 3. Coordination, paragraph 2. Replace first sentence with, "In addition, the Soil Conservation Service participates in development of coordinated resource plans when requested by ranchers who utilize land managed by more than one government agency."

Page 11. Alternative 1, paragraph 4. Replace with, "This alternative differs from the proposed action by allowing 686 AUMs more for livestock initially and 68,982 AUMs more in the long term.

Page 11. Alternative 3. Replace the second sentence in the second paragraph with, "In addition, livestock grazing would not be allowed on any riparian areas, early-seral condition rangeland, or in those portions of mapping units 1, 7, and 9 which are highly susceptible to erosion."

Delete the second sentence in paragraph three.

Page 14. Available Forage Allocation. Insert the following after paragraph 1.

The Brothers EIS addresses all forage allocations in terms of AUMs. An animal unit month (AUM) is the amount of forage needed to sustain one cow and one calf for one month and is equal to 800 pounds of air-dried forage.

An AUM is 800 pounds of air-dried forage whether consumed by livestock or wildlife. However, since individual deer require less than 800 pounds of forage per month, it takes more deer to consume one AUM. Depending on the area and type of forage available, it takes approximately 6 deer to consume 800 pounds of forage. The same is true for other animals such as elk and antelope. In general, it takes 3 elk or 12 antelope to consume an AUM.

For example, assuming that it takes 6 deer to consume 800 pounds of forage (1 AUM), then 30 AUMs could support 180 deer for one month.

If deer use occurs in an area only during 3 months each year, these 30 AUMs would meet the needs of 60 deer for that 3 month period. An additional 20 AUMs of forage nonpalatable to livestock might be available in this area for deer use, resulting in of forage available for deer, which would support 300 deer for one month, or 100 deer for the 3-month period.

An allocation of 30 AUMs of forage for deer might, in fact, meet the needs of 100 deer, assuming that deer use occurs in a given area only during 3 months each year and that 40 percent (20 AUMs) of their diet is forage not palatable to livestock.

To fully compare wildlife AUM allocations to livestock allocations, one must know the type of animal using the area, the vegetation types involved, the season of use, and the number of months involved. In addition, allocation of forage on public land may only be part of the total forage available, since private lands also play a major role in providing forage for wildlife.

Page 15. Figure 1. Replace winter grazing schematic with the following.

Page 18. Standard Procedures. Insert following after paragraph 6.

General coordination guidelines for shrub and juniper control projects developed in the Brothers Management Framework Plan (MFP) will be followed and are listed below by planning unit. The MFP is available for review in the Prineville District Office. Guidelines for the Dry River Unit (the western half of the Brothers EIS area) are:

1. Shrub control methods to be considered are spraying, burning, chaining, beating, and other new methods that may be developed.

2. Brush control projects will be considered only after a detailed allotment management plan or grazing system has been developed and implemented.

3. No shrub control projects will be conducted on good ecological condition range sites when 50% or more of the area is in excellent ecological condition. Control projects will be conducted to achieve a mosaic pattern of approximately 60% control and 40% leave.

4. Project layout and methods of control used will be such that the projects will blend into the natural environment as much as possible.

5. Mosaic patterns will be incorporated into all control projects. Shrubs are considered to be a desirable part of the vegetation makeup of any given block of land: on most of the areas to be treated about 15-20% of the vegetative cover in shrub would be desirable. This does not apply to wildlife winter range areas.

6. Forb composition (measured as % of cover) of 20 to 25% for John Day range sites and of 10 to 15% for High Desert and South Cascade range sites is the optimum wildlife recommendation for the District. This goal puts additional constraints on spraying of sagebrush with chemicals which also reduce forbs. It may be that some reduction could be accepted for the short term, if long term benefits in forb production could be attained. Another possible mitigating measure might be to seed some forbs following a sagebrush spray project.

7. Juniper Control - Projects will be restricted to no more than 60% removal of juniper trees with leave areas concentrated on sites providing optimum thermal cover. Areas within the 40% leave zone should constitute a minimum of 5 acres each and be evenly distributed.

Specific Guidelines

1. Antelope Summer Range: General guidelines apply to these areas plus the identified need to leave some 2 to 5 acre patches of shrubs for antelope fawning.

2. Deer and Antelope Winter Range: Coordinate brush control work with the Wildlife Biologist to insure that adequate winter forage and cover are maintained. No shrub control work will be initiated on low sage sites where soil depth is 15" or less.

3. Sage Grouse Habitat (Z-Mile Radius of Strutting Grounds)

   Projects within the Z-mile radius of strutting grounds will be planned for selective control in a manner that will not adversely impact present and future nesting sage grouse populations. Within the l-mile radius zone shrub reduction projects will be highly selective.

4. Sage Grouse - Spring-Summer-Fall Range

   Projects will be limited to no more than 60% of the area in any 10 year period with emphasis on mosiac patterns, creation of edge, and retention of important cover.

5. Sage Grouse Wintering Areas:

   These areas can only be considered for treatment after adequate consideration and planning has been given to the present and future wintering sage grouse populations found in each specific area.

6. Deer Winter Range

   Sagebrush and juniper control within the critical deer winter range will be restricted by habitat and forage requirements for the wintering deer populations, present and future, for each critical area.

   A brush control plan, consisting of project layout and an implementation plan will be developed for each critical deer winter range prior to starting any brush control work.

   In pastures that are less than 50% public lands and the ecological range condition is fair to better no brush control will be allowed on the public lands.

   For planning purposes it is estimated that 50% of the brush control projects proposed in the Brothers MFP Recommendations could be treated in a 10 year period, with no more than 35% of that total being done in any 3 year period. See overlay .44Bla for areas.

Guidelines for the Upper Crooked River Unit (the eastern half of the Brothers EIS) area are:

1. Shrub control methods to be considered are spraying, burning, chaining, beating, and other new methods that may be developed.

2. Brush control projects will be considered only after a detailed allotment management plan or grazing system has been developed and implemented.

3. No shrub control projects will be conducted on good ecological condition range sites.

4. Project layout and methods of control used will be such that the projects will blend into the natural environment as much as possible.

5. No attempt will be made to attain 100% shrub kill on any given area. Shrubs are considered to be a desirable part of the vegetation makeup of any given block of land. In most of the areas to be treated about 15-20% of the vegetative cover in shrub would be desirable. This does not apply to winter range areas.

6. Forb composition (measured as % of cover) of 20 to 25% for John Day range sites and of 10 to 15% for High Desert and South Cascade range sites is the optimum wildlife recommendation for the District. This goal puts additional constraints on spraying of sagebrush with chemicals which also reduce forbs. It may be that some reduction could be accepted for the short term, if long term benefits in forb production could be attained, Another possible mitigating measure might be to seed some forbs following a sagebrush spray project.

7. Juniper Control - Projects will be restricted to no more than 60% removal of juniper trees with leave areas concentrated on sites providing optimum thermal cover. Areas within the 40% leave zone should constitute a minimum of 5 acres each and be evenly distributed.

Specific Guidelines

1. Antelope Summer Range: General guidelines apply to these areas plus the identified need to leave some 2 to 5 acre patches of shrubs for antelope fawning.

2. Deer and Antelope Winter Range: Coordinate brush control work with the Wildlife Biologist to insure that adequate winter forage and cover are maintained. No shrub control work will be initiated on low sage sites.

3. Sage Grouse Habitat (P-Mile Radius of Strutting Grounds)

Projects within the 2-mile radius of strutting grounds will be planned for selective control in a manner that will not adversely impact present and future nesting sage grouse populations. Within the l-mile radius zone shrub reduction projects will be highly selective.

4. Sage Grouse - Spring-Summer-Fall Range

Projects will be limited to no more than 60% of the area in any 10 year period with emphasis on mosiac patterns, creation of edge, and retention of important cover.

5. Sage Grouse Wintering Areas:

These areas can only be considered for treatment after adequate consideration and planning has been given to the present and future wintering sage grouse populations found in each specific area.

6. Sagebrush and juniper control within the critical deer winter range will be restricted by habitat and forage requirements for the wintering deer populations, present and future, for each critical area.

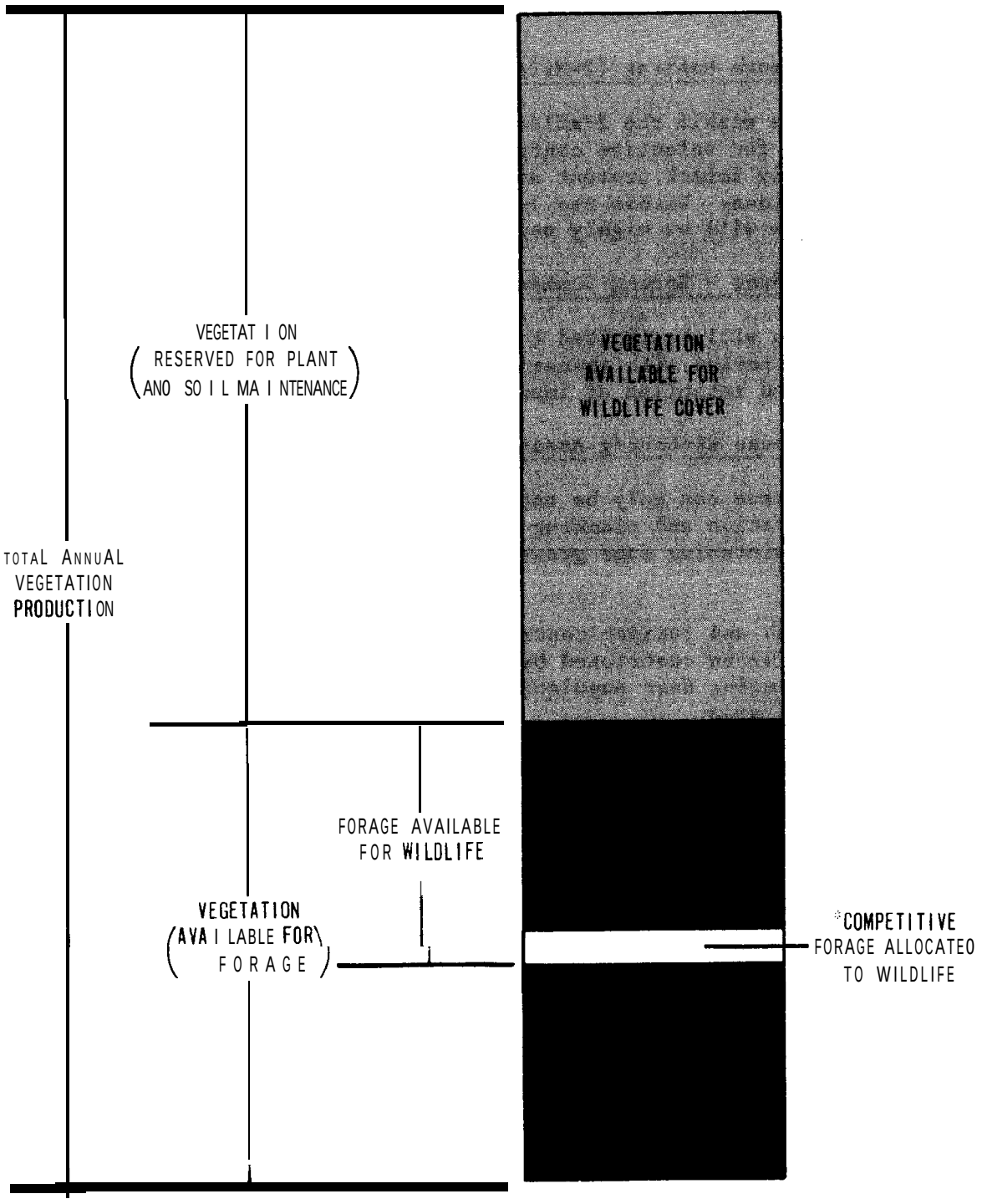
A brush control plan, consisting of project layout and an implementation plan will be developed for each critical deer winter range prior to starting any brush control work.

In pastures that are less than 50% public lands and the ecological range condition is fair to better no brush control will be allowed on the public Lands.

For planning purposes it is estimated that 40% of the brush control projects proposed in the Brothers MFP could be treated in a 10 year period, with no more than 35% of that total being done in any 3 year period. See overlay .44Bla for areas.

Page 30. Table 8. Change basin wild ryegrass to basin wild rye where it appears in the western juniper-big sagebrush vegetation type.

Page 38. Replace figure 3 with revised figure 3.



*COMPETITIVE FORAGE Vegetation that is available for consumption and is palatable to wildlife. The amount of competitive forage is dependent upon the kinds and amount of plants in an area, the amount of competitive forage varies greatly from one area to the next.

RELATIONSHIP BETWEEN VEGETATION **PRODUCTION** AND ALLOCATION OF FORAGE

Figure 3

Page 47. Research Natural Areas, paragraph 1. Change "Dryness" to "Dyrness."

Page 52. Environmental Consequences, paragraph 3. The next to the last sentence should read, 'No impacts would occur to endangered or threatened animal species."

Page 55. Conclusion, paragraph 1. Change to, "The greatest change in vegetation types would result from alternative 1, followed by the proposed action, and alternatives 3, 2, and 4. '

Page 61. Rangeland Improvements, change paragraph 7 to read as follows.

Fences have not proven to have a significant effect on habitat diversity.

Fences cause some big game mortalities immediately after fence construction, but this generally is low.

Page 65. Table 28. Replace with the following.

Table 28 Acres of Crucial Deer and Antelope Winter Range Affected by Rangeland Improvements

Trend	Proposed Action	Alt. 1 (Optimize Livestock)	Alt. 2 (No Action)	Alt. 3 (Optimize Water-shed & Wildlife)	Alt. 4 (Eliminate Livestock)
Crucial deer range	11,234	36,965	0	6,000	0
Crucial antelope range	14,014	41,710	0	9,000	0

Page 76. Insert Central Oregon Conservationists between Audubon Society and Defenders of Wildlife

Page 137. Change "Dryness" to "Dyrness" in entry beginning Franklin, J.F., Hall, F.C., Dyrness, C.T., and Maser, C.

Page 138. Insert the following after entry beginning "Meganck, Rich and K. Gibbs." McLean, A. and E.W. Tisdale 1972. Recovery Rate of Depleted Range Sites under Protection from Grazing. Journal of Range Management 25:178-184.

Page 139. Insert the following after entry beginning "Oregon State Water Resources Board.' Owensby, G.E., E.F. Smith, and K.L. Anderson 1973. Deferred Rotation Grazing with Steers in the Kansas Flint Hills. Journal of Range Management 26:393-395.