Lakeview RMP Amendment Scoping Comment Categorization

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1	ID	Comment Emphasis	Letter #	Commenter	Date Received	City	State	Form LTR #	Comment	Issue Category	Comment	Response/How Will This Comment be Used
2	Individual	OHV Support	1	Dwight Howard	4/8/2010	Hillboro	OR		1	4	At least once a year I travel BLM lands in Eastern Oregon on a dual sport motorcycle. I travel with reverence, awe, inspiration, and respect for the land and private property. I have traveled with my kids on dual sport bikes, and look forward to seeing the sense of wonder and discovery on the faces of my grandkids in just a few short years, as we travel these nearly forgotten byways of the American West.	This comment represents personal observations and no response is needed.
3	Individual	OHV Support	1	Dwight Howard	4/8/2010	Hillboro	OR		2	4	Like my native American and immigrant ancestors before me, explorers from last century, and responsible riders today, words cannot describe the thrill of riding over the crest of a Butte and seeing unspoiled land stretch to the horizon. As a retired veteran, citizen, and responsible rider, I ask you retain access to these lands for generations going forward, just as generations past. The moment one cannot experience the freedom of movement in these lands, these same lands cease to exist.	This comment represents personal observations and no response is needed.
4	Individual	OHV Support	1	Dwight Howard	4/8/2010	Hillboro	OR		3	4	Should the BLM open these lands for wind turbines, forever marring the unbroken landscape with towers screaming in the wind, yet close these same places for responsible riders, would be a tragedy to this place far greater than any activity in the last 200 hundred years.	This comment represents personal opinion and no response is needed.
5	Individual	OHV Support	2	Nate Jackson	5/7/2010	Sandy	OR		1	1	Keep OHV road closures to a minimum.	This comment represents personal opinion and no response is needed. However, motorized travel will be addressed in the OHV and Comprehensive Travel Management Plan (CTMP) portions of the RMP amendment.
6	OHV Group	Opposed To Wilderness	3	Randy Drake	5/12/2010	Bend	OR		1	4	There should be no more wildernesses on BLM lands.	This comment represents personal opinion and no response is needed.
7	OHV Group	Opposed To Wilderness	3	Randy Drake	5/12/2010	Bend	OR		2	3	Remove WSA designation and create a new designation of American Back County open to all Americans.	Removal of WSAs from wilderness study requires Congressional action. FLPMA contains no authority to create new administrative designations such as “backcountry areas”. Both of these issues are beyond the scope of the RMP amendment process.
8	OHV Group	Opposed To Wilderness	3	Randy Drake	5/12/2010	Bend	OR		3	4	Opposition expressed to wilderness or WSAs or questioning of the value of these designations.	This comment represents personal opinion and no response is needed.
9	OHV Group	Request to be on Mailing List	3	Randy Drake	5/12/2010	Bend	OR		4	9	Request to be On Mailing List	Commenter is on mailing list
10	Individual	Request to be on Mailing List	4	Travis Lowe	5/14/2010	Bend	OR		1	9	Please add myself to the mailing list	Commenter is on mailing list
11	Individual	Opposed To Wilderness	4	Travis Lowe	5/14/2010	Bend	OR		2	4	Disagree with the ONDA's attempt at turning much of the public lands in South Eastern Oregon into Wilderness.	This comment represents personal opinion and no response is needed.
12	Individual	OHV Support	5	Larry East	5/20/2010	Klamath Falls	OR		1	4	OHV s are a legitimate use of public lands,	This comment represents personal opinion and no response is needed.
13	Individual	Grazing Support	5	Larry East	5/20/2010	Klamath Falls	OR		2	4	Grazing is acceptable on public lands and no lands within these districts should consider nor become wilderness but primitive back country allowing motorized access for all. I want no new wilderness.	This comment represents personal opinion and no response is needed.
14	Individual	Non-Responsive	5	Larry East	5/20/2010	Klamath Falls	OR		3	4	My family and I have been hunting and camping for years in eastern Oregon would like to continue doing so.	This comment represents personal observations and no response is needed.
15	Individual	Request to be on Mailing List	5	Larry East	5/20/2010	Klamath Falls	OR		4	9	Please put me on your mailing list and keep me informed.	Commenter is on mailing list
16	Individual	OHV Support	6	G_W_Ohman	5/21/2010	Klamath Falls	OR		1	1	When deciding which roads are to be closed to vehicle traffic, keep in mind that these roads belong to the taxpayers of this America because the building of these roads were paid for by taxpayers from their tax money. BLM is tasked to manage the road system but that does not mean they have the right to stop the use of said roads. If some roads are not to be maintained for general vehicle traffic they still can be used by 4x4 trucks and ATV's so the roads need to be left open to those that are able to travel on said roads.	This will be addressed within the range of alternatives considered in the CTMP portion of the RMP amendment.
17		OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		1	4	We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the Southeastern Oregon and Lakeview RMP and EIS. We enjoy riding our OHVs on primitive trails and roads in the southeastern Oregon area. All multiple-use land managed by the Bureau of Land Management provides a significant source of these OHV recreational opportunities.	No response needed

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18	OHV Group	Non-Responsive	7	CTVA_Action	5/22/2010	Helena	MT		2	4	Please accept these comments.	No response needed
19	OHV Group	Non-Responsive	7	CTVA_Action	5/22/2010	Helena	MT		3	4	Thanks for your consideration.	No response needed
20	OHV Group	Multiple Use Support	7	CTVA_Action	5/22/2010	Helena	MT		4	4	We enjoy riding our OHVs on primitive trails and roads in the southeastern Oregon area. All multiple-use land managed by the Bureau of Land Management provides a significant source of these OHV recreational opportunities. We feel strongly about OHV recreation for the following reasons: We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. input process. These independent multiple-use recreationists include visitors who use motorized routes for weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking. Multiple-use visitors also include physically challenged visitors who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding. We have observed that 97% of the visitors to this area are there to enjoy motorized access and motorized recreation.	Most of this comment represents personal observations and no response is needed.
21	Group	Multiple Use Support	7	CTVA_Action	5/22/2010	Helena	MT		5	5	Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action. The relative importance of recreation on a national basis is demonstrated by the Bureau of Economic Analysis statistics for spending on recreation. In 1979 the index for recreation spending was 32.537 (year 2000 = 100, http://www.bea.gov/national/nipaweb/TablePrint.asp?FirstYear=1979&LastYear=2004&Freq=YearSelectedTable=33&ViewSeries=NO&Java=no&MaxValue=155.606&MaxChars=7&Request3Place=N&3Place=N&FromView=YES&Legal=Y&Land=). In 2004, the index was 113.695 for an increase of 349%. No other sector has increased this dramatically. Clearly, the public wants and needs adequate recreational opportunity and this should be the over-arching theme of this evaluation and decision.	BLM will review references and cite in the RMP amendment, if appropriate.
22	Group	OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		6	1	Many federal actions have led to the continual closure of motorized recreational opportunities and access and at the same time the number of OHV recreationists has grown to 50 million. Multiple uses of the forest are marginalized every time a forest plan or travel management plan comes up for action. The motorized closure trend has created significant cumulative effects and has reached the point where it is causing severe public distress. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be “no net loss” of motorized recreational opportunities with the Southeastern Oregon and Lakeview RMP and EIS. We would ask that this project address the attached checklist of issues and address the goals and needs identified. Using this checklist will help identify and address concerns and, hopefully, the needs of the public will be adequately met by implementing a more reasonable multiple-use alternative.	Much of this comment represents personal opinion. The RMP amendment will address travel management in the OHV and CTMP sections.

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23	OHV Group	Multiple Use Support	7	CTVA_Action	5/22/2010	Helena	MT		7	1	The project area with its current level of motorized access and recreation is where hundreds of thousands of residents from Oregon and the surrounding regions including California, Washington, and Idaho go to enjoy motorized recreation. The project area is where we go and what we do to create those memories of fun times with family and friends. Management of these lands for multiple-uses including reasonable motorized use allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands. We ask that management for sharing of these lands for multiple-use be selected as the preferred alternative. Sharing would include a 50/50 sharing and equal opportunity of non-motorized to motorized trails.	Much of this comment represents personal opinion. The RMP amendment will address travel management in the OHV and CTMP sections.
24	Group	OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		8	1	The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists. We cannot tell you how many times we have met motorized recreationists and they have asked us "What is going on?" This question will be even more prevalent if the travel plan is pushed by the public in a short time frame. In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation this cumulative effect. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact.	Much of this comment represents personal opinion. The RMP amendment will address travel management in the OHV and CTMP sections.
25	Group	OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		9	1	There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists, does not provide equal opportunity, and does not adequately address the growing needs of motorized recreationists. These are the supreme issues that this action must address. The evaluation and proposal must adequately address these three issues and the predisposition to motorized closures must be avoided. The proposed action must meet the needs of motorized recreationists both today and tomorrow. We respectfully request that the evaluation and proposal be directed to adequately address these issues and goals: 1) The needs of motorized recreationists and the cumulative impacts of motorized closures, 2) All existing routes including those meeting National OHV Rule guidelines and currently closed routes, 3) The current imbalance of non-motorized to motorized trails, 4) At least one pro-recreation alternative in the analysis, 5) Under the existing condition, too much of the Vale District Office area is set-aside for segregated exclusive non-motorized use for 1% of the visitors to the area. We do not agree with all of the effort that the agency is going through to segregate users. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964 (http://www.ourdocuments.gov/doc.php?flash=true&doc=97&page=transcript). In order to reasonably meet the requirements of integration a reasonable management goal for 99% of the forest would be for shared multiple-use that would produce a forest-wide 50/50 sharing and equal opportunity of non-motorized/motorized trail opportunities.	Much of this comment represents personal opinion. References to conditions on the Vale District or national forest do not apply to the Lakeview planning area. The RMP amendment will address travel management in the OHV and CTMP sections.
26	OHV Group	OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		10	1	The Southeastern Oregon and Lakeview RMP and EIS must include adequate evaluation of cumulative effects so that motorized recreation will not be removed from our public lands. An adequate evaluation of cumulative effects would include all past, current, and reasonably foreseeable actions that have or will produce motorized closures in the State. The environmental analysis must adequately address the human environmental including issues, needs, alternatives, and impacts on the public associated with the reduction or lack of adequate motorized recreation. An adequate analysis would include evaluation of significant social, cultural, historical use, current use, future needs, economic impact, and quality of the human environment issues from the perspective of motorized recreationists.	Much of this comment represents personal opinion and no response is needed. The RMP amendment will address cumulative effects within Chapter 4.

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27	Group	OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		11	1	The Southeastern Oregon and Lakeview RMP and EIS must include the evaluation of a pro-recreation alternative so that motorized recreationists do not end up losing before the process begins. A true pro-recreation alternative should be based on the actual usage of the area which is 99% motorized multiple-use in the case of the Southeastern Oregon and Lakeview RMP and EIS.	This will be addressed in the range of Alternatives (Chapter 2) and analysis of impacts (Chapter 4) in the RMP amendment.
28	Group	OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		12	1	A reasonable alternative should include: a. Sharing non-motorized trails with mountain bikes and motorcycles, b. Creating new mountain bike and motorcycle trails, c. Creating ATV trails from roadbeds that both currently open and closed, d. Creating new ATV trails e. Creating new ATV trails that connect with converted roadbeds to create loops, and, f. Establishment of 4x4 challenge routes using roadbeds that are both currently open and closed including historic mining routes	This will be addressed in the CTMP portion of the RMP amendment.
29	OHV Group	OHV Support	7	CTVA_Action	5/22/2010	Helena	MT		13	1	We would respectfully request that these (above) points and others in the following comments be adequately addressed so that a reasonable pro-recreation alternative can be implemented.	See other responses.
30	OHV Group	Non-Responsive	7	CTVA_Action	5/22/2010	Helena	MT		14	4	We appreciate your consideration of our comments.	No response needed.
31	Individual	OHV Support	8	Fred Worsley	5/26/2010	Roseburg	OR		1	1	Thank you for the letter and opportunity to comment on the Lakeview RMP. My comments are very brief and to the point! Leave the current roads open to motorized traffic that allows, access in the various areas and restrict off road use where appropriate and certain sensitive areas need protection. However, let the law abiding citizens enjoy their land outside of the restricted off-road areas. Place meaningful and substantial fines and enforce fines for lawbreakers that will make them think twice before they break the law.	Motorized use will be addressed in the OHV and CTMP portions of the RMP amendment. Law enforcement needs will also be addressed in the CTMP.
32	Individual	OHV Support	8	Fred Worsley	5/26/2010	Roseburg	OR		2	4	Let the law abiding citizens enjoy their land outside of the restricted off-road areas. Place meaningful and substantial fines and enforce fines for lawbreakers that will make them think twice before they break the law.	No response needed.
33	Individual	OHV Support	8	Fred Worsley	5/26/2010	Roseburg	OR		3	1	I personally am sick and tired of being denied access and restricted because of a few "bad apples". I finally drew a muzzleloader antelope tag this last hunting season and when I began the hunt I found several roads in the Antelope Butte, Sage Hen, and Hawksie Walksie (east of Sage Hen) areas closed to motorized traffic. I see no reason for these closures as there were adjacent roads nearby that were not closed. I particularly wanted to drive on top of Antelope Butte to glass for wildlife as well as my antelope. Also I have in the past stayed on top of the butte to star gaze at night-something that you folks likely did not even consider a use by the law abiding citizens. I am 59 years old and not getting any younger. Yes, I could have lugged my gear on my back and hiked to the top. But why? There is a road right to the top that is closed and should not be!	These roads were closed in Lakeview RMP (2003) to comply with the current wilderness interim management policy. Changing this policy is beyond the scope of the planning process. This decision will not be re-addressed in the RMP amendment.
34	Individual	OHV Support	8	Fred Worsley	5/26/2010	Roseburg	OR		4	4	Leave all the current roads open, fine the hell out of the few SOB's that are the law breakers and get back to letting the law abiding citizens use our land as we use to.	This comment represents personal opinion and requires no response.
35	Individual	Travel Management Planning	8	Fred Worsley	5/26/2010	Roseburg	OR		5	1	Protect those off road areas as necessary from all motorized vehicles with properly marked designation and enforce those areas.	Signing and enforcement will be addressed in the CTMP portion of the RMP amendment.
36	Individual	Multiple Use Support	8	Fred Worsley	5/26/2010	Roseburg	OR		6	4	As for the wilderness people who want to restrict my access with a vehicle on the current roads they can pay me for restricting my use. If they want to lock up my access and subsequent use of my land then they pay very big bucks for this or get the hell out of this country. It is time we take back use of our lands from the selfish, manipulative, preservationists. This is the people's land under a multiple use concept, not a minority group, and the people have created the BLM to manage accordingly. So do so!	This comment represents personal opinion and requires no response.
37	Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/26/2010	Chiloquin	OR		1	4	Klamath Direct wants you to know that their is substantial local support for the positions taken by regional and national groups in their challenges of prior Lakeview BLM RMP efforts to adequately address the ORV challenge [euphemistically known as OHV].	No response needed; However RMP amendment will address travel management.

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38	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		2	1	As you begin the process of revising the Lakeview BLM RMP in response to the settlement of the suit from ONDA, please be advised as part of your thinking that the approach taken by the Fremont-Winema N.F. in their proposed travel management plan is totally inadequate with respect to OHV access and control and invites an appeal if it is not substantially revised in response to final input. BLM should not follow the example of the F-W approach, but unfortunately BLM is under the same pressure by the Blue Ribbon supported ORV contingent to accommodate OHVs on its lands. Make no mistake about it, the environmental community will make a stand to stop what amounts to the privileged treatment afforded ORV users on public lands under the multiple use umbrella.	Much of this comment represents personal opinion and requires no response. However, BLM travel management planning policies and procedures are different from those used by the FS.
39	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		3	4	As a result of many ORV users' aggressive rip and run behavior and the mile diameter of the racket each two cycle and muffler-altered machine makes, the experience of virtually all other recreational users is negatively impacted - from hikers, to rock hounds, to bird watchers, to wildflower enthusiasts, to volcanic formation explorers, to horseback riders, to mountain bikers, to campers, to hunters, to fishermen, to kayakers, etc. No other recreational group has such a pervasively negative impact on other recreational users as ORV users, and most of these other users have an extremely low impact on the natural resources by comparison. In addition, ORVs have no season to which they are restricted; they are currently allowed all over the forests and grasslands all the time in contrast to many other seasonal user groups. So, the ORV negative impact cannot be avoided by other users trying to strategically schedule their low impact recreational activities.	This comment represents personal opinion and requires no response.
40	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		4	4	As it stands ORV users are afforded the position of the Alpha recreational user – everyone else stand aside, smell the fumes, put up with the screaming racket, overlook the resource degradation - especially in riparian areas, and beware - all the time. So, under the guise of multiple use, the recreational users who constitute only 2% of all recreational users and who create the highest negative impact on both natural resources and other users are in effect given priority among all recreationists. This is a situation that is unjustified, unnecessary, and intolerable. It is time to end the ORV Alpha recreationist syndrome.	This comment represents personal opinion and requires no response.

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41	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		5	1	BLM has as its first order mandate to manage its lands for the protection and sustainability of its natural resources. Recreational access is secondary to this primary obligation, and it follows that any recreational use travel management plan [mainly to address OHVs] must recognize that the activities of different recreational users have greater and lesser impacts to both natural resources and to other users. All recreational users are NOT equal and should not be regarded as having the same "rights" for access to and use of public lands under the multiple use mandate [the unfortunate position taken in the past]. Any travel management plan that the Lakeview BLM produces as part of its revised RMP must respect this recreation access and use principle: the lower the impact of the recreational use to resources and other users, the more open the access across broader territory; the higher the impact of the recreational use on resources and other users, the more restricted the access across more limited territory. This is the clear intent of direction long in place for federal lands – see: Nixon's Executive Order 11644, which states that when designating OHV routes, the responsible official "shall consider effects on the following, with the objective of minimizing: 1. Damage to soil, watershed, vegetation, and other forest resources, 2. Harassment of wildlife and significant disruption of wildlife habitats, 3. Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands." ORV use is to be considered where it does not negatively impact resources and other users. No other recreational use is subject to such a limitation. There is no directive to limit hikers to locations where their activity does not negatively impact ORV users!! Clearly ORV use is to be considered a secondary recreational use on national lands. It is not one among equals, and certainly ORV use is not meant to rule the recreation territory as the alpha use – the privilege to which it has become accustomed under the heretofore laissez faire management of both the FS and BLM.	The comment mostly represents personal opinion or personal interpretation of BLM OHV policy and requires no response. However, BLM will address "minimization criteria" on a route-specific basis within the CTMP portion of the RMP amendment.
42	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		6	4	We have all been watching for years the explosion of ORV use in the Christmas Valley dunes area, especially following the ORV restrictions put in place in the Oregon costal dunes areas. In these national costal dunes lands, the FS has found it necessary to create segregated areas for ORVs, much to the "displeasure" of the ORV crowd. In the face of these restrictions, much ORV activity has move east to the Christmas Valley dunes area where Lakeview BLM has been allowed it to proceed largely without oversight or restriction, the "blind eye" approach to management, which is management just the way the ORV crowd wants it. As it presently stands, I recommend taking a low impact hike in the Christmas Valley dunes area this Memorial Day weekend and see how enjoyable you find it with ORVs buzzing all over the place!! No control, no respect = maximal impact on other users. Hikers have been virtually forced to give up on the dunes, and the same encroachment by ORVs is being invited across the public forests and the grasslands of the area.	This comment represents personal opinion and requires no response.

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43	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		7	4	During the long period of passive BLM ORV management, economic development in the town of Christmas Valley has come to depend on ORV access and use on FS and BLM public lands. BLM's passive management has indirectly allowed this development to occur, and now the agency is expected to further accommodate this ORV economy in spite of the directive to produce a travel management plan that addresses ORV negative impacts to both resources and other users. Continuing to support ORV based economic development for communities in the vicinity of public lands is in direct conflict with meeting BLM mandates for both natural resource management and protecting the legitimate access rights and uses of low impact users. There is no legitimate argument for BLM to support ORV economic development in the Christmas Valley area [or any other similar area], unless we are to invoke the "precedent" set by failed past management practice! The ORV development of the Christmas Valley area is a symptom of a recreational "disease," and BLM should not be in the business of accommodating and supporting communities that develop themselves to foster this "disease" to the detriment of the greater public good.	This comment represents personal opinion and requires no response.
44	Enviro Group	Non-Responsive	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		8	4	As planning proceeds, you can expect more input from most active environmental organizations in the area, including Klamath Direct.	No response needed
45	Enviro Group	Travel Management Planning	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		9	1	It is time to restrict ORV use to specific roads and trails and dirt bikes to specifically designated "sacrifice" areas near communities [old gravel quarries to accommodate the hyper motocross and "airborne" youth crowds]. And roads and trails open to ORVs does not mean all secondary roads and trails in the existing system [for which there is probably a plan to reduce density anyway].	This comment mostly represents personal opinion and requires no response. However, the BLM will address the effects of a range of OHV alternatives and route specific management in the OHV and CTMP portions of the RMP amendment.
46	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		10	1	At least half of the secondary road and trail system that is part of the future plan for the District must be off limits to ORVs so the many non-ORV users can get away from the ORV impacts – those present and those otherwise invited to appear.	This comment mostly represents personal opinion and requires no response. However, the BLM will address the effects of a range of OHV alternatives and route specific management in the OHV and CTMP portions of the RMP amendment.
47	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		11	4	No restrictive ORV travel management plan is adequate that relies on ORV users obtaining a map designating open roads and trails and then expecting these ORV users to police their own activities. There is overwhelming evidence, which BLM planners must be aware of, that self-policing in the case of ORV users does not work!	This comment represents personal opinion and requires no response.
48	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		12	4	In this regard, the claims of the ORV Tread Lightly program are all image and very little reality, except for the few actual puttering Moms and Pops that are out there on their ATVs on a Sunday afternoon. Tread Lightly tries to make the ORV users look good with its education program, posters and commitment to environmental "sensitivity," but the research on the behavior of actual ORV users demonstrates that very few are actually guided by the Tread Lightly principles.	This comment represents personal opinion and requires no response.
49	Enviro Group	Opposed to OHVs	9	Klamath_Direct_T_Burns	5/28/2010	Chiloquin	OR		13	1	There must be vigorous enforcement of ORV restriction of ORV users on public lands, and the costs of this enforcement must be paid for by the ORV community. If ORV users want access for their high impact activities on public lands, where they need no liability insurance to cover damages to property, themselves, or others and where the public supports rescue when they hurt themselves or get lost or break down in the back country, they can pay the enforcement expense for the privilege from their gas tax rebate funds.	Law enforcement needs will be addressed in the CTMP.
50	Individual	Travel Management Planning	10	Rus Buswell email 1	5/28/2010	Not Provided	Not Provided		1	4	I want to comment on your travel management plan for your resource area/district. I am concerned about the closing of roads that are being used for multiple use activities. I understand the need to protect areas from damage and I appreciate your efforts regarding the same.	No response needed

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51	Individual	Travel Management Planning	10	Rus Buswell email 1	5/28/2010	Not Provided	Not Provided		2	1	I want to make a distinction in the motorcycle world. For back country riding you have categories of "biking" - I'm talking motorcycles with that term - you have the dirt bike riders on machines that are not street legal and you have street legal adventure riders. Adventure riders are on machines that are generally bigger, heavier and with dual purpose tires (street and secondary roads including gravel and natural surface roads). It is my belief that the dirt bikes usually have much more aggressive tread on their tires they are generally lighter/faster and they tend to be harsher on the land. Quads (4 wheel motorcycles) would fall in the category of a harsher machine when it comes to resource damage. These are just plain facts that can't be simply ignored.	The comprehensive travel management plan (CTMP) will address the needs of different types of motorized users, including motorized trails. The impacts of these types of uses will be addressed in Chapter 4 of the RMP Amendment/EIS.
52	Individual	Travel Management Planning	10	Rus Buswell email 1	5/28/2010	Not Provided	Not Provided		3	4	I urge you in your planning to consider these distinctions. An adventure bike is generally going to be ridden in areas that are less prone to damage (existing roads) and is going to be ridden by older riders. Not to be to age discriminatory but these older riders are more likely to be following the rules and are less aggressive riders, on the whole. That certainly is a generalization that does not apply in all cases. While I would applaud your attempts to also make areas available to the dirt bikes and quads, I think it is important to look at these bikes as different categories that need to be approached from different perspectives	No response needed
53	Individual	OHV Support	11	Rus Buswell email 2	5/28/2010	Not Provided	Not Provided		1	4	Keep TAT and OBCDR back country routes open.	This comment represents personal preference and no response is needed.
54	Individual	Public Involvement	11	Rus Buswell email 2	5/28/2010	Not Provided	Not Provided		2	1	Use Electronic world and blogs to educate and recruit volunteers to work on trails.	Public outreach/education needs will be Addressed in DRMP Amendment. as part of implementation.
55	Individual	Request to be on Mailing List	12	L_Seely	6/1/2010	Manzanita	OR		1	9	Keep on mailing list	Commenter is on mailing list
56	OHV Group	Opposed To Wilderness	13	Pacific NW 4WD Assoc Carol Jensen	6/1/2010	Not Provided	Not Provided		1	4	I oppose the creation of Wilderness that limits access to public lands. Congress worded the 1964 Wilderness Act to include some common sense and a real sense of Wilderness. The 1964 Act talked of huge expanses of land untrammeled by man, where the imprint of man is unnoticed. The true intent of the Act is not being followed. I do not support the continued efforts to create Wilderness areas that limit access. Americans with disabilities access is limited by the creation of Wilderness areas.	This comment represents personal opinion or interpretation of Federal statute and no response is needed.
57	OHV Group	Non-Responsive	13	Pacific NW 4WD Assoc Carol Jensen	6/1/2010	Not Provided	Not Provided		2	4	Thank you for your consideration.	No response needed
58	Individual	Opposed to Grazing	14	Cort Vaugh	6/2/2010	Bend	OR	2	1	1	Adopt language that supports voluntary grazing permit relinquishment.	Voluntary permit relinquishment will be addressed in at least 2 alternatives within the RMP amendment.
59	Individual	Climate Change	14	Cort Vaugh	6/2/2010	Bend	OR	2	2	1	Consider the impact of grazing on climate change.	The potential for grazing management alternatives to contribute to carbon storage and greenhouse gas emissions will be addressed in Chapter 4 of the RMP amendment.
60	Individual	sage grouse	14	Cort Vaugh	6/2/2010	Bend	OR	2	3	3	The Lakeview RMP area includes prime sage grouse habitat. Take a fresh look at protecting sage grouse.	Sage-grouse habitat is being addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.
61	Individual	Protect Areas With Wilderness Character	14	Cort Vaugh	6/2/2010	Bend	OR	2	4	1	Protect the wilderness quality areas identified by ONDA.	In accordance with the 2010 Settlement Agreement and current inventory guidance, the BLM will complete its own inventory of wilderness characteristics and include a summary of its findings in Chapter 3 - Affected Environment section of the RMP Amendment. BLM will also address the impacts of at least 2 alternatives that vary in the amount of protections applied to lands the BLM identifies as having wilderness characteristics in Chapters 2 and 4 of the RMP amendment.
62	Individual	Protect Areas With Wilderness Character	14	Cort Vaugh	6/2/2010	Bend	OR	2	5	1	Close the wilderness quality areas to motorized use with the travel management plan	This will be addressed within the range of alternatives presented in Chapter 2 and in the CTMP portion of the RMP amendment.
63	Individual	Opposed To Wilderness	15	David Moore	6/2/2010	Halfway	OR		1	4	Oppose ONDA efforts to lock up public lands for exclusive use of elite group of hikers and funding of process which funds to lawyers - retain focus on balance public use.	No response needed.

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64	Individual	Multiple Use Support	15	David Moore	6/2/2010	Halfway	OR		2	4	I trust your organization will continue to resist the actions of these high priced lawyers and retain your focus on the best balanced PUBLIC use of these public lands.	No response needed.
65	Individual	North Lake Special Recreation Area Planning	16	Janet Gaston	6/3/2010	Not Provided	Not Provided	4	1	1	I want all of the Christmas Valley sand dunes open for the public to freely use.	The RMP amendment will address a range of alternatives for OHV use in the Sand Dunes area.
66	Individual	North Lake Special Recreation Area Planning	16	Janet Gaston	6/3/2010	Not Provided	Not Provided	4	2	1	Everything that was closed (Christmas Valley) should be re-opened.	The current OHV closure area in the Fossil Lake area was put in place to protect cultural and paleontological resources on or near the surface. This closure decision was made in the Lakeview RMP (2003) and will not be revisited in the RMP amendment.
67	Individual	North Lake Special Recreation Area Planning	16	Janet Gaston	6/3/2010	Not Provided	Not Provided	4	3	1	Any trails in that area (Christmas Valley) should also be available for public use.	Addressed in DRMP Amendment.
68	Individual	OHV Support	17	Klamath Falls Four Runners Kevin Simpson	6/3/2010	Not Provided	Not Provided	4	1	9	Same as Form Letter #4.	See response to Form Letter #4.
69	Individual	Protect Areas With Wilderness Character	18	Ravi Grover	6/3/2010	Chicago	IL	2	1	9	Same as Form Letter #2.	See response to Form Letter #2.
70	Individual	North Lake Special Recreation Area Planning	19	Reid Sherwin	6/3/2010	Not Provided	Not Provided		1	1	Request significant off road jeep trails preferable technically challenging and not dead ends	Addressed in DRMP Amendment.
71	Individual	North Lake Special Recreation Area Planning	19	Reid Sherwin	6/3/2010	Not Provided	Not Provided		2	1	Open Christmas Valley Sand Dunes.	Development of Alternatives and Addressed in DRMP Amendment.
72	Individual	Protect Areas With Wilderness Character	20	J_Grobelny	6/4/2010	Not Provided	Not Provided	2	1	9	Same as Form Letter #2.	See response to Form Letter #2.
73	Rec Group	Non-Responsive	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		1	4	The Blue Ribbon Coalition (BRC) is a nationwide organization representing approximately 600,000 motorized recreationists, equestrians, mountain bike enthusiasts and resource users. A significant percentage of our members recreate in Oregon and use motorized vehicles, including off highway vehicles, to access lands managed by the Oregon BLM. In addition to access travel itself, BRC members visit the lands mentioned herein for motorized recreation, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping and other similar pursuits. Blue Ribbon's members and supporters have concrete, definite and immediate plans to continue such activities in the future. Please incorporate these comments into the record and carefully consider our suggestions.	No response needed
74	Rec Group	Non-Responsive	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		2	4	The plan revision doesn't have to be a win – lose situation.	This comment represents personal opinion and requires no response.
75	Rec Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		3	4	We understand the courts have found flaws with some of the analysis in the previous plan, and some of those flaws concerned how the previous planning effort addressed lands with wilderness characteristics and recreational uses, including off-highway Vehicle use. As off-highway vehicle enthusiasts, we believe this “supplemental” planning effort provides an opportunity to improve recreational management, including enhancing and improving the opportunity and quality of the OHV experience in the planning area – AND – is also an opportunity to bring active management and real protection to important natural resources, including “wilderness character.”	This comment represents personal opinion and requires no response.
76	User Group	Environmental Law and Policy	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		4	1	It is important to note that the court offered only procedural guidance, not a substantive mandate to restrict OHV use. The prior plan was flawed for not formulating a “reduce ORV” Alternative. Planners should not conclude the court ordered a decrease of off-highway vehicle use.	Development of Alternatives

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77	Rec Group	Non-Responsive	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		5	4	We hope the planning team and decision maker will view this as an opportunity to provide for current and future recreational demands, mitigate impacts and leverage existing partnerships and programs for management and monitoring.	No response needed
78	Rec Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		6	1	As noted below, off-highway vehicle recreation has increased in popularity in recent years. Ditto the importance of BLM in providing opportunities for off-highway vehicle use. Inadequacies in the BLM's former planning effort do not preclude the agency from considering Alternatives that improve and enhance those opportunities where appropriate in a managed, sustainable manner.	Development of Alternatives
79	User Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		7	1	We encourage the BLM to develop at least one Alternative that improves and enhances off-highway vehicle recreation while also providing adequate protection for the resources identified in FLPMA §201 and §202.	Development of Alternatives
80	Rec Group	Environmental Law and Policy	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		8	4	In this planning effort, the court's ruling must be incorporated in context with BLM's other lawful mandates and Alternatives that are developed must not be in significant conflict with those mandates.	This comment represents personal interpretation of Federal statutes, court ruling, and Settlement Agreement and requires no response.
81	Rec Group	Environmental Law and Policy	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		9	5	We understand the courts have found that lands identified with wilderness characteristics can be identified pursuant to BLM's inventory and planning guidance, and incorporated into the land and resource management plans. The courts have ruled such authority is provided via FLPMA §201 and §202. However, the ability to formally establish Wilderness Study Areas, as well as the ability to formally recommend to Congress that lands be designated Wilderness is precluded by FLPMA §603.	Review Reference and incorporate if appropriate
82	User Group	Opposed To Wilderness	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		10	1	The agency must walk the fine line between adhering to these conflicting mandates. BRC would like to see the planning team develop a range of options across various Alternatives. For example, in one Alternative, the BLM may consider identifying “lands with wilderness characteristics” and developing general management guidance on how those lands are to be managed. BLM should not, however, develop an Alternative that formally establishes Wilderness Study Areas, or could be interpenetrated as making a recommendation to Congress on lands to be included in the National Wilderness Preservation System.	Interpretation of BLM policy. Addressed in alternative development.
83	Rec Group	Environmental Law and Policy	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		11	4	The agency must not create a situation where an activity can occur for an inventory for a land management designation that precludes the very same activity.	This comment represents person opinion and requires no response.
84	Rec Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		12	1	This issue deals with the question of how lands that have wilderness characteristics will be managed. We are concerned because many of the areas that wilderness advocacy groups are saying have wilderness characteristics also experience meaningful historical use by motorized and/or mountain bikes. The BLM must not, through this planning effort, place itself and the recreating public in an awkward “catch 22” by inappropriately defining lands with wilderness potential that have long received meaningful motorized/mechanized access. The “catch 22” here will occur if your inventory criteria for lands with wilderness characteristics allow for the presence of a significant amount of motorized use, but then your management proscriptions for the same area precludes those existing uses. If the existing uses do not stop the lands from being identified as having wilderness characteristics, then certainly those historic activities should be allowed to continue.	Much of this comment represents personal opinion and requires no response. Other portion will be addressed in alternative development.
85	User Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		13	1	It has been recognized, as a matter of fact and law, that continuation of motorized activities within areas proposed or recommended for Wilderness does not significantly degrade wilderness values. In the same vein, federal courts have recognized that temporary noise and disturbance associated with motorized activity does not adversely impact wilderness character and is not inconsistent with laws, regulations, and policies requiring the maintenance of wilderness character. See River Runners for Wilderness v. Martin, 2009 WL 2151356 (9th Cir, 2009).	Interpretation of case law. Addressed in alternative development.

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86	Rec Group	Environmental Law and Policy	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		14	4	FLPMA's sections 201,202 and 603 give the agency authority to inventory and manage for wilderness characteristics, but nothing in law or regulation mandates that "non conforming uses," uses be eliminated. Even the BLM's Interim Management Policy for Lands Under Wilderness Review does not mandate that non-conforming uses be eliminated.	This comment represents personal interpretation of Federal statute and requires no response.
87	Rec Group	Opposed To Wilderness	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		15	4	One other important item related to wilderness. Only Congress can establish Wilderness. Congress, the American People, and those who live near these lands often work together to find the right balance of Wilderness and multiple use lands. Whenever a federal land managing agency makes those decisions itself, that unlawfully removes options for legislative compromise between Protect Areas With Wilderness Characters, local governments and other multiple use stakeholders.	This comment represents personal interpretation of Federal statute and requires no response.
88	User Group	Public Involvement	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		16	4	We could not find any information on the BLM's websites referenced in the Notice of Intent: http://www.blm.gov/or/districts/vale/plans/valermp.php http://www.blm.gov/or/districts/lakeview/plans/lakeviewrmp.php. In fact, we couldn't find any information on any of BLM's website regarding this planning effort.	Both websites are operational.
89	Rec Group	Non-Responsive	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		17	9	We formally request the BLM adopt the following issues as formal planning issues and request that alternatives be developed to address them accordingly:	See responses below.
90	Rec Group	Public Involvement	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		18	1	Indeed, many BRC members in the area were generally aware of the lawsuit, but not aware that BLM is amending its plan. We encourage the decision maker to review the scoping efforts and determine if all of the affected stakeholders have been contacted and made aware of this planning effort.	Public outreach will be addressed in Chapter 1.
91	Rec Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		19	1	1) **Cumulative loss of OHV recreational opportunity.** The cumulative loss of recreational opportunity by those who choose or are required to use motorized vehicles for access and recreation is a significant issue that should be incorporated into the analysis and into the decision making process. NEPA requires federal agencies to properly analyze the direct, indirect, and cumulative effects of the proposed action. 40 C.F.R. § 1508.8. Cumulative effects include "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably-foreseeable future actions….". 40 C.F.R. § 1508.7. In NEPA, the term "environment" includes the "human environment" which "shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." 40 C.F.R. § 1508.14. Thus, the agency's duty to analyze impacts does not end with impacts to the physical environment, but includes all of the effects on the human environment, including the effects by vehicle assisted visitors.	Much of this comment consists of personal interpretation of Federal statute or regulation and requires no response. However, the cumulative loss of recreational opportunities associated with motorized vehicles will be addressed in in Chapter 4 - Environmental Consequences section of the RMP amendment.
92	Rec Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		20	1	2) **Motorized recreational opportunity** has been and will be drastically reduced throughout the region. The BLM itself continues the trend of eliminating opportunity for vehicle-based recreation across virtually all of Oregon's field offices. Additional significant closures are being proposed by land managers across the region. The amount of closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past. The cumulative loss of motorized recreational opportunity should be brought into the analysis and incorporated into the decision making process. Significance criteria could include number of miles closed, number of acres closed or other similar quantifier. The analysis should include a brief but accurate description of the current travel management rules on adjacent public lands. The analysis should also include a brief but accurate description of the ongoing travel management planning projects on adjacent lands as well as other public lands in the region.	Much of this comment consists of personal interpretation of what should be included in a CTMP analysis and requires no response. However, the cumulative loss of motorized recreational opportunities will be addressed in in Chapter 4 - Environmental Consequences section of the RMP amendment.

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93	User Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		21	1	3)**Trail-based recreational experience.** We are uncertain how the effects on recreation experiences will be considered in the decision making process. Normally, recreation experience would be more appropriately addressed via site-specific planning. However, the focus on wilderness and its recreational values, as well as competing recreational values, make this issue at least worth consideration. Naturally, like all recreational enthusiasts, BRC's members and supporters are interested in a quality recreational opportunities. Insofar as that can be reflected as a planning Issue, we would suggest "trail-based recreational experience" be considered. Significance criteria such as "loops," "level or range of difficulty," "scenic quality," "destinations" or other similar qualities OHV users appreciate in trails should be considered by the planning team.	This will be addressed in the CTMP.
94	User Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		22	1	4) The issue of "**cumulative loss of multiple use sustained yield management**" should be identified as a formal planning issue and brought forward for analysis. All of the Alternatives should reflect, and at least one Alternative should enhance the importance given the agency's multiple use sustained yield (MUSY) mandate contained in FLPMA. Each year more and more federally managed lands are removed from multiple use management. Past planning activities, legislation and litigation have significantly expanded preservation oriented management and significantly reduced areas available for multiple use. The reduction of MUSY lands has been identified by many states and counties as a key problem affecting the health and economic well-being of local communities. MUSY is extremely important to local governments located adjacent to large areas of federally managed lands.	Commenter misunderstands the definitions of multiple use and sustained yield. However, social and economic concerns will be addressed in the development of alternatives and impact analysis sections of the RMP amendment.
95	Rec Group	Environmental Law and Policy	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		23	1	The agency should develop a wide range of Alternatives. EPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives to proposed actions or preferred alternatives analyzed during a NEPA process. 40 C.F.R. § 1502.14; 40 C.F.R. § 1508.9. "[A]agencies shall rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14. The alternatives section is considered the "heart" of the NEPA document. 40 C.F.R. § 1502-14 (discussing requirement in EIS context). The legal duty to consider a reasonable range of alternatives applies to both EIS and EA processes. Surfrider Foundation v. Dalton, 989 F. Supp. 1309, 1325 (S.D. Cal. 1998) (citing Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1229 (9th Cir. 1988) ("Alternatives analysis is both independent of, and broader than, the EIS requirement."). A NEPA analysis must "explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14 (EIS); Id. at § 1508.9 (EA); Bob Marshall Alliance, 852 F.2d at 1225 (applying reasonable range of alternatives requirement to EA). A NEPA analysis is invalidated by "[t]he existence of a viable but unexamined alternative." Resources, Ltd. v. Robertson, 35 F.3d 1300, 1307 (9th Cir. 1993). The reasonableness of the agency's choices in defining its range of alternatives is determined by the "underlying purpose and need" for the agency's action. City of Carmel-by-the-Sea v. U.S. Dept. of Transportation, 123 F.3d 1142, 1155 (9th Cir. 1997); Methow Valley Citizens Council v. Regional Forester, 833 F.2d 810, 815-816 (9th Cir. 1987), rev'd on other grounds, 490 U.S. 332 (1989). The entire range of alternatives presented to the public must "encompass those to be considered by the ultimate agency decisionmaker." 40 C.F.R. § 1502.2(e). The agency is entitled to "identify some parameters and criteria—related to Plan standards—for generating alternatives…." Idaho Conservation League v. Mumma, 956 F.2d 1508, 1522 (9th Cir. 1992) (italics in original). However, in defining the project limits the agency must evaluate "alternative means to accomplish the general goal of an action" and cannot "rig" "the purpose and need section" of a NEPA process to limit the range of alternatives. Simmons v. U.S. Army Corps of Engineers, 120 F.3d 664, 669 (7th Cir. 1997) (emphasis added). An agency must perform a reasonably thorough analysis of the alternatives before it. "The 'rule of reason' guides both the choice of alternatives as well as the extent to which an agency must discuss each alternative." Surfrider Foundation v. Dalton, 989 F. Supp. 1309, 1326 (S.D. Cal. 1998) (citing City of Carmel-by-the-Sea v. United States Dep't of Transportation, 123 F.3d 1142, 1154-55 (9th Cir. 1997)). The "rule of reason" is	Much of this comment represents personal interpretation of law, regulation, and case law and requires no response. The remainder will be addressed in development of a reasonable range of alternatives in Chapters 2 and 4 of the RMP amendment.

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96	User Group		21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		24	1	5) The agency should develop an alternative that enhances a wide range of diverse recreational opportunities. As noted above, all of the Alternatives should reflect, and at least one Alternative should enhance the importance given the agency's multiple use sustained yield (MUSY) mandate contained in FLPMA, of which recreation is a key component. Past planning activities, legislation and litigation have significantly expanded preservation oriented management and significantly reduced areas available for multiple use. The reduction of MUSY lands has been identified by many states and counties as a key problem affecting the health and economic well-being of local communities. MUSY is extremely important to local governments located adjacent to large areas of federally managed lands. At lease one alternative should include Environmental Law and Policy to enhance multiple use sustained yield management.	Much of this comment represents personal opinion and requires no response; the remainder will be addressed in development of range of alternatives in chapter 2 of the RMP amendment.
97	User Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		25	1	Because this planning effort may focus on lands with wilderness characteristics and off-highway vehicles, the agency must include an accurate and adequate analysis of existing motorized and mountain bike routes. Existing recreational uses must be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and ultimately the decision reached by the Deciding Officer.	This will be addressed in the range of alternatives, CTMP, and impact analysis sections of RMP amendment.
98	Rec Group	Public Involvement	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		26	1	BLM must make all “new information regarding wilderness characteristics” available for public review and comment prior to utilizing such information to develop draft alternatives. The original 1978 Wilderness Inventory Handbook notes: "The wilderness inventory process requires full public involvement." This public involvement "is particularly important because the criteria in the wilderness inventory process call for judgments that can be highly subjective. In recognition of that fact, the BLM wilderness inventory process will be conducted as openly as possible with the broadest opportunity for input from all concerned, in order to arrive at a sound decision." (underline emphasis added) There is no question that Congress considered the inventory process an appropriate one for public review and comment. The agency should recognize that anything even remotely dealing with wilderness, “wilderness values”, or “wilderness character” is highly controversial and must act accordingly. The BLM must provide the public full opportunity for review and comment on the specifics of “new information regarding wilderness characteristics” prior to utilizing that inventory to developing draft alternatives. Developing Alternatives without public input on the “new information” will only fuel that controversy, not reduce it. BLM must make all “new information regarding wilderness characteristics” available for public review and comment prior to utilizing such information to develop draft alternatives.	Summary will be included in Affected Environment and all documentation will be published on website. However, BLM is not required to make this information available prior to developing alternatives.

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99	User Group	Environmental Law and Policy	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		27	1	The BLM is not allowed to inventory and develop land use plans for a single resource value. When conducting land use planning, FLPMA requires that all resource and values be inventoried. It is improper to make decisions based upon an inventory for a single resource value, in this case; 'wilderness character'. FLPMA's §201, which is the section of FLPMA under which the Department claims authority wilderness inventory outside §603 does not give the BLM authority to undertake such an inventory effort for just one resource value. Section 201 directs the Secretary to "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern." It is clear from this language that all resource and other values on the public lands were to be part of a single inventory. It is not authorization to consider only part of the spectrum of "resources and other values." It is clear from the parenthetical phrase inserted in this section by Congress that Congress wanted the broadest range of resources and values considered and listed specifically two among the many which were to be included. The DEIS must include an inventory of other resource values and uses in each area with wilderness characteristics. That inventory should include, but not be limited to, inventory of motorized and mechanized recreational values and opportunities, inventory of landing strips, inventory of rangeland improvements (stock ponds, fences, cattle-guards, etc.) and inventory of lands with Mineral and Oil and Gas potential.	Interpretation of law and policy. BLM will rely on both existing and updated resource inventory information during the development of the RMP amendment.
100	User Group	OHV Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		28	4	In response to the increase in popularity of OHV recreation, the BLM should develop an Alternative that improves and enhances OHV recreation. Discussion: BLM's OHV Strategy states, ""Motorized off-highway vehicle use on public lands administered by the BLM has increased substantially in recent years. Some of [the factors contributing to growing OHV popularity] are: greater public interest in unconfined outdoor recreational opportunities; rising disposable income … advances in vehicle technology, the rapid growth of the West's cities and suburbs …· a population with an increasing median age with changing outdoor recreational interests. This popularity is evidenced by the fact that recreational enthusiasts are buying OHVs at the rate of 1,500 units per day nationwide, with nearly one-third of them doing so as first-time buyers."1 "[BLM's OHV] Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an 'acceptable use of public land wherever it is compatible with established resource management objectives.' As established by the FLPMA, BLM is required to manage public lands on the basis of multiple use and sustained yield, while protecting natural values. Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands". According to the NRSE3 over 22% of the population of Oregon describes themselves as an OHV enthusiast. Unwisely, rather than work to accommodate the increased demand for OHV recreation, BLM has frequently reacted by restricting OHV opportunities. But more importantly, opportunities to manage OHV use by marking roads and trails, providing usable maps, identifying OHV trails and systems and entering into cooperative management agreements with OHV user groups have, by and large, been ignored by the BLM. Although more pro-active management is clearly permissible within the existing management plans, a quick search on the BLM's website indicates that the agency has chosen to emphasize only the parts of their OHV policy associated with limitations and closures. I believe this planning effort can and should enhance BOTH motorized and mountain bike recreation, as well as protect important natural resources, including lands with wilderness characteristics.	Much of this comment represents personal interpretation of BLM OHV policy and requires no response.
101	Rec Group	North Lake Special Recreation Area Planning	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		29	1	BLM should use the Special Recreation Management Areas to adequately manage recreational uses while protecting natural resources.	SRMAs were designated in the 2003 RMP. A RAMP will be developed for the North Lake SRMA as part of the plan amendment process.

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102	Rec Group	Grazing Support	21	Blue Ribbon Coalition, Brian Hawthorne	6/7/2010	Pocatello	ID		30	4	Development of grazing management alternative(s). No comment at this time. Thank you for the opportunity to comment.	No response needed
103	Individual	Opposed To Wilderness	22	Pyland	6/8/2010	Not Provided	Not Provided		1	3	Remove WSA designation at Christmas Valley Sand Dunes	Only Congress can remove a WSA from wilderness study. This issue is beyond the scope of the RMP amendment process.
104	Individual	North Lake Special Recreation Area Planning	22	Pyland	6/8/2010	Not Provided	Not Provided		2	1	Remove fence from sand dunes and only fence specific archaeological sites.	The existing Fossil Lake OHV closure boundary decision was made in the Lakeview RMP (2003) to protect paleontological and cultural resources. Sites are wide-scattered and are continuously being covered and uncovered by moving sand. Fencing individual sites is impractical. This is addressed further in the "Alternatives Considered, but Eliminated from Detailed Study" section of Chapter 2 - Alternatives.
105	Individual	OHV Support	22	Pyland	6/8/2010	Not Provided	Not Provided		3	3	Designate Christmas Valley Sand Dunes as motorized OHV Recreation Area Planning.	Only Congress can remove a WSA from wilderness study. This issue is beyond the scope of the RMP amendment process.
106	Individual	North Lake Special Recreation Area Planning	22	Pyland	6/8/2010	Not Provided	Not Provided		4	3	Install pit toilets in the camping area at the (sand) dunes.	This cannot currently be accommodated within the Sand Dunes WSA boundary. This proposal could be considered if the WSA was released from wilderness study in the future.
107	Individual	North Lake Special Recreation Area Planning	22	Pyland	6/8/2010	Not Provided	Not Provided		5	3	Dig a well at (sand) dunes and provide public water.	This cannot currently be accommodated within the Sand Dunes WSA boundary. This proposal could be considered if the WSA was released from wilderness study in the future.
108	Individual	Outside Scope	22	Pyland	6/8/2010	Not Provided	Not Provided		6	3	Name dunes and bowls as shown on DC4W map along with GPS coordinates.	Outside scope of RMPA - No response needed.
109	Individual	North Lake Special Recreation Area Planning	22	Pyland	6/8/2010	Not Provided	Not Provided		7	1	Move Lost Forest access road to the west side of the Drake property.	This will be addressed in North Lake RAMP and CTMP portions of RMP amendment.
110	Individual	North Lake Special Recreation Area Planning	22	Pyland	6/8/2010	Not Provided	Not Provided		8	1	Sign and enforce speed limits within camping areas.	This will be addressed in North Lake RAMP and CTMP portions of RMP amendment.
111	Individual	North Lake Special Recreation Area Planning	22	Pyland	6/8/2010	Not Provided	Not Provided		9	1	Eliminate "kiddie riding" in camping areas.	This will be addressed in North Lake RAMP and CTMP portions of RMP amendment.
112	Individual	Protect Areas With Wilderness Character	23	Melanie Jennings	6/16/2010	Portland	OR	2	1	9	Same as Form Letter #2.	See response to Form Letter #2.
113	Individual	OHV Support	24	Patti Pyland	6/17/2010	Not Provided	Not Provided		1	9	Duplicate of Letter #22.	Refer to responses for Letter #22 above.
114	State	Military Training Access	25	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		1	4	This morning I received via the US Mail the copy of the RMP-EIS public scoping letter that you sent me. I want to thank you for sending me a copy of the scoping letter. I am tasked here with preparing a draft Oregon Military Department (OMD) letter in response to our previous phone conversation and having a copy of the scoping letter will help in the process of preparing a response letter from the OMD. I thank you for your assistance and consideration.	No response needed.
115	Individual	OHV Support	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	1	7	Move Fossil Lake Fence back to a predetermined area, which is a approved by OHV users and BLM.	The current Fossil Lake OHV closure boundary is a decision made in Lakeview RMP (2003) and is not being reconsidered in the RMP amendment. It is discussed in the "Alternatives Considered, but Eliminated from Detail Study" section of Chapter 2 - Alternatives.
116	Individual	Opposed to Wilderness	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	2	3	Remove WSA from all public lands.	Only Congress can remove a WSA from wilderness study. This issue is beyond the scope of the RMP amendment process.
117	Individual	Travel Management Planning	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	3	1	Do not close old roads/ways, routes, and two tracks to motorized traffic.	Addressed in CTMP
118	Individual	North Lake Special Recreation Area Planning	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	4	1	Virtue Flats and Christmas Valley Sand Dunes must include OHV USER and all motorized users.	Addressed in OHV Alternatives and CTMP
119	Individual	Travel Management Planning	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	5	1	Development of travel management plan must include OHV user and all Motorized users. OHV play areas must include all three class of OHV not favoring any one.	Addressed in OHV Alternatives and CTMP
120	Individual	Travel Management Planning	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	6	4	Old routes and roads make firebreaks and ways for emergency crews.	No response needed.
121	Individual	Travel Management Planning	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	7	1	Need motorized vehicles to access primitive areas for camping, hunting, sightseeing.	Addressed in OHV Alternatives and CTMP

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122	Individual	Opposed To Wilderness	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	8	3	All lands to be considered for Backcountry Areas, as they are more important than wilderness. Leave open for generations.	A portion of this comment represents personal opinion and requires no response. A portion of this comments suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as “backcountry areas”. This issue is beyond the scope of the RMP amendment process.
123	Individual	Travel Management Planning	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	9	1	All roads, routes and two tracks need to be GPS and listed as open forever and protected from closures.	Much of this comment represents personal opinion and requires no response. Individual route management decisions will be addressed in the CTMP.
124	Individual	Grazing Support	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	10	4	Grazing is to be allowed and grazing allotments will always be renewed or sold to a new person.	This comment represents personal opinion and no response is needed.
125	Individual	Grazing Support	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	11	4	Grazing is the most important fire fighting tool	This comment represents personal opinion and no response is needed.
126	Individual	Opposed to Wilderness	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	12	3	Remove the WSA and designate the area to become known as Christmas Valley Sand Dunes OHV Area.	Only Congress can remove a WSA from wilderness study. This issue is beyond the scope of the RMP amendment process.
127	Individual	North Lake Special Recreation Area Planning	26	Travis Lowe	6/17/2010	Not Provided	Not Provided	3	13	4	Lost Forest Road needs to be moved to the northeast side of private lands to alleviate trespass on private lands.	This comment represents personal opinion. The private landowner could sign or fence his boundary to prevent trespassing.
128	Enviro Group	Non-Responsive	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Not Provided	Not Provided		1	4	See attached for KS wild's comments on the Lakeview RMP and EIS. I had a few studies attached, but apparently the .gov server won't accept files in the 1-3 rob range.	No response needed
129	Enviro Group	Request to be on Mailing List	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		2	9	Klamath Siskiyou Wildlands Center asks that Lakeview BLM pay close attention to issues dealing with WSAs, OHV use, grazing, Travel Management Planning, and NEPA compliance when drafting the Lakeview RMP amendment and EIS. Please ensure that we are on your mailing list to receive hard copies of all forthcoming NEP A documents regarding this project.	No response is needed. Commenter is on the mailing list.
130	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		3	3	In the Lakeview area 1.7 million out of 3.2 million acres contain wilderness character worthy of protection. If the WSA are not going to be re-inventoried, put these WSAs to Congress. Please close and employ measures to restrict WSAs from OHV use.	Commenter expresses personal opinion regarding presence of wilderness character in the planning area. Those places where BLM has found wilderness characteristics (outside of existing WSAs) will be described in the Affected Environment section of the RMP amendment. BLM can take no further action regarding designated WSAs until Congress acts. This specific issue is beyond the scope of the RMP amendment. OHV use within WSA will be addressed in the development of alternatives.
131	Enviro Group	Environmental Law and Policy	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		4	4	The BLM handbook described the "key factors of wilderness character" to consider during the inventory process as being: a) Size - at least 5,000 contiguous roadless acres of public land must exist. b) Naturalness - the imprint of man's work must be substantially unnoticeable. c) An outstanding opportunity for solitude or an outstanding opportunity for primitive and unconfined type of recreation must exist. All three criteria had to be met in order for an area to be designated as a WSA (BLM 1978). This guidance was followed during the Section 603 inventory process. A total of 14 wilderness study areas (WSAs) and 1 instant study area (ISA) covering approximately 486,873 acres and located completely or partially within the Lakeview Resource Area were designated during this process (BLM 1989; 1991). All WSAs are currently managed under the Interim Management Policy for Lands Under Wilderness Review (BLM 1995).	This comment largely consists of a restatement of Laws, Regulations, and BLM wilderness policy; no response is needed.
132	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		5	1	Please manage and maintain designated WSAs to the standards articulated in (a)-(c) above. This would include restricting any OHV use, road building, harvesting, or fanning activities in the WSAs to ensure that the factors are maintained. Instead of passively allowing illegal activity and harmful use, maintain the WSAs to keep their character when originally inventoried.	WSAs are managed in accordance with the 1995 Wilderness IMP. This will be addressed further in Affected Environment, Alternatives, and Impact Analysis sections of RMP amendment.

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133	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		6	4	There appears to be a disparity between WSA acreage that BLM identified twenty years ago, and what ONDA has identified. There should not, however, be any disparity about what the key factors of wilderness character are. If so, please look to 16 U.S.C. § 1133(c) when making inventory decisions. As to the acreage, please follow ONDA's recommendation to designate 1.7 million of your acres as wilderness, rather than your '89/'91 WSA process which found less than 500k acres. Anything less would likely result in more litigation coming at the expense of taxpayers.	This comment consists of personal interpretation of wilderness inventory requirements, case law, and BLM wilderness inventory findings. No response needed.
134	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		7	4	The Wilderness Inventory Maintenance Process continues, "The mere passage of time is not, in and of itself, a significant or critical factor defining the need to update or maintain an inventory. The critical question to be answered is 'what has changed since the last inventory'?" This question is an example of passive management of public lands; the real question should be, "what is the best method to maintain the inventory and preserve the wilderness character of these lands? This would be accomplished by taking a look at the impacts of OHV use and grazing on WSA areas, as these impacts are increasingly degrading the WSA inventory, and are not as simple as "the mere passage of time."	Commenter is confusing BLM's wilderness inventory process for lands outside of WSAs with how designated WSAs are managed under the 1995 Wilderness IMP. They are not the same guidance documents.
135	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		8	4	Please continue to manage WSAs using the most restrictive means when management areas overlap. ROD at 70. Please do monitor pre-FLPMA activities in WSAs to avoid illegal uses.	WSAs are managed in accordance with the 1995 Wilderness IMP. In the places where WSAs overlap ACECs and the ACEC management direction is more protective, BLM follows that direction. Commenter appears to be confusing "grand-fathered" pre-FLPMA uses which are allowable and legal, with other uses that are not legal.
136	Enviro Group	Travel Management	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		9	4	We request that Lakeview BLM develop a management policy for closed and limited OHV use areas in the forthcoming RMP and EIS. It would behoove the BLM to create a hierarchy within BLM's management policy to be followed for managing public lands for OHV use. First priority needs to be Wilderness Areas. Follow the Wilderness Act of 1964 that designated wilderness areas "shall [have] no commercial enterprise and no permanent road," no motorized vehicles, and no manmade structures. 16 U.S.C. § 1133(c). Craft an implementation plan and measures to keep wilderness areas in their natural character.	OHV use is Addressed in Alternative Development. However, the idea that wilderness areas should be BLM's top management priority is personal opinion or misinterpretation of FLPMA's multiple use mandate.
137	Enviro Group	Travel Management Planning	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		10	4	Second highest priority is to follow FLPMA for WSA designations. In areas not designated as wilderness, follow FLPMA provisions for multiple use management of striking balance among "recreation, range, timber, minerals, watershed, wildlife and fish, and [uses serving] natural scenic, scientific and historical values." 43 U.S.C.. § 17029(c). Until WSA receive designation from Congress, follow FLPMA provision that "the Secretary shall continue to manage such lands ... in a manner so as not to impair the suitability of such areas for preservation for wilderness." 43 U.S.C. § 1782(c). Mandate the total exclusion of OHV use from WSA. Be specific as to how this exclusion will be implemented and achieved to avoid discretionary decision-making and lawsuits later.	WSA management and OHV use is Addressed in Alternative Development. However, the idea that other valid multiple uses under FLPMA should be BLM's second management priority is personal opinion.
138	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		11	1	Until WSA receive designation from Congress, follow FLPMA provision that "the Secretary shall continue to manage such lands ... in a manner so as not to impair the suitability of such areas for preservation for wilderness." 43 U.S.C. § 1782(c). Mandate the total exclusion of OHV use from WSA. Be specific as to how this exclusion will be implemented and achieved to avoid discretionary decision-making and lawsuits later.	WSAs are managed in accordance with the 1995 Wilderness IMP which does allow vehicle use on roads and trails that existed at the time of WSA designation. However, a range of OHV and CTMP alternatives will be addressed in the RMP amendment that includes closing WSAs to motorized use.
139	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		12	1	We ask that you include within the RMP and EIS a program to close WSA areas that are currently subject to illegal OHV use. This should be done via roadblocks on roads, decommissioning illegal trails, etc. Create a plan for implementation with specifics as to how this will be achieved within a timeframe.	WSAs are managed in accordance with the 1995 Wilderness IMP which does allow vehicle use on roads and trails that existed at the time of WSA designation. However, a range of OHV and CTMP alternatives will be addressed in the RMP amendment that includes closing WSAs to motorized use.

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140	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		13	4	Table R-I from the ROD is not indicative of proper management of WSA areas: Off-Highway Vehicle Management (Table R-I) Area open to OH use 1,760,352 Area closed to OHV use 10,799 Area with limited OHV use 384,537 Designated roads and trails! Existing roads and trails 1,005,729	This comment represents personal opinion and no response is needed.
141	Enviro Group	Opposed to OHVs	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		14	4	In accordance with ONDA's wilderness character inventories and our comments, we would like to see 1.7 million acres closed to OHV use. Nearly 11,000 acres closed to OHV use does not constitute proper management of our public lands. KS Wild asks that you consider an alternative that manages this harmful, high impact, and incompatible recreational use. The Ninth Circuit mandates that you consider closures of significant portions of land to comply with NEPA. Oregon Natural Desert Ass Inv. Bureau of Land Management, 531 F.3d 1114 (9th Cir. 2008).	Much of this comment represents personal opinion regarding presence of wilderness character, OHV impacts, and interpretation of 9th Circuit Court findings. Places where BLM has found wilderness character will be summarized in Chapter 3 - Affected Environment section. A reasonable range of OHV alternatives will be addressed in Chapter 2 of the RMP Amendment. Further, the 9th Circuit Court ruling applies only to the Vale District and did not mandate closures of significant portions of land to comply with NEPA. It is beyond the Court's authority to direct any particular management of public lands. The Court's authority is limited to determining whether or not the BLM followed all applicable laws and regulations prior to making a final decision.
142	Enviro Group	ACECs	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		15	3	Designate important waterbodies and botanical reserves as Areas of Critical Environmental Concern (ACEC) under FLPMA. BLM must "give priority to the designation and protection of areas of critical environmental concern ... " 43 U.S.C. § 1712(c)(3). Designation of ACECs are important for core areas vulnerable sites such as wetlands, fragile soils, wildlife habitat, and riparian corridors. These areas need to be protected from high impact OHV use.	The 2003 Lakeview RMP-ROD retained 4 existing and designated 17 new ACECs. Most of these were to protect native plant communities or special status plants. Two ACECs (Warner Wetlands and Lake Abert) were designated specifically to recognize important natural processes (wildlife habitat) associated with these water body/wetland complexes. In addition, the Twelvemile Creek area was recommended suitable as a recreational class wild and scenic river. BLM believes that it has already addressed the designation and management of “important waterbodies and botanical reserves” across the Planning Area and these existing decisions are not being reconsider in the RMP amendment.
143	Enviro Group	Opposed to OHVs	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		16	1	We request BLM to develop a management policy to keep OHV use restricted to existing and designated areas; further, BLM should act to decommission existing roads in areas of ecological importance to restrict OHV use.	Development of range of alternatives.
144	Enviro Group	Opposed to OHVs	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		17	4	Utilize the multiple use standard that requires BLM to undertake multiple use "without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources ... 43 U.S.C. 1702(c). Managing for unlimited OHV use is not a proper management tool that takes into account the relative value of the resources. OHV use can cause permanent impairment and productivity to the land and aquatic habitat, and this is unacceptable management policy.	Personal opinion. No response needed.
145	Enviro Group	Opposed to OHVs	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		18	4	The use of OHVs are inconsistent with other uses to be balanced on BLM land. The use of OHVs on federal land has negative environmental consequences, including soil disruption and compaction, harassment of animals, and annoyance of wilderness lovers. Some 42 million Americans participate in off-road travel each year, more than double the number two decades ago. H. Cordell, Outdoor Recreation for 21st Century America 40 (2004). Designate forest/logging/maintenance roads with signage for OHV travel. Create maps available for OHV usage with trail and road designations. Clearly post fines for illegal trail creation and on available maps.	Personal opinion. No response needed.
146	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		19	1	Incentivize for and compensate long time federal grazing permittees who end grazing on public lands.	The RMP amendment will address voluntary grazing permit relinquishment within the range of grazing alternatives.

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147	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		20	1	Adopt an alternative that allows for voluntary grazing permit relinquishment.	The RMP amendment will address voluntary grazing permit relinquishment within the range of grazing alternatives.
148	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		21	1	Create management provisions allowing for the buying out of permits and leases.	The RMP amendment will address voluntary grazing permit relinquishment within the range of grazing alternatives.
149	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		22	1	Provide incentives for permanent protection and relinquishing of permits and resignation for no grazing use.	The RMP amendment will address voluntary grazing permit relinquishment within the range of grazing alternatives.
150	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		23	1	This amendment stage is where the provision needs to be included in the LRMP. See USDOI, Office of the Solicitor, Memorandum ofM-37008 (May 13, 2003).	The RMP amendment will address voluntary grazing permit relinquishment within the range of grazing alternatives.
151	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		24	1	Exclude grazing from WSA areas. From Table 6, out of 3.5 million acres managed, only 261,000 acres are excluded from livestock grazing. Cut back on unsustainable grazing levels, and set a utilization standard to ensure overgrazing does not happen. The adjacent Rogue River- Siskiyou National Forest standard is 40%, set the utilization standard at a comparable level, such as 30%. Livestock Grazing Management (Table R-l) Areas allotted to grazing 2,916,985 Areas unallotted to grazing 155,734 Areas excluded from grazing 88,697 Total forage allocation (AUMs) 164,128	Personal opinion. The RMP amendment will address a range of grazing management alternatives.
152	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		25	1	From the ROD at 52: "In areas where livestock grazing is not compatible with other uses, no grazing will be permitted. Public land which has been found not to be suitable for livestock grazing or containing resource values which cannot be adequately protected from livestock impacts through mitigating measures are not allocated to livestock grazing." Strengthen this language to exclude grazing from WSA areas. WSA area uses are not compatible with livestock grazing, and the almost 3 million acres allotted to grazing is unacceptable management of our public lands. Consider an alternative that does a better job balancing competing uses.	Personal opinion. The RMP amendment will address a range of grazing management alternatives, including one where grazing is removed from WSAs via permit relinquishment.
153	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		26	3	Failing exclusion from WSA areas, raise fees charged by BLM for public forage in WSA areas. These resources are of higher value, and FLPMA mandates that BLM "receive fair market value of the use of the public lands and their resources." Develop management policy for grazing fees to match up with areas of ecological importance.	Grazing fees are set at the national level by criteria established in regulation. Raising fees is beyond the scope of the plan amendment process.
154	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		27	7	Exclude grazing from water sources near hiking and public recreational trails. Designate such areas as Areas of Critical Environmental Concern (ACEC) under FLPMA. BLM must "give priority to the designation and protection of areas of critical environmental concern ... " 43 U.S.C. § 1712(c)(3).	There are currently no designated hiking trails in the Planning Area. Most steams and riparian areas have already been removed or excluded from grazing. The 2003 RMP-ROD retained or designated 21 ACECs and included special management direction for those areas. These ACEC designation decisions are not being re-addressed in the plan amendment.

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155	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		28	3	Take conservation non-use into account when balancing resource value of the land against impairment of the land when open for grazing and OHV usage. See 43 U.S.C. 1702(c) ("without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources ... "). Utilize the regulations at; 43 C.F.R. § 4130.2(g)(2) to place permitted land for up to three years of temporary non-use at the permittees convenience.	The grazing regulations currently do not allow such a thing as "conservation non-use", so addressing such a concept is beyond the scope of the RMP amendment. The remainder of this comment appears to encourage BLM to follow Federal statute and regulation and requires no response.
156	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		29	1	Wild and Scenic Rivers management. Exclude grazing from WSR designations. Exclude grazing from areas of concern identified by BLM. When closing areas to grazing make it policy to eliminate permits from AUMs, rather than shifting to other lightly grazed areas. ONDA v. Singleton, 75 F.Supp.2d 1139 (D Or 1999).	Grazing has already been removed from the Twelve-Mile Creek WSR corridor. The range of alternatives in Chapter 2 will address voluntary relinquishment as a method of reducing or removing livestock grazing from ACECs, WSAs, lands with wilderness character, and critical habitat.
157	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		30	7	Refrain from grazing near any water bodies and riparian areas. Depending on the area, comply with standards from the NWFP, PACFISH, and INFISH.	Most steams and riparian areas have already been removed or excluded from grazing. The NWFP, PACFISH, and INFISH strategies do not apply to any lands within the Planning Area. However, riparian standards were adopted in Appendix F of the Lakeview RMP (2003) and will be carried forward into the RMP amendment.
158	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		31	7	Look at grazing impacts to salmon and aquatic habitat. Take Oregon Natural Desert Ass Inv. United States Forest Service, Case No. 07-1871-HA (9th Cir. 2010) (not published) into account. The Forest Service grazing plan allowed livestock to damage steelhead habitat over nearly half a million acres along more than 300 miles of streams in the John Day River Basin in eastern Oregon. Livestock can damage stream banks and muddy the clear, cool water needed for steelhead, a Pacific Northwest native trout listed as threatened under the Endangered Species Act. ... The judge said in the ruling that damage done to stream banks in 2007 and 2008 was "particularly deplorable" and noted "this court has repeatedly found the grazing program to be insufficiently protective of listed fish species." The current plan could have better protected fish if it had been enforced more effectively, the judge said.	Most steams and riparian areas have already been removed or excluded from grazing. Further, there are no salmon in streams within the Planning Area. However, riparian standards were adopted in Appendix F of the Lakeview RMP (2003) and will be carried forward into the RMP amendment. The case law cited has absolutely no relevance to streams in the Planning Area.
159	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		32	7	See http://onda.orglpressroomlpress-releases/judge-rules-to-reduce-grazing-in-malheur-nationalforest. Tell farmers when to move their cattle away from critical stream banks. You need to be monitoring and enforcing BLM management rules and policies on these stream banks being degraded by cattle.	Most steams and riparian areas have already been removed or excluded from grazing. Riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.
160	Enviro Group	Environmental Law and Policy	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		33	7	The Northwest Forest Plan defines riparian reserves as portions of watersheds where riparian dependent resources are emphasized and where "special standards and guidelines apply." NWFP at B-12. Riparian dependent resources are exactly where cows congregate. The Klamath National Forest recognized this in their DEIS for the Mount Ashland LSR project; "Cattle congregate ... between springs, meadows, and streamside riparian areas which may cause localized seasonal removal of riparian and meadow vegetative cover and localized trampling of stream channels. This may lead to short term, localized impacts to water quality in limited areas adjacent to streams." These same impacts are well documented in the scientific literature, and throughout the allotment to even the most casual observer. The BLM must maintain and restore aquatic ecosystems, not degrade them. Grazing these allotment would surely degrade aquatic ecosystems.	Most steams and riparian areas have already been removed or excluded from grazing. The NWFP does not apply to any lands within the Planning Area. However, riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.
161	Enviro Group	Environmental Law and Policy	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		34	7	The Northwest Forest Plan states the need to keep cows out of riparian areas: GM-1. Adjust grazing practices to eliminate impacts that retard or prevent attainment of Aquatic Conservation Strategy objectives. If adjusting practices is not effective, eliminate grazing. GM-2. Locate new livestock handling and/or management facilities outside Riparian Reserves. For existing livestock handling facilities inside the Riparian Reserve, ensure that Aquatic Conservation Strategy objectives are met. Where these objectives cannot be met, require relocation or removal of such facilities.	Most steams and riparian areas have already been removed or excluded from grazing. The NWFP does not apply to any lands within the Planning Area. However, riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.

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162	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		35	7	When managing cattle on public lands where riparian waterways are implicated, maintain (1) the physical integrity of the aquatic ecosystem, (2) the sediment regime of the aquatic ecosystem, (3) the riparian plant communities, and (4) the stream flow characteristics.	Most steams and riparian areas have already been removed or excluded from grazing. The NWFP does not apply to any lands within the Planning Area. However, riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.
163	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		36	7	Grazing activities result in altered stream channels that lead to bank erosion, deteriorated channels and increased width-to-depth ratios. Inputs of excess nutrients from cattle waste and sediment from disturbed streambanks reduces water quality and the abundance and diversity of aquatic insect populations in cattle-accessible streams. Grazing within riparian areas damages the physical structure of water bodies and stream banks specifically.	Most steams and riparian areas have already been removed or excluded from grazing. The NWFP does not apply to any lands within the Planning Area. However, riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.
164	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		37	7	Damaged banks result in increased erosion and increased sediment inputs to streams. An increase in sediment input will continue as damaged banks continue to erode even in the absence of future grazing. Appropriate management practices may diminish the rate of sediment input, but maintenance and restoration of the sediment regime requires the aquatic ecosystems within both allotments to be protected from grazing.	Most steams and riparian areas have already been removed or excluded from grazing. The NWFP does not apply to any lands within the Planning Area. However, riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.
165	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		38	7	Cattle in riparian areas trample and consume aquatic and terrestrial plant species. Consumption and trampling result in the reduction of plant species that are intolerant of cattle induced disturbance and an increase in the populations of plant species that are tolerant of the disturbance. Maintain and restore the species composition and structural diversity of plant communities in riparian areas and wetlands to provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, and channel migration and to supply amounts and distributions of coarse woody debris sufficient to sustain physical complexity and stability. See NWFP. Adjusting grazing management practices may reduce adverse impacts, but maintenance or restoration of species composition and structural diversity of riparian plant communities requires that riparian vegetation be protected from grazing,	Most steams and riparian areas have already been removed or excluded from grazing. The NWFP does not apply to any lands within the Planning Area. However, riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.
166	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		39	7	Meadows change substantially as a result of years of livestock grazing. The ability of meadows to absorb water decreases as a result of soil compaction by livestock. The inability of meadows to absorb rainfall and snowmelt leads to higher peak flows to streams and wetlands. Adjusting management practices may reduce the rate at which livestock detrimentally impact flow characteristics, but protection of natural stream flow characteristics requires that meadows be protected from grazing. Livestock grazing substantially and detrimentally impacts the health of aquatic resources. Continuing to allow grazing will neither maintain current conditions nor restore conditions of aquatic resources. Please exclude livestock from meadows and riparian areas to eliminate future injury and to heal from past injuries.	Most steams and riparian areas have already been removed or excluded from grazing. Riparian standards were adopted in Appendix F of the 2003 RMP and will be carried forward into the plan amendment.
167	Enviro Group	Climate Change	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		40	1	Take an in-depth look at grazing and how various permitted uses of public lands contributes to the effects of climate change.	The plan amendment will address the impacts of management activities on carbon storage and greenhouse gas emissions.

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168	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		41	1	Trombulak, S.C. and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. Conservation Biology 14(1): 18-30. The following analysis provided by the Ashland Resource Area of the Medford BLM regarding the impacts of new road on edge effects and micro climatic changes should be reflected in your forthcoming EIS and RMP document: Barricades, however, don't mitigate the edge effects and microclimatic changes that roads produce. Various studies (e.g., Ortega and Capen 1999; Marsh and Beckman 2004) show that the negative impacts of roads to wildlife habitat are not limited to the road prism –there is a zone of influence that extends into the adjacent habitat. For example, Marsh and Beckman (2004) found that some terrestrial salamanders decreased in abundance up to 80 meters from the edge of a forest road due to soil desiccation from the edge effects. Ortega and Capen (1999) found that ovenbird (a forest-interior species) nesting density was reduced within 150 meters of forest roads. This study suggests that even narrow forest roads fragment habitat and exert negative effects on the quality of habitat for forest-interior species.	BLM will address the effects of roads on the terrestrial and aquatic communities found within the planning area in Chapter 4 of the RMP Amendment/EIS. However, it appears that most of these studies cited here describe potential impacts in wet, forested environments that are not found in, and hence are not applicable to, the planning area.
169	Enviro Group	Travel Management Planning	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		41	1	The cumulative hydrological and terrestrial impacts of large-scale road construction are of the utmost concern to us. Please ensure compliance with the Clean Water Act when any roads are constructed. Attached to these scoping comments you will find a peer-reviewed article by Trombulack and Russell (2000) detailing some of the negative impacts of road construction and use on Terrestrial and Aquatic ecosystems. The forthcoming EIS and RMP documents should address and avoid the harmful impacts detailed in this study. The abstract for the article reads as follows: "*Roads are a widespread and increasing feature of most landscapes . We reviewed the scientific literature on the ecological effects of roads and found support for the general conclusion that they are associated with negative effects on biotic integrity in both terrestrial and aquatic ecosystems. Roads of all kinds have seven general effects: 1) mortality from road construction, 2) mortality from collision with vehicles, 3) modification of animal behavior, 4) alteration of the physical environment, 5) alteration of the chemical environment, 6) spread of exotics, and 7) increased use of areas by humans. Road construction kills sessile and slow-moving organisms, injures organisms adjacent to a road, and alters physical conditions beneath a road. Vehicle collisions affect the demography of many species, both vertebrates and invertebrates ; mitigation measures to reduce road kill have been only partly successful. Roads alter animal behavior by causing changes in home ranges, movement, reproductive success, escape response, and physiological state . Roads change soil density, temperature, soil water content, light levels, dust, surface waters, patterns of runoff , and sedimentation, as well as adding heavy metals (especially lead), salts, organic molecules, ozone, and nutrients to roadside environments. Roads promote the dispersal of exotic species by altering habitats, stressing native species, and providing movement corridors. Roads also promote increased hunting, fishing, passive harassment of animals, and landscape modifications. Not all species and ecosystems are equally affected by roads, but overall the presence of roads is highly correlated with changes in species composition, population sizes, and hydrologic and geomorphic processes that shape aquatic and riparian systems. More experimental research is needed to complement post-hoc correlative studies. Our review underscores the importance to conservation of avoiding construction of new roads in roadless or sparsely roaded areas and of removal or restoration of existing roads to benefit both terrestrial and aquatic biota.*	The plan amendment will address the impacts of road construction in Chapter 4. This reference will be reviewed and cited, if applicable. Road density throughout the planning area are low. Route closures will be addressed across a range of CTMP alternatives considered. However, none of the alternatives being analyzed anticipates "large scale road construction" within the planning area during the life of the plan.
170	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		42	5	Deadman's Palm EA III-II0. Ashland Resource Area, Medford BLM. 2009. The Ortega and Capen (1999) and the Marsh and Beckman (2004) articles referenced by the Ashland Resource Area of the Medford BLM in the above quotation are attached to these scoping comments for your convenience. Road related edge effects, microclimatic changes and soil desiccation acknowledged by your colleagues in the Ashland Resource Area must be disclosed and analyzed in your forthcoming EIS and RMP amendment.	Review Reference; cite or incorporate into the plan amendment if appropriate; Impacts described in the example Ashland Resource Area EA may not be applicable to the planning area.

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171	Enviro Group	Travel Management	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		42	5	An additional example of the scope of impacts from temporary road construction that must be analyzed in the forthcoming EIS and RMP occurs in the Klamath National Forest's DEIS for the Mt. Ashland LSR Project: "Temporary spur road construction may increase road density, result in habitat fragmentation, increase edge habitat, and result in harassment to wildlife." Mt. Ashland LSR Project DEIS, 3-24. Klamath National Forest. 2007.	Review Reference; cite or incorporate into the plan amendment if appropriate; Impacts described in the example EIS may not be applicable to the planning area.
172	Enviro Group	Travel Management Planning	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		43	1	The following study articulates the impacts and sedimentation problems that result from culverts and failure to decommission and properly store roads. Please create a management plan that specifies the road decommission process. Detail an implementation plan in the RMP and EIS for removing culverts that block fish passage as well as a plan for decommissioning roads that dump sediment into aquatic habitat. Where roads intersect streams, there is the potential for large amounts of sediment to be released into the stream system. If a culvert is plugged with debris, the result is often a washout where the streamflow overtops the road and erodes to the original stream grade. These washouts can then cause other downstream culverts to fail in a domino effect. When a blocked culvert does not result in a local washout, streamflow may be diverted down the roadbed itself or along the slope-side ditch, causing large amounts of gully erosion along the roadbed and hill slopes below the road. For example, in northern California, Best et al. (1995) recorded that only 15 stream diversions produced 64 000 mt of sediment (about 4000 dump trucks' worth) over a 25-year period."	The RMP amendment will include a comprehensive travel management plan (CTMP) that addresses road management actions, including road closure methods. Generally, the impacts of culverts and sedimentation described in the cited studies are not applicable to most roads in the Planning Area. In particular, there are few fish-bearing steams in the Planning Area and no culverts blocking fish passage on those streams.
173	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		44	1	Please develop a rigorous standard for reviewing cumulative impacts in NEPA documents. Public lands NEPA documents are often lacking in cumulative impact analyses, yet they are the most important part of an EIS. To simply categorize a vast array of impacts as minor or insignificant is failing to take a hard look at the cumulative impact the proposed action will have on the environment. The National Research Council identifies why this is important: [W]hen numerous small decision about related environmental issues are made independently, the combined consequences of those decision are not considered. As a result, the patterns of the environmental perturbations or their effects over large areas and long periods are not analyzed. This is the basic issue of cumulative effects assessment.	Cumulative effects will be addressed in Chapter 4 of the plan amendment.

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174	Enviro Group	Utility Corridors	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		45	1	National Research Council, Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope. The National Academies Press; Washington DC, 25 (March 2003). The following processes are consistently applicable wherever a cumulative impact analysis is required, and should be an integral part in the forthcoming EIS as well as any BLM NEPA documents conducted in the Lakeview area. **Time crowding**-frequent and repeated effects on a single environmental medium. This would be the case, for example if repeated oil spills occurred on an area of tundra before that area had recovered from previous spills. Time crowding also can result if there are long delays before the effects of an action are fully manifest. An increase in the melting of permafrost might not become apparent until decades after the actions that caused it were initiated. **Space crowding**-high density of effects on a single environmental medium, such as a concentration of drilling pads in a small region so that the areas affected by individual pads overlap. For example, air pollution from temperate latitudes can interact with local sources of contamination to increase atmospheric haze on the North Slope. **Compounding effects**-synergistic effects attributable to multiple sources on a single environmental medium, such as the combined effects of gaseous and liquid emissions from multiple sources on a single area, or nonlinear effects, or interaction of natural and anthropogenic effects, such as the Exxon Valdez oil spill and El Nino events. **Thresholds**-effects that become qualitatively different once some threshold of disturbance is reached, such as when eutrophication exhausts the oxygen in a lake, converting it to a different type of lake. **Nibbling-** progressive loss of habitat resulting from a sequence of activities, each of which has fairly innocuous consequences, but the consequences on the environment accumulate, for example by causing the extirpation of a species from the area.	Cumulative effects will be addressed in Chapter 4 of the plan amendment and follow applicable BLM and DOI guidance.
175	Enviro Group	Protect Areas With Wilderness Character	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		46	5	Id. at 26. The Ninth Circuit recognizes the need to view cumulative impacts on a larger scale. Please make sure to follow the law and use the best available science when crafting cumulative impacts analyses in NEPA documents. Cumulative impacts of multiple projects can be significant in different ways. The most obvious way is that the greater total magnitude of the environmental effects-such as the total number of acres affected or the total amount of sediment to be added to streams within a watershed-may demonstrate by itself that the environmental impact will be significant. Sometimes the total impact from a set of actions may be greater than the sum of the parts. For example, the addition of a small amount of sediment to a creek may have only a limited impact on salmon survival, or perhaps no impact at all. But the addition of a small amount here, a small amount there, and still more at another point could add up to something with a much greater impact, until there comes a point where even a marginal increase will mean that no salmon survive. Klamath-Siskiyou Wildlands Center v. BLM, 387 F.3d 989, 995 (9th Cir. 2004).	Review Reference
176	Enviro Group	Request to be on Mailing List	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		47	9	Please ensure that we are on your mailing list to receive hard copies of all forthcoming NEPA documents regarding this project.	Commenter is on mailing list
177	Enviro Group	Non-Responsive	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010				48	5	Attachment to Comments - See copy in administrative record	Review References; cite or incorporate into the plan amendment if appropriate

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178	Enviro Group	Opposed to Grazing	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - attachments	6/21/2010	Ashland	OR		49	1	Incorporate FLPMA's unnecessary or undue degradation standard into management planning decisions for grazing. 43 U.S.C. § 1732(b).	43 CFR Part 1732(b) states the "Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the (public) lands." This section of the FLPMA specifically deals with how the BLM is to manage the use, occupancy, and development of the public lands. This section does not require the BLM insure that a given use has absolutely no impacts. Rather, it requires that the BLM prevent "unnecessary" or "undue" degradation of the public lands. Grazing is a valid multiple use identified within the FLPMA and is recognized that it some impacts to public lands. However, BLM is not required to prevent all impacts associated with valid uses, just those that are "unnecessary or undue". BLM has dealt with this through specifying management goals in the RMP and through the development of rangeland health standards. If a given grazed area is meeting the RMP goals and rangeland health standards, then undue or unnecessary degradation is not occurring. The range of alternatives in Chapter 2 of this plan amendment will also address changes in grazing management that would occur in those limited instances where rangeland health violations have been documented due to grazing.
179	Enviro Group	Multiple Use Support	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		50	1	Utilize the multiple use standard that requires BLM to undertake multiple use "without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources ... 43 U.S.C. 1702(c)	BLM has dealt with this through specifying management goals in the RMP and through the development of rangeland health standards. If a given area is meeting RMP goals and rangeland health standards, then grazing is not causing "permanent impairment of the productivity of the land and quality of the environment". The range of alternatives in Chapter 2 of this plan amendment will also address changes in grazing management that would occur in those limited instances where rangeland health violations have been documented due to grazing.
180	Enviro Group	Travel Management Planning	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		51	5	Switalski *et al.* Benefits & Impacts of Road Removal: The Ecological Society of America, 2004, www.frontiersinecology.org. Please ensure that the impacts of proposed road construction on road density, habitat fragmentation, edge habitat and wildlife harassment are well documented, or better yet, avoided as part of the LRMP amendment and EIS process.	Review Reference; cite or incorporate into the plan amendment if appropriate; Impacts described in the example EIS may not be applicable to the planning area.
181	Enviro Group	Environmental Law and Policy	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		52	1	Please follow the NWFP, NFMA, and the CWA when planning any road construction projects.	The NWFP and NFMA do not apply to public lands in the Planning Area. Compliance with the CWA will be addressed in Chapter 1 and in Chapter 2-Alternatives sections of the RMP amendment.
182	Enviro Group	Utility Corridors	27	Klamath Siskiyou Wildlands Center, Jordan Beckett - comments	6/17/2010	Ashland	OR		53	1	Designate Preapproved solar panel sites so solar companies would be able to build in a timely manner instead of taking private A1 and A2 (zoned) Ag land.	The siting of solar and wind energy projects are addressed through the issuing of a right-of-way (ROW). During the plan amendment, the BLM will classify all public lands as either open to ROW location, areas where ROWs are to be avoided if possible, and areas where ROWs are excluded or not allowed. Those areas that are identified as open to ROW location would be the most appropriate places for new energy developments. However, the BLM cannot adequately address all potential impacts of such developments until they have a firm proposal in front of them. For this reason, the plan amendment/EIS cannot adequately anticipate or address such developments or "pre-approve" them. Additional NEPA analysis will be required at the time a specific proposal is presented.
183	Individual	Grazing Support	28	Linn Oster	6/21/2010	Not Provided	Not Provided		1	4	Continue with grazing; it is great for the desert and community.	This comment represents personal opinion and no response is needed.
184	Individual	Grazing Support	28	Linn Oster	6/21/2010	Not Provided	Not Provided		2	9	Same as Form Letter #3.	See response to Form Letter #3.

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185	OHV Group	Local Social Economic	29	Harney County High Desert Wheelers, Dan Hauk	6/25/2010	Not Provided	Not Provided	3	1	4	Our ancestors found these vast lands considerably more arid than those of the east but managed to scrape enough from the land to survive. As guides, hunters, fur trappers, grazing of animals, gathers of wild horse for the cavalry, mining, farming they utilized these lands for their existence. They arrived before there were wagon roads. They crossed the Snake River before the area was known as the Oregon Territory. The biggest boon for them was when motorized travel became a part of this desert well over a century ago. Before the First World War, our grandparents were traversing these lands of southeastern Oregon in motorized carriages with their fathers. These men created new two-tracks, ways, routes and roads that we so dearly love today. Many of them scratched a living for their families from farming, logging and mining near towns that no longer exist within the Vale, Bums, and Lakeview BLM Districts. Wild game, fruits and vegetables were a large part of every meal and came straight from the land.	This comment represents personal opinion and no response is needed.
186	OHV Group	Local Social Economic	30	Pacific_NW_4WDA_ Randell	6/29/2010	Bend	OR		1	4	Since our births they have brought us in motorized vehicles (Class II and Class III motorized OHVs) to hunt, fish, camp, gather firewood, sightsee, and walkabout these places they called home. For well over fifty years my wife and I have returned to these lands with our children to show them the lands they came from and teach them things that can only be taught within these vast lands. Today our grandchildren are at our sides as we attempt to show them the grandeur of this land. Much cannot be accessed because motorized travel is restricted. Lands that once was free to all Americans in the Vale, Bums, and Lakeview BLM Districts now have motorized restrictions stopping travel across vast areas. Now imaginary lines of WSA and wilderness stop us from visiting the places our father's fathers knew like the back of their hands and helped create into these lands, as we know them today. Our history before Oregon becoming a state, before BLM, is now being eradicated by a handful of anti-access extremists. They have nothing to gain but an agenda to end man's access to public lands. They have not felt the sweat of their hands nor the hunger in our ancestors bellies and they care naught of these things. They are just cursed with some mad disease and a strange belief that these lands will benefit without man's presence. Even though these lands were inhabited by Mona's ancestors since time began and mine for over a century all Americans still find these lands unique. This proves one of my main points; man can use these lands for work and play and still have truly unique land that 97 percent of all Americans will appreciate just as man has for thousands of generations.	No response needed.

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187	User Group	Opposed to Wilderness	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		2	4	All that the current WSA has done is close lands to the public land users. Roads, ways, routes, trails and vast areas have been closed without all the public's input being considered. Considering only the anti-access groups words, to close vast amounts of lands to the American public is not right. The BLM is not considering our words or attendance at public meetings not supporting these massive land closures. The BLM should rally behind us the majority and honor us by leaving these lands open to motorized use. We are the majority of the public land users! Count us accessing these lands in our OHVs! The fact that these roads, ways, routes, and trails in WSAs are closed to motorized travel has not accomplished a single thing. Over 93 percent of the current public land use is on roads or near existing routes. By closing them to us, the BLM has already made minnie wilderness that cannot be accessed by the majority of the American public. These lands are now wasting away with very little use or no use at all by anyone. None of these set aside lands have any more wildlife than other BLM lands. None of these lands has more endanger species thriving or endangered plants springing up overnight than other BLM lands. The old growth junipers and sage abounds in WSA and outside WSA alike. No amounts of water has increased. The majority of these WSA are dryer than other BLM lands. No desert flowers have increased over these BLM lands, in fact it is just the opposite. No argument for setting these lands aside has occurred since the day you closed us; the public land user out. The only thing accomplished by this action is denying us access to these primitive areas for all these years. The above words apply to existing wilderness also. Both are a total waste for our country's natural resources. We want our lands back!	Much of this comment represents personal opinion and requires no response. However, the RMP amendment and CTMP will address a range of OHV and motorized access alternatives.
188	User Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		3	4	We need lands for work and play. Since you have closed these lands (and WSA you are considering to create and other land closures), the number of users recreating on WSA and wilderness have gone down considerably on these BLM lands. Motorized use on the other and has gone up perhaps as high a 430 percent along side of these lands. This should make you realize that the public needs more roads, ways, two tracks, trails and areas to operate their OHVs. Keep in mind all motorized vehicles are broken into three classes. All motorized vehicles are OHVs and there is no way to access BLM without being in an OHV. Off Highway Vehicles includes every type of vehicle made excluding aircrafts and snowmobiles. Most of this use is occurring on existing ways, trails, roads, camping areas (primitive or not), accessing hot springs, hunting areas, gathering of wood or timber, mining, which includes looking at old mines, viewing from vistas, grazing and ranch use, natural features, viewing wildlife and wild plants, etc. ... OHV use is occurring on all of these backcountry roads by grandpa to young riders as young as seven. Entire families are spending the entire week recreating in OHVs on public lands. It is how Americans are recreating and we need more lands opened to us. Not a single acre or route should be closed to us as most of the use is occurring within three hundred feet of the above-mentioned areas. The roads, trails, ways, two tracks, and play areas open to motorized use is being used considerably while the WSA and wilderness are being used only by a few. In contrast, the lands between the roads and routes are being used very little by anyone visiting public lands today.	Much of this comment represents personal opinion and requires no response. However, the RMP amendment and CTMP will address a range of OHV and motorized access alternatives.
189	OHV Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		4	1	An example of this is the Steens Mountains where I hunt and operate my OHV. I can leave my jeep with the keys in it as the user rate has fallen off so great it is safer than my garage. I can hike, hunt or just walk about (excluding a few places) for the entire day and not see a single person using these lands. Very few people are using the lands in-between the roads and where there are existing road closures. Driving to and from this outing, I will encounter dozens of OHVs on the road. Every campsite will have an OHV in it and in most camps more than one. Over 90 percent of these people will continue using their OHVs while using these BLM lands for their entire stay.	No response needed

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190	User Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		5	4	While operating my OHV on backcountry two-tracks I have encountered entire families with their friends using their motorized vehicles. It is quite cute as we wave to each other not having a clue how they got there or where they are going as no camps had been encountered by us. It does not matter where we are recreating, we encounter OHVs in Prineville, Burns, Vale, and Baker or Lakeview BLM lands the scenes are the same. People accessing public land while using an OHV and most will throughout their stay on BLM lands.	No response needed.
191	User Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		6	4	This was but one example whether I am in Lakeview, Bums, Vale, Baker, or Prineville BLM Districts. People recreating on these old routes is becoming the common use of public lands. No longer is it just for old people and the disabled but we are now seeing entire families enjoying these so called primitive places which would be inaccessible to them without OHVs.	No response needed.
192	OHV Group	Travel Management Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		7	4	Off Highway Vehicles are broken into three classes (possibly a fourth being side x sides). Class I are the Quads and smaller side x sides. These must be less than 50 inches and weigh less than 800 pounds. Class III is called single trackers, as they are motorcycles on two wheels. It does not matter if they are licensed or not. Class II is all the rest (except side x sides) which includes BLM rigs. It can be a 64 Falcon or a four door F-350. If it is wider than 50 inches and weighs more than 800 pounds, it is a Class II motorized vehicle. Again, it mayor may not be licensed such as a buggy. The BLM's public lands need more roads, trails, routes, ways, two-tracks and play areas. It does not matter which Class you choose, use has gone up over 300-430 percent in the last ten years on all public lands.	Much of this comment represents personal opinion and requires no response. However, the RMP amendment and CTMP will address a range of OHV and motorized access alternatives.
193	User Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		8	1	The American people need an OHV trail system that includes all OHVs. Trails, ways, routes, and old roads left just as primitive as possible. Using the natural terrain, that makeup the landscape is perfect. No additional blade needs to be used for most of these trails but left as the user finds them. The public OHV users need these routes to be thousands of miles long. Trails that connect to all BLM lands to access and recreate as traditionally families have done. All three classes of OHVs should be allowed to use these routes, favoring no specific users. The OHV users input needs to be heard as to which routes, two-tracks, old roads and play areas are left open. The OHV community needs to be involved in consideration what features make a good trail. The OHV community needs to be involved to assure that user satisfaction is being addressed. The BLM needs to work with the majority of these users; not the anti-access groups closing them. Our trail system needs to be drawn on maps and protected from closures just as you protect the current WSAs and wilderness. It is discriminatory not to consider the majority of the public. Our recreation and trail systems need the same protection as the BLM has given to wilderness and other non-motorized closures. We, the motorized community are part of the public operating motorized vehicles on BLM lands and our rights are being stripped away with each closure dictated by the anti-access groups.	Much of this comment represents personal opinion and requires no response. However, the RMP amendment and CTMP will address a range of OHV and motorized access alternatives.
194	User Group	Travel Management Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		9	1	These roads, ways, routes, and trails are our national treasures. Each trail is unique with its own history that deserves protection. Some were started before motorized vehicle but all have been used by motorized traffic for over a century. To close anyone of them to motorized traffic would be a discredit to their makers. Each road is going somewhere that is truly unique from all of the surrounding roads. Some to an operating mine or old mine sites. Some to where a truly trophy animal was taken or a new hunting site. Some to a vista that ill take your breath away at the end of the road. Some just wind through the mountains and valleys between old communities. Some to old homesteads that exist no more, yet an old corral still stands against time. Some to a well or spring gushing fresh, clear, cold water in this arid land. Each of these roads has it own place for motorized traffic to use and explore. To close a single one would erase someone's history from our public lands. The anti-access group does not have the right to dictate to the BLM that it has to close these roads. It is your duty as the public's voice to not close these motorized ways to Americans.	Much of this comment represents personal opinion and requires no response. However, the RMP amendment and CTMP will address a range of OHV and motorized access alternatives.

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195	OHV Group	Travel Management Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		10	4	These old roads, two tracks, trails if left open will allow quicker access for emergency crews. From fighting fires to search and rescue, these old routes show up on GPS and can assist quickly summing up help for putting out a fire. Existing roads are firebreaks already on the ground and thus allow no need for new roads to be built when fire or nature strikes. These old ways are already on the map and in the GPSs unit and will aid in recovery of any sick or injured person.	The RMP amendment and CTMP will address a range of OHV and motorized access alternatives, including the need for emergency and fire-fighting access.
196	OHV Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		11	1	The future Travel Management Plan must account for OHV s on public lands. Managing OHV s is not closing roads but developing ORV trail systems and play areas for those using them now and in the future. Motorized vehicle use is growing. Our recreation is growing in leaps and bounds by some accounts over 430 per cent since 1998. OHVs need roads, trails, ways and routes as use will continue to grow respectively in the same amount. It is the OHV community's belief that the BLM is not taking this growth of motorized recreational use seriously. Once again, I will reiterate; it is the oldest, least maintained roads, two-tracks, ways, routes and OHV areas we spend our entire vacations recreating on.	Much of this comment represents personal opinion and requires no response. However, the RMP amendment and CTMP will address a range of OHV and motorized access alternatives.
197	User Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		12	1	Virtue Flats and Christmas Valley Sand Dunes are examples of but two areas that allow cross-country travel at this time. Other areas need to be found that would allow this type of travel even if it were exclusively a trail system on 80,000 acres or more in each district of BLM lands. Please take the OHV community serious as you write the new TMP. We are here now but in ten years, we will have double. We are the growing public land user not the declining.	The RMP amendment and CTMP will address a range of OHV and motorized access alternatives.
198	OHV Group	Travel Management Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		13	1	The primitive camping and use of old roads must be taken into account in the near future. Some like to drive their OHV into the desert until the road ends and will spend the weekend camped there. The end of the road is very meaningful to many and provides a unique experience in these arid lands. Primitive areas need to be left open to motorized travel in the new TMP.	The RMP amendment and CTMP will address a range of OHV and motorized access alternatives.
199	OHV Group	Travel Management Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		14	3	In the new TMP we would like these old roads, ways, two- tracks and routes to be called Back Country. Back Country would receive the same protection as WSA. These ways would never be closed in the future to motorized travel. We need this Back Country to save these lands in their present state, which include man's use, past and future. Allowing the lands to be worked or recreated on as the American public deems proper.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry area". Therefore, this issue is beyond the scope of the RMP amendment process.
200	User Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		15	4	Sage grouse do not live, breed, nor raise their young on these old roads or ways. I can drive right by them and they will not move a muscle. I can hunt upland game birds all day and not find even one on the trail. Amongst the sage is where I will find them as they freeze into momentary statues. In all of recorded history, not a single grouse has been hit by an OHV on these old roads, two tracks, trails or ways. Sage grouse should not even be considered for a reason to close a road to motorized traffic. On the other hand sage grouse are being harassed by hikers and their dogs as they walk about on BLM lands. If any areas are closed to motorized use then the same lands must be closed to the anti-motorized groups as well. I know first hand what their dogs do to these timid birds. Please do not close any lands to OHV s because grouse live in the area. It is ok to close these lands to cross country travel to all. Leave the roads and trails open. Making these lands WSA or Wilderness will not keep these animals in better health than making it Back Country, which allows motorized travel.	This comment represents personal experience or opinion.
201	OHV Group	Grazing Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		16	1	Grazing is very important to public lands. The BLM should do everything possible to make sure this continues to happen on our lands. Grazing removes more flammable tinder in one year than most realize. These dried grasses are all but spontaneous fire just waiting to happen.	Portions of this comment represent personal opinion and no response is needed. However, the effects (both beneficial and adverse) of grazing will be analyzed in the RMP amendment.

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202	OHV Group	Grazing Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		17	4	Grazing allotments should not be ending. In fact, new allotments need to be made. As a rancher ends his allotment it needs to be given to another at the going rate or kept on the books until another takes it up. Do not allow grazing allotments to end! Grazing on public lands should be encouraged whether it is WSA, Wilderness or Backcountry it needs to be allowed.	This comment represents personal opinion and no response is needed.
203	OHV Group	Grazing Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		18	1	Most evasive weeds would be consumed by heavy grazing in the springtime particularly. At this time, range cows are being trained to eat nothing but weeds leaving the good grass behind for other animals. That would leave a few requiring pulling by hand. Hand pulling and herbicides cost taxpayers four or five times more than grazing. Grazing is a good thing and it still allows motorized travel in these vast BLM lands.	Much of this comment represents personal opinion and no response is needed. However, the effects of livestock grazing on the potential spread of weeds and control of weeds will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.
204	OHV Group	Grazing Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		19	4	Grazing animals need water which ranchers supply. Ranchers and BLM make sure that the springs are flowing, reservoirs are full and not breached and creeks provide as much water as possible. By allowing grazing, the waters are there also for wildlife to partake. In fact, if you slowly drive up on one of these tanks on a hot afternoon, one will quite often see sage grouse dusting themselves or hunkered on the damp dark side with beaks open as they gasp in the hot summer air. Without grazing, these water holes would not have been there in the past, or in the future. This water has saved these grouse and millions of other wild animals for over a century now.	This comment represents personal opinion and no response is needed.
205	OHV Group	Climate Change	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		20	1	Climate change is beyond the control of man. The climate has been changing since the beginning of time. Sometimes it is good for one area but not for another. We now know that man and animals walk beneath the polar caps and may again one day. We know these lands of the BLM were once under a great ocean, once under mountains of ice, once a solid glowing mass of lava and once was an extremely dry desert where the tiniest animals fought to survive. With solar flares, to land movement, to the very tilt or rotation of the earth the climate is changing at this very moment. Nothing man can do will prevent this change. The BLM should not respond to this nonsense. In the near future, the anti-access group will threaten climate change as reasons to close more lands to motorized use. Please do not listen to their words but to common sense. Yes, climate change is occurring as it has in our great granddad's days so it will be in our children's children's days. From the beginning of time to the end of time man will not be the ones to change this phenomenon. There is no pattern, beginning, or ending. It is as it is.	Appropriate research regarding climate change will be considered during the RMP amendment process.
206	User Group	Local Social Economic	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		21	1	OHVs of all three Classes contribute economic wealth to all communities. Especially the smaller towns such as Christmas Valley, Baker City, Halfway, Fields, Unity, Prairie City etc. ... will be use by OHV users. All the towns on the way to camps will be better off with OHVs passing through them. Where motels, restaurants, gas, groceries, propane, tires, forgotten camping items, hunting and fishing tags and apparel are purchased for the vacation that will be spent on BLM lands. In the big cities, trucks, jeeps, SUVs, campers, trailers of every type and description, motor homes, motorcycles, quads, clothing, tools, boats big and small and repairs are purchased in preparation for the trip. Monies that are spent total into the billions just to spend a day or two on these remote spots in Oregon. Think about it for just a few minutes and add to the list what OHV users spend just to visit these vast arid lands. These monies are tenfold what the occasional WSA or wilderness user will spend in a lifetime using lands closed to motorized use. Without all the motorized use on BLM lands there would be very little need of most BLM employees. If grazing was gone, mining gone, timber sales gone, hunters were gone, OHVs gone, lands closed to all motorized use what would you do? Take a few minutes and think that through. The motorized community is truly buttering the bread your family eats. The need for us to use these BLM lands are many but with lands closed to motorized travel we will not come. The more old roads, ways, routes, trails and play areas for motorized use will mean more jobs for all Americans.	The majority of this comment represents personal opinion and no response is required. However, the social-economic effects of OHV users and other recreational activities will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.

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207	OHV Group	Opposed to Wilderness	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		22	1	Christmas Valley Sand Dunes OHV area needs to be removed form WSA. The Lakeview BLM District has within their means not to recommend this area as wilderness or WSA. We beg of you not to recommend this for either but to recommend it for OHV use. We ask that the Sand dunes be removed from Area of Critical Environmental Concern (ACE C) and be just listed as Christmas Valley Sand Dunes OHV Area. This area of drifting sand is slowly drifting away to the northeast primarily into the Lost Forest. As it does, vegetation is returning slowly on the southwest side. One day the dunes and Lost Forest will be gone and the native sages and grasses will return to claim both areas. There is no way to stop either from happening and to list this area as WSA or ACEC is not right. OHV use in this area should be the primary use of these drifting dunes until they succumb to nature. As stated by BLM there is nowhere within Oregon that this type of recreation can be had for OHV enthusiasts. Please work with the OHV community and make this area Christmas Valley Sand Dunes OHV Area. We need your help at the Washington level to accomplish this task. It can be done with the BLM, Lake County, the community of Christmas Valley and the support of the primary public user; the OHV community.	The majority of this comment represents personal opinion and no response is required. In addition, the removal of an area from WSA status requires Congressional action and is beyond the scope of analysis.
208	User Group	North Lake Special Recreation Area Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		23	4	Within the Lost Forest separate the 960 acres from the WSA and let all of it be known as the Lost Forest Research Natural Area. The line for this would be the same along the northeast side of private property and along the ridgeline facing south towards the dunes. No OHV s would be allowed into this area until the vegetation is dead and sand piled on top of sufficient depth to allow travel not on native soil. The sand is moving as I write this and the sand dunes are walking that way and this line will need to be changed as the forest is killed by the dunes. There is lots of new pine tree growth in section 31 and 32 and most likely OHVs will never be allowed in these sections. It is our observation that on this leading edge the Lost Forest seems to be rejuvenating itself. Except for the far northeast corner which is where the dunes are currently moving through the Junipers. Much of Section 33 and 34 have become part of the sand dunes and offer OHV users much needed new ground. This area is very popular with families. The dunes are small and the junipers allow parents to sit out of the elements and watch their children ride without fast riders present. It also is becoming a designation picnic site used by slower riders. This far northeast corner needs left open to OHV use. As the sand moves into the Lost Forest, the boundary needs to be changed in this far corner allowing more access as the sand piles up. The sand is killing the vegetation and will kill all that it suffocates and sand blasts dry.	Much of this comment represents personal visual observations about sand movement along the southern boundary of the Lost Forest RNA. The BLM does not dispute the idea that the dunes are actively moving. However, the 960 acres of the RNA in this area overlaps with the northern portion of the Sand Dunes WSA. The removal of an area from WSA status requires Congressional action and is beyond the scope of analysis.
209	User Group	ACECs	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		24	1	It is the contention of many that there should be a campground here (in the northeast corner of Sand Dunes WSA) next to Buffalo Well Road (6141-0-AO). In Section 3 or 34 for accessing these dunes and the desert trails to the east. Class II users are using this area and are accessing these roads to Wagon tire Butte, Glass Butte, Stauffer Rim, Derricks Cave, Green Mountain, Devils Garden, and BLM lands east and northeast of the sand dunes. A primitive campground needs to be created here.	The Lakeview RMP (2003) included the designation of a primitive camping area in Section 3 within the ACEC boundary, but outside of the WSA boundary (see Map SMA-9). The eastern open portion of the sand dunes are accessible from this camping area.

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210	OHV Group	North Lake Special Recreation Area Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		25	7	The Fossil Lake (closure) Boundary needs to be moved back to allow OHV more access to the southern dunes. Over a third of the best dunes are southwest of the current boundary. Within Sections 10, 11, 12 and 1 is an area where the dunes provide some of the best riding this area has to offer. This area needs to be reopened to OHVs. The BLM closed (concern the OHV designation in the Lost Forest-Sand Dunes- Fossil Lake ACEC, Sand Dunes WSA and Lost Forest RNA. Map SMA-9 and SMA-9A from the 2003 ROD) these dunes claiming areas of critical concerns. Upon meeting with them on site, we showed them routes that would avoid these areas. Region 6 of the PNW volunteered to fence or put up signs so riders would avoid the areas that were pointed out to us. All of this could have been done to prevent OHV s from traveling on sensitive sites. The present boundary is for OHV s only and does not stop people from walking, people on foot are accessing this area to gather what they wish. The OHV community sees this as an OHV closure; period. In this area, people have for over a century picked and dug up what they like and continue to do so. Why have you picked the OHV community only to stay behind this current boundary? It is not logical to stop our use only, particularly when there is no sheriff around to arrest the thieves or the OHV users that sneak a ride into these great dunes. It is not enforceable except by the law enforcement officers continually riding the boundary line. This is costing the OHV community and BLM thousands of dollars every year. It would make sense to put the boundary where no one rides which is extremely easy to do. Put up markers or fence the truly critical areas from all the public not singling out the OHV users.	The Fossil Lake closure was expanded by the decision of the 2003 RMP-ROD to protect paleontological and archaeological resources on or near the surface from being crushed by vehicles.
211	User Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		26	7	It would only make sense to allow the OHV community and BLM to fence or place signs not allowing anyone to disturb the specific areas of concern. The Fossil Lake fence which we built along Power Line Road has been pushed over three miles into the existing WSA. It should be put back where it belongs or mitigate a new line that the OHV community and BLM agrees with. It seems illegal to me that no one can infringe on a WSA but the boundary was moved against our public input at BLM meetings and in writing. Three miles of riding area was closed down and we need it back. Imagine for a minute if you had put the road into the wilderness three miles the lawsuits and files you would now be faced with. Why have you treated us differently and took this large riding area from us knowing we need these additional dunes?	Portions of this comment is personal opinion and no response is needed. The Fossil Lake closure was expanded by the decision of the 2003 RMP-ROD to protect paleontological and archaeological resources.
212	User Group	North Lake Special Recreation Area Planning	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		27	7	This southern boundary between Fossil Lake and the dunes will slowly be moving northeast as each year passes. This boundary should be changed as the sand moves. After all, it is the sand that OHV users come to Christmas Valley Sand Dunes OHV Area for. It is not for the old things that may lie below the sands or the surrounding desert. After all, the areas covered in vegetation closest to Fossil Lake are where the undisturbed fossils rest not in the bare lands.	The Fossil Lake closure was expanded by the decision of the 2003 RMP-ROD to protect paleontological and archaeological resources on or near the surface throughout the closure area. Commenter is incorrect in stating that the only place these resources exist are in areas covered by vegetation.
213	OHV Group	Public Involvement	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		28	1	I have attended your meetings and have written here my concerns; what will you do with them? I am asking you to put most of my words into your Final Draft. It is my greatest concern you will not. Instead, you will mitigate your Final Decision behind closed doors with the anti-access extremists, without the public being present to fight for their rights on our public lands. All of my time to meet with you and writings will fall on the floor. I am begging you not to do this. Instead, keep the public informed and allow us to participate in these closed-door sessions. No more, should these anti-access extremists hold your feet to their coals. We need to be permitted to put out their fires at your side. This is how it should be and they should not be able to dictate to you without us being in the room. They and the courts should at least see our face in the same courtroom while fighting to keep these vast lands open to the majority wishes. Traditional use of our public lands, wide open spaces with families recreating on the trails created by their grandparents as they reeked livings out of mines, grazing, and other back country endeavors.	The RMP amendment process is an open public process. Scoping comments will be summarized and discussed in the Scoping Report. These comments will be used to develop the issues, alternatives, and impacts that will be addressed in the RMP amendment. The public will be provided with additional opportunities to review and comment on the RMP amendment/Draft EIS. Those comments will be included and addressed within the Proposed RMP/Final EIS.

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214	User Group	Public Involvement	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		29	1	It is not legal to mitigate our routes and areas closed behind closed doors with a group of anti-access extremist. Please do not lock another single acre of land behind imaginary lines calling them wilderness or WSAs. Instead, remember us, who quite often out number the anti-access extremists ten to one at your meetings. Remember our brief words that state over and over again no more wilderness. Our letters although not fluent in grammar but ask again and again to leave these old roads, routes and ways open to motorized traffic. Put our words in your RMP, ES1, TMP and amendments to your ROD.	The RMP amendment process is an open public process. Scoping comments will be summarized and discussed in the Scoping Report. These comments will be used to develop the issues, alternatives, and impacts that will be addressed in the RMP amendment, but will not be carried forward, word-for-word, into the RMP amendment. The public will be provided with additional opportunities to review and comment on the RMP amendment/Draft EIS. Those comments will be included and addressed within the Proposed RMP/Final EIS.
215	User Group	Opposed to Wilderness	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		30	4	No more "wilderness" on public lands please! I am asking the BLM not to consider any further Wilderness Study Areas. There are lands already set aside for WSA and no further lands need identified as WSA. Do not aid the anti-access extremist to enlarge their existing wilderness or WSA! In fact, the WSAs need to be removed from all the current BLM lands. I ask the BLM to help the American public in removing all of them. I ask the BLM to initiate the congressional meetings necessary to remove these WSAs from all of BLM lands. The Washington BLM office can do this with Americans working hand in hand with the BLM.	Much of this comment represents personal opinion and does not require a response. However, the removal of an area from WSA status requires Congressional action and is beyond the scope of analysis. Further, the BLM is required under the Settlement Agreement, to update its inventory of wilderness characteristics (outside of existing WSAs) within the Planning Area and address the effects of alternative methods of protecting those values.
216	OHV Group	OHV Support	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		31	4	Thank you for allowing me to comment on these things. I see no difference for one BLM District to the next. The anti-access groups will not stop until all motorized travel is off public lands and all grazing is stopped on public lands and until all roads and things man has created, have been removed from these lands. I am asking for this not to happen but instead, the BLM continues to fight for the American public's rights to access these lands. Fighting for our rights to continue recreating and working these lands for the benefit of all living things including us, humans, that are also part of this vast ecosystem. Parents teach our history as they take their children on these old trails and tell of their fathers and their fathers herding sheep, tending cattle, hunting, fishing, timber harvest. fur trapping, mining etc. ... while recreating on our public lands. Newcomers to these lands will recreate in all forms but the most popular mode is in or on an OHV.	This comment represented personal opinion and no response is needed.
217	User Group	Non-Responsive	30	Pacific_NW_4WDA_ Randell	6/30/2010	Bend	OR		32	4	You will be receiving our official scoping comments in the mail soon, this email responds to a phone conversation Eric Mayes and I had on 7/1/10. Thank you both for the great and informative conversations on your RMP Amendment/ EISs'.	No response needed
218	Federal	Climate Change	31	EPA, Erik Peterson	7/1/2010	Not Provided	Not Provided		1	5	Eric (Mayes) and I spoke this afternoon about Climate Change and Travel Management Planning. I mentioned that we had some summary notes of a recent climate science conference http://www.ecy.wa.gov/climatechange/docs/ipa_20100615conference.pdf). I also mentioned that we could probably share them. Currently we are finalizing the notes and at that point I'm hopeful I'll be able to share them with you.	Review References and cite or incorporate where appropriate.
219	Federal	Travel Management Planning	31	EPA, Erik Peterson	7/1/2010	Not Provided	Not Provided		2	1	In terms of travel management planning, Eric (Mayes) and I talked for a bit about committing to a process vs. identifying a specific combination of route designations. Some Forest Service ID Teams have presented the route designation process as a table. With routes as rows and management triggers as columns. Common management triggers include, "adverse water quality effects", "risk of spread for invasive species", "winter elk habitat", "user abuse (trash, human waste etc.)". As I understand it, the table then becomes a sort of survey for resource specialists. Decisions on routes with management concerns are made with the aid of this master table. That is a very rough summary of an example of a process for making route designation decisions. My point is not that this process is the best process, but that committing to and adequately describing the process followed - and to be followed - is useful. And, generally speaking, committing to a process to be followed may be more appropriate (in certain circumstances) than identifying and committing to a specific set of route designations.	Addressed in the CTMP.

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220	Federal	Travel Management Planning	31	EPA, Erik Peterson	7/1/2010	Not Provided	Not Provided		3	5	There are references to the specific sections of the Forest Service Handbook and Forest Service Manual which cover minimum system designations and route designation prioritization in the letters below. If you would like additional information on travel management planning, please feel free to contact either me.	While FS guidance may be useful to see how they address travel management, it does not apply directly to BLM. The CTMP will be developed in accordance with applicable BLM travel management guidance.
221	Federal	Environmental Law and Policy	31	EPA, Erik Peterson	7/1/2010	Not Provided	Not Provided		4	5	(See attached file: 10-016-AFS EA Umpqua National Forest Travel Management Plan.pdf) (See attached file: 10-017-AFS NOI Colville National Forest South End Motor Vehicle Management Project.pdf)	While FS guidance may be useful to see how they address travel management, it does not apply directly to BLM. The CTMP will be developed in accordance with applicable BLM travel management guidance.
222	Federal	Environmental Law and Policy	31	EPA, Erik Peterson	7/1/2010	Not Provided	Not Provided		5	4	EPA will review the draft EIS in accordance with its responsibilities under Section 1022C of the National Environmental Policy Act NEPA and Section 309 of the Clean Air Act to review and comment in writing on the environmental impacts of major federal agency actions. EPA' s review will include evaluation of the anticipated environmental impacts as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.	No response needed
223	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		1	4	It is EPA's goal that the Resource Management Plan Amendment EIS promote full public disclosure of all foreseeable direct, indirect, and cumulative environmental impacts and mitigation, and consistency with environmental and public involvement requirements of State and Federal laws, Executive Orders and policies.	No response needed
224	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		2	4	We hope that EPA's ETS guidance and scoping comments will be helpful, and would appreciate receiving feedback, comments or questions regarding the information provided or issues discussed. If you have any questions, please feel free to contact me at 503 326-2859 or at kubo.teresaepa.gov. Thank you for your willingness to consider our comments at this stage of the land management planning and NEPA processes.	No response needed
225	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		3	1	We recognize that modified grazing strategies have resulted in improvements to rangeland health and to improved riparian condition on BLM lands. Nevertheless, grazing continues to influence watershed condition, and plays a role in the ongoing impairment of water bodies and terrestrial habitat condition in the planning area. The RMP process provides an opportunity to consider the latest science, reassess current land use, and adopt appropriate guidelines related to grazing management. We encourage the adoption of standards and guidelines similar to those included in the proposed action for the Blue Mountains Forests Revised Land and Resource Management Plan.	The RMP Amendment will address the latest science related to grazing management. Further, the RMP Amendment will continue to utilize appropriate BLM rangeland health standards and guidelines.
226	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		4	1	Timing of grazing by cattle may be a critical consideration to minimize impacts on stream banks. The results of at least one study in Oregon indicate that grazing riparian areas when adjacent uplands are attractive to cattle early summer may help reduce the deleterious impacts of grazing on stream banks. We encourage the BLM to consider the impacts of timing, particularly where high priority aquatic habitat is present, when developing standards and guidelines to meet grazing objectives in riparian areas.	The majority of the perennial streams in the Planning Area are excluded from grazing. The RMP Amendment will address the latest science related to grazing management. Further, the RMP Amendment will continue to utilize appropriate rangeland health standards and guidelines.
227	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		5	5	We recommend that the BLM consider replicating the approach adopted in the Upper Deschutes Resource Management Plan and Final EIS, published by the BLM Prineville District Federal Register: 1/14/05, Vol. 70, No. 10 p. 2653-2654. This RMP proposed a decision matrix to help managers compare the value of a grazing allotment for livestock grazing to its ecological and social value for other uses, and measures the potential conflict that exists between grazing and other uses. Where an allotment scores low for grazing use, and high for ecological or social values, the BLM may seek to close the allotment to livestock grazing or reallocate the forage as a grass bank.	The BLM will not be using a "decision matrix" in this planning effort. The RMP amendment must comply with the terms of the Settlement Agreement which includes provisions for analyzing at least two alternatives that accept voluntary relinquishment of grazing in different types of special management areas.

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228	Federal	Environmental Protection	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		6	7	We encourage the BLM to consider the adoption of reserve forage allotments RFAs. These allotments would not be allocated to one specific grazing operator, but could be used on a temporary, non-renewable basis to allow for rangeland restoration and recovery. The RMP should establish overarching guidelines for the use of RFAs. These guidelines should establish what would trigger the use of an RFA, and what would be considered high versus low priority The RMP should also establish sideboards for the term of use of an RFA, including ecological thresholds. Direction should be provided on how the number of permittees able to graze simultaneously would be established, and how forage would be allocated.	The current RMP grazing management direction (i.e. No Action Alternative in Chapter 3) and Affected Environment Section (Chapter 2) note that there are several allotments or portions of allotments that are currently open to grazing, but have no permanent forage allocation assigned to them. Though the BLM does not have "reserve forage allotments" per se, the aforementioned areas are made available to permittees who are dealing with drought or fire rehabilitation on a temporary basis. Temporary use of these areas would be authorized in the future based on the process identified in 43 CFR 4110.3-1(a) or similar regulation.
229	Federal	Environmental Protection	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		7	1	Within the analysis of grazing impacts, we encourage the BLM to consider the influence of grazing intensity on stream temperatures. Previous research has demonstrated that streams from watersheds with no grazing had significantly lower maximum temperatures than those from watersheds managed for grazing, particularly within ponderosa pine and mountain meadow ecosystems.	The majority of the perennial streams in the Planning Area are excluded from grazing. The RMP Amendment will address the latest science related to grazing management. Further, the RMP Amendment will address livestock grazing impacts on water quality, including steam temperatures.
230	Federal	Environmental Protection	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		8	1	We also encourage the BLM to consider the role played by grazing within the context of wildfire. Livestock alter forest dynamics by: reducing the biomass and density of understory grasses and sedges, which otherwise outcompete conifer seedlings and prevent dense tree recruitment, and reducing the abundance of fine fuels, which formerly carried low-intensity fires through forests. In doing so, livestock play a role in determining how fire behaves on the landscape. We encourage you to analyze grazing use and its potential influence on fire behavior at the landscape scale.	The effects of livestock grazing on the build-up of fine fuels and altered fire regimes will be addressed in the RMP Amendment.
231	Federal	Utility Corridors	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		9	1	In examining the 80-meter wind map for Oregon produced by the National Renewable Energy Laboratory, it appears that there exists a potential for wind energy development on BLM land, particularly in the southeast corner of the state within the Vale District. We believe that this potential, combined with recent wind development activity on adjacent private lands, and the ongoing need to site transmission lines on or near BLM Lands, present a management challenge that would be appropriate to consider in the RMP amendment process. We encourage the BLM to consider the potential for wind energy siting and/or right of way siting needs, as present and potential uses of public lands are considered consistent with the identified planning criteria. Helpful guidance in determining whether or not an area is suited to wind energy development can be found in the Recommendations of the U.S. Fish and Wildlife Service Wind Turbine Guidelines Advisory Committee, and the Oregon Columbia Plateau Eco region Wind Energy Siting and Permitting Guidelines.	The siting of solar and wind energy projects are addressed through the issuing of a right-of-way (ROW). During the plan amendment, the BLM will classify all public lands as either open to ROW location, areas where ROWs are to be avoided if possible, and areas where ROWs are excluded or not allowed. Those areas that are identified as open to ROW location would be the most appropriate places for new energy developments.
232	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		10	1	We ask that the BLM consider the following recommendations as the travel management plan is developed: that the EIS discuss the identification of a minimum road system and include an alternative which minimizes motorized and non-motorized user conflict.	The RMP Amendment and CTMP will address a range of OHV and motorized access alternatives.
233	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		11	1	We ask that the BLM consider the following recommendations as the travel management plan is developed: Science-Based Analysis and Minimum Road System. We recommend that the EIS incorporate a science based analysis to identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of BLM lands. The EIS should summarize how the identified system minimizes adverse environmental impacts associated with road use, construction, reconstruction, decommissioning, and maintenance.	The CTMP will address "minimization criteria" identified in governing regulation on a route-specific basis. Routes will be considered for closure, additional maintenance, or reconstruction based in part on how well they meet these minimization criteria.

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234	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		12	1	We ask that the BLM consider the following recommendations as the travel management plan is developed: Minimizing Motorized and Non-Motorized User Conflict From 1982 to 2000, the number of people driving motor vehicles off road in the United States increased over 109 percent. EPA recognizes the significance of this increase and commends the BLM for bringing travel management planning into this RMP amendment process. Simultaneously we understand that recreation visits involving OHVs constitute a small percentage of all recreation visits to public land. We believe that balancing the needs of motorized and non-motorized users should be a key component of the travel planning and recommend the EIS quantitatively and qualitatively describe the priorities and concerns of motorized and non-motorized users. We propose that an alternative which emphasizes the minimization of potential conflict between these users e.g. separates use by physical geography or administrative boundaries be developed.	EPA is incorrect in stating that "recreation visits involving OHVs constitute a small percentage of all recreation visits to public land". Virtually all recreational users of public land get there by motorized vehicle. Further, OHV users comprise a substantial recreational user base in the Planning Area. The CTMP will address "minimization criteria" identified in governing regulation on a route-specific basis. Routes will be considered for closure, additional maintenance, or reconstruction based in part on how well they meet these minimization criteria.
235	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		13	1	We ask that the BLM consider the following recommendations as the travel management plan is developed: EPA's areas of concern regarding the construction, maintenance, closure decommissioning and use of roads include: * alteration of hydrologic regimes from road drainage, * road stream crossings, * road surface erosion, * culvert sizing and potential for washout, * culvert allowance of fish migration and effects on stream structure, * seasonal and spawning habitats, * large woody debris recruitment, * fire risk from recreation, * noxious weed proliferation and * road encroachment on and fragmentation of stream, riparian, wetland and terrestrial habitats.	The CTMP will address "minimization criteria" identified in governing regulation on a route-specific basis. Routes will be considered for closure, additional maintenance, or reconstruction based in part on how well they meet these minimization criteria. However, BLM has few perennial or fish-bearing streams and no culverts impacting fish passage. In addition, BLM sees no logical relationship between travel management and large woody debris recruitment on rangelands.
236	Federal	Travel Management	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		14	1	User created routes, closed roads and legacy roads impact our areas of concern and should be included in any analysis of environmental impacts from the proposed action and alternatives. Our road management concerns are focused on route density, maintenance and design and decommissioning.	Route density within most of the Planning Area is low. Commenter fails to identify exactly where there "areas of concern" are within the Planning Area. The RMP amendment and CTMP will address OHV and route-specific management alternatives.
237	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		15	1	EPA believes reductions in route density improve the health of ecosystems and watersheds. The EIS should include the current number of road miles and density and the change in road miles and density that will occur as a result of the plan. The alteration of resource impacts caused by changes in road miles and density should be analyzed and described. This analysis should consider all routes, roads and trails and include those that are closed or user created.	Route density within most of the Planning Area is low. The RMP amendment and CTMP will address OHV and route-specific management alternatives.
238	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		16	1	We recommend prioritizing road density reduction in crucial winter ranges, along wildlife migration corridors, near impaired waters and sensitive and/or rare plant and animal habitat. Emphasis should be placed on reducing miles of roads in areas with multiple stream crossings and/or high erosion and sediment delivery potential.	Route density within most of the Planning Area is low. Seasonal closures are already in effect within critical deer winter range and will likely be carried forward or expanded in other alternatives. There are very few stream crossings on perennial streams in the Planning Area. The RMP amendment and CTMP will address OHV and route-specific management alternatives.
239	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		17	1	EPA also suggests that targets for reducing transportation system mileage and road densities over time be considered. Establishing numerical targets for decommissioning, maintenance, reconstruction and revision of designations could help guide management. These numerical targets could also be environmental, such as reductions of the amount of sedimentation delivered to streams, or decreases in the amount of fragmented habitat. EPA respects the need to base numerical targets on funding expectations.	Route density within most of the Planning Area is low. The RMP amendment and CTMP will address OHV and route-specific management alternatives.
240	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		18	1	EPA recommends that BLM identify a road system that reflects long term funding expectations. We support giving priority to upgrading the most heavily used roads and restricting travel on classified roads that pose environmental threats and cannot be maintained due to lack of funds and other resources. The EIS should discuss resources available to maintain and build roads and trails.	Route density within most of the Planning Area is low. The RMP amendment and CTMP will address OHV and route-specific management alternatives. In particular, the CTMP will include a description of maintenance level priorities for each route.

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241	Federal	Travel Management Planning	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		19	1	We believe it is appropriate to consider, as part of the EIS, the environmental impacts of different methods for road and trail closure and decommissioning. Road closures and decommissions can range from administrative signage or barricading at the road entrance to prevent off-road vehicles from entering to obliterating, revegetation, and stabilizing the road. Where appropriate we recommend obliterating and revegetation roads.	The CTMP will address various methods of route closures.
242	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		20	1	Land management activities, including grazing, energy development, resource extraction, and motorized vehicle use have the potential to impact endangered, threatened or candidate species listed under the Endangered Species Act ESA, their habitats, as well as state sensitive species.	The RMP amendment will address potential impacts to listed and special status species.
243	Federal	Environmental Protection	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		21	1	Sagebrush habitat is of particular concern. Sagebrush habitats are declining rapidly across western North America, with over 350 associated plant and animal species at risk of local or regional extirpation'°. Key threats to the sagebrush ecosystem include the invasion of cheatgrass, high severity fires often associated with cheatgrass invasion, the expansion of juniper woodlands, and other human impacts, such as livestock grazing. As management strategies are revisited through this RMP amendment process, we encourage the BLM to consider these threats and to seek opportunities to conserve and restore native sagebrush. Restoration and protection emphasis should be placed on those areas where large-scale loss and degradation have not yet occurred.	The RMP amendment will address at least two alternatives that focus management attention on sagebrush habitat, particularly as it relates to greater sage-grouse habitat.
244	Federal	Environmental Protection	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		22	5	Maintenance of biodiversity can minimize the need for listing species as threatened or endangered. The state of the art for this issue is changing rapidly but CEQ's, "Incorporating Biodiversity Considerations Into Environmental Impact Analysis Under the National Environmental Policy Act," provides useful guidance.	Suggested guidance. No response is required.
245	Federal	Climate Change	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		23	1	Climate change is likely to impact the ability of the BLM to maintain or increase the resilience of the lands it manages. For example, reductions in winter snowpack are already beginning to be reflected in earlier spring streamflow throughout the western United Sates', and this decline is expected to accelerate over the next century. Continued warming in the Pacific Northwest is likely to result in increased water use by vegetation that may result in increased drought stress and reduced water availability for wildlife and humans. In particular, changes in the timing of watershed runoff are expected to place increased stress on water supplies and water storage facilities throughout the Pacific Northwest. Redistribution of forested and non-forested habitats is also expected, resulting in altered habitat conditions for most terrestrial wildlife species. The EIS should discuss these risk factors, and consider how management strategies under the various alternatives can contribute to the BLM's long term climate change adaptation strategy.	The RMP amendment will address recent science regarding climate change. However, because the current state of climate science prevents the association of specific actions with specific climate-related effects, the BLM can neither: (a) Analyze the climate-related effects of BLM actions nor (b) Ascribe any significance to these potential effects.
246	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		24	1	EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts, Consideration of Cumulative Impacts in EPA Review of NEPA Documents, which can be found on EPA's Office of Federal Activities home page at: http://www.epa.gov/compliance/resources/nepa.html. The guidance states that in order to assess the adequacy of the cumulative impacts assessment, five key areas should be considered: 1. Identifies resources if any, that are being cumulatively impacted; 2. Determines the appropriate geographic within natural ecological boundaries area and time period over which the effects have occurred and will occur; 3. Looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern; 4. Describes a benchmark or baseline; and 5. Includes scientifically defensible threshold levels.	Review guidance and consider in cumulative effects portion of Chapter 4 of the RMP amendment to the extent applicable.

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247	Federal	Environmental Protection	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		25	5	In addition, because BLM lands are intertwined with a mix of privately owned lands, the EIS should assess cumulative impacts across the landscape and identify what assumptions will be used with respect to adjacent non-BLM lands, as well as the mechanisms for cooperating with other land owners on RMP development and implementation.	Addressed in cumulative effects analysis portion of Chapter 4 in RMP amendment.
248	Federal	Public Involvement	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		26	1	Proposed projects under RMPs may affect tribal natural and cultural resources, including historical or traditional cultural places of importance to the area's Native American communities. In identifying historic resources, and assuring that treaty rights, and privileges are addressed appropriately, the lead federal agency must conduct government to government consultation with affected tribes. Documentation of these consultations should be included in the EIS consistent with Executive Order EO 13175 Consultation and Coordination with Indian Tribal Governments to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights. The EIS should document how tribal input was considered in the proposed action.	BLM is aware of its responsibilities regarding tribal consultation. Consultation efforts will be documented in the RMP amendment.
249	Federal	Environmental Law and Policy	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		27	5	The EPA is particularly interested in seeing the BLM utilize this planning process to consider the latest science, reassess current land use, and adopt appropriate guidelines related to grazing management, travel management, and energy facility siting - including new utility corridors.	The BLM will consider the most appropriate science when assessing the potential impacts of grazing, travel, and energy facility management actions in the RMP amendment.
250	Federal	Climate Change	32	EPA, Teresa Kubo	7/1/2010	Seattle	WA		28	1	We also encourage the BLM to consider trends in sagebrush habitat and climate change as resource information related to wilderness	BLM must follow specific wilderness inventory guidance when updating its wilderness characteristics inventory. While trends in sagebrush habitat may be somewhat relevant to the "naturalness" criteria, climate change is irrelevant to this inventory update effort.
251	Permittee	Grazing Support	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		1	4	My first concern is the considerations you are making on grazing. Grazing on BLM land is a vital part of our operation as well as the operation of most ranches in Lake County. Without public land grazing, most ranches would no longer be viable and would ultimately have to be turned into something that was. This would invite development that would be detrimental to the area's natural beauty, resources, and wildlife. Wildlife do much better in a hay field than on a golf course. I believe that the grazing plan that was adopted as part of the current RMP addresses any concerns that need to be addressed and it should be left alone. The only adjustments should be to strengthen the ability of responsible grazing to continue on indefinitely.	Much of this comment represents personal opinion and no response is necessary. However, the 2010 Settlement Agreement requires that the BLM consider at least two additional grazing management alternatives (in addition to continuing current management), but does not mandate that the BLM choose any particular alternative as its final decision. The RMP amendment will address those alternatives.
252	Permittee	Grazing Support	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		2	4	The fact that you are considering different ways to deal with retiring permits is also concerning. Ranchers should be able to work cooperatively with BLM employees to better the land, not live in fear that they will take away the ability to graze it forever. If an issue arises, it should be able to be dealt with on a case by case basis that best fits the situation instead of having an approach of simply retiring a permit if conditions aren't immediately met. Weather, fencing, monitoring, and other factors can vary greatly year to year and allotment to allotment, and so should on ground management decisions.	Much of this comment represents personal opinion and no response is necessary. However, the 2010 Settlement Agreement requires that the BLM consider at least two additional grazing management alternatives (in addition to continuing current management) that include a process for voluntary relinquishment in special areas. One of these alternatives would also address removal of grazing, either temporarily or permanently, in any area failing to meet rangeland health standards (and grazing was the causal factor).
253	Permittee	Grazing Support	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		3	1	Permit relinquishment should be left alone. Current process has worked well and permits need to remain available to area ranches for the local economy.	Part of this comment represents personal opinion and no response is necessary. However, the 2010 Settlement Agreement requires that the BLM consider at least two additional grazing management alternatives (in addition to continuing current management) that include a process for voluntary relinquishment in special areas.
254	Permittee	Public Involvement	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		4	6	The wilderness inventories review that you will be going through as part of the amendment process. I would appreciate it if you would involve me in any of your review process that affects my current permit or areas adjacent to it. I feel that the knowledge that I have of the area would be beneficial to helping you in your determination of wilderness characteristics.	Commenter received a letter dated Jan. 30, 2012, responding to this specific request.

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255	Permittee	Grazing Support	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		5	6	I feel that it is important as the review process is underway that permittees have the ability to maintain current improvements and implement ones that are necessary to insure responsible grazing.	The wilderness characteristics inventory update process by itself does not change existing range management. Permittees can continue to maintain those existing range improvements for which they have maintenance responsibilities.
256	Permittee	OHV Support	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		6	1	ATVs are a critical management tool that saves time and money as well as improves the overall way that grazing impacts the land. It is crucial that ranchers be allowed to use them responsibly to help manage grazing, especially for monitoring and fencing. I understand that in areas that are already wilderness or in wilderness study areas, OHV use needs to be restricted. However, other areas need to remain open to responsible use by permittees	OHV use and motorized access will be addressed in Alternative Development of both the RMP amendment and CTMP.
257	Permittee	Non-Responsive	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		7	9	I appreciate you taking my comments into consideration as you go forward in the Lakeview RMP amendment process. Please keep me informed of the progress of the process as it moves forward.	Commenter is on mailing list
258	Permittee	Grazing Support	33	Harvey_Ranch_K_Clark	7/3/2010	Paisley	OR		8	4	Oppose further restrictions on grazing.	Comment represents personal opinion. No response is needed.
259	Permittee	Local Social Economic	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	1	4	Viability of many ranchers depends on continued ability to graze livestock on public lands. Grazing is legally mandated use.	Comment represents personal opinion. No response is needed.
260	Permittee	Public Involvement	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	2	6	Wilderness inventory process needs to provide opportunity for input by individual grazing permit/lease holders. ONDA wilderness inventories are inaccurate.	Commenter received a letter dated Jan. 30, 2012, responding to this specific request.
261	Permittee	Opposed to Wilderness	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	3	1	Inventoried lands possessing wilderness characteristics must not be automatically managed as de facto wilderness. Until and unless they are designated as WSAs by an act of Congress, the BLM is obligated to manage these lands under the multiple-use mandate.	Under the terms of the 2010 Settlement Agreement, the BLM is required to update its inventory of wilderness characteristics. Merely finding wilderness character to be present does not change current management in such areas. However, the Settlement Agreement also requires the BLM analyze at least two alternatives that address varying levels of protections for such lands. Wilderness is recognized as one of many valid multiple uses under the FLPMA that BLM must consider during the RMP amendment process.
262	Permittee	Environmental Law and Policy	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	4	1	ONDA v BLM settlement requires that provide for both voluntary grazing permit/lease relinquishment processes and the identification of areas no longer available for grazing use. This alternative provides for elimination of grazing on certain allotments are contrary to the Taylor Grazing Act and the Federal Land Policy and Management Act.	Portions of this comment represent personal interpretations of the Settlement Agreement, Federal law, or regulation and do not require a response.
263	Permittee	Local Social Economic	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	5	1	Settlement alternatives also appear to give no consideration to the economic and social values that must be considered under NEPA.	In accordance with NEPA, the BLM will analyze effects of the alternatives on economic and social values within Chapter 4- Environmental Effects section of the RMP amendment.
264	Permittee	Grazing Support	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	6	1	BLM should consider alternative that is based on the grazing levels determined in the 2005 ROD.	This will be addressed under the no-action alternative (continue current management) included in Chapters 2 and 4 of the RMP amendment.
265	Permittee	Grazing Support	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	7	1	BLM needs to develop alternatives that provide permittees with the flexibility to use management changes to improve range conditions where grazing is a significant factor in failing to achieve the standards for rangeland health.	This will be addressed under the no-action alternative (continue current management) included in Chapters 2 and 4 of the RMP amendment.
266	Permittee	Grazing Support	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	8	1	It is vital that the BLM consider the frequent compatibility of grazing with other public lands uses and values, and not presuppose the presence of conflict where none exist.	The portion of the comment stating that no conflict exists represents personal opinion and does not require a response. The main purpose of the RMP process is to develop a plan that balances multiple and competing uses and resolves resource conflicts.
267	Permittee	Local Social Economic	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	9	1	BLM must give thorough consideration to the substantial benefits that public-lands grazing affords the environment, rural communities, and the general public.	Both positive and negative effects of grazing will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.
268	Permittee	Local Social Economic	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	10	1	These ranches, most of them small family businesses, form the base of the local economy, providing jobs, tax revenue, and a safe, domestic food source.	The contribution of ranching to the local economy will be addressed in Chapter 3 - Affected Environment section of the RMP amendment.
269	Permittee	Local Social Economic	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	11	4	If rendered useless for agricultural production, these ranches would be subject to sale, inevitably resulting in the increased development and fragmentation of remote areas. Housing, roads, power lines, septic systems, and other byproducts of development would have an immeasurable impact on local wildlife and plant life.	Some of this comment represents personal opinion and requires no response. The environmental effects of the management alternatives will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.

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270	Permittee	Local Social Economic	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	12	4	Ranches are vital living part of the fabric of Lake County history. If historic ranches are sold, subdivided, and developed, the exceptional beauty of Lake County's remote rural landscapes, and its untamed pastoral aesthetic, will be irretrievably lost.	Some of this comment represents personal opinion and requires no response. The social and visual effects of the management alternatives will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.
271	Permittee	OHV Support	34	70_Ranch_J_McNeley	7/3/2010	Lakeview	OR	1	13	1	It is important that BLM exempt permittees from vehicle restrictions and allow necessary use of OHVs to perform their duties as ranchers and land stewards.	Exceptions to OHV area or route-specific limitations can be made for administrative purposes. This will be addressed in the OHV and CTMP portions of the RMP amendment.
272	Permittee	Grazing Support	35	M_Oleary	7/3/2010	Paisley	OR	1	1	4	Same as Form Letter #1.	See response to Form Letter #1
273	OHV Group	Non-Responsive	36	Jefferson State 4WD Association, Tom Harris	7/4/2010	Keno	OR		1	4	Served on the BLM Multiple Use Advisory Council and after it became the SEORAC for 12 years. Also chaired the Steens Mountain Advisory Council and served three (3) years there while still a member of the SEORAC. My expertise is in organized motorized recreation which has been a consuming hobby for over 60 years. I have held offices in motorized clubs wherever I lived and was once the President of the Pacific Northwest 4WD Association, Inc. I am still a member of the PNW4WDA and the California Association of 4WD Clubs.	No response needed
274	OHV Group	Opposed to OHVs	36	Jefferson State 4WD Association, Tom Harris	7/4/2010	Keno	OR		1	4	Motorized recreation and the feral horses share a commonality in that the threat is in numbers and how we manage them. The key is in the term "sustainability." Only so many feral horses will survive in an area that must sustain the food and cover that other species, including domestic cattle, demand. So it is true that the landscape will only allow so many miles of motorized trails per square mile of area. Too much motorized activity will necessarily displace the requirements for survival of animal and plant life.	Much of this comment represented personal opinion regarding the term sustainability and no response is needed.
275	OHV Group	Public Involvement	36	Jefferson State 4WD Association, Tom Harris	7/4/2010	Keno	OR		2	6	The organizations that support this line of concern cover all facets of concerned citizens from organized motorized recreation to the Sierra Club. Differences exist as to how we apply remedial action. Since these differences are based on sparse information and bias, let's talk!	The BLM recognizes that a variety of organizations, groups, and individuals are concerned about, or interested in management of public lands. A substantial component of both the land use planning and NEPA processes focus on seeking and considering public, tribal, and other agency input. BLM has made a reasonable attempt to coordinate with all interested parties and provide information about public land management issues during this RMP amendment effort.
276	OHV Group	Public Involvement	36	Jefferson State 4WD Association, Tom Harris	7/4/2010	Keno	OR		3	1	As this Amendment applies to the Travel Management Plan, I Would like to call your attention to a number of trail maps that I GPS'd for you, at your request, in 1993 and 1994 when I retired. A number of years later Trish Lindaman, of our Lakeview Office, re-accomplished those trails with the same findings. Do you still have those maps and will they be considered? Keep in mind that volunteer stewardship is often considered key to succession area and trail management. 3.2 million Acres require more eyes and hands than BLM has.	These route inventory maps and accompanying report will be used to develop a range of designated motorized road and trail alternatives in the RMP amendment and CTMP.
277	OHV Group	North Lake Special Recreation Area Planning	36	Jefferson State 4WD Association, Tom Harris	7/4/2010	Keno	OR		4	1	On another very important note, Dick Leever, of the SEORAC, and I have collaborated on the beginning of a plan to remove the WSA from the Christmas Valley Sand Dunes and apply in its stead a dedication of a motorized OHV area. You have a copy of this initial effort. This plan is important as it enables available gas tax funding to ensure proper management of a sustainable OHV area and the protection of the other facets of the North Lake Special Recreation Area Planning. As you know State and Federal gas taxes are not available for Wilderness Study Areas. This change in designation is also essential to the continued economic growth of the Christmas Valley area.	While the designation of the Christmas Valley Sand Dunes as a motorized OHV area represents an interesting proposal, the area would first have to be removed from WSA status. Since only Congress can remove a WSA from wilderness study, this issue is beyond the scope of the RMP amendment process.
278	OHV Group	North Lake Special Recreation Area Planning	36	Jefferson State 4WD Association, Tom Harris	7/4/2010	Keno	OR		5	1	It is our hope that the Lakeview Resource Management Plan, amended or not, will result in an open-ended process with time for suitable planning and consideration. I'm sure you will agree that application of NEPA values must be applied in a site-specific fashion as individual projects and requests present themselves and that takes time.	The RMP amendment process is an open, public process. Plan implementation will require the preparation of subsequent NEPA documents for specific projects, which will also include opportunities for public involvement.
279	OHV Group	Opposed to Wilderness	36	Jefferson State 4WD Association, Tom Harris	7/4/2010	Keno	OR		6	4	Monuments and further establishment of Wilderness will not serve as a viable alternative to intelligent planning. Indeed, some Wilderness areas defy and complicate attention to maintenance in an ever-changing environment.	Comment represents personal opinion. No response is needed.
280	Business	Grazing Support	37	A_Rieber	7/5/2010	Adel	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
281	Permittee	Grazing Support	38	Rodney Ferry	7/5/2010	Lakeview	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.

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282	Permittee	Grazing Support	39	Cahill_Ranch	7/6/2010	Adel	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1
283	Permittee	Grazing Support	40	Charles B. Jones, ZX Ranch	7/6/2010	Grand View	ID	1	1	4	Same as Form Letter #1.	See response to Form Letter #1
284	Permittee	Non-Responsive	41	Dan and Laury Cron	7/6/2010	Plush	OR		1	3	Thank you for the opportunity to comment on the amendment of the Lakeview RMP as noted in your 4/30/20.1.0 notice. We confess we are local, ranchers and run on BLM managed lands. We retired from an extremely active survey business in Hood River in The Dalles, Oregon area and bought a rundown ranch near Plush, Oregon about 13 years ago. We truly love the desert and the opportunity to make our environment better while producing wholesome safe beef.	No response needed
285	Permittee	Opposed to Wilderness	41	Dan and Laury Cron	7/6/2010	Plush	OR		2	3	Re-evaluate the existing lands designated as Wilderness Study Areas. For example I think we can all agree that the Historic Gravesite westerly of the Historic Shirk Ranch should be available for all to enjoy and not just the physically fit. Vehicles should be allowed to use the existing roads to said gravesite.	Since only Congress can remove a WSA from wilderness study, this issue is beyond the scope of the RMP amendment process. Management of routes within WSAs is handled under the 1995 Wilderness IMP. Under current policy, user-created routes that have developed since the completion of the Section 603 wilderness study in 1991 must be closed. The route in question falls within this category.
286	Permittee	OHV Support	41	Dan and Laury Cron	7/6/2010	Plush	OR		3	7	Re-evaluate the closure of existing Wilderness Study Areas to small all-terrain vehicles. Said vehicles are very important to present and future public needs to mention a few: a) access to archeological sites b) Fire suppression c.) Noxious weed control d) allotment boundary fence management e) recreational hunting f) designated grazing management and inventory g) BLM enforcement Agents h) etc.	BLM recognizes the importance of motorized access in being able to conduct management and administrative activities on the public lands. However, WSAs are not currently closed to ATV or other motorized use. Motorized use within WSAs is handled under the 1995 Wilderness IMP. The IMP allows vehicles to use routes that existed at the time of completion of the Section 603 wilderness study in 1991. While vehicles are not allowed to travel off-road or cross-country, they are currently allowed on existing or designated routes within WSAs in the Planning Area. Changing national level BLM policy is beyond the scope of the RMP amendment.
287	Permittee	Opposed to Wild Horses	41	Dan and Laury Cron	7/6/2010	Plush	OR		4	3	Decrease the number of descendants of feral abandoned horses allowed to be on the Lakeview District managed lands. As science proves, wild horses are the single most detriment to the desert environment and being Non-Native have no natural predators. This non native species should be phased out over time to best meet present and future public needs.	Portions of this comment represent personal opinion and no response is needed. Wild horse management is not part of the Purpose and Need for the RMP amendment. However, wild horse management direction from the 2003 RMP-ROD will be carried forward into the RMP amendment.
288	Permittee	Environmental Protection	41	Dan and Laury Cron	7/6/2010	Plush	OR		5	1	Improve Desert Water Quality by: a) removal of feral horses, b) restore trampled springs, c) restore existing water holes - including channels that will capture flash run off, d) develop new water holes to control flash flood erosion, e) develop water pipelines with controlled water troughs.	Water quality management is not part of the Purpose and Need for the RMP amendment. However, water quality management direction from the 2003 RMP-ROD will be carried forward into the RMP amendment.
289	Permittee	Opposed to Wilderness	41	Dan and Laury Cron	7/6/2010	Plush	OR		6	1	Allow for the same improvements in existing Wilderness Study Areas as were allowed at the time of designation - for example new fence construction, water enhancement, and/or development or access to areas.	Developments within WSAs is handled under the 1995 Wilderness IMP. Under this policy, new development can only be allowed in WSAs if they meet the non-impairment criteria described therein. Changing national-level BLM policy is beyond the scope of the RMP amendment.
290	Permittee	Environmental Protection	41	Dan and Laury Cron	7/6/2010	Plush	OR		7	1	Improve Air Quality: Bring Air Quality to current EPA standards by improving existing roads. As we all know the Dust is BAD, BAD, BAD on the main traveled desert roads posing a health hazard to the public as well as the BLM employees.	Air quality management is not part of the Purpose and Need for the RMP amendment. However, air quality management direction from the 2003 RMP-ROD will be carried forward into the RMP amendment.
291	Permittee	Environmental Protection	41	Dan and Laury Cron	7/6/2010	Plush	OR		8	4	Improve Wildlife habitat by enforcement of current regulation of no camping within designated feet of water sources.	No response needed
292	Permittee	Grazing Support	41	Dan and Laury Cron	7/6/2010	Plush	OR		9	1	Continue to use cattle as a management tool. As studies and records have proved controlled cattle grazing is healthy for the ecosystem. Cattle are also the backbone of Lake County's economy. On the average every mother cow brings about $500 of direct money into Lake County. Many ranchers would be put out of business without public grazing. Most of the real, maintenance and improvements on public lands are done by ranchers. Cattle also bring revenue to the federal government thru grazing fees. Cattle also prevent catastrophic fires or the need to perform controlled burns by reducing fuel loads.	Some of this comment represents personal opinion and no response is needed. However, the effects of livestock grazing on fuel loading and the local economy within the Planning Area will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.

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293	Permittee	Local Social Economic	41	Dan and Laury Cron	7/6/2010	Plush	OR		10	1	We can look at Hart Mountain where cattle were removed over a decade ago and find the following: a) Wildlife has suffered In that sage hen grouse number has declined. Bighorn sheep and mule deer populations have also declined. b) Management now has to do controlled bums to try to do what cattle grazing did naturally. These controlled burns have the same negative Impacts as open field burning. Said burns also cremate all living creatures unable to outrun the flames. It takes years for these burned areas to recover with these areas being susceptible to non native cheatgrass takes over. It is also extensive to perform these controlled burns in that many get out of control. c) The economy of Lake County suffers in that overall cow numbers had to be decreased when cows were banned from Hart Mountain. d) The loss of revenue to the Federal government due to the loss of cattle grazing fees.	Some of this comment represents personal opinion and no response is needed. However, the effects of livestock grazing and prescribed burning on wildlife habitat, weed invasion, and the local economy within the Planning Area will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.
294	Permittee	Local Social Economic	41	Dan and Laury Cron	7/6/2010	Plush	OR		11	4	We think the above described considerations will be a step in the right direction of management to best meet present and future public needs In protecting and enhancing the environment while improving wildlife habitat, forage management, water quality, air quality, and recreation needs by all being physically fit or not. These considerations will also help insure the economic stability of Lake County as well as producing a safe source of beef for America.	No response needed
295	Permittee	Non-Responsive	41	Dan and Laury Cron	7/6/2010	Plush	OR		12	4	Thank you for your attention and the opportunity to comment.	No response needed
296	Permittee	Local Social Economic	41	Dan and Laury Cron	7/6/2010	Plush	OR		13	4	P.S. Our prayer Is that BLM can spend more money and energy on real improvements on the land and less money and energy on litigation. As we know most improvement today are done local ranchers with grazing permits.	No response needed
297	Permittee	Request to be on Mailing List	41	Dan and Laury Cron	7/6/2010	Plush	OR		14	9	Request to be On Mailing List.	Commenter is on mailing list.
298	Permittee	Public Involvement	42	K_Clark	7/6/2010	Paisley	OR		1	6	I would like first to point out my frustration on the scoping meetings that were held to provide information on the issue at hand. Conducting meetings in Bend and Portland was unnecessary and adds more cost to the BLM budget. If there are members of the public and special interest groups that claim to have such a large stake in how the land is going to be managed in the Lakeview district, they should travel to the area that is affected to attend meetings. Even more disturbing to me was that the meeting in Portland was held at the Audubon Society of Portland. Currently this group is a co-petitioner with Oregon Natural Desert Association (ONDA) on at least one other issue in Southeastern Oregon. Thus having a public meeting under these circumstances at the Audubon Society of Portland could be interpreted as a bias to these organizations' viewpoints.	In accordance with applicable laws such as the FLPMA and NEPA, BLM must make reasonable efforts to involve all potentially interested parties in its resource management planning process. The public lands belong to all of the American public, not just those living in the immediate area. Hosting meetings only in Lakeview, for example, could be viewed by some as showing a bias towards local residents.
299	Permittee	Opposed to Wilderness	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		1	1	As the BLM has received wilderness inventories from ONDA, special attention should be given to rationale, assertions, and data presented in these documents. After reviewing the areas that I am familiar with, I have found inaccuracies in the material presented as well as illogical arguments as to why these areas should be managed for wilderness characteristics.	BLM must complete its own wilderness characteristics inventory update for the Planning Area in accordance with current inventory guidance. During this update, BLM must consider information provided by outside parties and determine if it is accurate or represents valid "new information". This process is described in more detail within wilderness inventory documentation posted on BLM's website. BLM's inventory will be summarized and presented in Chapter 3 - Affected Environment section of the RMP amendment. Full inventory documentation is also available on BLM's website.
300	Permittee	Opposed to Wilderness	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		2	4	I am familiar with the area that is called the Poker Jim Ridge proposed WSA Addition to Orejana Canyon. The following statements will be referenced to the ONDA-Lakeview Wilderness Inventory Recommendations by page number and paragraph. In paragraph 3 page 64 there is a sentence that reads "1114a is a way because it can only be accessed from the south by way 1114h, and it cannot be accessed from the north end because of private property." This is an interesting argument because ONDA actually trespassed on our property without permission to take pictures at photo points ZZ 17-20.	No response needed.

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301	Permittee	Opposed to Wilderness	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		3	1	Laird Ranch and their agents have commented extensively on the Juniper Mountain Horseshoe pasture issue which in turn covers the wilderness characteristics. Since that material has been entered into record, I will not comment any further in this letter. I would urge the BLM to review the Juniper Mountain files and compare them to other proposed wilderness study areas, primarily to see if similar oversights were made on other proposals.	BLM must complete its own wilderness characteristics inventory update for the Planning Area in accordance with current inventory guidance. During this update, BLM must consider information provided by outside parties and determine if it is accurate or represents valid "new information". This process is described in more detail within documentation on BLM's website. BLM's inventory will be summarized and presented in Chapter 3 - Affected Environment section of the RMP amendment. Full inventory documentation is also available on BLM's website.
302	Permittee	Public Involvement	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		4	4	In paragraph 5 page 165 there is a sentence that reads, “Blue Joint (Bluejoint) Lake is an ephemeral lake, which typically has water in it during the spring then dries out over the summer. My family homesteaded the Bluejoint Ranch near the turn of the century. In nearly 110 years of family history in the area this kind of event has never occurred. Instead, the presence of water in the lake is affected by a series of wet years where it fills, and slowly dries over a period of years. Since there are arguments that follow in the document based on that faulty assertion it should call into question the credibility of the people making these observations.	No response needed.
303	Permittee	Opposed to Wilderness	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		5	1	I have some observations/questions if the BLM is going to consider “citizen inventories” in regard to wilderness characteristics, why does an established fence have no or little impact on wilderness character but if a new fence is built it would impact the wilderness character?	BLM must complete its own wilderness characteristics inventory update for the Planning Area in accordance with current inventory guidance. During this update, BLM must consider whether existing range improvements such as fences substantially alter the natural character of the landscape. A naturalness finding must be made for each inventory unit and must take into consideration the density of human disturbances and whether or not these disturbances are "substantially noticeable". This determination is documented in the wilderness characteristics inventory updates posted on BLM's website. BLM only considers the potential effects of future projects on natural character in a given NEPA analysis, if the BLM first determined that the surrounding area had wilderness characteristics.
304	Permittee	Grazing Support	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		6	1	I have some observations/questions if the BLM is going to consider “citizen inventories” in regard to wilderness characteristics. If a new fence was built through or near live and dead junipers how would this give raptors an unfair advantage in the wild as has been argued in the past documents? My observation has been that raptors do not like to perch on narrow t-posts as opposed to trees.	It is unclear how this comment relates to BLM's wilderness characteristics updates. BLM does not generally discuss fence posts or raptor perches in wilderness inventory documentation.
305	Permittee	Grazing Support	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		7	1	I have some observations/questions if the BLM is going to consider “citizen inventories” in regard to wilderness characteristics. Why do established waterholes have little or no impact on wilderness character but constructing new waterholes would have an impact? Managing for wilderness characteristics could make maintenance of these improvements more difficult with more red tape. The irony of the waterhole issue is that without manmade waterholes on the desert, wildlife would decrease dramatically. Without ranchers’ efforts to maintain these range improvements they would diminish over time. Therefore, without the ranchers’ stewardship the many species in the wildlife community could potentially become nonexistent.	BLM must complete its own wilderness characteristics inventory update for the Planning Area in accordance with current inventory guidance. During this update, BLM must consider whether existing range improvements such as water developments substantially alter the natural character of the landscape. A naturalness finding must be made for each inventory unit and must take into consideration the density of human disturbances and whether or not these disturbances are "substantially noticeable". This determination is documented in the wilderness characteristics inventory updates posted on BLM's website. BLM only considers the potential effects of future projects on natural character in a given NEPA analysis, if the BLM first determined that the surrounding area had wilderness characteristics.

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306	Permittee	Grazing Support	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		8	1	I would like the BLM to carefully review the legal aspects of grazing reductions, permit relinquishment, and other issues in the grazing portion of the alternatives to be set forth. Will the new alternatives comply with the Taylor Grazing Act and the Federal Land Policy & Management Act? I would like to see alternatives that may review reinstatement of suspended non-use on certain permits.	The 2010 Settlement Agreement requires that the BLM consider at least two additional grazing management alternatives (in addition to continuing current management) that include a process for voluntary relinquishment in special areas. One of these alternatives would also address removal of grazing, either temporarily or permanently, in any area failing to meet rangeland health standards (and grazing was the causal factor). BLM believes that it can draft appropriate language for these alternatives that complies with the Taylor Grazing Act, FLPMA, 43 CFR Part 4180, and other applicable guidance. These alternatives will be described in Chapter 2 - Alternatives, of the RMP amendment. In addition, BLM will address how well a given alternative complies with various laws, regulations, and policy, as part of its rationale for selecting a preferred alternative and ultimately in identifying its final decision in the ROD. BLM considered including an alternative that allowed for reinstatement of suspended non-use, but determined that such an alternative did not meet the Purpose and Need.
307	Permittee	Grazing Support	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		9	1	I would like to see alternatives that would re-evaluate the effectiveness of grazing closures such as the Warner Wetlands. The areas that were closed to grazing in the potholes have actually reduced productivity for wildlife and have experienced an explosion in Canada thistle. Livestock grazing could be used to hamper Canada thistle and other noxious weeds. This would also enhance herbicide application efforts making the weeds easier to find and spray.	Generally, this alternative falls outside the stated purpose and need for the plan amendment. BLM believes that more regular flooding and active management of water levels within the diked area (which is now possible with the new pump station), coupled with appropriate herbicide treatments on the tops of the dikes (above the water line) will provide adequate control of weeds specifically within the ungrazed diked area. To effectively control weeds within the ungrazed potholes portion of the Warner Wetlands ACEC (outside of the flooded, diked area) using livestock grazing would require additional maintenance of existing boundary fences and construction of numerous new cross fences to subdivide the area into smaller grazing units where intense grazing could be applied for a relatively short time period during critical life stages of the targeted weed species. BLM also expects to have additional, more effective herbicides available for treatment once the district weed management plan/EA is completed.
308	Permittee	Grazing Support	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		10	4	Properly managed livestock grazing has proven itself to enhance the environment and wildlife habitat. It also has an enormous impact to the local economy which is even more crucial with a shrinking private sector. The arguments to reduce or end livestock grazing are political and philosophical and cannot hold up to environmental scrutiny.	This comment represents personal opinion and no response is needed.
309	Permittee	Grazing Support	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		11	1	Any alternatives should allow for permit/leaseholders to use OHV as needed to perform duties on the rangelands. Fencing, herding, mineral distribution, and monitoring are some of the duties that routinely require OHV use.	BLM recognizes the importance of motorized access in being able to conduct management and administrative activities on the public lands. Administrative access is potentially allowable, even in areas where OHV use is limited or closed (see p. 86 of Lakeview RMP-ROD, 2003). However, such access needs are not automatically granted and must be identified and permitted on a case-by-case basis as part of the grazing permit process.
310	Permittee	Non-Responsive	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		12	4	Thank you for the opportunity to comment and I look forward to being involved in the process. Again, if you have any questions or need further explanation to points raised please do not hesitate to contact me.	No response needed
311	Permittee	Grazing Support	43	Laird Ranch_Laird	7/6/2010	Not Provided	OR		13	9	Same as Form Letter #1.	See response to Form Letter #1.
312	Individual	Travel Management Planning	44	L_Anderson	7/6/2010	Plush	OR	1	1	1	Open road/trail #7155-0-1AA to motorized use.	The road was closed during the Lakeview RMP-ROD (2003). BLM is not revisiting this decision in the RMP amendment.
313	Individual	Travel Management Planning	45	Michael G. Coogan	7/6/2010	Vancouver	WA		1	7	Careful placement of fencing to help solve the issues of cattle encroachment to allow public access to summit of Juniper Mountain and surrounding area.	This issue has already been addressed through the Decision Record for the Horseshoe Pasture Division Fence and Riparian Project and is currently under litigation. BLM is not revisiting this decision in the RMP amendment.
314	Individual	Travel Management Planning	45	Michael G. Coogan	7/6/2010	Vancouver	WA		2	1	Keep as many other roads/trails/ways, open to motorized travel by the public.	This will be addressed through OHV and CTMP alternatives included in the RMP amendment.

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315	Individual	Non-Responsive	45	Michael G. Coogan	7/6/2010	Vancouver	WA		3	4	Original Letter being sent by mail. Attached is PDF copy.	No response needed.
316	State	Military Training Access	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		1	1	The Oregon Military Department (OMD) wants to reaffirm to the Lakeview District its continued interest in developing future options and proposals for potential Oregon National Guard military training activities and use of the public lands in the vicinity of the former US Air Force Christmas Valley radar site and the Poverty Basin. An enclosure provides a more detailed list of the US Public Land Survey System Township and Ranges, the vicinity of which the OMD continues to explore its interests, options and fact-finding for potential future proposals. The enclosure also lists major roads within this area that would be of interest to the OMD as part of any potential training proposal. These lists of areas and roads should not be considered definitive as the OMD has not yet determined the specific area and parameters of any proposal for future military training use. These lists cover a very broad area in the general vicinity of the named topographic features about which the OMD continues to have interest for potential future lands to support and sustain Oregon National Guard training activities on these public lands.	This will be addressed through the development of a range of alternatives in Chapter 2 - Alternatives and CTMP sections of the RMP amendment that vary in the amount of area(s) or routes open to motorized use. Specific areas could also be proposed for withdrawal for military training purposes and included in an alternative. The potential impacts of OHV designations and other management activities on future military training operations will be analyzed in Chapter 4 - Environmental Effects.
317	State	Non-Responsive	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		2	4	The OMD offers the following comments with respect to the three specific issues being considered by the BLM in its RMP amendment and EIS, those issues being: wilderness study area designation; off-highway vehicle (ORV) area designation; and grazing range management alternatives.	No response needed
318	State	Opposed to Wilderness	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		3	4	The OMD area of interest is on lands not previously designated by the BLM as wilderness study area (WSA) and not previously recognized by the BLM as having wilderness characteristics. The OMD agrees with the BLM's original assessment that these lands do not contain regionally unique features and significant wilderness characteristics that would require special wilderness study area protection and management.	No response needed
319	State	OHV Support	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		4	1	The OMD area of interest is on lands currently open to OHV use. When considering potential maneuver training area use, OMD desires that the designation for most of these public lands remains open for OHV use.	This will be addressed through the development of a range of alternatives in Chapter 2 - Alternatives of the RMP amendment that vary in the amount of area(s) open to OHV use.
320	State	Grazing Support	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		5	4	The OMD area of interest is on lands currently open to seasonal grazing. Grazing management activities do not detract nor prohibit cooperative use of the same lands for military maneuver training area activities, as currently practiced in the Prineville District. The OMD would support a grazing land management strategy that allows for the voluntary retirement of desert grazing lands.	No response needed
321	State	Non-Responsive	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		6	4	The Lakeview District has identified four related land management issues, those being: cave management; travel management plans; the North Lake Special Recreation Management Area plan; and new utility corridor designations. The OMD offers the following response comments regarding these specific issues:	No response needed
322	State	Significant Caves	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		7	4	The OMD is not presently aware of any significant caves within its area of interest. However, should any regionally significant caves be found within this area of interest, the OMD will conform to the BLM management of designated caves on public lands.	No response needed
323	State	Travel Management Planning	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		8	1	In the attached enclosure to this letter, the OMD lists a number of main routes and roads within its area of interest. While this list is not a comprehensive list of all the roads within the area of interest, it identifies the roads that, at a minimum, OMD desires to see remain open and incorporated into the BLM's travel management plan.	This will be addressed through the development of a range of alternatives in the CTMP section of the RMP amendment that vary somewhat in the amount of existing or routes open to motorized use.

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324	State	North Lake Special Recreation Area Planning	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		9	1	The North Lake Special Recreation Management Area (SRMA) does affect lands surrounding the former US Air Force radar site. The OMD intends to maintain the opportunity to use the old radar site as a staging area for both emergency operations and military training. In order to do so, it must have unconstrained ingress and egress to the site for heavy transport vehicles. This could be jeopardized by incompatible use of recreational activities on lands adjacent to the former radar site, so OMD requests that any allowed recreational activities not prohibit the State's use of the former radar site as a staging and training site. Lands of potential interest in the general vicinity of the former US Air Force Radar site: Township 26 South, Range 19 East Township 26 South, Range 20 East	The former Backscatter Radar site is now under the jurisdiction of the Government Services Administration (GSA). With the exception of the access road to the site from the south, BLM no longer has any say over how this site is used or managed. BLM is currently working on issuing a new ROW authorizing access to the site on this road. Lands to the north of the site are WSA and receive a lot of authorized OHV use. Public lands to the south, west, and east are generally open to most forms of recreation such as hiking, camping, and hunting, but OHV use is limited to existing roads and trails. The BLM currently has no plans to develop or encourage additional recreational opportunities on lands immediately adjacent to the site within the North Lake RAMP. It is unclear if OMD considers these existing, limited types of recreational activities to be incompatible with their intended use of the former backscatter site.
325	State	North Lake Special Recreation Area Planning	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		10	4	In regard to the Horse Mountain - Poverty Basin area; the SRMA is north of the OMD area of interest, and recreation management within the SRMA should not affect the potential future training opportunities within the Poverty Basin area of interest.	No response needed.
326	State	Utility Corridors	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		11	1	With regard to new utility corridor designations, the OMD would prefer new utility corridors be placed north of Horse Mountain and south of the Poverty Basin and Alkali Buttes.	The RMP amendment will be focusing its consideration of new major utility corridors to two specific areas, neither of which are anywhere near the Poverty Basin area.
327	State	Non-Responsive	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		12	4	Your point-of-contact for this OMD response and for further information regarding the OMD's fact finding interests in regards to the Poverty Basin area is Mr. Bill McCaffrey, Fire Management Officer, Oregon Army National Guard, 503-584-3586.	No response needed
328	State	Military Training Access	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		13	1	Lands of potential interest in the general vicinity of the Horse Mountain - Doughnut Mountain - Poverty Basin - Saunders Rim - Alkali Buttes - Alkali Lake State Airport Runway - Twin Buttes - Sand Canyon - Biscuit Point - Shell Rock Canyon - Euchre Butte - Jug Mountain - Coleman Flat (north of Hwy 395) - Venator Butte: Township 28 South, Range 20 East: excluding vicinity of wild horse area and Diablo WSA Township 28 South, Range 21 East Township 28 South, Range 22 East Township 28 South, Range 23 East: excluding archeological areas and areas east ofHwy 395 Township 29 South, Range 20 East: excluding vicinity of wild horse area and Diablo WSA Township 29 South, Range 21 East Township 29 South, Range 22 East Township 29 South, Range 23 East: excluding archeological areas and areas east ofHwy 395 Township 30 South, Range 20 East: excluding vicinity of wild horse area and Diablo WSA Township 30 South, Range 21 East Township 30 South, Range 22 East Township 30 South, Range 23 East: excluding vicinity of Alkali Lake proper Township 31 South, Range 20 East: excluding vicinity of wild horse area and Diablo WSA Township 31 South, Range 21 East Township 31 South, Range 22 East Township 31 South, Range 23 East: excluding lands east ofHwy 395 Township 32 South, Range 20 East: excluding vicinity of wild horse area and Diablo WSA Township 32 South, Range 21 East Township 32 South, Range 22 East: excluding vicinity of private lands	This will be addressed through the development of a range of alternatives in Chapter 2 - Alternatives of the RMP amendment that vary in the amount of area(s) open to OHV and military training use.

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329	State	Military Training Access	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		14	1	List of major roads and routes of potential interest: BLM Road 6104-0-00 BLM Road 6114-0-00 BLM Road 6124-0-00 BLM Road 6144-0-00 BLM Road 6144-0-DO BLM Road 6160-0-00 BLM Road 6160-0-AO BLM Road 6160-0-EO BLM Road 6164-0-00 BLM Road 6164-0-AO BLM Road 6164-0-FO BLM Road 6170-0-00 BLM Road 6184-0-00 BLM Road 6184-0-AO BLM Road 6184-0-BO BLM Road 7144-0-AO BLM Road 7144-0-BO	This will be addressed through the development of a range of alternatives in the CTMP section of the RMP amendment that vary somewhat in the amount of existing or routes open to motorized use.
330	State	Military Training Access	46	Oregon Military Department, William F. McCaffrey	7/6/2010	Salem	OR		15	1	In addition to the above numbered roads, the Oregon Military Department has interests in maintaining the access road to the former US Air Force radar site.	BLM is currently working on issuing a new ROW authorizing access to the site on this road. This concern can be addressed outside of the RMP amendment process.
331	Permittee	Grazing Support	47	S_Abbe	7/6/2010	Adel	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
332	Individual	OHV Support	48	Steve Roach	7/6/2010	Klamath Falls	OR	1	1	9	Same as Form Letter #3.	See response to Form Letter #3.
333	Permittee	Grazing Support	49	Taylor Ranch	7/6/2010	Plush	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
334	Rec Group	Non-Responsive	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR	1	1	4	The following comments are submitted on behalf of the American Hiking Society. We appreciate the opportunity to provide input on the Bureau of Land Management's (BLM's) Resource Management Plan revisions for both the Lakeview District and Southeastern Oregon (Vale District). We ask that you please ensure that this comment letter is included in the administrative record for both RMP revisions.	No response needed
335	Rec Group	Opposed to OHVs	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		2	1	We encourage the RMP planning teams to recognize the myriad benefits of retaining substantial portions of the planning areas free from the intrusion of motorized vehicles. Doing so not only benefits wildlife populations by maintaining intact, largely un-fragmented habitat, it also benefits fisheries and water quality as a result of reduced erosion and sedimentation into water bodies in comparison to watersheds where motorized recreation is allowed.	Much of this comment represents personal opinion and no response is needed. The RMP amendment will address several alternatives for motorized vehicle use in the OHV and CTMP management direction.
336	Rec Group	Opposed to OHVs	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		3	4	For purposes of public use, enjoyment and a lifetime of fitness, we believe it is important to emphasize non-motorized recreational opportunities not only in remote backcountry settings, but also close to communities (i.e., front country settings) where residents can find refuge from the sights and sounds of modern society.	This comment represents personal opinion and no response is needed.

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337	Rec Group	Local Social Economic	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		4	1	Providing opportunities for quality, muscle-powered recreation on public lands can result in a significant economic boost to local and regional economies. Recent peer-reviewed research from the Outdoor Industry Foundation demonstrates that active, non-motorized recreation contributes $5.8 billion annually to Oregon's economy, supporting 73,000 jobs and creating $310 million in annual state tax revenue. These numbers are significant and demonstrate the benefits of emphasizing sustainable non-motorized forms of recreational opportunities on public lands such as the John Day Basin, particularly when 41 percent of the state's population participates in non-motorized forms of trail-based activities (see: Table B of the *State-Level Economic Contributions of Active Outdoor* Recreation—Technical Report on Methods and Findings, April2007, available on the web at: http://www.outdoorindustry.org/research.php?action=detail&research_id=52). Given the significant economic benefits associated with promoting and protecting sustainable forms of recreation, we encourage the BLM to recognize the value and importance of outdoor recreation in the RMP revisions and attempt to quantify the economic benefits associated with promoting non-motorized forms of recreational opportunities among the various RMP alternatives.	Much of this comment represents personal opinion and no response is needed. BLM recognizes that recreation, both motorized and non-motorized forms, provide substantial economic benefits to Oregon. However, the BLM disputes the idea that non-motorized recreation provides more economic benefits than motorized recreation specifically within Lake and Harney Counties. BLM also needs to point out that the John Day Basin is not located in Lakeview Planning Area. Nevertheless, the RMP amendment will address the economic benefits of all forms of recreational activities in the Planning Area across a range of alternatives in the social-economic section of Chapter 4 - Environmental Effects.
338	User Group	Environmental Law and Policy	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		5	1	The Federal Land Policy and Management Act (FLPMA) requires the BLM to minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands and make planning decisions accordingly. This directive includes by definition the BLM's efforts to designate both areas and individual roads and trails for ORV use. The BLM further is required by FLPMA to "take any action necessary to prevent unnecessary or undue degradation of the lands" and to prevent "permanent impairment of the productivity of the land and the quality of the environment." Executive Order No. 11644 (1972) (as amended by Executive Order No. 11989 (1977)), required that BLM promulgate regulations that direct the agency to "designate all public lands as either open, limited or closed to off road vehicles." BLM is required to make such designations in its RMP process, with full public participation.	BLM is aware of its responsibilities under FLPMA and various executive orders to involve the public when designating areas and individual routes for motorized use. This will be address in the OHV and CTMP portions of the RMP amendment.
339	User Group	Opposed to OHVs	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		6	1	In making designations, BLM is obligated by both the Executive Orders and its regulations to ensure that ORV areas and trails are located: to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability; to minimize harassment of wildlife or significant disruption of wildlife habitats, and especially for protection of endangered or threatened species and their habitats; to minimize conflicts between ORV use and other existing or proposed recreational uses of the same or neighboring public lands and to ensure compatibility with populated areas, taking into account noise and other factors; outside officially designated wilderness areas or primitive areas and in natural areas only if BLM determines that ORV use will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established. Regulations are clear in directing BLM to allow ORV use only where it does not endanger or interfere with the other resources and users of the public lands.	This will be address in the OHV and CTMP portions of the RMP amendment. In particular, the CTMP will address these criteria as "minimization criteria".
340	Rec Group	Opposed to OHVs	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		7	4	Remarkably, however, handouts distributed during public scoping meetings by the Lakeview and Vale District offices for the current RMP revisions include the following unsupportable claims: During this process, the BLM is seeking to balance public and administrative access needs of both motorized and non-motorized users while protecting other resources (Lakeview RMP Amendment Travel Management Planning handout, dated May 2010, emphasis added).	This comment represents personal observation or opinion and no response is needed.

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341	Rec Group	Opposed to OHVs	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		8	4	The BLM *is seeking to balance* access needs for motorized and non-motorized users while sustaining the natural and cultural resources present in the planning area (Southeastern Oregon RMP Amendment Off Highway Vehicle Use handout, Vale District Office, dated May 2010, emphasis added). Both statements signal that the BLM appears willing to make concessions for the protection of public land resources and traditional, non-motorized recreation for the benefit of providing access for ORV-related recreation. Doing so would directly contradict the intent of the BLM regulations described above. In doing so, the BLM puts itself at great risk of legal challenge by promoting a system of ORV routes that are neither sustainable nor consistent with agency policy and legal mandates	This comment represents personal observation or opinion and no response is needed.
342	User Group	Environmental Law and Policy	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		9	1	BLM regulation also requires that the agency must annually monitor ORV use and its impacts. If it is determined that ORVs "are causing or will cause considerable adverse effects upon soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened and endangered species, wilderness suitability, other authorized uses, or other resources" the BLM must immediately close those areas or trails to ORV use "until the adverse effects are eliminated and measures implemented to prevent recurrence." While these regulations represent a powerful tool that allows the BLM to respond immediately to damage caused by ORV use, rarely are they invoked by the agency while the requirement to perform annual monitoring of ORV use remains largely ignored. The RMPs should acknowledge and describe to the public these mandates that clearing direct BLM to curtail ORV use where it is known, or has the potential to result in considerable adverse environmental impact.	Monitoring needs will be addressed in the Monitoring Appendix attached to the RMP amendment.
343	Rec Group	Opposed to OHVs	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		10	1	Recreational Opportunity Spectrum classifications must be revised to include both Primitive and Semi-Primitive Non-Motorized classifications ***Justification*** : Motorized use conflicts with the objectives of Primitive and Semi-Primitive Non-Motorized (SPNM) land classifications of the Recreation Opportunity Spectrum (ROS), which is applied in the BLM RMP process. One objective of the Primitive and SPNM classifications is to facilitate management of landscapes to provide isolation from the sights and sounds of humans, closeness to nature, tranquility, and self-reliance through the application of outdoor skills. Thus, RMPs and agency policy generally prohibit motorized use in these areas. Clearly, the 'Primitive' classification would appear both prudent and consistent with BLM guidelines for the interim management of WSAs located within both the Lakeview and Vale Districts.	The Recreational Opportunity Spectrum (ROS) classification system is being replaced with a new Recreation Classification System (RCS). This will be described further in Chapter 3 - Affected Environment section of the RMP amendment.

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344	User Group	Opposed to Wilderness	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		11	1	The 2003 Lakeview District RMP failed to designate any BLM lands as falling within the ROS 'Primitive' classification, despite the fact that many landscapes within the District would appear consistent with this classification. Oddly, Wilderness Study Areas (WSAs) within the District were assigned a ROS classification of SPNM when, typically, WSAs are managed by the BLM with an objective consistent with the Primitive ROS classification. The act of omitting the Primitive ROS classification from the RMP analyses thereby allowed the BLM to (erroneously) classify all BLM lands outside of WSAs as available for motorized recreation through their designation as either Semi-Primitive Motorized, Roaded Natural, etc. The ROS classifications must be revised in the RMPs to include both Primitive and SPNM land classifications. The justification, if any, to not include these classifications should be accompanied by analysis of the environmental consequences of the corresponding decrease in the ability of the BLM to provide recreational settings where the public would otherwise have enjoyed a relatively quiet and motor-free recreational experience. The RMPs and environmental analysis must therefore include in-depth analysis that clearly articulates the purpose, need and impacts of omitting Primitive and/or SPNM ROS classifications, should this continue to be the case in the revised RMPs. . ***Justification*** : "Open" areas permit motorized cross-country travel, which is difficult to monitor and can cause wide-ranging damage to the land. On virtually all public lands, this type of ORV use effectively prevents any other uses both during active use, because there is no safe way to conduct other activities at the same time as unrestricted ORV access, and for the foreseeable future because resources that would support other uses and values (such as vegetation and wildlife habitat) will be diminished or destroyed. The number of motorized recreationists today and the increased ability of these machines to cause widespread environmental damage justify eliminating the extensive "Open" area designations designated in the current Lakeview and Southeastern Oregon RMPs (currently comprising 56% of the 3.16 million-acre Lakeview RMP planning area and 56% of the 4.64 million-acre Southeastern Oregon RMP planning area). As such, **all "Open" area designations on BLM lands must be revisited in the current RMP revisions and damaging cross-country travel eliminated if the BLM is to manage public lands consistent with FLPMA and the Executive Orders regarding ORV management**. Allowing motorized travel on anything other than designated routes can cause management conflicts throughout BLM-managed lands and extending onto adjacent lands. For example, the U.S. Forest Service	The Recreational Opportunity Spectrum (ROS) classification system is being replaced with a new Recreation Classification System (RCS). This will be described further in Chapter 3 - Affected Environment section of the RMP amendment.
345	User Group	Non-Motorized Recreation	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		12	1	The RMPs should enact broad ORV closures on lands with sensitive resources and establish a system of designated routes. ***Justification*** : The BLM must consider broad ORV closures for lands proposed under the different RMP alternatives for varying degrees of protective status. ORV closures should be considered for such lands as WSAs, riparian corridors, wildlife habitat management areas, Areas of Critical Environmental Concern, The Owyhee Wild and Scenic River corridor (and tentative Wild river classifications), areas with wilderness character, and citizen-proposed wilderness areas. In most cases, the management strategies that prompt consideration of these varying protective categories would benefit from the prohibition of motorized vehicles. Alternatives must be analyzed in the EISs for the RMP revisions that include ORV Closed area designations in all WSAs, including the Shifting Dunes WSA (portions of which were designated Open in the 2003 Lakeview RMP Record of Decision). Thus, the potential environmental impacts and affect on wilderness characteristics must be analyzed in detail for any Open ORV designations in areas with wilderness character. The fact that less than 1% of all BLM lands were designated Closed for ORV use via the Records of Decision for the current Lakeview District and Southeastern Oregon RMPs is not supportable.	The RMP amendment will address a range of OHV area designation alternatives, including all appropriate classes: open, limited, and closed. The impacts of these designations on other resources and uses will also be addressed. The Owyhee River lies within the Vale District, not the Lakeview District. There is no "Shifting Dunes WSA" located in the Lakeview Resource Area. Other portions of this comment represent personal opinion and do not require response.

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346	Rec Group	Non-Motorized Recreation	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		13	1	The RMPs should address "Comprehensive Travel Management." Justification: As the BLM has recognized and explicitly stated in the current revision to its Land Use Planning Handbook: Comprehensive travel management planning should address all resource use aspects (such as recreational, traditional, casual, agricultural, commercial, and educational) and accompanying modes and conditions of travel on the public lands, not just motorized or off-highway vehicle activities. This definition recognizes that there are multiple users of the public lands, including a wide variety of recreationists, and BLM should take these interests into account when making travel planning decisions. Thus, by broadening the definition of travel management, the BLM wisely has put recreational use of ORVs among the many, and sometimes competing, demands for access to and throughout public lands. The recent Instruction Memorandum (IM) from the BLM Oregon/Washington State Director (IM No. OR-2009-050, August 2009) underscores the need for District Managers to "manage all public lands for travel with a comprehensive approach" and use the IM "as a tool in developing travel management plans at the resource management plan levels" consistent with the agency's national directive to undertake Comprehensive Travel Management. It includes a noteworthy vision statement for Travel Management that should be referenced in the RMP revisions to frame the Travel Management process. ORVs are one of many recreational uses, but this use presents a high cost to BLM for management, has the potential to damage many other resources and tends to exclude (or at least substantially interfere with and undermine) other recreational uses (such as hunting, fishing, hiking and enjoyment of solitude). Comprehensive Travel Management is a vital part of land use planning that permits BLM to consider protection of the multiple resources, values and uses of the public lands when deciding where, when and how travel should occur. By incorporating concepts of Comprehensive Travel Management as part of the current RMP, BLM can best comply with its duty to protect the variety of values and multiple uses of the public lands through the designation of appropriate travel areas and routes	Much of this comment represents personal interpretation of BLM policy and requires no response. However, travel and access needs will be addressed in the Recreation, OHV, and CTMP portions of the RMP amendment.
347	User Group	Travel Management Planning	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		14	1	The RMPs should contain a statement of Desired Future Conditions (DFCs) for travel management. Justification: A statement of DFCs for travel management should be included in the RMPs and will help the public to understand the BLM's vision for future travel plans and route designation efforts that are to be tiered from the RMP. We encourage BLM to include in the statement of DFCs concepts of landscape health, habitat connectivity, and criteria by which to assess how route networks affect these and other important resources. Such criteria would reflect DFCs for both resource protection and access priorities and should include route density factors for important wildlife species, conservation of visual resources, and habitat management goals. As per BLM's Land Use Planning Handbook, if the BLM does not complete a travel management plan as part of the current RMP revisions, the RMPs must (among other things) identify both the agency's rationale for permitting motorized travel within planning area sub-regions and route criteria and constraints for subsequent road and trail selection and identification.	The RMP amendment will describe or address desired future conditions and management goals for all resource values and uses including OHV use and travel management. Within the travel management plan component of the plan, each route will be evaluated against the minimization criteria described in 43 CFR 8342.

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348	User Group	Travel Management Planning	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		15	1	The BLM should scrutinize continued use of user-created routes and develop criteria for their suitability as part of the travel system. Justification: User-created ORV routes, by definition, were neither designed nor properly constructed to accommodate motorized uses. BLM guidance on travel planning (IM No. 2004-005) identifies the importance of carefully scrutinizing the perceived benefits of user-created routes. It directs BLM planners to: Choose individual roads and trails, rather than using inherited roads and trails. Most existing roads and trails on public lands were created by use over time, rather than planned and constructed for specific activities or needs. Therefore, user-created routes have the potential to pose significant conflicts with BLM's obligations under FLPMA, Executive Order No. 11644 and BLM's matching regulations, as well as numerous other federal mandates. The current RMPs must recognize this important distinction by first identifying all user-create routes and then applying criteria for their suitability in the resultant travel system.	Much of this comment represents personal interpretation of BLM policy and requires no response. However, the CTMP portion of the RMP amendment will address the management of all existing routes, including user-created routes.
349	Rec Group	Travel Management	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		16	1	The RMPs should use route density as a quantitative measure for the impact of ORV routes and seek to minimize the density of routes as they apply to important wildlife species and their habitat. Justification: The RMPs should include objectives for reducing impacts on wildlife habitat that direct BLM planners to consider road density targets on the identified needs of wildlife species. For example, it is documented in Oregon that elk use declines in areas adjacent to roads open to motorized vehicles and that as motorized vehicular access increases, the quality and amount of elk habitat are degraded. An open road density of three linear miles of road per square mile of land seriously reduces the value of that area for elk, whereas an open road density of six linear miles per square mile can reduce elk use to near zero. Wildlife and other quantitative thresholds for important variables such as noise, soil loss, sedimentation, must be documented and used to determine appropriate road and trail densities throughout the planning area.	Route density within most of the Planning Area is low. Seasonal closures are already in effect within critical deer winter range and will likely be carried forward or expanded in other alternatives. The RMP amendment and CTMP will address OHV and route-specific management alternatives.
350	User Group	Travel Management Planning	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		17	1	The RMPs should not establish or maintain ORV area designations of "Limited to Existing Roads and Trails." Justification: The designation "Limited to Existing Roads and Trails" runs counter to informed decision making, ignores the threat posed by unmanaged ORV use, and inappropriately sets up the ORV riding public to one day witness the closure of many routes that it has come to use and enjoy. Even in cases where BLM has conducted an adequate inventory, the "Limited to Existing Roads and Trails" designation is unworkable, unenforceable, and leads to inevitable conflict when other resource values are put at risk by a BLM unable to rise to the task of making difficult decisions, no matter how unambiguous its policy is on the matter. According to Kurt Kotter, former BLM Idaho Associate State Director, the designation of "Limited to existing roads and trails does not work, it cannot be properly enforced." Thus, this designation should not be considered for use in the current RMP.	Most of this comment represents personal opinion and requires no response. OHV area designations will be addressed in Chapter 2 - Alternatives portion of the RMP amendment.

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351	User Group	Travel Management Planning	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		18	1	The RMPs should include alternatives that address a Closed-Unless Posted-Open Policy for all ORV roads and trails. Justification: Given the number of people who chose to recreate with ORVs and the agency's shrinking budgets for management, maintenance, and enforcement, it would be unreasonable and irresponsible for the BLM to continue with current policies that prohibit ORV travel only where routes are marked as closed. This policy inhibits the BLM's ability to effectively communicate route closures to the public either via the production of up-to-date maps and brochures, the construction of informational kiosks, and regular maintenance of signs indicating route closures. These same policies prevent law enforcement officers from citing riders who venture off established routes where signage indicating a closure has been either vandalized or removed. Instead, the onus should be put on riders (most of which are responsible and would choose to follow the rules) to travel only those routes that are marked as open by BLM to ORV use. This Closed-Unless-Posted-Open policy would also remove the incentive for persons to vandalize and remove closure signs, thereby resulting in significant cost savings to the BLM for the replacement of such signs.	The CTMP portion of the RMP amendment will address signage and enforcement issues.
352	Rec Group	Travel Management	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		19	1	The RMPs should provide criteria for determining the appropriateness of ORV "play area" designations. Justification: Several informal ORV "play areas" have developed in the planning area by default as a result of current "Open" ORV designations on public lands and the BLM's inability to respond to, and manage for, significant growth in motorized recreation over the past two decades. At present, the BLM does not have the resources to properly manage use in these default ORV play areas, which often are located near population centers, and is limited in its ability to monitor and enforce illegal trespass and other nuisance issues. While there seems to be little debate that ORV play areas will continue to have a role among the spectrum of recreational opportunities provided on public lands, the location and type of uses allowed at ORV play areas must be selected with great care and only after thorough public dialogue with all affected interests. Even then, the BLM must exercise extreme diligence toward ensuring that such play areas are managed in a way that minimizes environmental and societal impacts. At a minimum, the process used by BLM in evaluating ORV "play" areas, if any, in the RMPs must include criteria contained in 43 CFR §8342.1 and, as such, may be inappropriate and inconsistent with residential uses and the desires of many residents in affected communities.	OHV area designations, including open areas, will be addressed in Chapter 2 - Alternatives portion of the RMP amendment.
353	User Group	Travel Management Planning	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		20	1	The RMPs should include detailed route closure and restoration schedule. Justification: The BLM should have a detailed plan for closing and obliterating routes identified in the RMPs for closure. The plan for route closure should include a timeline, budget commitment, and restoration strategy for all such excess routes. BLM is obligated not just to identify areas and routes for closure but to actually close those areas and routes once designations are made. Route closures are considered to be implementation decisions (see IM No. 2004-079) and, as a result represent enforceable commitments by the agency to take specific actions. BLM can best fulfill its commitments to closures by detailing in the RMPs its plan in terms of both timing and methodology.	The CTMP portion of the RMP amendment will address signage and enforcement issues, as well as outline closure methods.
354	User Group	Travel Management Planning	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		21	4	The RMP revisions represent an important opportunity for the BLM to establish a travel and recreation system that provides appropriate access to public lands, contributes as needed to the regional transportation system *and* ensures that biodiversity, wildlife habitat condition, and overall watershed condition and function is maintained or improved. FLPMA and BLM policies dictate that these outcomes should comprise a primary objective of the current planning effort. We hope that the BLM has come to these same conclusions and intends to address ORV and travel management in a meaningful and proactive way in the RMPs.	This comment represents personal opinion and no response is needed.

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355	Rec Group	Public Involvement	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		22	9	We look forward to reviewing BLM's Analysis of the Management Situation when it becomes available and to continued opportunities for public dialogue and comment throughout the RMP process. We ask that you please ensure that American Hiking Society is included among your mailing list as an interested party.	An AMS is not required for a plan amendment and will not be prepared. Commenter is on the mailing list.
356	Rec Group	Opposed to OHVs	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		23	4	The RMPs should ensure that no areas remain "Open" for cross-country ORV travel within the planning area.	This comment represents personal opinion and no response is needed.
357	Rec Group	Non-Responsive	50	American Hiking, Randy Rasmussen	7/7/2010	Corvallis	OR		24	4	I may be one of the few that have seen all the areas in the old BLM District, before the Medford area was added. Therefore I have some real observations:	This comments represents personal observations and opinion. No response is needed.
358	Individual	Local Social Economic	51	D. Andy Parker	7/7/2010	Lakeview	OR		1	4	I live in Lakeview and Lake County by choice, both are unique. Both depend on the high natural resource to carry on in any economic endeavor. It must be managed correctly and properly as multiple use.	This comments represents personal observations and opinion. No response is needed.
359	Individual	Grazing Support	51	D. Andy Parker	7/7/2010	Lakeview	OR		2	4	Cattle are essential, remove them and the whole thing will burn sooner or later. Example Bettys Butte.	This comment represents personal opinion and no response is needed.
360	Individual	Opposed to Wilderness	51	D. Andy Parker	7/7/2010	Lakeview	OR		3	4	There is nothing that I have seen that truly qualifies as wilderness. Perhaps a rock pile or two such as Devil's Garden at Ft. Rock, a few rocky rims, but this is day dreaming on someone's part.	This comment represents personal opinion and no response is needed.
361	Individual	Opposed to OHVs	51	D. Andy Parker	7/7/2010	Lakeview	OR		4	4	It does have significant value for the isolation and wide open space. Areas with these new off road vehicles will be a nightmare for management, as is the pseudo wild horse.	This comment represents personal opinion and no response is needed.
362	Individual	Local Social Economic	51	D. Andy Parker	7/7/2010	Lakeview	OR		5	4	I'm afraid our campuses are producing managers that are to urbanized, propagandized by teachers and researchers and interest groups such as the urban Sierra Club, etc., cow hate groups, on and on for whatever cause. Since they do not live here it is difficult for them to understand the impacts selfish interest makes.	This comment represents personal opinion and no response is needed.
363	Individual	Multiple Use Support	51	D. Andy Parker	7/7/2010	Lakeview	OR		6	4	I understand it belongs to all of us, so the wise manager has the goal of satisfying a wide spectrum with this multiple use. The dollars will never be there to satisfy the demands. So selections must be made for the moments looking to the future of what demands may come forth.	This comment represents personal opinion and no response is needed.
364	Individual	Multiple Use Support	51	D. Andy Parker	7/7/2010	Lakeview	OR		7	4	An impossible task? Yes, nevertheless we plod forward. But do not destroy what now exists, the community, that depends on the resource. Other uses will and can be compatible. This desire to exclude must be handled with the tools of resource management, law and will of the people and not the squeaking wheel.	This comment represents personal opinion and no response is needed.
365	Individual	Grazing Support	51	D. Andy Parker	7/7/2010	Lakeview	OR		8	5	See attachments.	BLM will review Attachments and incorporate into the RMP amendment, if appropriate.
366	Individual	Public Involvement	51	D. Andy Parker	7/7/2010	Lakeview	OR		9	6	I was unable to open the document to read ... so I could not address the subject exactly.	The website is functioning properly.
367	Business	Grazing Support	52	L_Hansen	7/7/2010	Lakeview	OR		1	4	We oppose further restrictions on grazing on the Lakeview District for economic reasons. Economic hardship to Grazing Permittees and to the local companies which provide services to the Permittees.	This comment represents personal opinion and no response is needed.
368	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		1	1	Please accept these comments from the Oregon Natural Desert Association ("ONDA"), Wild Earth Guardians and Oregon Wild concerning BLM's plans to prepare amendments to the Lakeview and Southeastern Oregon Resource Management Plans ("RMPs").	No response needed

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369	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		1	1	Please recognize and protect wilderness-quality lands and roadless areas, including areas outside of existing WSAs that possess wilderness characteristics. These areas are important for their value as an "enduring resource of wilderness" for the American people, 16 U.S.c. § 1131(a), as well as for their ecological and economic benefits. Congress made preservation of these landscapes a national priority more than 40 years ago in the Wilderness Act.	While BLM understands that Congress recognized the value of wilderness through passage of the Wilderness Act in 1960, that law originally applied only to Forest Service lands. Wilderness was brought into the realm of BLM management through passage of the FLPMA in 1976. FLPMA recognizes wilderness values as one of many competing and potentially valid multiple uses of public lands that must be balanced through the preparation of, and decisions made within, a resource management plan. Wilderness is by no means BLM's only management consideration or priority. BLM is required to complete its own wilderness inventory update within the Planning Area in accordance with current inventory policy and the terms of the 2010 Settlement Agreement. This information will be summarized in the RMP amendment. A copy of BLM's inventory findings have been provided to you directly. This information is also made available to the public on BLM's website. It is likely that BLM's inventory findings will not be in complete agreement with the inventory information that ONDA provided.
370	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		2	1	The EIS should present and analyze the effects of the proposed action on wilderness characteristics and un-fragmented roadless areas in the planning area. We ask that BLM ensure that its evaluation of wilderness characteristics that may be present in these areas, as well as its discussion of the land use plans' potential impacts to those characteristics, appear in the EISs themselves. This will give the public the opportunity to review and comment on BLM's wilderness evaluations in the context of this NEPA and land use plan amendment process	BLM's wilderness inventory update information will be summarized in the RMP amendment. A copy of BLM's full inventory findings have been provided to you directly and is also made available to the public on BLM's website. The RMP amendment will include at least two alternatives that provide additional protections to lands that the BLM identifies as having wilderness characteristics. The public will have an opportunity to comment on this inventory information and BLM's assessment of impacts to wilderness values during the comment period for the Draft RMP Amendment/EIS.
371	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		3	1	Please also insure that the EISs disclose and discuss the ONDA wilderness report information as well as BLM's own, related data and analyses. As you know, ONDA provided to BLM comprehensive wilderness inventory reports for these planning areas in... 2005 (Lakeview RMP)...In the 2005 report for the Lakeview area, ONDA found that about 1.7 of the area's 3.2 million acres contained outstanding wilderness character worth of protection for future generations.	BLM's wilderness inventory update information will be summarized in the RMP amendment. A copy of BLM's full inventory findings have been provided to you directly and is also made available to the public on BLM's website. The RMP amendment will include at least two alternatives that provide additional protections to lands that the BLM identifies as having wilderness characteristics. The public will have an opportunity to comment on this inventory information and BLM's assessment of impacts to wilderness values during the comment period for the Draft RMP Amendment/EIS.
372	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		4	1	Based on these findings, ONDA asks BLM to recognize and protect the numerous vast unfragmented roadless areas, including by closing significant portions of them to motorized use and by limiting impacts from energy development, mining, rangeland projects and other potentially wilderness-disturbing actions within areas that possess wilderness character.	BLM's wilderness inventory update information will be summarized in the RMP amendment. The RMP amendment will include at least two alternatives that provide additional protections to lands that the BLM identifies as having wilderness characteristics.
373	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		5	3	Take a fresh look at protecting Greater sage grouse (and other sagebrush obligate species) and sagebrush habitat throughout these landscapes. Since BLM completed its environmental analyses for these two plans many years ago, our understanding of the threats to sage grouse and their habitat has continued to expand.	Sage-grouse habitat is being addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.
374	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		6	5	Sage grouse are sagebrush obligates. They depend on sagebrush all year to provide roosting, cover and food. They require large areas with a variety of sagebrush communities to meet their life-history needs. For example, they require big sagebrush on deep soil sites with a healthy understory and tall residual grass cover for nesting. They rely on low sagebrush communities for food and winter habitat. Riparian areas, seeps, springs and other wet areas also are important for sage grouse. This is because they rely upon eating forbs (i.e. wildflowers), in these areas during the late growing season when upland plant communities have been depleted.	Most of this information appears to be accurate or factual, but does not require a response.

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375	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		7	3	Oregon contains some of the largest expanses of relatively intact sagebrush habitat in North America. Oregon sage grouse populations and sagebrush habitats comprise nearly 20% of the range wide distribution of the species and the Lakeview and Southeastern Oregon land use planning areas contain important core habitat for sage grouse. For this reason, management actions in Oregon have implications on a range wide scale for the species. Population fluctuations and decline in Oregon during the past century are similar to those documented throughout the species' range.	Sage-grouse habitat is being addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.
376	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		8	3	The threats to sage grouse habitat across the West are numerous. They include domestic livestock grazing, which can lead to the establishment and spread of weeds, erosion, denuded vegetation and associated lack of cover, pollution of water, and other impacts to sagebrush habitats; the proliferation of the non-native annual grass cheatgrass, which is spreading rapidly and replacing sagebrush; periods of drought and the effects of global climate change, which may exacerbate the expansion of cheatgrass and the loss of sagebrush habitat; West Nile virus, which is spread through mosquito populations as they colonize wet areas on the landscape including livestock water developments: altered and unnatural fire regimes, which are caused by, among factors, grazing, climate change and altered vegetation ecosystems; encroachment of juniper trees on sagebrush habitats, which has been caused manly by the impacts of livestock grazing, fire suppression and climatic influences over the last century or more; high road densities, which fragment sagebrush habitats; various types of energy development and utility corridors; unrestricted cross-country travel by off-road vehicles and motorized travel on routes near sage grouse leks and nesting areas; and land use issues such as urban development, agriculture, and water development.	Sage-grouse habitat threats are being addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.
377	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		9	3	Barbed-wire fencing also negatively impacts sage grouse. Fencing is a mortality threat for sage grouse when flying grouse collide with the fencing. This is especially the case around late brood rearing habitat such as springs, seeps and wet meadows. Fences also provide perches for predators that prey on sage grouse. Nearly all of these threats are present in sage grouse habitat in Oregon, including within the planning areas, to one extent or another.	Sage-grouse habitat threats are being addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.
378	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		10	5	In December 2009, the U.S. Geological Survey announced the release of a publication titled, Ecology and Conservation of Greater Sage-Grouse: A Landscape Species and Its Habitats. In the monograph, 38 federal, state, university and nongovernmental experts collaborated to produce new scientific information about Greater sage grouse populations, sagebrush habitats, and relationships among sage grouse, sagebrush habitats and land use. The information is formally published as a scientific monograph in the series Studies in Avian Biology. This monograph is the best available compendium of science on sage grouse.	Sage-grouse science is being addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.
379	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		11	3	Earlier this year, and after reviewing the monograph, the U.S. Fish and Wildlife Service recognized that sage grouse deserve protection under the Endangered Species Act. Sage grouse now are a candidate species for listing. Habitat fragmentation is one of the biggest threats to sage grouse, and the sagebrush steppe is recognized as one of the most imperiled ecosystems in North America. If current trends persist, many local populations may disappear in the next several decades, with the remaining fragmented population vulnerable to extinction. Because the Lakeview and Southeast Oregon land use planning areas cover almost 7 million acres of the most important core sage grouse habitat outside of Wyoming, it is important that BLM take a hard look in the EIS at impacts to sage grouse and sagebrush habitat.	Sage-grouse habitat threats are being addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.

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380	Enviro Group	Opposed to Grazing	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		12	1	Please amend the land use plans to allow for voluntary relinquishment of grazing permits. In adopting the first iterations of the SEORMP and Lakeview RMP, BLM failed to seriously consider alternatives that would cut back on unsustainable grazing levels. Compensating federal grazing permittees to end their grazing on public lands is an equitable way to resolve longstanding conflicts between domestic livestock grazing and environmental protection, recreation and other legitimate uses of public lands. Other BLM districts in Oregon have since adopted mechanisms providing for voluntary permit relinquishment and we ask BLM to now include this in these two land use plans.	The notion that current grazing levels in the Planning Area are "unsustainable" represents personal opinion and no response is needed. However, BLM will include 2 alternatives within the RMP amendment that address voluntary relinquishment within different types of special areas, in accordance with the 2010 Settlement Agreement.
381	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		13	4	Please study the impacts of these two land use plans with respect to climate change and energy development. BLM should consider how domestic livestock grazing, motorized travel and other uses of the public lands contribute to, and exacerbate the effects of, climate change.	The RMP amendment will address recent climate trends and the effects of various management actions on greenhouse gas emissions and carbon sequestration.
382	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		14	1	BLM should adopt an alternative that will provide for land and watershed management that will both mitigate for climate change (i.e., store more carbon in the form of healthy plant communities) and prepare for climate change (e.g., by reducing cumulative stress from livestock, ORV use, fire suppression, weeds and so forth). Both of these objectives can be advanced by re-establishing natural disturbance regimes and reducing anthropogenic (man caused) disturbances.	The comment represents personal opinion and no response is needed.
383	Enviro Group	Utility Corridors	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		15	1	BLM should also ensure that these plans set sideboards for renewable energy development that ensure such projects can be developed without degradation of the desert wildlands and damage to sensitive wildlife populations. Please develop alternatives which exclude energy development, including transmission and generation facilities, from areas of critical environmental concern and other special management areas including priority habitat for sensitive species such as sage grouse.	The siting of solar and wind energy projects, and large utility lines are addressed through the issuing of a right-of-way (ROW). During the Lakeview RMP amendment, the BLM will address a range of alternatives that classify all public lands as either open to ROW location, areas where ROWs are to be avoided if possible, and areas where ROWs are excluded or not allowed. Those areas that are identified as open to ROW location would be the most appropriate places for new energy developments. Areas containing sensitive species generally will be addressed through a range of alternatives that place sensitive species habitats into ROW avoidance or exclusion zones. However, sage-grouse habitat will be addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon.
384	Enviro Group	Travel Management Planning	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		16	1	Roads are expensive to maintain and their negative environmental impacts are well documented. They create and transport sediment that impairs water quality and degrades stream and riparian habitat. They invite the spread of invasive weeds, which compete with native vegetation. They fragment and degrade wildlife habitat.	The impacts of road management activities will be addressed in the CTMP and Chapter 4 - Environmental Effects portions of the RMP amendment.
385	Enviro Group	Travel Management Planning	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		17	1	At a minimum, please close routes that will enhance wilderness values and restore wilderness characteristics; close routes that maximize opportunities for non-motorized recreation, including backcountry hunting and fishing; close routes that might adversely affect wildlife values, including big-game habitat; close routes in order to protect large blocks of roadless sagebrush habitat; and close routes that are causing soil erosion or otherwise might lead to spread of invasive weeds.	The CTMP will address a range of route management alternatives.
386	Enviro Group	sage grouse	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		18	1	Please close routes within three miles of sage grouse leks, at least on a seasonal basis to protect sage grouse from disturbance during lekking and broad-rearing.	Impacts to sage-grouse habitat will be addressed through a range of alternatives analyzed in separate plan amendment process covering BLM-administered lands throughout eastern Oregon. However, that planning effort will not likely result in route-specific decisions. The Lakeview RMP amendment will include a CTMP that will address a range of route-specific management alternatives. One of the "minimization criteria" considered during this process will be the presence of special status species habitat, including sage-grouse.

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387	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		19	1	Please use the ONDA wilderness and route inventory reports as a baseline inventory of route conditions and as a guide for which routes are obsolete, redundant, causing resource damage or should be closed or decommissioned for any other reason. Please disclose and discuss this important baseline information in the EIS	ONDA's route inventory was considered during BLM's wilderness inventory update process. As part of its evaluation, BLM generally did not find many of the observations concerning route conditions to represent an accurate baseline. This inventory failed to identify many existing routes. Further, this inventory does not identify which specific routes ONDA believes are either obsolete, redundant, or causing resource damage, making it impossible for BLM to use this information for this specific purpose.
388	Enviro Group	Non-Responsive	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		20	4	Thank you for the opportunity to offer our initial comments on these land use plan amendments. If you have any questions regarding these comments, please contact me at the address provided below. Please maintain ONDA, Wild Earth Guardians and Oregon Wild on your project mailings at each of the addresses provided below.	No response needed
389	Enviro Group	Protect Areas With Wilderness Character	53	Oregon Natural Desert Association, Peter M. Lacy	7/7/2010	Portland	OR		21	9	Same as Form Letter #1.	See response to Form Letter #1.
390	Enviro Group	Non-Responsive	54	Public_Lands_Council_D_Van_Liew	7/7/2010	Not Provided	Not Provided	1	1	4	Please accept and fully consider these scoping comments on behalf of The Wilderness Society (TWS). The membership of TWS includes more than 14,000 Oregon citizens and more than five hundred thousand members and supporters nationally who care deeply about the management of our public lands. We appreciate this opportunity to comment and appreciate the Bureau of Land Management commitment to addressing the circumstances and values related to management of the public resources.	No response needed
391	Enviro Group	Public Involvement	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		1	4	We encourage BLM to maximize public involvement in preparation of the Southeastern Oregon and Lakeview RMP Amendments. In addition to the public comment periods required by the National Environmental Policy Act (NEPA) and BLM's regulations, there are other opportunities throughout the planning process for public involvement, which are used by many BLM offices. Public involvement allows the public to provide useful information and bring concerns to BLM's attention throughout the planning process. For instance, we would encourage the BLM to provide for public input into the management situation analysis and identification of planning issues, and on a preliminary range of alternatives prior to preparing the Draft RMP Amendment, steps other BLM offices have taken to expand opportunities for public comment.	BLM has and will continue to provide appropriate public involvement opportunities during the planning process. Since this is a plan amendment effort and not a new plan or revision, no AMS has been developed. However, BLM will make its updated datasets and inventory information available to the public on its website and will be publishing a Scoping Report for public review prior to publishing the Draft RMP amendment/EIS.
392	Enviro Group	Public Involvement	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		2	6	The BLM has identified the need to ensure that the best available data is used. In this context, we would also note that other BLM offices have made inventory data available to the public to assist in identifying new data needs and also made base data available for public use, and encourage the Vale and Lakeview District Offices to take similar action. By way of example, along with its release of the Draft RMP, the BLM's Arizona Strip Field Office provided zipped GIS files for all data layers needed to create the maps contained in the Draft RMP (and can be viewed on-line at http://www.blm.gov/az/GIS/files.htm#strip). The server space required for this operation is minimal and without this information, effective public participation in this process is severely hampered.	BLM will make its updated datasets and inventory information available to the public on its website.
393	Enviro Group	Public Involvement	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		3	6	Making analyses available before issuing the Draft RMP Amendment is another excellent way to increase public understanding of and participation in the RMP amendment. The Kemmerer (Wyoming) Field Office, for example, made their analysis of comments submitted on the Draft RMP and their ACEC evaluations public by posting them on their website long before they issued the Proposed RMP/FEIS1. Making such analyses available to the public before the publication of the Draft RMP Amendment will better prepare participants to understand the complex analyses and large amounts of data in the Draft RMP Amendment and increase the relevance and usefulness of comments and other public participation. We hope to see these types of opportunities provided to the many members of the public who are interested in the development of the amendments to the Southeastern Oregon and Lakeview RMPs	BLM has and will continue to provide appropriate public involvement opportunities during the planning process. BLM will make its updated datasets and inventory information available to the public on its website and will be publishing a Scoping Report for public review prior to publishing the Draft RMP amendment/EIS.

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394	Enviro Group	Public Involvement	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		4	6	Recommendations: The BLM should make every attempt to encourage the public to participate in the RMP revision including holding workshops, making a preliminary range of alternatives available for public comment prior to preparing a Draft RMP Amendment, providing interim information regarding inventories of routes and visual resources, posting GIS files, and posting analyses such as ACEC evaluations and analysis of comments submitted on the Draft RMP Amendment to the RMP amendment website.	BLM has and will continue to provide appropriate public involvement opportunities during the planning process. BLM will make its updated datasets and inventory information available to the public on its website and will be publishing a Scoping Report for public review prior to publishing the Draft RMP amendment/EIS. Public involvement will be documented in Chapter 5 of the RMP amendment.
395	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		5	1	BLM is required to inventory for wilderness character and consider a range of alternatives for protecting wilderness characteristics in the RMP Amendments. Wilderness character is a resource for which BLM must keep a current inventory. As the U.S. Court of Appeals for the Ninth Circuit recently held: wilderness characteristics are among the 'resource and other values' of the public lands to be inventoried under § 1711. BLM's land use plans, which provide for the management of these resources and values, are, again, to "rely, to the extent it is available, on the inventory of the public lands, their resources, and other values." 43 U.S.C. § 1712(c)(4).	This finding strictly applies to the Southeastern Oregon RMP, not the Lakeview RMP. However, the BLM is well aware of its responsibilities to update it inventory of wilderness characteristics and will do so in accordance with current guidance and the 2010 Settlement Agreement.
396	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		6	3	Oregon Natural Desert Ass'n v. Bureau of Land Management, 531 F.3d 1114, 1119 (9th Cir.2008). Therefore, BLM is required to consider "whether, and to what extent, wilderness values are now present in the planning area outside of existing WSAs and, if so, how the Plan should treat land with such values." Id. at 1143. Further, the court stated: "wilderness characteristics are a value which, under the FLPMA, the Bureau has the continuing authority to manage, even after it has fulfilled its 43 U.S.C. § 1782 duties to recommend some lands with wilderness characteristics for permanent congressional protection." Id. at 1142.	This finding strictly applies to the Southeastern Oregon RMP, not the Lakeview RMP.
397	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		7	4	Section 201 of the Federal Land Policy and Management Act (FLPMA) mandates that BLM inventory the resources of the public lands, their resources and values. 43 U.S.C. § 1711. In the land use planning process, including revision of RMPs, Section 202 of FLPMA requires that BLM take into account the inventory and determine which multiple uses are best suited to which portions of the planning area. 43 U.S.C. § 1712. BLM's mandate of multiple use and sustained yield, as well as other relevant law and BLM's current guidance, provides for inventory and protection of wilderness values.	This comments represents restatement or interpretation of Federal law and requires no response.
398	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		8	4	Nationally, BLM has acknowledged the need for new guidance on inventorying for and managing lands with wilderness characteristics and committed to releasing such guidance in the near future. An inter-disciplinary DOI review team released its final report and recommendations on the 77 contested leases issued in Utah BLM's December 2008 lease sale ("Stiles Report") in October 2009.2 The Stiles Report noted the lack of national guidance on managing lands with wilderness characteristics and found that this lack of guidance contributes to uninformed oil and gas leasing decisions, and recommended the guidance be issued soon. The report further recommended that "BLM-Utah review the [recently-completed RMPs] in light of this new guidance and make necessary modifications." (pp. 32-33).	The BLM is updating its inventory of wilderness characteristics in accordance with current national guidance.
399	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		9	1	The Stiles Report includes significant recommendations regarding additional protections that should be considered, including not leasing at all, based on the presence of wilderness characteristics. Specific recommendations include: "Adding an NSO stipulation could allow both mineral development and protection of the wilderness characteristics this land has in common with the contiguous Natural Area" (p. 6); "This parcel should be reviewed using the soon-to-be released new Wilderness Characteristics Inventory Manual…Additional stipulations may be found necessary after completion of a revised inventory of wilderness characteristics" (p. 7); and "The team recommends deferral to reconsider the impacts on documented wilderness characteristics" (p. 9).	The RMP amendment will address at least two alternatives that provide additional protections to lands that the BLM identifies as having wilderness characteristics.

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400	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		10	4	Per FLPMA and BLM's current guidance, and in light of the Stiles Report and upcoming guidance, BLM is obligated to inventory for and consider a range of alternatives to protect lands with wilderness characteristics.	BLM's wilderness inventory update information will be summarized in the RMP amendment. The RMP amendment will include at least two alternatives that provide additional protections to lands that the BLM identifies as having wilderness characteristics.
401	Enviro Group	Multiple Use Support	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		11	4	Wilderness character is a valuable resource and important multiple use of the lands governed by the Southeastern Oregon and Lakeview RMPs.	This comment represents personal opinion and no response is needed.
402	Enviro Group	Scenic Values	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		12	4	Scenic values – FLPMA specifically identifies "scenic values" as a resource of BLM lands for purposes of inventory and management (43 U.S.C. § 1711(a)), and the unspoiled landscapes of lands with wilderness characteristics generally provide spectacular viewing experiences. The scenic values of these lands will be severely compromised if destructive activities or other visual impairments are permitted.	This comment represents personal interpretation of Federal law and no response is needed.
403	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		13	4	Recreation – FLPMA also identifies "outdoor recreation" as a valuable resource to be inventoried and managed by BLM. 43 U.S.C. § 1711(a). Lands with wilderness characteristics provide opportunities for primitive recreation, such as hiking, camping, hunting and wildlife viewing. Most, if not all, primitive recreation experiences will be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved.	This comment represents personal interpretation of Federal law and no response is needed.
404	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		14	4	Wildlife habitat and riparian areas – FLPMA acknowledges the value of wildlife habitat found in public lands and recognizes habitat as an important use. 43 U.S.C. § 1702(c). Due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, thereby supporting additional resources and uses of the public lands. As part of their habitat, many species are also dependent on riparian and other wetland habitats, especially during either seasonal migrations or seasons and years when surrounding habitats are dry and unproductive. Wilderness quality lands support biodiversity, watershed protection and overall healthy ecosystems. The low route density, absence of development activities and corresponding dearth of motorized vehicles, which are integral to wilderness character, also ensure the clean air, clean water and lack of disturbance necessary for productive wildlife habitat and riparian areas (which support both wildlife habitat and human uses of water).	This comment represents personal interpretation of Federal law and wilderness values and no response is needed.
405	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		15	5	Swanson et al. (1994) contends that managing an ecosystem within its range of variability is appropriate to maintain diverse, resilient, productive, and healthy ecosystems for viable populations of native species. Using the historical range of variability, they believe, is the most scientifically defensible way to meet society's objective of sustaining habitat. Patrick Daigle and Rick Dawson, Extension Note 07; Management Concepts for Landscape Ecology (Part 1 of 7). October 1996. ttp://www.for.gov.bc.ca/hfd/pubs/docs/en/en07.pdf; citing Swanson, F. J.; Jones, J. A.; Wallin, D. O.; Cissel, J. H. 1994. Natural variability--implications for ecosystem management. In: Jensen, M. E.; Bourgeron, P. S., tech. eds. Eastside Forest Ecosystem Health Assessment--Volume II: Ecosystem management: principles and applications. Gen. Tech. Rep. PNW-GTR-318. Portland, OR: U.S. Dept. of Agriculture, Forest Service, Pacific Northwest Research Station: pp. 89-106.	BLM will review this study and consider within the RMP amendment, if appropriate.
406	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		16	4	Further, inventorying lands with wilderness characteristics will also provide important data on existing large blocks of habitat and how BLM can restore these blocks of habitat to better match the historic range of variability.	This comment represents personal opinion and no response is needed.
407	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		17	4	Identifying, restoring and protecting substantial roadless areas in the lands governed by the Southeastern Oregon and Lakeview RMPs can provide crucial benefits to wildlife.	This comment represents personal opinion and no response is needed.
408	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		18	4	Cultural resources – FLPMA also recognizes the importance of "historical values" as part of the resources of the public lands to be protected. 43 U.S.C. § 1702(c). The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources.	This comment represents personal interpretation of Federal law and wilderness values and no response is needed.

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409	Enviro Group	Local Social Economic	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		19	1	Economic benefits – The recreation opportunities provided by wilderness quality lands also yield direct economic benefits to local communities. According to the U.S. Fish & Wildlife Service, in 2006 State residents and non-residents spent $2 billion on wildlife recreation in Oregon. (USFWS 2006, National Survey of Hunting, Fishing and Wildlife-associated Recreation - http://www.census.gov/prod/2008pubs/fhw06-or.pdf). In addition, local communities that protect wildlands reap measurable benefits in terms of employment and personal income. For instance, a recent report by the Sonoran Institute (Sonoran Institute 2004, Prosperity in the 21st Century West -The Role of Protected Public Lands) found that: Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands.	BLM will address the economic benefits of recreation within Chapter 4 - Environmental Effects section of the RMP amendment. However, the USFWS 2006 study cited herein applies to all forms of recreation, not just primitive types of recreation associated with wilderness. Further the Sonoran Institute 2004 study does not reflect the actual economic conditions within Lake and Harney Counties between 1970 and 2000.
410	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		20	1	These findings confirm earlier research, showing that wilderness is in fact beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Recent survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. (Morton 2000, Wilderness: The Silent Engine of the West's Economy). Other "nonmarket" economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic view sheds, biodiversity conservation, and watershed protection. (Morton 1999, The Economic Benefits of Wilderness: Theory and Practice; Loomis 2000, Economic Values of Wilderness Recreation and Passive Use: What We Think We Know at the Turn of the 21st Century). All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands.	BLM questions the applicability of such studies specifically to the Lakeview Planning Area. Almost 485,000 acres of WSAs have existed in Lake and Harney County portions of the Planning Area and non-market or recreational economic values have not increased substantially since wilderness study began in 1979. Generally, the local economies have declined during this timeframe.
411	Enviro Group	Local Social Economic	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		21	5	We have included with these comments a document entitled "Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy," which details our expectations for the baseline analysis of the region's economy as well as the analysis of the potential impacts of proposed management alternatives on the area. We request that your analysis of socioeconomic considerations in the Southeast Oregon and Lakeview Resource Areas follow the approach set out in this document.	BLM will review the attachment and consider within the RMP amendment, if appropriate.
412	Enviro Group	Local Social Economic	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		22	4	Quality of life – The wildlands located within the Vale and Lakeview District Offices help to define the character of these areas and are an important component of the quality of life for local residents and future generations, providing wilderness values in proximity to burgeoning urban and suburban areas. Their protection enables the customs and culture of this community to continue.	The majority of this comment represents personal opinion and requires no response.
413	Enviro Group	Multiple Use Support	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		23	4	Balanced use – The vast majority of BLM lands are open to motorized use and development. FLPMA recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" that includes recreation, watershed, wildlife, fish, and natural scenic and historical values (43 U.S.C. § 1702(c)). FLPMA also requires BLM to prepare land use plans that may limit certain uses in some areas (43 U.S.C. § 1712). Many other multiple uses of public lands are compatible with protection of wilderness characteristics – in fact, many are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife habitat). Protection of wilderness characteristics will benefit many of the other multiple uses of BLM lands, while other more exclusionary uses (such as off-road vehicle use and timber harvesting) will still have adequate opportunities on other BLM lands.	This comment represents personal interpretation of Federal law and motorized use and no response is needed.
414	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		24	1	BLM must consider alternatives in the RMP Amendments for managing lands to protect their wilderness characteristics.	The RMP amendment will address a reasonable range of alternatives, including 2 that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.

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415	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		25	4	The range of alternatives is "the heart of the environmental impact statement." 40 C.F.R. § 1502.14. NEPA requires BLM to "rigorously explore and objectively evaluate" a range of alternatives to proposed federal actions. See 40 C.F.R. §§ 1502.14(a) and 1508.25(c). NEPA's requirement that alternatives be studied, developed, and described both guides the substance of environmental decision-making and provides evidence that the mandated decision-making process has actually taken place. Informed and meaningful consideration of alternatives -- including the no action alternative -- is thus an integral part of the statutory scheme. Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1228 (9th Cir. 1988), cert. denied, 489 U.S. 1066 (1989) (citations and emphasis omitted).	This comment represents personal interpretation of Federal law and no response is required. However, The RMP amendment will address a range of alternatives, including the CEQ-required no-action alternative.
416	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		26	4	An agency violates NEPA by failing to "rigorously explore and objectively evaluate all reasonable alternatives" to the proposed action. City of Tenakee Springs v. Clough, 915 F.2d 1308, 1310 (9th Cir. 1990) (quoting 40 C.F.R. § 1502.14). This evaluation extends to considering more environmentally protective alternatives and mitigation measures. See, e.g., Kootenai Tribe of Idaho v. Veneman, 313 F.3d 1094,1122-1123 (9th Cir. 2002) (and cases cited therein); see also Envt'l Defense Fund., Inc. v. U.S. Army Corps. of Eng'rs, 492 F.2d 1123, 1135 (5th Cir. 1974); City of New York v. Dept. of Transp., 715 F.2d 732, 743 (2nd Cir. 1983) (NEPA's requirement for consideration of a range of alternatives is intended to prevent the EIS from becoming "a foreordained formality."); Utahns for Better Transportation v. U.S. Dept. of Transp., 305 F.3d 1152 (10th Cir. 2002), modified in part on other grounds, 319 F3d 1207 (2003); Or. Envtl. Council v. Kunzman, 614 F.Supp. 657, 659-660 (D. Or. 1985) (stating that the alternatives that must be considered under NEPA are those that would "avoid or minimize" adverse environmental effects).	This comment represents personal interpretation of Federal law and no response is required. However, The RMP amendment will address a reasonable range of alternatives.
417	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		27	4	NEPA requires that an actual "range" of alternatives is considered, such that the Act will "preclude agencies from defining the objectives of their actions in terms so unreasonably narrow that they can be accomplished by only one alternative (i.e. the applicant's proposed project)." Colorado Environmental Coalition v. Dombeck, 185 F.3d 1162, 1174 (10th Cir. 1999), citing Simmons v. United States Corps of Engineers, 120 F.3d 664, 669 (7th Cir. 1997). This requirement prevents the EIS from becoming "a foreordained formality." City of New York v. Department of Transp., 715 F.2d 732, 743 (2nd Cir. 1983). See also, Davis v. Mineta, 302 F.3d 1104 (10th Cir. 2002).	This comment represents personal interpretation of Federal law and no response is required. However, The RMP amendment will address a reasonable range of alternatives.
418	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		28	1	Given the stated purpose of the preparation of the Southeastern Oregon RMP and Lakeview RMP Amendments, and the information compiled by the public regarding lands with wilderness characteristics, the range of alternatives for these lands should include a number of alternatives to protect their wilderness values. This range of alternatives is also consistent with BLM's FLPMA obligations to inventory its lands and their resources, which includes wilderness character. FLPMA also obligates BLM to take this inventory into account when preparing land use plans, using and observing the principles of multiple use and sustained yield. 43 U.S.C. § 1712(c)(4); 43 U.S.C. § 1712(c)(1). Through management plans, BLM can and should protect wilderness character and the many uses that wilderness character provides on the public lands through various management decisions, including by excluding or limiting certain uses of the public lands. See, 43 U.S.C. § 1712(e). This is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness character (such as recreation, wildlife, natural scenic values) and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(c).	The RMP amendment will address a reasonable range of alternatives, including 2 that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.
419	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		29	3	BLM should consider designating new Wilderness Study Areas.	BLM can no longer designate WSAs. This is beyond the scope of the RMP amendment process.

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420	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		30	4	We are aware of the April 2003 settlement agreement (Utah Settlement) between Secretary of the Interior Norton and the State of Utah in which BLM abdicated its authority to designate any additional WSAs, and we maintain that this agreement is invalid and will ultimately be overturned in pending litigation.	This comment represents personal opinion regarding on-going litigation and no response is needed.
421	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		31	3	The federal court in Utah revoked its approval of the Utah Settlement, stating that its approval of the initial settlement was never intended to be interpreted as a binding consent decree. Recognizing that the court's decision undermined the legal ground for the Utah Settlement, the State of Utah and the Department of Interior have now formally withdrawn the settlement as it was originally submitted. See, Motion to Stay Briefing and for a Status Conference, September 9, 2005, attached. This casts serious doubt upon BLM's current policy not to consider designating new WSAs. There is no binding consent decree and the BLM has not even issued any updated guidance seeking to continue applying this misguided, and illegal, policy.	The majority of this comment represents personal opinion regarding the legality of the Utah Settlement agreement and requires no response. The authority to designate WSAs under Section 603 of the FLPMA expired in 1991. BLM now has national policy describing the discretion is has to determine how to manage lands with wilderness characteristics through the land use planning process.
422	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		32	3	In addition, the Utah Settlement is based on an interpretation of FLPMA §§ 201, 202, and 603 that is contrary to FLPMA's plain language. Section 603 did not supersede or limit BLM's authority under § 201 to undertake wilderness inventories, but rather relies explicitly on BLM having exactly that authority under § 201. Nor did § 603 in any way limit BLM's discretion under § 202 to manage its lands as it sees fit, including managing areas as § 202 WSAs in accordance with the Interim Management Policy (IMP). Every prior administration except the most recent has created WSAs under § 202 and they plainly had authority to do so. This administration has such authority as well, making this a reasonable alternative deserving of consideration in this NEPA process.	That portion of this comment that relates to the Utah Settlement represents personal interpretation of Federal statute or personal opinion and no response is needed. BLM recognizes that it still has the authority under Section 201 of the FLPMA to conduct wilderness inventories and has national policy direction regarding how to conduct such inventories. Further, BLM now has national policy describing the discretion is has to determine how to manage lands with wilderness characteristics through the land use planning process. However, the authority to designate WSAs under Section 603 of the FLPMA expired in 1991.
423	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		33	4	Further, in defining what is a "reasonable" range of alternatives, NEPA requires consideration of alternatives "that are practical or feasible" and not just "whether the proponent or applicant likes or is itself capable of carrying out a particular alternative"; in fact, "[a]n alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable." Council on Environmental Quality, Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, Questions 2A and 2B, available at http://ceq.hss.doe.gov/nepa/regs/40/40p3.htm; 40 C.F.R. §§ 1502.14, 1506.2(d). In addition, the Utah Settlement is illegal because the court in Utah lacked jurisdiction to prohibit designation of new WSAs nationwide, including in Oregon.	This comment represents personal interpretation of Federal law or court case law regarding what represents a reasonable range of alternatives and the legality of the Utah settlement. No response is required.
424	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		34	1	Recommendations: In light of the most recent ruling and subsequent action of the parties, we emphasize that the BLM can and should continue to designate new WSAs in this planning process, including the areas identified with this submission. Further, if BLM fails to fulfill these obligations, it risks violating both FLPMA and NEPA, and jeopardizing the validity of this entire planning process.	The authority to designate WSAs under Section 603 of the FLPMA expired in 1991. However, BLM has the discretion to determine how to best manage lands with wilderness characteristics through the RMP process. The RMP amendment will address a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics. Neither FLPMA or NEPA require that BLM give such areas priority over all other multiple uses. Rather, FLPMA requires that the BLM manage the public lands and their resources under the principle of multiple use "in the combination that will best meet the present and future needs of the American people" (Section 103 (c)). The land use planning process is where such decisions about multiple use balancing are made.
425	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		35	1	BLM should also consider other management alternatives for protecting lands with wilderness characteristics.	The RMP amendment will address a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.
426	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		36	4	The Utah Settlement does not affect BLM's obligation to value wilderness character or, according to BLM directives, the agency's ability to protect that character, including in the development of management alternatives. BLM's recent acknowledgment of this obligation in the Stiles Report and the related court rulings provide important direction in this regard. Further, in previous guidance, BLM has not only claimed that it can continue to protect wilderness values, but has also committed to doing so.	BLM has the discretion to determine how to manage lands with wilderness characteristics through the land use planning process. The RMP amendment will address a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.

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427	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		37	5	On September 29, 2003, BLM issued IMs 2003-274 and 2003-275, formalizing its policies concerning wilderness study and consideration of wilderness characteristics in the wake of the Utah Settlement. In the IMs and subsequent public statements, BLM has claimed that its abandonment of previous policy on WSAs would not prevent protection of lands with wilderness characteristics. The IMs contemplate that BLM can continue to inventory for and protect land "with wilderness characteristics," such as naturalness or providing opportunities for solitude or primitive recreation, through the planning process. The IMs further provide for management that emphasizes "the protection of some or all of the wilderness characteristics as a priority," even if this means prioritizing wilderness over other multiple uses. This guidance does not limit its application to lands suitable for designation of WSAs; for instance, the guidance does not include a requirement for the lands at issue to generally comprise 5000-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection. IM 2003-274 states that "BLM may continue to inventory public lands for resource or other values, including wilderness characteristics" and that the agency can "manage them using special protections to protect wilderness characteristics." (emphasis added). Further, IM 2003-275, Change 1, reads: The BLM can make a variety of land use plan decisions to protect wilderness characteristics, such as establishing Visual Resource Management (VRM) class objectives to guide the placement of roads, trails, and other facilities; establishing conditions of use to be attached to permits, leases, and other authorizations to achieve the desired level of resource protection; and designating lands as open, closed, or limited to Off Highway Vehicles (OHV) to achieve a desired visitor experience. Accordingly, administrative protection can and should be considered for lands with wilderness characteristics that are not currently protected.	Much of this comment represents recitation of BLM policies, many of which have been replaced or superseded, and no response is required. BLM has the discretion to determine how to manage lands with wilderness characteristics through the land use planning process. The RMP amendment will address a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.
428	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		38	1	The Draft RMP Amendments should also consider management alternatives that provide administrative protection for the wilderness characteristics of those lands currently designated as WSAs if they are not ultimately designated as Wilderness by Congress; their wilderness characteristics are already acknowledged by the BLM. Further, BLM is obligated to evaluate the potential impacts on wilderness values from its management decisions.	Not all existing WSAs were recommended to the President in 1991 as suitable for wilderness designation. The RMP amendment will address management of existing WSAs that are later released from wilderness study by Congress. The RMP amendment will address the impacts of various management activities on WSAs within the Chapter 4 - Environmental Effects section.
429	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		39	5	In the most recent ruling on the Utah Settlement challenge (State of Utah v. Norton, Case No. 2:96-CV-0870, Order and Opinion (D. Utah September 20, 2006)), Judge Benson found against the Conservation Groups for a number of reasons, including agreeing with the legal interpretation of FLPMA put forth by the State of Utah and the BLM (a finding we continue to dispute). However, the ruling also justifies the court's interpretation by finding that the agency can provide virtually the same protection for lands with wilderness characteristics through administrative decisions as it can through designation of new WSAs, with the only material difference being that, while the agency can alter its own management decisions, only Congress can change a WSA designation. The court stated: "Both Utah and the BLM acknowledge that the BLM has the discretion to manage lands in a manner that is similar to the non-impairment standard by emphasizing the protection of wilderness characteristics as a priority over other potential uses." Order and Opinion, p. 41.	Much of this comment represents interpretation of court case law and no response is required. BLM has the discretion to determine how to manage lands with wilderness characteristics through the land use planning process. The RMP amendment will address a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics. However, the BLM cannot manage such lands specifically under the 1995 Wilderness IMP.

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430	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		40	4	In a subsequent briefing to the U.S. Court of Appeals for the 10th Circuit, the Department of the Interior and the BLM reiterated that "the settlement does not preclude BLM from inventorying public lands for wilderness-associated characteristics" and that "the land management decision obtained through FLPMA § 202 process may resemble management under FLPMA § 603's non-impairment standard." In discussing how BLM will manage lands with wilderness characteristics, the brief refers to the "BLM's discretion under FLPMA § 202 to preserve their wilderness-associated characteristics." Brief of the Federal Appellees, State of Utah v. Kempthorne, Case No. 06-4240 (February 26, 2007), pp. 40, 43. Similarly, the Vale and Lakeview District Offices can and should protect lands with wilderness characteristics from the damage likely to result from energy development and uncontrolled off-road vehicle (ORV) use, both of which the BLM has acknowledged are likely to occur if these activities are permitted to occur on lands with wilderness characteristics. In addition, the information submitted regarding citizen-proposed wilderness constitutes significant new information that must be addressed in these RMP amendments. This information has not yet been sufficiently analyzed in the existing land use plan, so NEPA requires analysis of the potential environmental direct, indirect and cumulative effects of uses such as energy development and motorized use on these areas and consideration of protection for them. See, 40 C.F.R. § 1502.9(c); Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 374 (1989).	Much of this comment represents interpretation of Federal statute or court case law and no response is required. BLM has the discretion to determine how to manage lands with wilderness characteristics through the land use planning process. The RMP amendment will address the impacts of a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.
431	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		41	4	In a recent decision, the U.S. District for the District of Utah found that information regarding wilderness characteristics that was not considered in the existing land use plan was: a textbook example of significant new information about the affected environment (the wilderness attributes and characteristics of the Desolation Canyon, Floy Canyon, Flume Canyon, Coal Canyon, and Flat Tops unit) that would be impacted by oil and gas development; information that was not reflected in BLM's existing NEPA analyses.	This comment represents interpretation of court case law and no response is required.
432	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		42	5	Southern Utah Wilderness Alliance v. Norton, 457 F. Supp. 2d 1253 (D. Utah 2006). A compliant NEPA analysis requires not only assessment of potential impacts but also a consideration of potential mitigation measures, such as protecting lands with wilderness characteristics. 40 C.F.R. §§ 1502.14, 1502.16. The Southeastern Oregon and Lakeview RMP Amendments must consider protective measures tailored specifically to protect lands with wilderness characteristics.	Much of this comment represents interpretation of Federal statute or court case law and no response is required. BLM has the discretion to determine how to manage lands with wilderness characteristics through the land use planning process. The RMP amendment will address the impacts of a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.
433	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		43	1	BLM's Arizona State Office has issued guidance that elaborates upon the BLM's national guidance by providing for identification of lands with wilderness characteristics and development of management prescriptions to protect and enhance these values (IM No. AZ-2005-007 – attached). The Proposed RMP for the Arizona Strip includes land use allocations for lands with wilderness characteristics in every alternative and sets out protective management prescriptions (Table 2.10). This RMP also includes a detailed discussion of how BLM identified and assessed wilderness characteristics and the need for protective management (Appendix 3.D). The process is consistent with FLPMA's direction that BLM inventory for the many values of the public lands and consider ways to protect them (i.e., not all uses are appropriate in all places) in the RMP. 43 U.S.C. §§ 1711, 1712. The recently-released Records of Decision for this planning area all include protection for lands with wilderness characteristics (available on-line at: http://www.blm.gov/az/st/en/info/nepa/environmental_library/arizona_resource_management.html).	The RMP amendment will follow appropriate national and Oregon BLM guidance.

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434	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		44	1	Other RMPs that are being prepared in Colorado, Arizona, New Mexico and Utah include identification of lands with wilderness characteristics and include management of certain areas to maintain and enhance these values in management alternatives under consideration. For example, the recently-released Preliminary Draft Alternatives for the Tri County RMPs (prepared by the BLM's Las Cruces, NM Field Office) also provide for protection of citizen proposed wilderness, stating that these areas "would be managed to maintain wilderness characteristics." See, Tri County RMPs/EIS Newsletter, p. 3 (attached and also available on-line at: http://www.nm.blm.gov/lcfo/tri_county/tricounty.html.) The Preliminary Goals and Objectives (p. 3, also attached) set out a management approach specific to lands with wilderness characteristics, including: • Goal: Maintain naturalness, outstanding opportunities for solitude, and unconfined recreation. • Objectives: - Manage areas with wilderness characteristics to maintain the natural qualities of the landscape where the imprint of human activity is substantially unnoticeable; where the sights, sounds, and evidence of other people are rare or infrequent; and where visitors can be isolated, alone, or secluded from others. - Provide management direction for assessing site specific impacts from proposals that fall within identified areas with wilderness characteristics based on the long-term effect on naturalness, ability to restore the impacted area to it's natural state, compatibility with VRM objectives, loss of opportunity for solitude and primitive recreation, and potential for proposed use to be accommodated outside of the area.	The RMP amendment will follow appropriate national and Oregon BLM guidance. The RMP amendment will address a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.
435	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		45	5	In addition, the Draft RMP for the Little Snake Field Office (released February 9, 2007 and available on-line at: http://www.co.blm.gov/lsra/rmp/index.htm) addressed management of lands with wilderness characteristics and/or backcountry characteristics. Most of the lands at issue in the Little Snake Draft RMP were identified as part of a citizens' wilderness proposal, which the BLM re-inventoried and considered for management of their naturalness and/or opportunities for primitive recreation or solitude. The Draft RMP identifies two specific management approaches, one for "Lands with Wilderness Characteristics Outside Existing WSAs" and another for "Lands with Backcountry Characteristics Outside Existing WSAs." See, Draft RMP, pp. 2-158 – 2-161; 2-199 – 2-201 (attached). Management prescriptions include: Lands with Wilderness Characteristics: • Objective: "to protect naturalness, opportunities for semi-primitive recreation and solitude"; • closed to oil and gas operations and other minerals activities; • off-road vehicles (ORVs) limited to designated routes; • Class II or Class III Visual Resource Management (VRM) classification; and • Some areas may be managed as a Special Recreation Management Area (SRMA) to "provide quality primitive recreation experiences in a largely natural setting.": o closed to oil and gas leasing (or to new oil and gas leasing); o closed to ORVs; o VRM Class II. Lands with Backcountry Characteristics: • Described as "backcountry areas"; • Objective: "to provide backcountry recreation experience in predominantly natural settings"; • closed oil and gas leasing; • closed to ORVs; and • VRM Class II.	The RMP amendment will follow appropriate national and Oregon BLM guidance. The RMP amendment will address a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics.

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436	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		46	1	To ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the Southeastern Oregon and Lakeview RMP Amendments, the BLM must address wilderness as a separate and unique issue in the planning process including in its Planning Criteria, in the Analysis of the Management Situation and in each section of the RMP Amendments. Protection of lands with wilderness character should be identified as a major issue in the scoping report. This will assist the public in understanding the values of wilderness-quality lands and the potential effects of other multiple uses on wilderness character, as well as in communicating comments or concerns regarding the management of these lands to BLM. Because comments on protection of wilderness values will be clearly identified, BLM will be in a better position to clarify any misconceptions and provide complete responses. In preparing the amended.	Much of this comments represents personal opinion and requires no response. However, the management of WSAs and lands with wilderness characteristics will be addressed in the Lakeview RMP amendment.
437	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		47	1	In preparing the amended RMPs and accompanying EIS, BLM should clearly present management alternatives in the context of protecting wilderness character and analyze environmental consequences to that character. The protection of wilderness character should also be identified as one of the major scoping issues in the RMP Amendments.	The RMP amendment will address the impacts of a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics. In addition, lands with wilderness characteristics will be addressed in the Purpose and Need and Issues sections of Chapter 1.
438	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		48	4	We look forward to seeing inventory for and protection of wilderness qualities comprehensively addressed as the preparation of the Southeastern Oregon and Lakeview RMP Amendments proceed.	No response needed.
439	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		49	1	Recommendations: BLM should include protection of lands with wilderness characteristics in the RMP's management alternatives and thoroughly analyze this issue throughout the planning process. To ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the RMP, BLM must inventory for lands with wilderness characteristics (including those lands identified by the Oregon Natural Desert Association and others as citizens' proposed wilderness), consider alternatives for protecting lands with wilderness characteristics (including for those lands currently designated as WSAs if they are not ultimately designated as Wilderness by Congress) and address wilderness character outside of WSAs as a separate and unique issue in the planning process in each section of the RMP Amendments, as described above.	BLM must complete its own wilderness characteristics inventory update for the Planning Area in accordance with current inventory guidance. During this update, BLM must consider information provided by outside parties and determine if it is accurate or represents valid "new information". This process is described in more detail within wilderness inventory documentation posted on BLM's website. BLM's inventory will be summarized and presented in Chapter 3 - Affected Environment section of the RMP amendment. Full inventory documentation is also available on BLM's website. The RMP amendment will address the impacts of a reasonable range of alternatives that vary in levels of protections to lands that the BLM identifies as having wilderness characteristics. The RMP amendment will also address management of existing WSAs that are later released from wilderness study by Congress.
440	Enviro Group	Opposed to OHVs	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		50	1	After noting the manner in which ORV use transforms both the condition and experience of a landscape, the U.S. Court of Appeals for the Ninth Circuit reiterated that "[s]triking the proper balance with regard to ORV use is thus of considerable importance to the BLM's land management planning." Oregon Natural Desert Association v. Bureau of Land Management, 531 F.3d at 1144. Specifically, the court noted the failure to consider the impacts of ORV designations on lands with wilderness characteristics and the failure to consider a range of alternatives closing lands to ORV use altogether. Id. at 1144-1145. The BLM now has the opportunity to thoroughly evaluate the impacts of ORV use on lands with wilderness characteristics and other values in the planning areas, and to consider significant closures to protect these resources.	Much of this comment represents interpretation of court case law and no response is required. BLM will evaluate the effects of a reasonable range of OHV and CTMP alternatives during the RMP amendment process.
441	Enviro Group	Travel Management	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		51	1	Travel management decisions should be made in the RMP.	This will be addressed in the OHV and CTMP sections of the RMP amendment.

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442	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		52	1	BLM's internal guidance states that "each RMP will divide planning areas into OHV area designations that are open, limited or closed." IM No. 2004-005; see also 43 C.F.R. § 8342.2(b). This internal guidance was also incorporated into the updated version of BLM's Land Use Planning Handbook. H-1601, Appendix C, Section II.D (Comprehensive Trails and Travel Management). The Land Use Planning Handbook states that BLM should: Complete a defined travel management network (system of areas, roads and/or trails) during the development of the land use plan, to the extent practical. If it is not practical to define or delineate the travel management network during the land use planning process, a preliminary network must be identified and a process established to select a final travel management network.	Much of this comment represents interpretation of BLM travel management guidance and no response is required. BLM will develop a CTMP during the RMP amendment process.
443	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		53	1	The Land Use Planning Handbook (Appendix C, Section II.D) also sets out requirements for travel management at both the land use and implementation planning levels: - At the land use plan level, BLM must identify areas for use based on program goals and objectives, primary users, reason for "allowing travel" into an area, setting character to be maintained (including Visual Resource Management and Recreation Opportunity Spectrum classifications), and primary means of travel appropriate to meet objectives and keep setting character; and - At the implementation level, BLM must define a detailed travel management network, "establish a process" to identify roads, trails, etc. with criteria for selections, guidelines for management, monitoring and maintenance, and indicators for future plan maintenance.	Much of this comment represents interpretation of BLM travel management guidance and no response is required. BLM will develop a CTMP during the RMP amendment process.
444	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		54	1	Recommendations: The BLM should take this opportunity to complete travel management concurrently with the RMP Amendments. The amended RMPs should also identify priorities for implementation of the travel management plan, which may also be instructive in the event that the agency expects that additional travel planning will be needed. Special management areas, such as ACECs, special recreation management areas and citizen-proposed wilderness, will include travel designations within their boundaries. Priorities for sub-regions to receive comprehensive travel management planning, which can also be useful for guiding implementation, were identified in the Draft RMP issued by the Little Snake Field Office (available on-line at: http://www.co.blm.gov/lsra/rmp/index.htm) and we would encourage you to further prioritize areas in this manner as well. Please see Appendix F from the Little Snake Draft RMP, which sets out criteria for prioritizing areas to receive comprehensive travel management planning, including: • Special management areas • Areas identified as "limited to designated roads and trails" • Areas that meet fragile soil criteria • User and resource conflicts • Excessive complaints • Wildlife/wild horse population trends • Evidence of trail/road proliferation • Areas with high road densities • Impacts on cultural resources • Unacceptable erosion • Degradation of water quality • Impacts on visual resources • Loss of trail integrity • Habitat fragmentation and damage • Impacts on sensitive plants • Need to provide a variety of user experiences	Much of this comment represents interpretation of BLM travel management guidance or personal opinion as to what a CTMP should address. No response is required. BLM will develop a CTMP during the RMP amendment process. The CTMP will include a discussion of implementation.

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445	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		55	1	If the agency does not complete travel management plans for all of the planning areas as part of the RMP Amendments, then these RMP Amendments must identify not only areas for use, but also reasons for permitting travel into an area and appropriate criteria for determining routes that will be made available for different uses, taking into account such factors as undeveloped recreation opportunities available and natural settings.	The Lakeview RMP amendment will address travel management.
446	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		56	4	Travel planning requires the agency to manage human travel across the landscape. The land use planning process, which addresses the broader landscape within a planning area, provides one of the best opportunities to make travel planning decisions in the appropriate context. While we understand that BLM does not have authority to close or relocate highways, major roads, or County roads, BLM must include these routes when analyzing the transportation network as they have a great impact on habitat fragmentation and reduction in core area size (discussed in length later in these comments and in Appendix 1). The placement and design of travel routes defines which areas will remain or become roadless, and which areas will be disturbed and how. In other words, route decisions determine the fragmentation of the landscape, and, thus, how naturally or unnaturally a landscape will behave in terms of water flow and quality, wildlife migration, and species composition and function.	Much of this comment represents interpretation of BLM travel management guidance or personal opinion as to what a CTMP should address. No response is required.
447	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		57	5	NEPA requires federal agencies to assess the direct, indirect and cumulative environmental impacts of proposed actions, taking a "hard look" at environmental consequences and performing an analysis commensurate with the scale of the action at issue. 42 U.S.C. § 4321 et seq; 40 C.F.R. § 1508.8; see also Metcalf v. Daley, 214 F.3d 1135, 1151 (9th Cir. 2000); Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 348 (1989). Travel planning affects the entire landscape and can only be thoroughly and properly assessed by considering potential impacts and making decisions at a comparable level. In terms of how to evaluate the potential impacts of travel management decisions, NEPA's definition of "cumulative impact" is instructive: the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7. BLM must account for the direct, indirect, and cumulative impacts of all roads in the Southeastern Oregon and Lakeview Planning Areas when completing a comprehensive travel management plan.	Much of this comment represents interpretation of Federal statute, court case law, or travel management guidance, and no response is required.
448	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		58	1	Recommendation: BLM should address travel management on a landscape-wide basis by addressing the impacts of all roads in the planning area and accounting for the landscape-wide impacts of these roads.	BLM will develop a CTMP during the RMP amendment process. This will include addressing the impacts of a reasonable range of travel management alternatives.

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449	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		59	5	As mentioned in the beginning of this section of our comments, BLM must address travel management on a landscape level to ensure that BLM meets its responsibility as stewards of the public land and mitigates against habitat fragmentation. We have included The Wilderness Society's recent Science and Policy Brief, "Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM Lands" (Appendix 1). Also included in Appendix 1 are four scientific reports prepared by TWS and discussed in the habitat fragmentation report. These include Fragmenting Our Lands: The Ecological Footprint from Oil and Gas Development, Protecting Northern Arizona's National Monuments: The Challenge of Transportation Management, Wildlife at a Crossroads: Energy Development in Western Wyoming, and Ecological Effects of a Transportation Network on Wildlife. In addition to summarizing the four reports included, "Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM Lands" provides a summary of available scholarly and government reports and studies on the impact of habitat fragmentation on wildlife, provides methods for calculating habitat fragmentation, and provides recommendations on how to integrate fragmentation analysis into travel management. BLM should use the information provided in Appendix 1 to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Southeastern Oregon and Lakeview RMP Amendments. Specific fragmentation analysis can be done as part of the future comprehensive travel plan; route density targets and roads in need of immediate closure should be addressed in the RMP Amendments.	BLM will develop a CTMP during the RMP amendment process. This will include addressing the impacts of a reasonable range of travel management alternatives. BLM will review the attached documents and cite if appropriate.
450	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		60	5	We also recommend you look at the travel planning criteria set out in the Record of Decision for the Dillon (MT) RMP (relevant sections attached and also available on-line at: http://www.mt.blm.gov/dfo/rod/contents.htm), as an example of criteria that incorporate key aspects of BLM's ORV regulations as well as ecological metrics. This field office did not complete a comprehensive travel management plan as part of its RMP revision; however, it included road density targets and included an appendix outlining the principles it will use when completing a comprehensive travel management plan during implementation. The Vale and Lakeview District Offices should adopt a similar approach.	Review example CTMP.
451	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		61	1	BLM's regulations require that in designating both areas and routes for ORV use, the agency must "minimize" potential damage to natural resources (such as soil, watersheds), potential impairment to wilderness suitability, potential harassment of wildlife and disruption of habitat, and potential conflict with other existing or proposed recreational uses. 43 C.F.R. § 8342.1. These minimization criteria are also set out in Executive Order No. 11644, as amended by Executive Order. No. 11989. In preparing these RMP Amendments, the BLM must ensure compliance with the minimization criteria and document such compliance.	The CTMP will address "minimization criteria" identified in governing regulation and BLM policy on a route-specific basis.
452	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		62	1	A recent court decision is particularly instructive. On September 28, 2009, the Northern District of California issued a decision striking down BLM's use of a Route Decision Tree to designate a travel network in an RMP. Center for Biological Diversity v. U.S. Bureau of Land Management, No. 06-cv-4884 (N.D. Cal. Sept. 28, 2009), Slip Op. at 19-30. To designate particular trails and routes as open to motor vehicles in the RMP, BLM used a Route Decision Tree or flowchart that set out a series of questions regarding the character, uses, and potential impacts of routes on different resources, and then proposes options for managing routes for motorized use. The court found that this approach violated BLM's regulations, the "minimization criteria," governing ORV use. Because the Decision Tree did not explicitly include consideration of the minimization standards, BLM failed to comply with the regulation. Although BLM claimed that it considered the minimization criteria, the court rejected that claim because there was no supporting documentation in the administrative record.	The CTMP will address "minimization criteria" identified in governing regulation and BLM policy on a route-specific basis.

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453	Enviro Group	Travel Management	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		63	1	Recommendations: In reevaluating the travel planning decisions in these RMPs, the BLM must explicitly and continually look to the minimization criteria, and provide adequate documentation so that the public can comment on and confirm such compliance.	The CTMP will address "minimization criteria" identified in governing regulation and BLM policy on a route-specific basis.
454	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		64	1	When completing a comprehensive travel management plan, it is vital to complete it in a systematic and transparent manner.	The RMP amendment process, including the development of a CTMP, is an open public process. Scoping comments will be summarized and discussed in the Scoping Report. These comments will be used to develop the issues, alternatives, and impacts that will be addressed in the RMP amendment. The public will be provided with additional opportunities to review and comment on the RMP amendment/Draft EIS. Those comments will be included and addressed within the Proposed RMP/Final EIS.
455	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		65	1	(1) Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective.	Travel, access, and recreational needs will be addressed in the OHV and CTMP portions of the RMP amendment.
456	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		66	1	The RMP amendments and related comprehensive travel plans provide opportunities for BLM to evaluate its travel system goals and whether the current system of roads and trails is furthering or hampering these goals. BLM should create a travel network that best serves the many resources which the agency is tasked with managing and does not inadvertently do a disservice to any other resource or public land visitor.	The RMP amendment and the CTMP contained therein, will include OHV and travel/access related goals.
457	Enviro Group	Travel Management Planning	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		67	1	TMP should follow these eight travel planning principles: (1) Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective. (2) Prior to conducting an inventory or designation of routes, BLM should assess the present resources, requirements for protection, and which uses for recreation and development are compatible with these resources, requirements and other users. (3) BLM should use a legal definition of "road" when designating routes. 4) BLM's consideration of ORV use should take into account its potential damage to resources and other uses, including exclusion of other users. (5) Where BLM presents a baseline travel system, it must present route maps in a responsible manner that does not legitimize illegally-created routes. (6) BLM should include a detailed closure and restoration schedule in the plan. (7) BLM should include and implement a monitoring plan. (8) BLM should include and implement education and outreach in the plan	These principles will be addressed within the OHV and CTMP portions of the RMP amendment, to the extent applicable.
458	Enviro Group	Utility Corridors	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		68	1	As noted in the BLM press releases from the Vale and Lakeview Districts, BLM intends to address energy development and new utility corridor designations as part of these RMP Amendments. Given the rapid expansion of energy development in this region, particularly wind projects and associated transmission line projects and upgrades, BLM should seize this opportunity to proactively address siting issues. Such an approach will greatly increase opportunities to responsibly develop clean, renewable energy and associated transmission while minimizing impacts to wildlands, wildlife and other sensitive resources and values in the area. Zoning for development and avoidance areas is one of the best ways to address this issue, as shown by BLM's ongoing work to designate zones in numerous other planning processes.	The siting of solar, wind, and utility projects are addressed through the issuing of a right-of-way (ROW). During the plan amendment, the BLM will classify all public lands as either open to ROW location, areas where ROWs are to be avoided if possible, and areas where ROWs are excluded or not allowed. Those areas that are identified as open to ROW location would be the most appropriate places for new energy developments.
459	Enviro Group	Utility Corridors	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		69	1	The RMP Amendments should identify zones that are most suitable for renewable energy projects and any other energy development and new utility corridors designations and then limit all development to those zones. Because impacts from transmission lines, roads, and other linear infrastructure can differ some from impacts of energy generation projects, but zoning is appropriate for all these types of development, and minor alterations to zoning criteria should adequately address any differences.	The siting of solar, wind, and utility projects are addressed through the issuing of a right-of-way (ROW). During the plan amendment, the BLM will classify all public lands as either open to ROW location, areas where ROWs are to be avoided if possible, and areas where ROWs are excluded or not allowed. Those areas that are identified as open to ROW location would be the most appropriate places for new energy developments.

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460	Enviro Group	Utility Corridors	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		70	1	The new guidance on managing energy development in sage-grouse habitat, IM 2010-071, Gunnison and Greater Sage-grouse Management Considerations for Energy Development provides important criteria to be incorporated into the zones, providing the following measures for different energy-related activities: Oil and Gas/Geothermal: • Withhold from sale or defer the sale of parcels, in whole or in part, that industry has proposed for oil and gas or geothermal leasing in priority habitat as supported by analysis under the National Environmental Policy Act (NEPA) of the impacts of leasing on sage-grouse. • If parcels are offered for sale in sage-grouse priority habitat, attach a lease notice to new leases alerting the lessee that additional conditions will be applied to approvals to develop to the lease, including Applications for Permit to Drill (APDs), sundry notices and associated rights-of-way, if future sage-grouse conservation efforts are appropriate. • In priority habitat and where supported by NEPA analysis, attach conditions to the approval of APDs that are more protective than the stipulations or restrictions identified in the applicable Resource Management Plan (RMP), as appropriate. Wind and Solar Energy Development and Associated Site Testing: • Screen new right-of-way applications to identify whether the wind or solar energy development or site testing and project area includes priority habitat. If so, alert the applicant as early as possible that the application may be denied or that terms and conditions may be imposed on the right-of-way grant to protect priority habitat as supported by NEPA analysis. Transmission: •Re-route proposed transmission projects to avoid priority habitat. RMP Revisions/Amendments: • In RMP revisions and amendments, analyze one or more alternatives that would exclude priority habitat from energy development and transmission projects.	The RMP amendment will address the impacts of a reasonable range of management alternatives, that vary in levels of protections to sage-grouse habitat.
461	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		71	1	Development zones should be delineated based on high-resource, low-conflict areas near existing infrastructure, ideally on already degraded lands. The BLM is already taking a similar approach in the ongoing Programmatic Environmental Impact Statement (PEIS) for Solar Energy Development and these RMP Amendments should take advantage of the opportunity to define zones in more detail than will be possible with the broader PEIS. In addition, within the zones, BLM should prioritize lands that are most suitable for development, ensure adequate protective measures are imposed on development, and require both on-site and off-site mitigation of impacts to resources, as well as loss of uses (such as recreation).	Utility and right-of-way (ROW) location will be addressed in the Lakeview RMP amendment through the designation of ROW exclusion, avoidance, and open areas.

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462	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		72	1	For off-site mitigation, we also direct BLM's attention to IM 2008-204, which describes the broad type of actions that may be taken to address both direct impacts of a project and greater cumulative effects that development is having on a landscape. IM 2008-204 identifies and elaborates on the types of off-site mitigation that can be used, stating: •Offsite mitigation may include, as appropriate: - In-kind: Replacement or substitution of resources that are of the same type and kind as those being impacted. Example: For every acre of new, long-term surface disturbance in important sage-grouse nesting/early brood-rearing habitat in Area (A), (X) acres of unsuitable habitat in Area (B) is reclaimed, treated, or planted to create new or suitable nesting/early brood-rearing sage-grouse habitat. - Out-of-kind: Replacement or substitute resources that, while related, are of equal or greater overall value to public lands. Example: For every acre of new, long-term surface disturbance in important sage-grouse nesting/early brood-rearing habitat in Area (A), the project proponent agrees to bury (Y) miles of existing power lines and remove the power poles used as hunting perches by raptors in Area (B). - In-lieu-fee: Payment of funds to the BLM or a natural resource management agency, foundation, or other appropriate organization for performance of mitigation that addresses impacts of a project. Example: The applicant may make payment to the BLM or a conservation group based on the amount of acres that will be disturbed in exchange for commitment from the recipient to apply the funds toward local sage-grouse core habitat protection/restoration projects.	The RMP amendment will address the impacts of a reasonable range of management alternatives, that vary in levels of protections to sage-grouse habitat. The alternatives will vary in the amounts of protective management, best management practices, and mitigation measures applied.
463	Enviro Group	Utility Corridors	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		73	3	In the context of energy development and new utility corridor designations, there may be additional conservation priorities that can be pursued to mitigate the impacts of individual projects and BLM could begin discussions with interested stakeholders to identify these potential targets for off-site mitigation efforts or funding.	The RMP amendment cannot address off-site mitigation specifics such as these when there are no such proposals currently in front of the agency. Such discussions are more appropriately considered at the time a specific proposal is put before the agency and there is an actual proponent to deal with.
464	Enviro Group	Utility Corridors	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		74	1	The RMP Amendments should identify zones for all types of energy development and new utility corridor designations that prioritize high potential for renewable energy development areas that contain degraded lands and are in close proximity to new transmission, while excluding sensitive conservation lands, such as citizen-proposed wilderness areas and ACECs, and incorporating the new guidance on protection of sage-grouse populations. The RMP Amendments should also specifically preclude development outside the designated zones.	The siting of solar, wind, and utility projects are addressed through the issuing of a right-of-way (ROW). During the plan amendment, the BLM will classify all public lands as either open to ROW location, areas where ROWs are to be avoided if possible, and areas where ROWs are excluded or not allowed. Those areas that are identified as open to ROW location would be the most appropriate places for new energy developments.

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465	Enviro Group	Utility Corridors	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		75	1	Within the zones, the RMPs should also set out prioritization criteria, which direct development to degraded lands and identifies other areas where development is more likely to lead to conflict, as well as setting out protective stipulations to safeguard other resources. We have provided a proposed "Sensitivity Based Prioritization for Development Areas Within Energy and New Utility Corridor Zones" (attached) to be used by the Lakeview and Vale District Offices in implementing these recommendations. This prioritization is based on identifying, within designated zones, lands that are to be prioritized for development, lands that may be developed but require additional protective measures to address sensitive resources with potential for conflict and controversy, and lands that should be avoided.	The siting of solar, wind, and utility projects are addressed through the issuing of a right-of-way (ROW). During the plan amendment, the BLM will classify all public lands as either open to ROW location, areas where ROWs are to be avoided if possible, and areas where ROWs are excluded or not allowed. Those areas that are identified as open to ROW location would be the most appropriate places for new energy developments.
466	Enviro Group	Utility Corridors	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		76	3	For off-site mitigation, BLM should provide for addressing a wide range of options to address the cumulative, far-reaching impact of renewable energy development (as set out in IM 2008-204) and should design a process to reach out to stakeholders and develop a set of conservation priorities to target in connection with off-site mitigation.	The RMP amendment cannot address off-site mitigation specifics such as these when there are no such proposals currently in front of the agency. Such discussions are more appropriately considered at the time a specific proposal is put before the agency and there is an actual proponent to deal with.
467	Enviro Group	Climate Change	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		77	5	Impacts to the ecosystem from climate change include shrinking water resources; extreme flooding events; invasion of more flammable non-native plant species; soil erosion; loss of wildlife habitat; and larger, hotter wildfires. Many of these impacts have been catalogued in recent studies by federal agencies showing the impacts of climate change specifically in the United States such as the recent report entitled Global Climate Change Impacts in the United States, available at http://www.globalchange.gov/publications/reports/scientific-assessments/usimpacts.	BLM will review citation and consider in RMP amendment, if appropriate.
468	Enviro Group	Climate Change	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		78	1	On September 14, 2009, Interior Secretary Salazar issued Secretarial Order (S.O.) No. 3289. This order unequivocally mandates all agencies within the Department of Interior to "analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview." S.O. 3289, incorporating S.O. 3226 (emphasis added). The Southeastern Oregon and Lakeview RMP Amendments fall squarely under this guidance and BLM must assess impacts from the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within this document.	Much of this comment represents interpretation of Department of Interior policy and requires no response. However, the RMP amendment will address the impacts of various management alternatives on greenhouse gas emissions and carbon storage.
469	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		79	5	Additionally, the BLM State Office for Oregon/Washington has issued guidance on analyzing greenhouse gas emissions and addressing changing climate conditions in NEPA documents (IM No. OR-2010-012). This policy guidance states that this type of analysis should be included in resource management plans as these types of plans "typically have a long enough duration that climate change could potentially alter the choice among alternatives."	Much of this comment represents interpretation of BLM policy and requires no response. However, the RMP amendment will address the impacts of various management alternatives on greenhouse gas emissions and carbon storage.
470	Enviro Group	Climate Change	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		80	5	The BLM must fully analyze the cumulative and incremental impacts of the proposed decisions in the RMP. Center for Biological Diversity v. National Travel Safety and Highway Administration, 538 F.3d 1172, 1217 (9th Cir. 2008). In CBD v. NTSHA, the NTSHA failed to provide analysis for the impact of greenhouse gas emissions on climate change and was rebuked by the U.S. Court of Appeals for the Ninth Circuit, which observed that "[t]he impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct." 538 F.3d at 1217. For example, off-road vehicle designations, oil and gas management stipulations, and renewable energy development may significantly increase or reduce greenhouse gas emissions contributing to climate change and must be analyzed under NEPA.	Much of this comment represents interpretation of Federal statute or court case law and requires no response. However, the RMP amendment will address the impacts of various management alternatives on greenhouse gas emissions and carbon storage.

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471	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		81	4	Further, NEPA regulations require that NEPA documents address not only the direct effects of federal proposals, but also "reasonably foreseeable" indirect effects. These are defined as: Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. § 1508.8(b).	This comment represents interpretation of Federal statute and requires no response.
472	Enviro Group	Climate Change	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		82	1	In addition to evaluating the impact of management decisions on climate change, including opportunities to reduce such impacts, BLM's environmental analysis must also evaluate the likely impacts of climate change on the affected environment – i.e., species of concern in the project area and their habitats, which could increase the importance of maintaining undisturbed areas (such as lands with wilderness characteristics) and ensuring habitat connectivity to support species diversity and landscape level movements. The latter impacts are clearly relevant in the scope of existing guidance. See, e.g., Secretarial Order 3289, Addressing the Impacts of Climate Change on America's Water, Land, and Other Natural and Cultural Resources (February 22, 2010).	The RMP amendment will address climate trends.
473	Enviro Group	Environmental Law and Policy	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		83	4	Further, 40 C.F.R. § 1502.15 requires agencies to "describe the environment of the areas to be affected or created by the alternatives under consideration." Establishment of baseline conditions is a requirement of NEPA. In Half Moon Bay Fisherman's Marketing Assn. v. Carlucci, 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit states that "without establishing . . . baseline conditions . . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA." The court further held that "[t]he concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process."	This comment represents interpretation of Federal statute and court case law and requires no response.
474	Enviro Group	Climate Change	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		84	1	BLM is required to take a hard look at direct, indirect, and cumulative impacts to and from climate change in the planning areas governed by the RMP Amendments. A comprehensive analysis will allow the BLM to assess and reduce the vulnerabilities of management alternatives to climate change, integrate climate change adaptation into alternatives, and produce accurate predictions of environmental consequences of the management alternatives.	Much of this comment represents personal opinion and requires no response. However, the RMP amendment will address the climate trends and the impacts of various management alternatives on greenhouse gas emissions and carbon storage.

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475	Enviro Group	Non-Responsive	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		85	5	Attachments: 1. Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy, 2006, The Wilderness Society. 2. State of Utah v. Norton, Motion to Stay Briefing and for a Status Conference, September 9, 2005. 3. State of Utah v. Norton, Case No. 2:96-CV-0870, Order and Opinion (D. Utah September 20, 2006). 4. Brief of the Federal Appellees, State of Utah v. Kempthorne, Case No. 06-4240 (February 26, 2007). 5. IM AZ-2005-007. 6. Tri County RMPs/EIS Newsletter, p. 3. 7. Tri County RMP/EIS, Preliminary Goals and Objectives, p. 3, management approach specific to lands with wilderness characteristics. 8. Little Snake Draft RMP, pp. 2-158 – 2-161; 2-199 – 2-201. 9. Excerpts from the Record of Decision (ROD) for the Dillon Resource Management Area (Montana). 10. Sensitivity Based Prioritization for Development Areas Within Energy and New Utility Corridor Zones with map appendix. Appendix 1: Habitat Fragmentation a. Habitat Fragmentation from Roads: Travel Planning Methods to Safeguard BLM Lands, The Wilderness Society, 2006. b. Weller, C., Thomson, J., Morton, P., Aplet, G. 2002. Fragmenting Our Lands: The Ecological Footprint from Oil and Gas Development. The Wilderness Society: Washington, DC. 24 p. c. Hartley, D. A., Thomson, J. L., Morton, P., Schlenker-Goodrich, E. 2003. Ecological Effects of a Transportation Network on Wildlife. The Wilderness Society: Washington, DC. 27 p. d. Thomson, J. L., Hartley, D. A., Ozarski, J., Murray, K., Culver, N. W. 2004. Protecting Northern Arizona's National Monuments: The Challenges of Transportation Management. The Wilderness Society: Washington, DC. 39 p. e. Thomson, J. L., Schaub, T. S., Culver, N. W. Aengst, P.C. 2005. Wildlife at a Crossroads: Energy Development in Western Wyoming. The Wilderness Society: Washington, DC. 40 p.	BLM will review the Attachments and cite in RMP amendment, if appropriate.
476	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		86	1	BLM must include various ways to protect these (wilderness quality) lands in each of the management alternatives. In addition to considering designation of new WSAs, BLM should propose protective management prescriptions or other protective status (including mineral withdrawals, non-motorized recreation prescriptions, ACEC designations, and prohibitions on new road construction and erection of structures such as cell towers) for these lands.	The authority to designate WSAs expired in 1991. Therefore, this issue is beyond the scope of the planning process. The BLM is required under the Settlement Agreement to address the effects of at least 2 alternative methods of protecting lands that the BLM identifies as having wilderness characteristics.
477	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		87	1	BLM has been aware of these proposed wilderness areas for some time, and the agency must attend to them. In the “Alternatives” section of the RMP Amendments. The Alternatives section must also discuss the implications of each alternative for the wilderness-quality lands governed by the Southeastern Oregon and Lakeview RMPs.	In accordance with the 2010 Settlement Agreement and current inventory guidance, the BLM will complete its own inventory of wilderness characteristics and include a summary of its findings in Chapter 2 - Affected Environment section of the RMP Amendment. The BLM will address the effects of at least 2 alternative methods of protecting lands that the BLM identifies as having wilderness characteristics in Chapters 3 and 4 of the RMP amendment.
478	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		88	1	Finally, BLM must specify the “Environmental Consequences” of the resource management decisions on the wilderness-quality lands in the planning areas. This discussion should include, but not be limited to, an analysis of the cumulative impacts of other activities (including those undertaken by non-federal entities) within the planning areas on these unique lands. In short, in every major section of the RMP Amendments,	The BLM will address the effects of at least 2 alternative methods of protecting lands that the BLM identifies as having wilderness characteristics in Chapters 3 and 4 of the RMP amendment.

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479	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		89	1	BLM must address wilderness-quality lands and citizen proposed wilderness areas. BLM should then take appropriate actions to protect wilderness character in the preferred management alternative.	In accordance with the 2010 Settlement Agreement and current inventory guidance, the BLM will complete its own inventory of wilderness characteristics and include a summary of its findings in Chapter 2 - Affected Environment section of the RMP Amendment. The BLM will address the effects of at least 2 alternative methods of protecting lands that the BLM identifies as having wilderness characteristics in Chapters 3 and 4 of the RMP amendment.
480	Enviro Group	Protect Areas With Wilderness Character	55	Wilderness Society, Nada Culver	7/7/2010	Denver	CO		90	9	Same as Form Letter #1.	See response to Form Letter #1.
481	Permittee	Grazing Support	56	Withers_Ranch	7/7/2010	Paisley	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
482	Permittee	Grazing Support	57	AM_Farm_A_Guenn	7/8/2010	Langlois	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
483	Permittee	Grazing Support	58	Grieners_Quarter_Circle_JR_Ranch_M_Taylor	7/8/2010	Adel	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
484	Permittee	Grazing Support	59	Hotchkiss_Company_M_Doverspike	7/8/2010	Burns	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
485	Permittee	Grazing Support	60	Shine_Ranch_G_Shine	7/9/2010	Adel	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
486	Permittee	Grazing Support	61	Dennis Flynn Ranch		Adel	OR	1	1	9	Same as Form Letter #1.	See response to Form Letter #1.
487	Grazing Group	Non-Responsive	62	Oregon_Cattlemens_Assoc_K_Teisl	7/6/2010	Salem	OR	1	1	4	At a prior scoping meeting, BLM personnel informed us that late comments are accepted in the scoping process, should new or previously overlooked information become available. Such a situation has arisen, and we appreciate the opportunity to submit additional scoping comments at this time.	No response needed.
488	Grazing Group	ACEC	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		1	4	On May 7th, 1999, the BLM released a document titled "Area of Critical Environmental Concern (ACEC) Nomination Analysis for the Proposed Pronghorn ACEC," ("the Analysis"). This document was a response to the nomination of some two million acres of federal land, located largely within the Lakeview District, as an ACEC by the Oregon Natural Desert Association ("ONDA"). In the Analysis, the BLM rejected ONDA's request, concluding, There is little need for additional special management throughout most of the proposal area, as existing plans provide adequate direction for the protection of the relevant/important resource values, (p. 1).	This comment represents a combination of re-stating previous BLM ACEC findings and personal opinion. No response is needed.
489	User Group	ACEC	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		2	4	It is required, according to BLM's policy, that this (ACEC) Analysis inform the selection of the preferred alternative for the Lakeview RMP. The Analysis itself is clear on this point. It reads: "These findings will be incorporated into the ongoing Southeast Oregon Resource Management Plan (RMP) and considered in the Lakeview RMP which is scheduled to begin in June, 1999," (p. 1); "{T]he Lakeview District is beginning to prepare a new RMP for public lands it manages. This evaluation will provide specific data for these land use planning processes," (p. 3); "[T]his evaluation is being completed at this time due to the high level of interest from the general public, local concerns, and because the information is needed for use in the Lakeview Resource Management Plan (RMP) which is being initiated this year," (p. 6); and "An ACEC evaluation is considered part of the supporting record for the land use planning process," (p. 7). These statements make absolutely clear that this Analysis is relevant to the consideration and selection of the preferred alternative within the current Lakeview RMP amendment process.	This comment represents a combination of restating BLM policy, previous ACEC findings, and personal opinion. No response is needed.

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490	User Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		3	4	The ONDA v. BLM Settlement ("the Settlement") requires BLM to consider an alternative in the Lakeview RMP amendment that will close allotments or pastures either for the duration of the plan or temporarily where existing grazing management practices or levels of grazing use on public lands are significant factors in the allotment or pasture failing to achieve the standards for rangeland health, (p. 5). There are several problems with this alternative. First, by its extremity, this alternative implies that grazing practices in the Lakeview District are a wide-spread and pernicious threat to regional rangeland health. The (ACEC) Analysis, however, clearly indicates that grazing practices within the Lakeview portion of the proposed ACEC, which constitutes a significant percentage of the Lakeview District, are effective in maintaining rangeland health necessary for wildlife: Within the Lakeview District portion of the area, the Warner Lakes Management Framework Plan (BLM, 1983a), Hillcamp and O'Keeffe Individual Allotment Management Plans (BLM, 1975; 1994b) and the Beaty Butte Allotment Management Plan (BLM and USFWS, 1998b) provide adequate management direction to protect the relevant/important wildlife values. Each AMP contains specific vegetation management objectives, grazing systems, and planned actions to provide periodic rest periods from livestock grazing and improvement of wildlife habitat conditions. This area does not need additional special management to support the diverse wildlife resources common to the area, above that already described in these plans, (p. 33).	Much of this comment represents personal opinion questioning the need to consider a grazing removal alternative as spelled out the 2010 Settlement Agreement, based in part on current management direction in several specific allotments. No response is needed.
491	Grazing Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		4	4	The (ACEC) Analysis also indicates that there is already a system in place whereby the BLM has authority to address rangeland health issues by determining the "appropriate action" according to each case: The authorized officer is required to take appropriate action as soon as practicable, but not later than the start of the next grazing year upon determining through assessment or monitoring, that a [rangeland health] standard is not being achieved and that livestock are a significant contributing factor to the failure to achieve standards, (p. 34).	This comment represents restatement or interpretation of Federal grazing regulations and no response is needed.
492	Grazing Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		5	1	By contrast, ONDA's alternative dismisses the BLM's authority to address range land health issues individually by falsely implying that it is ecologically necessary to close any allotment or pasture, potentially for twenty years or more, should isolated management issues emerge. In contrast, the (ACEC) Analysis clearly indicates that such situations can be effectively addressed in a piecemeal, on-the-ground fashion. For example: The Beaty Butte (rangeland health) assessment identified one problem area where livestock grazing practices were responsible for not meeting the riparian standards along Guano Creek. However, it noted that implementation of the jurisdictional transfer with the Hart Mountain National Antelope Refuge and the Beaty Butte AMPIROD (BLM and USFWS, 1998b) would correct the problem by exclusion of grazing along the creek, (p. 34).	Much of this comment represents personal opinion questioning the need to consider a grazing removal alternative as spelled out the 2010 Settlement Agreement. No response is needed.
493	User Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		6	4	More generally, the (ACEC) Analysis states that current grazing policy is not a threat to other values on Lakeview District public lands, and that, should a management issue arise, adjustment of current plans are entirely sufficient to address them: Livestock grazing, as presently managed, is either not a known threat or can be adjusted, if needed, under current plans to protect the relevant/important values, (p. 42).	The ACEC analysis quoted here applies specifically to public lands in the southeastern corner of the Planning Area. It found that no special management needed to be applied to livestock grazing in that specific area to protect the relevant and important values that the BLM identified within limited portions of a larger area. Commenter is correct in noting that the BLM felt there was adequate management flexibility in current AMPs and the Federal grazing regulations to accommodate future changes in grazing management in this specific area, if needed. This finding, however, cannot be applied to the entire Planning Area.

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494	Grazing Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		7	1	The (ACEC) Analysis also corroborates our view that well-managed grazing potentially benefits rangeland health and wildlife, and further, that the existing management is succeeding in improving general rangeland conditions: The Oregon Department of Fish and Wildlife believe that proper livestock grazing management is compatible with, and can even enhance antelope habitat, (letter dated September 3, 1998), (p. 37); [A]antelope habitat conditions in the proposed ACEC are probably the best in this century. Ongoing efforts to improve livestock and wildlife management under existing management plans are increasing the amount of herbaceous forage and water sources available for antelope, (p. 20).	This represents personal opinion or restatement of ODFW opinion and no response is needed.
495	Grazing Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		8	1	BLM must also take into account that the temporary closure of allotments will inevitably result in the permanent closure of ranches. No ranch can afford to lose its grazing for twenty years, let alone three or four. Thus, ONDA's alternative that recommends retiring allotments for the life of the plan when a range-health issue arises effectively recommends terminating the existence of any ranch affected by a range-health issue.	BLM recognizes there will be social and economic effects associated with alternatives that reduce or eliminate grazing. This will be addressed in Chapter 4 - Environmental Effects section of the RMP amendment.
496	User Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		9	1	The negative consequences of ranch closure and sale were discussed in previous scoping comments. Among them, development, fragmentation, and loss of important habitat are destructive and irreversible, and have been widely noted in other ranching communities where ranch sales have been wide spread.	The RMP amendment will address the potential negative effects associated with ranch sale/closure that could result from some of the alternatives considered within Chapter 4 - Environmental Effects, social and economic section.
497	Grazing Group	Grazing Support	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		10	1	In summary, the (ACEC) Analysis provides ample evidence that current grazing practices and management in the Lakeview District are meeting with notable success according to BLM and ODFW. It also indicates that isolated management issues, when they arise, can be effectively addressed without closure of allotments or pastures. Closing pastures and allotments, as ONDA's alternative requires, is both potentially devastating to the ranchers that rely on these lands, and does not necessarily address the actual management issue on the ground. It is also inappropriately punitive, and would undermine the excellent cooperative relationship between ranchers and agency that has proven to be highly productive. We strongly encourage the BLM to select a preferred alternative which is informed by the practices found to be successful in the (ACEC) Analysis: one that recognizes the success of current grazing practices, and develops piecemeal, on-the-ground solutions to address isolated management issues in cooperative consultation with the permittee.	The ACEC analysis quoted here applies specifically to public lands in the southeastern corner of the Planning Area. It found that no special management needed to be applied to livestock grazing in that specific area to protect the relevant and important values that the BLM identified within limited portions of a larger area. Commenter is correct in noting that the BLM felt there was adequate management flexibility in current AMPs and the Federal grazing regulations to accommodate future changes in grazing management in this specific area, if needed. This finding, however, cannot be applied to the entire Planning Area.
498	User Group	Environmental Law and Policy	63	Oregon Cattlemens Assoc, O'Keeffe	11/15/2010	Adel	OR		11	4	In previous comments, we indicated that several of the alternatives under consideration for the Lakeview RMP amendment process which were included as part of the settlement (Settlement) of the ONDA v. BLM case are not legal. Specifically, we objected to sections 27 and 29 -30 of the Settlement.	This comment represents personal opinion or interpretation of the legality of several provisions of the 2010 Settlement Agreement and requires no response.
499	User Group	Environmental Law and Policy	64	Oregon Cattlemens Assoc, O'Keeffe	12/30/2010	Adel	OR		1	4	Section 27 requires the BLM to consider an alternative in the Lakeview RMP amendment that will close allotments or pastures for the duration of the plan or temporarily where existing grazing practices or grazing levels are significant factors in the allotment or pasture failing to achieve standards of rangeland health.	This is an accurate representation of the what section 27 of the 2010 Settlement Agreement requires.
500	Grazing Group	Environmental Law and Policy	64	Oregon Cattlemens Assoc, O'Keeffe	12/30/2010	Adel	OR		2	1	Sections 29 & 30 require the BLM to consider at least two alternatives in the Lakeview RMP amendment that require the BLM to ensure an end to livestock grazing for the life of the plan on voluntarily relinquished permits which are on or partially on NLCS land, or on lands with other special designations.	Sections 29 and 30 of the 2010 Settlement Agreement require that the RMP amendment address 2 alternatives that vary in the special areas where voluntary grazing permit relinquishment will be accepted and grazing no longer authorized.
501	Grazing Group	Environmental Law and Policy	64	Oregon Cattlemens Assoc, O'Keeffe	12/30/2010	Adel	OR		3	4	In previous comments, we indicated that these alternatives are contrary to existing statute, citing 10th Circuit Court opinion in Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir.1999), and on other grounds, 529 U.S. 728 (2000), which found a presumption of grazing on lands designated chiefly valuable for grazing within grazing districts. This finding was noted and expanded upon in opinion M-37008 of the Solicitor of the Department of the Interior.	This comment represents personal opinion or interpretation of Federal statute or court case law and requires no response.

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502	Grazing Group	Environmental Law and Policy	64	Oregon Cattlemens Assoc, O'Keeffe	12/30/2010	Adel	OR		4	4	The 10th Circuit opinion clearly indicates that the above alternatives are beyond the scope of law. According to the opinion, if rangeland health due to grazing becomes an issue, the presumption is that the issue needs to be immediately corrected by the necessary on-the-ground measures, and the lands will be returned to grazing as soon as rangeland health standards allow. Withdrawing relinquished permits from grazing for the life of the plan, regardless of whether they are on NLCS or similar designations, is arbitrary and violates the presumption of grazing on healthy lands designated chiefly valuable for grazing.	This comment represents personal opinion or interpretation of Federal statute or court case law and requires no response.
503	Grazing Group	Environmental Law and Policy	64	Oregon Cattlemens Assoc, O'Keeffe	12/30/2010	Adel	OR		5	4	To this we add that there is also extant case law indicating that illegal alternatives such as the above mentioned are not reasonable options for land use planning, stating simply that "Clearly an illegal or unauthorized alternative cannot be considered reasonable..." (State of Utah v. Norton 2006WL2711798 (D. Utah)).	This comment represents personal opinion or interpretation of Federal statute or court case law and requires no response.
504	Grazing Group	Environmental Law and Policy	64	Oregon Cattlemens Assoc, O'Keeffe	12/30/2010	Adel	OR		6	4	We strongly urge the BLM to select a preferred alternative that is both legal and reasonable in light of court opinion and existing statute.	No response required.
505	Grazing Group	Environmental Law and Policy	64	Oregon Cattlemens Assoc, O'Keeffe	12/30/2010	Adel	OR		7	3	We believe the recommendations for a "Backcountry Conservation Area" designation will help the Bureau of Land Management (BLM) resolve long-standing conflict over natural resource management while conserving high quality fish and wildlife habitat and outdoor recreation opportunities for multi - use. We certainly value the BLM's commitment to informed and thorough land use planning and look forward to working with you as this process advances.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as a “backcountry conservation area”. Therefore, this issue is beyond the scope of the RMP amendment process.
506	Enviro Group	Non-Responsive	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		1	4	Please accept and fully consider these scoping comments on the amendment to the Lakeview Resource Management Plan (Lakeview RMP) on behalf of the Theodore Roosevelt Conservation Partnership (TRCP). We recognize the official comment period has closed, but believe that these recommendations will help the Bureau of Land Management (BLM) resolve long-standing conflict over natural resource management while conserving high quality fish and wildlife habitat and outdoor recreation opportunities.	No response required.
507	Enviro Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		2	4	The TRCP is a partnership of the nation’s leading hunting and fishing organizations and represents more than 42,000 individual sportsmen nationwide, including more than 750 individuals in Oregon. We are working to conserve public lands fish and wildlife habitat and hunting and fishing opportunities for future generations. We appreciate this opportunity to comment and recognize the BLM’s commitment to addressing the circumstances and values related to management of the public resources, within the lands governed by the Lakeview Resource Management Plan.	No response required.
508	Enviro Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		3	4	We understand the implications on the amendment process are due to the ruling in Oregon Natural Desert Association v. Bureau of Land Management, 531 F.3d 1114 (9th Cir. 2008). Under this ruling the BLM is required to inventory land with wilderness characteristics and consider a range of alternatives for conserving these public lands in the Lakeview, Oregon. Public lands harbor some of the most in-tact fish and wildlife habitat and outdoor recreation opportunities in the state and these areas should be conserved administratively in ways that benefit fish and wildlife habitat and sustain hunting and fishing opportunities. We believe the recommendations below offer a path for doing so that will benefit fish, wildlife and our hunting and fishing traditions.	Much of this comment represents interpretation of case law or personal opinion and requires no response.
509	Enviro Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		4	4	BLM is required to inventory for wilderness character and consider a range of alternatives to conserve these lands in the Lakeview RMP Amendment	This comment represents personal interpretation of the 2010 settlement agreement and requires no response.

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510	Enviro Group	Multiple Use Support	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		5	4	To conserve high quality fish and wildlife habitat and dispersed recreation opportunities is a high priority for the BLM and an integral component of its multiple use mission. The U.S. Court of Appeals for the Ninth Circuit recently held that lands with wilderness character are a resource for which the BLM must keep a current inventory.	This comment represents interpretation of case law, BLM policy, or personal opinion and requires no response.
511	Enviro Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		6	4	Wilderness characteristics are among the 'resource and other values' of the public lands to be inventoried under § 1711. BLM's land use plans, which provide for the management of these resources and values, are, again, to "rely; to the extent it is available, on the inventory of the public lands, their resources, and other values." 43 U.S.C. § 1712(c) (4).Oregon Natural Desert Assn. v. Bureau of Land Management, 531 F.3d 1114, 1119 (9th Cir. 2008). Therefore, BLM is required to consider "whether, and to what extent, wilderness values are now present in the planning area outside of existing WSAs and, if so, how the Plan should treat land with such values." Id. at 1143.	This comment represents interpretation of case law or Federal statute and requires no response.
512	Grazing Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		7	4	In an increasingly developed world, roadless public lands, which include lands with wilderness character, provide social, cultural, economic, scientific, ecological benefits to the public. The TRCP is focused on the conservation of roadless areas for the conservation of unfragmented fish and wildlife habitat and high quality hunting and fishing areas. We believe the Lands with Wilderness Characteristics inventory represents a great opportunity to evaluate and consider high value roadless lands for administrative conservation to conserve fish and wildlife habitat and outdoor recreation opportunities.	This comment represents personal opinion and requires no response.
513	Grazing Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		8	4	Conserving high quality roadless areas through administrative designations is consistent with the BLM's obligations under the Federal Land Policy and Management Act (FLPMA), 42 U.S.C. § 1701, et seq., and National Environmental Policy Act (NEPA), 42 U.S.C. § 4321, et seq. FLPMA directs the BLM to manage the public lands in a manner "that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values." 43 U.S.C. § 1701(a) (8). (Emphasis added). Furthermore, the BLM is expected to protect "certain lands in their natural condition; that will provide food and habitat for fish and wildlife." Id.	This comment represents interpretation of Federal Statute, BLM policy, or personal opinion and requires no response.
514	Env. Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		9	4	Roadless landscapes offer a variety of resources and open-space opportunities for all Americans. They provide the settings and backdrops for primitive and unconfined recreation such as hunting and fishing. They are sources of clean and safe public drinking water and quality habitat for wild trout. They contain intact, unfragmented habitat for species dependent on large, undisturbed areas of land, such as sage grouse, pronghorn, mule deer, elk, and bighorn sheep. The scenic quality of these naturally appearing landscapes is among the highest in the nation. These areas serve as bulwarks against the spread of nonnative invasive plant species and provide reference areas for study and research. These characteristics not only provide scenic and recreation value to the American public, they are highly important for maintaining healthy and diverse economies in the American West. Managing an area to protect its roadless character provides a unique opportunity and benefits for present and future generations. Proper management of these roadless public lands is a high priority for the BLM and should be protected to the extent possible consistent with BLM's planning and management authorities.	This comment represents interpretation of BLM policy or personal opinion and requires no response.
515	Grazing Group	Multiple Use Support	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		10	4	Under Section 201 of the Federal Land Policy and Management Act (FLPMA) mandates the BLM inventory lands with wilderness characteristic, their resources and values. In the land use planning process, including revision of RMPs, Section 202 of FLPMA requires the BLM to consider the inventory and determine which multiple uses are best suited to which portions of the planning area. 43 U.S.C. § 1712. BLM's mandate of multiple use and sustained yield, as well as other relevant law and BLM's current guidance, provides for inventory and protection of wilderness values.	This comment represents interpretation of Federal Statute or BLM policy and requires no response.

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516	Grazing Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		11	4	Existing administrative land designations are inadequate	This comment represents personal opinion and no response is required.
517	Env. Group	Non-Responsive	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		12	4	The TRCP has significant experience working with rank and file sportsmen and hunting and fishing organizations and businesses across the West to conserve high quality fish and wildlife habitat and sporting opportunities. We have a clear understanding of the issues and concerns that sportsmen, rural residents and wildlife managers voice towards the management and conservation of roadless public lands.	This comment represents personal experiences and no response is required.
518	Grazing Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		13	4	Much of the reason sportsmen continue to experience high-quality hunting and fishing on public lands is because of roadless areas, commonly called backcountry. These areas offer intact fish and wildlife habitat and contribute to America's $821 billion outdoor recreation based economy. In an increasingly crowded world, these lands provide long-term public hunting opportunities and the means for sportsmen to escape crowds and experience solitude.	This comment represents personal opinion and no response is required.
519	Grazing Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		14	3	The debate over management of undeveloped public lands has spanned the past century. The discussion is often framed as a choice between high intensity industrial development and wilderness preservation. Unfortunately, a successful middle-ground designation that conserves Bureau of Land management-administered backcountry habitat – while also enjoying widespread support from both the sportsmen's community and citizenry at large – does not exist. Consequently, the current system of land management is leaving valuable fish and wildlife habitat vulnerable to poorly planned development and is causing widespread frustration.	Portions of this comment represent personal opinion and no response is required. A portion of this comment suggests the use of a new administrative designation. FLPMA contains no authority to create new "middle ground" administrative designations such as "backcountry habitat". Therefore, this issue is beyond the scope of the RMP amendment process.
520	Env. Group	ACEC	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		15	4	To meet its obligations under the FLPMA, the BLM employs administrative designations that facilitate the conservation of high-value lands, such as Areas of Critical Environmental Concern and Research Natural Areas. While these existing designations provide the necessary tools to conserve lands and can be effective in the right circumstances, the titles and terminology of these designations are often not understood by people who live near and use these public lands. Rural Westerners and sportsmen often are suspicious of these designations, and communicating their meaning requires considerable time and effort. As a result, the long-term success of pre-existing administrative designations has been limited.	This comment represents personal opinion regarding the success or effectiveness of current administrative designations and no response is required.
521	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		16	3	A new administrative conservation designation is needed that speaks to the rhetoric and values of the conservative American West while safeguarding the fish and wildlife habitat and nonmotorized uses of backcountry lands. This new designation would conserve more acres and has the potential to enjoy widespread support from the American people, including rural Americans, recreationists and hunters and anglers. BLM should consider a "Backcountry Conservation Area" designation.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process.
522	Env. Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		17	4	Sportsmen want to see high quality fish and wildlife habitat conserved for future generations through a special conservation designation that can be applied through the land use planning process. We believe the Lands with Wilderness Characteristics inventory process represents an ideal opportunity to evaluate and consider high value roadless lands for administrative conservation.	This comment represents personal opinion and no response is required.
523	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		18	3	The TRCP suggest the Lakeview RMP utilize a new administrative lands designation that safeguards high value fish and wildlife habitat and hunting and fishing on roadless and wilderness character public lands. This designation would benefit local economies, sportsmen, and habitat to maintain abundant fish and wildlife for future generations. We also believe that it would benefit from significant public support.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process. The remainder of the this comment represents personal opinion and requires no response.

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524	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		19	3	The TRCP recommends creating a “Backcountry Conservation Area” (BCA) designation for the BLM to consider and use during the land-use planning process to emphasize a non-motorized, recreation experience on lands that have been identified as having wilderness characteristics. This designation would seek to maintain the characteristics of backcountry lands and would represent a multiple-use framework that allows for reasonable vegetation management exceptions to benefit fish and wildlife habitat and protect people from wildfire, while ensuring that undeveloped BLM lands maintain their roadless character.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process. However, the plan amendment will address a range of fish and wildlife habitat, and fire management alternatives in Chapter 2.
525	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		20	3	This designation would safeguard existing primitive and unconfined, nonmotorized recreation opportunities that benefit from large, undisturbed landscapes, such as hunting, fishing, horse packing, camping, mountain biking, rafting and rock climbing. This designation would also maintain existing access points and would not close motorized access on preexisting authorized and permitted routes.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process. However, the plan amendment will address a range of recreation and travel/access management alternatives in Chapter 2.
526	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		21	3	This designation is not intended to replace or preclude other conservation designations. This designation is not intended to affect the BLM’s responsibility to maintain the wilderness character of appropriate lands nor is it intended to preclude, affect or address Wilderness Study Areas pending before Congress. This designation is instead intended to serve as a tool that can be used to conserve appropriate roadless areas where different management objectives have been identified.	This comment suggests the use of a new administrative designation to conserve roadless areas under management objectives that differ from WSA or other conservation designations. FLPMA contains no authority to create new administrative designations. Therefore, this issue is beyond the scope of the RMP amendment process.
527	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		22	3	A Backcountry Conservation Area designation should incorporate specific management principles.	While FLPMA contains no authority to create "backcountry conservation areas", some of the management principles presented by the commenter would be addressed in the range of alternatives in chapter 2.
528	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		23	3	To identify those lands with wilderness character most appropriate for a BCA administrative designation, we encourage the BLM to recognize and apply this new designation to those wilderness character lands and roadless areas larger than 5,000 acres or areas of sufficient size as to make practicable their conservation. These areas must also possess high value fish and wildlife habitat or recreation opportunities in the proposed Lakeview RMP. The word “or” in this sentence means that an area only has to possess one or the other. If those areas are found to have high-quality fish and wildlife habitat or recreation opportunities, the agency should consider designating those lands as BCAs.	This comment suggests that BLM identify lands with wilderness characteristics, roadless areas, or high value fish and wildlife habitat and designate as "backcountry conservation areas". FLPMA contains no authority to create new administrative designations. Further, there are no legally mandated criteria defined in existing laws, regulations, or BLM policy for defining such areas. Therefore, this issue is beyond the scope of the RMP amendment process. However, the plan amendment will present a range of management alternatives for lands with wilderness characteristics and fish and wildlife habitat in Chapter 2.
529	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		24	3	We recommend that external impacts on backcountry characteristics of an area, such as visual screening or noise, should not be used to disqualify an area from becoming a BCA. Suitable lands may or may not have wilderness character, but what they do possess are more than 5,000 contiguous acres (or are of a manageable size to ensure their conservation) without motorized use and high-quality fish and wildlife habitat or opportunities for primitive or back country recreation.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process. However, the plan amendment will address a range of management alternatives for both recreation and fish and wildlife habitat in Chapter 2.
530	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		25	3	We believe that suitable areas need not possess high-quality fish and wildlife habitat or recreation opportunities on every acre. On balance, however, an area shall include high-quality fish and wildlife habitat or primitive or backcountry recreation opportunities.	This comment suggests the use of a new administrative designation, along with some potential criteria. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process.
531	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		26	3	When deciding if an area is suitable for BCA designation, the BLM should consider outstanding rights. If there is a low likelihood of development or if development can take place without significantly impacting the area’s roadless character, preexisting rights for development should not preclude an area from being eligible for BCA designation.	BLM will not be inventorying for, or making decisions on "backcountry conservation areas". FLPMA contains no authority to create such administrative designations. Therefore, this issue is beyond the scope of the RMP amendment process. However, the plan amendment will address pre-existing rights, as one of several manageability criteria, when deciding how to manage lands with wilderness characteristics.

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532	Env. Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		27	1	We recommend the BLM seek to maintain existing authorized and permitted motorized access points that allow people to access BCAs for non-motorized recreation. We recommend these motorized routes be maintained, but they should not be improved or reconstructed to maintain the primitive and undeveloped character of an area. Existing cross-country vehicle travel should not disqualify an area from being designated as a BCA. Once designated, cross-country motorized vehicle travel should be prohibited in BCAs.	Travel and access needs within the planning area will be addressed in the OHV and CTMP portions of the RMP amendment.
533	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		28	3	This designation should also not restrict the use of helicopters, mechanical seeding devices, or chain saws or mechanized use such as mountain bikes and game carts as long as these uses comply with the BCA management restrictions. This designation should not affect the ability of the agency to suppress range and wildland fires utilizing mechanized equipment, nor should it prohibit prescribed burning.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process. However, the plan amendment will address a range of management alternatives for recreation, fire, and vegetation in Chapter 2.
534	Env. Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		29	1	This designation should not affect the BLM's preexisting authority to close existing motorized routes during the land-use planning process or for emergency purposes.	Travel and access needs within the planning area, including route closures and emergency access, will be addressed in the OHV and CTMP portions of the RMP amendment.
535	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		30	3	Lastly this designation should help the BLM address complex energy and renewable energy development issues on public lands by helping land managers identify areas suitable and unsuitable for surface disturbances associated with conventional and renewable energy production. Areas appropriate for BCA designation possess qualities incompatible with the impacts associated with surface disturbance and habitat fragmentation from conventional and renewable forms of development (such as natural gas, wind solar and geothermal) and nonwavable no surface occupancy development requirements should be applied to all new energy leasing, permitting and development within BCAs. Transmission and telecommunication corridors and pipelines should also be prohibited within the boundaries of BCAs. Important resource values exist on lands outside of potential BCAs, and our recommendation for this designation is not intended to determine the suitability or unsuitability of lands not designated as BCAs.	BLM does not need such a designation to make decisions that balance potential energy development and other ground disturbing activities with resource protection. This can be accomplished by other existing discretionary management tools, such as right-of-way avoidance or exclusion zones, no surface occupancy (leasable minerals), closures to mineral sales, etc.
536	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		31	3	When the BLM determines through the land-use planning process that the conservation of specific qualifying lands is appropriate, the agency should designate those lands backcountry conservation areas.	This comment suggests the use of a new administrative designation. FLPMA contains no authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process. The remainder of the this comment represents personal opinion and requires no response.
537	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		32	3	Lands considered for backcountry conservation designation should include the following: (1) High-quality fish and wildlife habitat or primitive or backcountry classifications for recreation opportunities; and (2) One of the following applies: a. The lands have been identified as containing wilderness characteristics; b. The area is a roadless area with 5,000 or more contiguous acres of BLM lands or; the area is a roadless areas of fewer than 5,000 acres of contiguous BLM lands and is contiguous with national forest inventoried roadless areas, national Recreation Area Plannings or other roadless federal lands, or; the area is of sufficient size as to make practicable its conservation.	This comment suggests criteria to use in defining "backcountry conservation areas". There are no legally mandated criteria defined in existing laws, regulations, or BLM policy for defining such areas. BLM will not be inventorying for, or making decisions on "backcountry conservation areas" as FLPMA contains no authority to create such new administrative designations. Therefore, this issue is beyond the scope of the RMP amendment process. However, if the commenter was to provide BLM with information on specific areas that she felt met these criteria, the BLM could potentially address them within the range of management alternatives.

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538	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		33	3	We recommend the following Restrictions ... within BCAs: Restrictions - This designation should conserve specific roadless areas and lands with wilderness characteristics that possess high-quality fish and wildlife habitat and/or significant sporting opportunities. - The construction of new roads, primitive roads and motorized trails within designated backcountry areas should be restricted to safeguard unfragmented habitat. - Vegetation management without conservation purposes, utility corridors, pipelines and surface occupancy associated with renewable and conventional energy development should be prohibited within designated areas.	This comment suggests specific management restrictions for "backcountry conservation areas". While BLM will not be inventorying for, or making decisions on such designations, the BLM could potentially address this within the range of management alternatives, if the commenter was to provide BLM with information on specific areas that she felt met their criteria. The RMP amendment will address a range of management alternatives for fish and wildlife habitat, recreation, roads and trails, vegetation, utility corridors and energy development.
539	Env. Group	Access Protection	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		34	3	We recommend the following ... Allowances within BCAs: - Designated areas should remain open to public hunting, fishing and trapping and state fish and wildlife agencies should retain management authority over fish and wildlife populations. - This designation should safeguard existing authorized and permitted motorized routes that are important for sportsmen to access backcountry areas. - Vegetation and water projects that improve habitat and control noxious weeds within designated areas, including the installation of water guzzlers, should be allowed. Such projects should be required to conserve the roadless character of the designated area. - Helicopters, chainsaws, game carts and mechanized transport should be allowed within designated areas. - This designation should not affect valid existing rights, public lands grazing allotments, or the ability of ranchers to access their improvements. - This designation should not affect the ability of the agency to suppress range and wildland fires utilizing mechanized equipment, nor should it prohibit prescribed burning.	This comment suggests specific allowable management actions or uses for "backcountry conservation areas". While BLM will not be inventorying for, or making decisions on such designations, the BLM could potentially address this within the range of management alternatives, if the commenter was to provide BLM with information on specific areas that she felt met their criteria. The RMP amendment will address management of travel, access, vegetation, range improvements, grazing, and other valid uses.
540	Env. Group	Access Protection	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		35	3	We encourage the BLM to seriously consider this recommended designation and evaluate roadless areas, including lands with wilderness character, for their suitability as BCAs for incorporation into the DEIS. We believe this designation has the potential to reduce political and social conflict surrounding lands conservation and will be working with a coalition of sportsmen's organizations to actively build support for this designation locally, regionally and nationally.	This issue is beyond the scope of the RMP amendment process. The remainder of the this comment represents personal preferences or opinion and requires no response.
541	Env. Group	Protect Areas With Wilderness Character	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		36	3	The BLM has authority to create administrative designations not in the planning handbook.	Neither FLPMA, nor the BLM Planning Handbook contains authority to create new administrative designations such as "backcountry conservation area". Therefore, this issue is beyond the scope of the RMP amendment process.
542	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		37	3	We recognize that the BCA land allocation designation is currently not included in the BLM planning handbook as an administrative designation. It should be noted that the BLM has the authority under Section 202 of FLPMA to conserve lands through administrative designations and the BLM has exercised this authority by creating unique administrative designations at the land use planning level.	Neither FLPMA, nor the BLM Planning Handbook contains authority to create new administrative designations such as "backcountry conservation area". The only administrative designation defined in this Section 202 is for an ACEC (see Section 202 (c)(3)). Therefore, this issue is beyond the scope of the RMP amendment process.
543	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		38	5	For example, in the developing RMP for the Lower Sonoran Field Office and Sonoran Desert National Monument, the BLM is creating two designations to protect priority wildlife species and habitat in the planning area through "Wildlife Habitat Areas" and "Wildlife Movement Corridors." These designations are included in the preferred alternative of the DEIS and proposed RMP. A second example of the BLM using their authority to create an administrative designation can be seen with the Lander RMP where the BLM created the Heritage Tourism and Recreation Management Corridor designation. This is designed to preserve not only the physical traces of the National Historic Trails, but also their historic settings.	These examples represent land use allocations or the use of existing historic trail designations. They do not represent new administrative designations. Through the land use planning process BLM defines many types of land use allocations and the management that is associated with a given allocation. In most of the examples cited, BLM appears to have given a title to a specific land use allocation. This is not the same thing as an administrative designation, but can be used to achieve the same result.

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544	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		39	4	These designations demonstrate: (1) the BLM has the authority at a state, district and field office level to conserve lands through administrative designations that are consistent with the BLM's obligations under the Federal Land Policy and Management Act (FLPMA), 42 U.S.C. § 1701, et seq., and National Environmental Policy Act (NEPA), 42 U.S.C. § 4321, et seq. and (2) the agency has demonstrated a willingness to designate and conserve native fish and wildlife habitat through the use of a new designation.	This comment represents personal interpretation of Federal statute and requires no response.
545	Env. Group	Multiple Use Support	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		40	4	Many westerners and sportsmen want to see a middle-ground conservation designation that conserves unfragmented fish and wildlife habitat and hunting and fishing while allowing reasonable exceptions that benefit our pastimes and the American public. By creating the BCA designation in the Lakeview RMP, the BLM would be exercising its authority to create a balanced, multiple use conservation designation that conserves high quality fish and wildlife habitat and recreation values.	This comment represents personal opinion and requires no response.
546	Env. Group	Environmental Law and Policy	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		41	4	BCA designation would help the BLM conserve fish and wildlife. It should also be noted that the BCA designation would help the BLM conserve sensitive species, many of which are important to hunters and anglers.	This comment represents personal opinion and requires no response.
547	Env. Group	Sensitive Species	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		42	1	To meet the obligation to protect wildlife habitat, the BLM Land Use Planning Handbook (H-1601-1) requires the BLM to designate priority species and habitats, in addition to special status species, for fish or wildlife recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age. It is Oregon's policy "to prevent the serious depletion of any indigenous species" (ORS 496.012). The Oregon administrative rules for threatened and endangered species (OAR 635-100-0100 to 0130) are intended to help implement this policy. Further, to provide a positive, approach to species conservation, a "sensitive" species classification was created under Oregon's Sensitive Species Rule (OAR 635-100-040). The Sensitive Species List focuses fish and wildlife management and research activities on species that need conservation attention.	A portion of this comment represents personal interpretation of BLM planning policy or Oregon State Law and requires no response. BLM is required to manage special status species, which differ in definition from what the state of Oregon defines as "sensitive" species. Special status species and their habitat will be addressed in the RMP amendment.
548	Env. Group	sage grouse	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		43	1	Priority species of relevance, to the Lakeview area, are listed below. - Bull trout (Malheur River Bull Trout SMU) - Inland Columbia redband trout - Migratory birds, including birds of conservation concern such as greater sage grouse - Species for which there is a signed conservation agreement or strategy.	There is no bull trout habitat in the Lakeview Planning Area. Habitat for redband trout and migratory birds will be addressed in the Lakeview RMP amendment. Sage-grouse habitat will be addressed through a separate plan amendment process covering BLM-administered lands throughout eastern Oregon and therefore, will not be addressed again within the Lakeview RMP amendment.
549	Env. Group	Access Protection	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		45	1	The proposed BCA designation would help the BLM sustain fish and wildlife species the following ways: 1) The designation would maintain and restore unfragmented, roadless areas that are key habitat for fish and wildlife species, including those enjoyed by the public such as wild trout and salmon, greater sage grouse, mule deer, elk, pronghorn and wild sheep, by not allowing the development of new motorized routes, transmission and pipeline corridors, or surface occupancy for energy development within these areas, 2) The BCA designation would not restrict the use of helicopters, mechanical devises, chain saws or game carts and would allow for habitat projects that benefit fish and wildlife - including sensitive, threatened and endangered species - while preventing activities, such as road building and energy developments that fragment wildlife habitat and degrade water quality, and 3) The BCA designation would allow projects that control the spread of noxious weeds, such as cheat grass, to restore and maintain native ecosystems that are important for the long term health of native fish and wildlife populations.	Most of this comment represents personal opinion. A special designation, in and of itself does nothing to protect a resource of concern. Rather, it is the discretionary management that is applied to such an area that potentially impacts (either beneficially or adversely) the values contained therein. The RMP amendment will address a range of alternatives that addresses fish and wildlife habitat needs, as well as restrictions on other types of development/use.

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550	Env. Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		46	1	Public access to public land is important to hunters and anglers looking to enjoy recreation and high quality fish and wildlife habitat. However too many roads, primitive roads and motorized trails fragment habitat and can result in fewer hunting opportunities and a lower quality hunting or fishing experience. Habitat security provided by roadless areas facilitates longer hunting seasons and greater numbers of mature bucks and bulls. Roadless areas also provide quality spawning habitat for wild trout and continued recreational fishing opportunities. To safeguard valuable fish and wildlife habitat and secure hunting and fishing opportunities on our public lands, the BLM should maintain areas and support the sustainable economy that relies on roadless areas.	Access, recreation, and social-economic needs will be addressed in the RMP amendment.
551	Env. Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		47	1	The BLM now has the opportunity to evaluate the impacts of ORV use on roadless areas, and conserve unfragmented fish and wildlife habitat. We encourage the BLM to maintain authorized and permitted motorized access points that are important to hunters and anglers while conserving roadless areas by prohibiting new motorized routes and roads in areas that are currently roadless. The proposed BCA designation, in part, would address travel management by identifying areas that are inappropriate for future road building.	The effects of motorized vehicle use, including OHVs, on fish and wildlife habitat, will be addressed in the RMP amendment.
552	Env. Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		48	1	The travel management and ORV plan should incorporate the following management principles: 1) Existing authorized or permitted roads, primitive roads, and motorized trails that are important for sportsmen's access should remain open to the public for hunting and fishing. 2) Road, primitive road, and motorized trail closures should focus on redundant and unnecessary routes that do not provide meaningful access to the sporting public, routes that result in significant resource damage and user created routes.	This will be addressed in the OHV and CTMP portions of the RMP amendment.
553	Env. Group	Travel Management Planning	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		49	1	The BLM should take this opportunity to complete travel management concurrently with the RMP Amendments. The TRCP recommends the BLM take the actions listed into consideration when reviewing the Travel Management Plan for the Lakeview RMP.	This will be addressed in the OHV and CTMP portions of the RMP amendment.
554	Env. Group	Non-Responsive	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		50	4	We appreciate the opportunity to be involved in the process of the Lakeview RMP. We will be working with sportsmen, recreationists, ranchers, and others to create specific recommendations for BCAs that will be submitted during the Lakeview RMP DEIS comment period. We encourage the BLM to seriously consider this recommended designation and evaluate roadless lands, including areas with wilderness character, for their suitability as BCAs for incorporation into the DEIS. We look forward to an in-person meeting to discuss our recommendations.	No response needed.
555	Env. Group	Request to be on Mailing List	65	Theodore Roosevelt Conservation Partnership - Mia Sheppard	2/24/2012	Brightwood	OR		51	1	Please keep my name on the mailing list for the North Lake SRMA.	The North Lake RAMP effort has been incorporated into the RMP amendment. Address has been added to RMP mailing list.
556	Individual	North Lake Special Recreation Area Planning	66	Anne Kinnaman	3/14/2005	Woodburn	OR		1	4	As you know I have been concerned about the BLM lands in North Lake County for some time. There are some wonderful recreational and educational opportunities available. The area also has a very sensitive ecosystem that needs protection.	No response needed.
557	Business Group	North Lake Special Recreation Area Planning	67	Lake County Chamber of Commerce - B. Gover	10/29/1995	Lakeview	OR		1	1	In addressing your issues, I'd like to express my thoughts on the vandalism first. BLM scheduling a meeting in North Lake County and getting their input and support is a very important first step. However instead of making it a meeting created and ran by government employees, why don't you approach the Christmas Valley Chamber ask for their cooperation, let them run the meeting and ask for residents ideas for public land management in their area and hopefully come to some kind of consensus. Maybe if you take that approach they will feel some ownership and help guard against the vandalism issue.	Vandalism will be addressed in the RMP amendment.

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558	Business Group	Local Social Economic	67	Lake County Chamber of Commerce - B. Gover	10/29/1995	Lakeview	OR		2	4	Obviously economic development and tourism is important to the businesses in the area, so protecting the environment and balancing the economics will be tricky. Don't just take input, but open discussion is important.	No response needed.
559	Business Group	North Lake Special Recreation Area Planning	67	Lake County Chamber of Commerce - B. Gover	10/29/1995	Lakeview	OR		3	1	The BLM needs to decide from their inventory of attractions, what they want to promote (brochures, signage, maps etc.). If you want to keep the public out of some of the sensitive areas don't even promote them to the traveling public. It's frustrating to the tourist to have a brochure or map of a special experience and then find they can't even get to it on a decent road or there is no toilets or picnic tables when they get there. They are angry! From my perspective there are some wonderful tourist opportunities in North Lake County; Derrick Cave, Crack in the Ground, Sand Dunes, Ft. Rock and maybe more that I haven't experienced . When talking to the individual Elderhostelers, they wouldn't be interested in exploring those attractions on their own, in their present access condition. I hesitate promoting them to individual tourists to explore on their own. Perhaps with a frank discussion from the area residents you can help determine which should be made more accessible and which should be protected or withdrawn from the promotional material.	Brochures, signage, and map needs will be addressed in the North Lake RAMP and CTMP portions of the RMP amendment. Generally, BLM promotes recreational features within the planning area as primitive motorized recreation experiences.
560	Business Group	Non-Responsive	67	Lake County Chamber of Commerce - B. Gover	10/29/1995	Lakeview	OR		4	4	I have at various times, made the above comments to BLM personnel and it still remains a source of frustration. Thanks for giving me this opportunity to comment.	No response needed.
561	Individual	Beyond Scope	68	Fran Baxter	4/29/2005	phone call	OR		1	7	Fran had heard rumors that the Green Mountain Lookout Tower was being moved and the old Tower might be donated to the residents of Christmas Valley. Note: Gretchen stated that a project to move and build a new Lookout Tower is currently underway, but that she has heard no discussion regarding the donation of the old Tower to the residents of Christmas Valley. There have been discussions about turning the old lookout tower into a BLM vacation rental, and that this may end up in the North Lake RAMP.	After consideration of the condition of the old tower and the costs required to make it safe for human habitation, the BLM made a decision to move forward with constructing a new tower and demolishing the old tower. This project is complete and the proposal to turn the old tower into a recreational rental will not be considered further.
562	Individual	Access Protection	68	Fran Baxter	4/29/2005		OR		2	7	It is important to have the new lookout tower on Green Mountain be accessible to the public.	The public can still walk into the new tower, but motorized access is limited by locked gate to reduce the risk of vandalism.
563	Individual	North Lake Special Recreation Area Planning	68	Fran Baxter	4/29/2005		OR		3	1	Good interpretive signs for Crack In the Ground. Roadway indicator signs (Crack). Better signage to Sand Dunes.	Signage needs will be address in the CTMP portion of the RMP amendment.
564	Individual	North Lake Special Recreation Area Planning	68	Fran Baxter	4/29/2005		OR		4	1	Distribution system needed for brochures/where they need to go (delivered). Chamber needs to do this! Communication (needed) between Christmas Valley/Silver Lake/Lakeview/Fort Rock Museum.	Brochure and map needs will be addressed in the North Lake RAMP and CTMP portions of the RMP amendment.
565	Env. Group	North Lake Special Recreation Area Planning	69	Tom Burns Concerned Friends of the Winema	12/7/2002		OR		1	5	Concerned Friends of the Winema [CFOW] wants to be sure you are aware of our organization's previous input to Lakeview BLM on this plan and our standing input to all public land agencies in the Upper Basin Area on recreation policy and development. Your file of public input on this plan should include two documents from CFOW: 1) Recreation Development Policy Statement of Concerned Friends of the Winema, revised 2/1/2001. This is our standing input on recreation policy on public lands and should be included as input from CFOW in any and all relevant planning activities, including the current one. 2) Comments on Draft of Lakeview Resource Area Management Plan/EIS, 11/15/01. This document is specific to an earlier draft of the Plan and references item # 1 as relevant for consideration. Please be sure that the input in these documents is part of your consideration as you work on the (North Lake) Management Plan. Also, it is important that you are aware that CFOW is very serious about the points made in these two documents. You will note that CFOW is especially concerned about uncontrolled ORV development in North Lake County. CFOW is in the area for the long term, and as noted in our input, we will hold any plan for ORV/OHV development by Lakeview BLM to the particulars of BLM's announced national ORV/OHV policy.	BLM has these documents on file.

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566	Env. Group	North Lake Special Recreation Area Planning	69	Tom Burns Concerned Friends of the Winema	12/7/2002		OR		2	4	We hope you can oversee the development of a balanced recreation plan for North Lake County that: 1) serves all users, 2)respects the legitimate rights of low impact visitors and users, 3) meets all of the guidelines of BLM national management policy for ORV/OHVs, and 4) is responsible to maintaining and improving the ecological condition of the natural resources under BLM management.	No response needed.
567	Env. Group	North Lake Special Recreation Area Planning	69	Tom Burns Concerned Friends of the Winema	12/7/2002		OR		3	9	Please be certain that CFOW is sent a copy for review and comment of any additional draft management plans that BLM develops for the North Lake County area.	Commenter is on the mailing list.
568	Env. Group	Non-Responsive	69	Tom Burns Concerned Friends of the Winema	12/7/2002		OR		4	5	I am attaching a copy of item #2 above. If you do not have a copy of item #1 in your files, let me know and I will send you a copy. Chuck Wells is the current President of CFOW. The CFOW address is: P.O. Box 1348, Chiloquin, OR 97624	BLM has these documents on file.
569	Env. Group	Non-Responsive	69	Tom Burns Concerned Friends of the Winema	12/7/2002		OR		5	5	Please: 1) include this document as part of CFOW's input to Lakeview BLM on the development of its North Lake County Recreation Management Plan, and 2) send me confirmation of your receipt of this document and of the presence of the two CFOW documents identified above in your file for planning on the current project.	BLM has these documents on file.
570	Individual	Opposed To Wilderness	70	John J. Davis Jr.	10/21/1995	Sonora	CA		1	4	I am opposed to any more wilderness	This comment represents personal opinion and no response is needed.
571	Individual	Travel Management Planning	70	John J. Davis Jr.	10/21/1995	Sonora	CA		2	4	I am opposed to road closures for any reason	This comment represents personal opinion and no response is needed.
572	Individual	Opposed To Wilderness	70	John J. Davis Jr.	10/21/1995	Sonora	CA		3	4	I am opposed to the Sierra Club and other similar organizations	This comment represents personal opinion and no response is needed.
573	Individual	Multiple Use Support	70	John J. Davis Jr.	10/21/1995	Sonora	CA		4	4	I believe in multiple use for all areas.	This comment represents personal opinion and no response is needed.
574	Individual	North Lake Special Recreation Area Planning	70	John J. Davis Jr.	10/21/1995	Sonora	CA		5	4	I am for non-funding of the project (North Lake RAMP) and other projects of a similar nature or studies.	This comment represents personal opinion and no response is needed.
575	Individual	North Lake Special Recreation Area Planning	70	John J. Davis Jr.	10/21/1995	Sonora	CA		6	4	I haven't been in this area for some time but it will survive if the environmentalists leave it alone.	This comment represents personal opinion and no response is needed.
576	Enviro Group	Travel Management Planning	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		1	1	I recommend the use of very large boulders to use for road closures. Where boulders are not possible due to the type of equipment needed to install them, then I recommend using fencing. In view areas, wood rail fences, other areas, wire fences.	Road closure methods will be addressed in the CTMP.
577	Enviro Group	Travel Management Planning	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		2	1	I recommend the closure of all user-created roads.	Road closures will be addressed in the CTMP.
578	Enviro Group	Travel Management Planning	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		3	1	I recommend more monitoring and presence of law enforcement. I also think issuing citations and fines are more effective than just issuing warnings.	Law enforcement needs will be addressed in both the RAMP and CTMP portions of the RMP amendment.
579	Enviro Group	Opposed to Grazing	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		4	1	I recommend the permanent retirement of grazing allotments in all critical wildlife areas.	The RMP amendment will address a range of grazing alternatives that include permit relinquishment and grazing reductions.
580	Enviro Group	North Lake Special Recreation Area Planning	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		5	1	Table Rock - Designated campsites, road closures on all user created roads and sensitive terrain roads. Possible location of a porta potty. If there are livestock grazing allotments on Table Rock, I recommend permanently retiring them.	Designating campsites and other recreational needs in the Table Rock area will be addressed in the RAMP portion of the RMP amendment. Road closures will be addressed in the CTMP. The RMP amendment will also consider a range of grazing alternatives that include permit relinquishment and grazing reductions within ACECs.

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581	Enviro Group	North Lake Special Recreation Area Planning	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		6	1	Sand Dunes - Install a permanent bathroom facility. Closure of all user created roads leading to and from campsites to Sand Dunes. More signage located in more areas. I recommend closing critical archaeological areas to OHV use completely.	Recreational facility needs in the Sand Dunes area will be addressed in the RAMP portion of the RMP amendment. Road and area closures will be addressed in the OHV and CTMP portions of the RMP amendment.
582	Enviro Group	North Lake Special Recreation Area Planning	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		7	1	The Sand Dunes and Lost Forest areas are perfect places for solitude. I recommend the closure of these areas for a few designated days each year for non-OHV users. Example for hikers, photographers, birders, etc.	A range of nonmotorized recreation experiences will be considered for the Sand Dunes and Lost Forest area through the design OHV alternatives that are analyzed in detail.
583	Enviro Group	North Lake Special Recreation Area Planning	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		8	1	Lost Forest - Designated campsites, road closures on all user created roads and sensitive terrain roads. Possible location of a porta potty. I recommend the use of more signage and located in more areas. If there are livestock grazing allotments in the Lost Forest, I recommend permanently retiring them. I recommend closing critical archaeological areas to OHV	Recreational facility needs in the Lost Forest area will be addressed in the RAMP portion of the RMP amendment. Area closures will be addressed in the OHV and ACEC sections of the RMP amendment. Road signage will be addressed in the CTMP. The RMP amendment will also consider a range of grazing alternatives that include permit relinquishment and grazing reductions within ACECs and WSAs.
584	Enviro Group	Opposed to OHVs	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		9	7	Close Juniper and Ponderosa Pine tree areas (in Sand Dunes - Lost Forest) to OHV use completely.	Motorized vehicle use in juniper covered areas near designated camping areas in the Sand Dunes has been limited to existing routes and signed on the ground. Motorized vehicle use throughout the Lost Forest area is limited to designated routes.
585	Enviro Group	Significant Caves	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		10	7	Derrick Cave - I recommend the closure of the side road to Derrick cave at the turn. I think it would be in the best interest of the preservation of the cave if people had to walk up the small hill to the entrance, rather than being able to drive up to within a few feet of the entrance. I recommend more signage.	The road to Derrick Cave was closed to motorized vehicles and designated as a foot trail in 2005. A parking area was developed adjacent to Road 6179-00 and visitors must walk in from that point.
586	Enviro Group	ACEC	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		11	7	Black Hills Botanical Area - I recommend the use of a designated camping area or no camping be allowed. Dispersed camping should not be allowed in the Black unless it is backpacking in a ways.	Under decisions made in the Lakeview RMP (2003), the Black Hills ACEC is closed to camping and personal firewood collecting. Day-use only is allowed.
587	Enviro Group	Non-Responsive	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		12	4	I have other recommendations for these and other areas in Lake County. I will send those when ready.	No response needed.
588	Enviro Group	Grazing Support	71	Southeast Oregon Resource Advisory Council - M. Miller	8/2/2003	email	OR		13	1	Green Mountain - I believe that grazing should not be allowed in the vicinity of the top of Green Mountain, nor near the camping area.	Excluding grazing from the Green Mountain campground is addressed as a potential future improvement within the range of Recreation Alternatives in Chapter 2 of the RMP Amendment.
589	Enviro Group	Opposed to OHVs	72	ONDA scoping comments North Lake RAMP			OR		1	6	My comments pertain primarily to the Sand Dunes Wilderness Study Area and Lost Forest, and the impacts that off-road thrill craft have on the wilderness values there. ONDA has conducted a district-wide wilderness inventory and has determined that not only the Sand Dunes, but much of the Lost Forest, and a large area east of the Sand Dunes has wilderness character.	BLM has conducted its own inventory of wilderness characteristics in these areas and determined that they are lacking in such characteristics.
590	Enviro Group	Opposed to OHVs	72	ONDA scoping comments North Lake RAMP			OR		2	4	I am also concerned about the outrageous, out-of-control, highly dangerous activities that occur in the Sand Dunes, especially during Memorial Day weekend. In my opinion, interim management policy for Wilderness Study Areas is being violated. Although interim management may allow historical uses, the current OHV abuses in the Sand Dunes WSA is anything but historic. The user numbers and user impacts have increased exponentially, as have illegal activities, serious injuries, and fatalities. I believe that BLM will find itself liable if its management does nothing to restore non-primitive recreation back to historic levels, and if it continues to encourage activities that cause injury and death. Designation of the OHV use area within the WSA undoubtedly violates both the spirit and the law of interim management policy.	This comment represents personal opinion and no response is needed.

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591	Enviro Group	Protect Areas With Wilderness Character	72	ONDA scoping comments North Lake RAMP			OR		3	1	The illegal activities that take place in the Sand Dunes WSA and Lost Forest are out of control. Not only do they cause irreparable damage to archeological, paleontological, and botanical resources, they are also a hazard to human health and life. Enforcement has been woefully inadequate to non-existent. Injuries are inevitable due to alcohol consumption, dense traffic, high speeds, blind jumps, and unrestrained children driving. Given the lack of staff and budget that would be required to bring the situation under control, I would contend that the simplest, most cost-effective course of action would be to close the Sand Dunes to motorized traffic altogether.	Most of this comment represents personal opinion and no response is needed. However, the RMP amendment will address a range of OHV designations specifically in the Fossil Lake - Sand Dunes - Lost Forest area.
592	Enviro Group	North Lake Special Recreation Area Planning	72	ONDA scoping comments North Lake RAMP			OR		4	1	I think one of the worst things BLM can do is to provide more access routes to the Sand Dunes. Such an action would impair the wilderness character of lands contiguous with the Sand Dunes WSA on the east, it would encourage even more traffic, more difficult to enforce, and further violation of interim management. I do not see a need for more recreation site development, with the possible exception of portable toilet sites. Any developments should be on the north side of the WSA in locations not identified by ONDA as having wilderness character (see map).	Most of this comment represents personal opinion and no response is needed. However, the RMP amendment will address recreational facility needs and potential locations in the RAMP portion of the document.
593	User Group	Non-Responsive	73	Oregon Hunters Association	4/1/2004	Medford	OR		1	4	I am writing on behalf of the Oregon Hunters Association. We are an association of approximately 10,000 members whose goal is to help maintain a healthy wildlife resource so that future generations can enjoy Oregon's great outdoors and hunting. To help meet this goal each year members of the Oregon Hunters Association spent hundreds of hours and thousands of dollars on wildlife and habitat projects.	No response needed.
594	Enviro Group	Travel Management	73	Oregon Hunters Association	4/1/2004	Medford	OR		2	9	One of our concerns is the ability for hunters to have access to our resources so that they can enjoy the great outdoors. In keeping with this we are asking to be kept informed of any transportation management changes on public lands. By transportation management changes we mean any activities such as road closures, restricting on and off road travel with any form of motorized or mechanical vehicle, including OHVs.	Commenter is on the mailing list.
595	Enviro Group	Request to be on Mailing List	73	Oregon Hunters Association	4/1/2004	Medford	OR		3	4	Please send any correspondence or notification of such matters to: Mr. Duane Dungannon Oregon Hunters Association PO Box 1706 Medford, Oregon 97501-0252 Email: OHA@ccountry. Phone: 541.772.7313. If you have any questions concerning our request please give me a call or send me an email.	No response needed.
596	Enviro Group	Request to be on Mailing List	74	E Rees		Eugene	OR		1	9	I wish to remain on the mailing list regarding the north Lake Recreation Area Planning Management Plan. Thank You.	Commenter is on the mailing list.
597	Enviro Group	Request to be on Mailing List	75	Native Plant Society of Oregon - S Garrett	3/7/2005	Bend	OR		1	9	I am very interested in the North Lake SRMA. Please keep me informed. I am concerned with resource protection.	Commenter is on the mailing list.
598	Individual	Public Involvement	76	S Wells	10/26/1995	Chiloquin	OR		1	9	Thanks very much for your time. The sharing of information at the town of the dunes area. Tom and I really appreciated it. Saw the notice in the H&N about forming a working group for the recreating plan. The distances are pretty far for us, but (unable to read word) discuss with the group at meeting tonight. In any case, we're very interested and would like to be kept informed.	Commenter is on the mailing list.
599	Rec Group	North Lake Special Recreation Area Planning	77	Spokes Unlimited	8/17/1999	Klamath Falls	OR		1	6	I recently received the publication Lakeview Resource Area Planning Update. When planning any new recreation project, or replacing various elements of campgrounds, trails, etc.- such as signs, picnic tables, surfaces, piers - please keep in mind the impact the project will have on people with disabilities.	BLM considers handicap accessibility when designing recreation projects.
600	Rec Group	Public Involvement	77	Spokes Unlimited	8/17/1999	Klamath Falls	OR		2	4	In addition, I wanted to offer my assistance, when appropriate, and hope that I may call upon you in return to help explain some of the new recreational/trail accessibility regulations which are due to come into effect in the not too distant future. Please feel free to call with any accessibility issue or question.	No response needed.

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601	Enviro Group	Protect Areas With Wilderness Character	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		1	4	Attached is input from Concerned Friends of the Winema and Klamath Direct for your continued scoping on the North Lake SRMA. I have included copies of our previous input, except the general recreation Policy statement of CFOW. If you do not have the latter, please let me know.	No response needed.
602	Enviro Group	Public Involvement	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		2	1	We strongly recommend additional scoping meetings in the Bend and Klamath Falls areas. The North Lake area is used extensively by interested parties from the west who are not easily accommodated by meetings to the east. As it is, the limited meeting sites selected substantially favor input from OHV interests and communities that unfortunately tie their future to OHV users.	Appropriate public involvement opportunities will be provided and documented in Chapter 5 of the RMP amendment.
603	Env. Group	North Lake Special Recreation Area Planning	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		3	4	In the near future, you will be hearing from many other interested parties who have concerns similar to those expressed in the input for our two groups. Please keep in mind that our low impact recreational users are just as local as most of the OHV users who come to the North Lake area from elsewhere! North Lake is one of those lightly populated areas where many more users come from outside the area than from within it; so local is a relative term.	No response needed.
604	Enviro Group	Request to be on Mailing List	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		4	9	Please let me know if you receive this material in full and if our input is actively represented in the planning file.	Commenter is on the mailing list.
605	Enviro Group	Non-Responsive	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		5	9	Copy of Tom Burns (CFOW) Letter attached.	See previous responses to Letter #69.
606	Enviro Group	North Lake Special Recreation Area Planning	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		6	9	This input is in reference to scoping which has been renewed, after a considerable hiatus, for the North Lake Special Recreation Management Area. Concerned Friends. of the Winema [CFOW] and Klamath Direct [KD] want to be certain that the input that we have offered in previous iterations of the development of the North Lake Recreation Management Plan will be included in the current planning process.	Both letters are on file and commenter is on the mailing list.
607	Enviro Group	North Lake Special Recreation Area Planning	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		7	1	The following earlier input from us should be part of your file and considered active for this planning process:1) Recreation Development Policy Statement- for Concerned Friends of the Winema [CFOW], revised 2/1/01. 2) Comments on the Draft of the Lakeview Recreation Area Planning Management Plan- for CFOW, 11/15/01. 3) BLM North Lake County Recreation Management Plan- input for CFOW, 12/7/02. All of the points and issues raised in the above mentioned documents as well as in the present input are matters of importance to both CFOW and KD.	These letters are on file, but these comments in their entirety are not necessarily relevant to the current RMP amendment. Those comments that are relevant will be considered in the OHV, RAMP, and CTMP portions of the plan amendment. See all responses to Letter 69 and 78.
608	Enviro Group	Public Involvement	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		8	1	It is not easy for us to make the meetings Lakeview BLM has set up to accommodate locals in Christmas Valley and Lakeview, and we strongly recommend scoping meetings in the Bend and Klamath Falls areas to get input from users of the area who come from the west.	Scoping meetings for the RAMP and Plan Amendment were held in various locations around the state. Additional public involvement opportunities will be provided and documented in Chapter 5.
609	Env. Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		9	4	Our members are frequent visitors to the North Lake Recreation Area Planning and take a very personal interest in seeing the quality of the experience we have on the public lands of the area improved and not diminished. We are low impact recreational users, and we do not want to see uncontrolled, unregulated, unenforceable high environmental impact development- especially for high user impact activities like OHVs - encouraged on these fragile semi-arid lands.	Much of this comment represents personal observation or opinion and no response is needed.
610	Enviro Group	Protect Areas With Wilderness Character	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		10	1	Since we are aware that there is considerable pressure to increase OHV use - especially in the *Christmas Valley Dunes* area, here are some questions that we think specifically apply and that must be adequately addressed in any viable/responsible recreation management plan for the North Lake area that considers increased OHV use:	See following responses.
611	Enviro Group	North Lake Special Recreation Area Planning	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		11	2	1) Is the boundary of the area open for OHV use clearly and fully marked?	BLM does not currently mark open areas. Rather BLM marks the boundaries of the closed areas (Fossil Lake) with fencing and/or signs.
612	Enviro Group	Travel Management Planning	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		12	2	2) Is the area that is not open for OHV use clearly identified/signed and not just left passively open as a result of no designation or the intent to address in the future?	BLM does not currently mark open areas. Rather BLM marks the boundaries of the closed areas with fencing and/or signs.

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613	Enviro Group	Travel Management Planning	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		13	1	3) Are the requirements of a Comprehensive Travel Management Plan met in fact and not just in name in the management plan with an overall open/closed area and trail system with appropriate signage?	There currently is no Comprehensive Travel Management Plan (CTMP) in place for North Lake County or the Lakeview Resource Area. BLM currently has a Transportation Plan which contains approximately half of all existing roads in the Planning Area. Part of the outcome of the RMP Amendment will be the development of a CTMP that addresses both motorize and non-motorized access needs.
614	Enviro Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		14	1	4) How will OHV users- not the public- cover the special user costs for enforcing the open and closed boundaries for the area on a 24/7 basis during the entire use season since OHV users are interested in and their vehicles are equipped for use night and day?	Increased law enforcement patrols and some recreational use monitoring costs in north Lake County in recent years have been covered in part by ATV grant funding from the Oregon Department of Parks and Recreation from fees received from ATV permits and gasoline taxes.
615	Env. Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		15	6	5) How will OHV users- not the public -cover the costs for the special expense of enforcement to identify, process and punish OHV boundary violators?	Increased law enforcement patrols and recreational use monitoring costs in north Lake County in recent years have been covered in part by ATV grant funding from the Oregon Department of Parks and Recreation from fees received from ATV permits and gasoline taxes.
616	Enviro Group	Environmental Protection	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		16	6	6) How will ecological damage to the area be independently assessed on a regular schedule with what provisions for closure and restoration as needed?	Increased recreational use monitoring in north Lake County has been provided by a seasonal employee/patrols in recent years.
617	Enviro Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		17	6	7) How will OHV users - not the public - cover the costs of damage assessment and the needed closures and restoration?	The expenses for monitoring and implementing closures are appropriately funded by the BLM. However, increased law enforcement patrols and some recreational use monitoring costs in north Lake County in recent years have been covered in part by ATV grant funding from the Oregon Department of Parks and Recreation from fees received from ATV permits and gasoline taxes.
618	Enviro Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		18	1	8) How will the interests of non-OHV users of the dunes be accommodated such that in the wide open dunes area their experience will not be adversely affected by the constant buzz of ORV engines and/or the smell of ORV exhaust?	A range of nonmotorized recreation experiences will be considered for the Sand Dunes and Lost Forest area through the range of OHV alternatives that are analyzed in detail.
619	Enviro Group	Environmental Protection	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		19	1	9) How will the immediately surrounding and uniquely important Fossil Lake and Lost Forest areas be adequately protected?	The current RMP (2003) provides protections to the Fossil Lake - Sand Dunes - Lost Forest ACEC/ISA/WSA complex. The RMP amendment will address an additional range of alternatives for OHV use, recreational use, and travel management in this area.
620	Enviro Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		20	4	These are the kinds of questions that must be adequately answered in any consideration of recreation development for ORV/OHV use in the Dunes, or in any other location within the North Lake Recreation Area Planning. We cannot see how it is possible to answer these kinds of questions satisfactorily without either bankrupting the OHV users or requiring the public to neglect the interests of the vast majority of low impact users while subsidizing the costly and ecologically destructive play of a privileged few- play that is sponsored by Honda, Kawasaki, and Suzuki and the OHV associations these corporations support in the U.S. for their economic self interest. Let Honda and the OHV users pay the full additional costs of their activities on public lands (as compared to low impact users)- ecological damage, injury liability, special area enforcement, etc. and see if they are still anxious to promote OHV development.	Much of this comment represents personal opinion and requires no response. However, responses are provided to the nine questions above.
621	Env. Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		21	4	Under the guise of multiple use, OHV recreational users are looking for a free ride -what we call a permit for "recreation mining" on public lands.	This comment represents personal opinion and no response is needed.
622	Enviro Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		22	4	Allowing general recreational OHV use on the semi-arid public lands of the West makes as much ecological sense for the soils and vegetation of the area as promoting jet ski contests up and down the rivers and streams of the area for the "benefit" of water quality and aquatic life. For those who promote recreational OHVs spread border to border across western public lands, imagine what could be offered next: tractor pulling tug of war in all the meadows and riparian areas.	This comment represents personal opinion and no response is needed.

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623	Enviro Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		23	4	Aren't the possibilities of the unrestrained application of the Multiple Use label WONDERFUL? Everybody is IN, regardless of the direct contradiction between the activities they propose and the primary obligation of the management agencies to meet their goal of managing public lands for ecological sustainability. But we can all take heart and ignore the fundamental problem if we just sponsor "Tread Lightly" shows and promote environmentally sensitive poster contests among the prospective rip and run youth. What counts is what is done, not what is said, and it takes a deaf and blind person to miss the ecological mess OHVs and their ilk make, not to mention essential conflicts with other users.	This comment represents personal opinion and no response is needed.
624	Env. Group	Opposed to OHVs	78	Klamath Direct T Burns	3/7/2005	Chiloquin	OR		24	4	So, ultimately the question to Lakeview BLM is whether it will have the courage to restrict the advance of the OHV onslaught on our public lands or elect to promote the OHV problem, succumb to the well funded OHV lobby, do the bidding of Honda, Kawasaki and Suzuki, and make ever larger ecological sacrifice zones out of our public lands. We expect that Lakeview management will recognize the fundamental underlying problem and select restriction rather than expansion for OHV recreational use in the North Lake SRMA.	This comment represents personal opinion and no response is needed.
625	Rec Group	Non-Responsive	79	T Harris	7/22/2003	Keno	OR		1	4	Having traversed much of this area recreationally over the years I am fairly familiar with the transportation system and its possibilities for motorized and non-motorized recreation.	This comment represents personal experience and no response is needed.
626	Rec Group	OHV Support	79	T Harris	7/22/2003	Keno	OR		2	1	Shortly after I retired, I spent over two years under contract to Lakeview BLM and Fremont National Forest recommending motorized trail systems for designation and some for closure. The information thus gathered is still on file and speaks for itself. I have duplicate copies, as well. These motorized trails are on numbered BLM roads for the most part and their utilization adds a necessary dispersal for motorized recreation. The much-sought value of solitude can be enjoyed in this expansive trail system which still enjoys the protection of the “Limited Use” category.	The motorized road and trail inventory that Mr. Harris completed under contract for the BLM identifies routes that are potentially suitable for various classes of OHVs. This inventory will be considered in developing a comprehensive CTMP that addresses both motorized and non-motorized uses.
627	Rec Group	OHV Support	79	T Harris	7/22/2003	Keno	OR		3	1	The “Open” category of land base which is necessary for concentrated use is found in the Christmas Valley Sand Dunes WSA located between a protected fossil area of international importance and the Lost Forest RNA, boasting Ponderosa Pine in minimal rainfall conditions. Many enthusiasts use 8,000 acres of sand dune formations, primarily on holiday weekends.	Most of this comment represents personal observation and no response is needed. However, the RMP amendment will consider a range of OHV alternatives for the Sand Dunes area.
628	Rec Group	OHV Support	79	T Harris	7/22/2003	Keno	OR		4	4	The sand dune complex soaks up intensive use like a sponge and the wind clears the tracks overnight. While the Christmas Valley Sand Dunes complex is in the WSA status, vehicles are allowed because of the “Open” category that existed there prior to FLPMA, October 1976.	Most of this comment represents personal opinion and no response is needed. However, it is important to point out that the Sand Dunes area remains open to OHV use for the present because the current Wilderness Interim Management Policy allows such use in sand dune areas. This has nothing to do with whether or not the area was open to such use prior to the passage of FLPMA.
629	Rec Group	Non-Responsive	79	T Harris	7/22/2003	Keno	OR		5	4	Some concerns and thoughts that rise to the surface are:	See responses below.
630	Rec Group	OHV Support	79	T Harris	7/22/2003	Keno	OR		6	4	1) Self-healing open areas for OHV are in short supply and motorized recreation needs that consideration for diversity and a viable alternative.	This comment represents personal opinion and no response is needed.
631	Rec Group	North Lake Special Recreation Area Planning	79	T Harris	7/22/2003	Keno	OR		7	1	2) The values sought for a sand dune wilderness were thought to qualify despite historic OHV use. The only threat to those visible values is in the periphery of the dunes, a substantial sum of which is in private ownership. The best way to protect, I feel, is in the existence of a presence, preferably in the form of an onsite host.	Much of this comment represents personal opinion and no response is required. However, an on-site host at the Sand Dunes could be considered, along with a discussion of continued recreational monitoring patrols provided by a seasonal employee, within the North Lake RAMP alternatives in Chapter 2 of the RMP amendment.
632	Rec Group	ACEC	79	T Harris	7/22/2003	Keno	OR		8	1	3) The Fossil Area, Lost Forest and the Sand Dunes, all under the blanket of an Area Critical Environmental Concern (ACEC), are prone to frequent vandalism largely due to remoteness of location and inadequacy of funding for some managerial presence.	Vandalism will be addressed in the recreation and North Lake RAMP portions of the RMP amendment, through the use of public education and more on-site BLM presence (both hosts and law enforcement) during high-use periods.

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633	Rec Group	OHV Support	79	T Harris	7/22/2003	Keno	OR		9	7	4) Recreation funding may well be available from Oregon State gas taxes and from Federal Recreational Trail Funds. These funds, available singly or one serving as a match for the other, could fund a host site, restrooms and showers for the area. Apart from OHV, these amenities would compliment and enhance visitation to the area. In order to qualify, the Sand Dunes area would have to have at least a ten-year availability for OHV planning. The WSA status is not conducive to OHV planning. It would be necessary to petition for a legislative change in that status.	BLM recognizes that the WSA and ISA designations in the Sand Dunes and Lost Forest areas limits opportunities for developed recreation facilities. Such facilities would be appropriate outside of the ACEC and WSA boundaries. However, removal of these areas from wilderness study or management under the Wilderness IMP requires Congressional action and is beyond the scope of the RMP amendment.
634	Rec Group	Environmental Law and Policy	79	T Harris	7/22/2003	Keno	OR		10	4	5) In this semi-remote area, resource protection can better be afforded by active management than by passive designation.	This comment represents personal opinion and no response is needed.
635	Rec Group	Multiple Use Support	79	T Harris	7/22/2003	Keno	OR		11	1	6) The possibilities of accommodation of both motorized and non-motorized values in an alternate time and space or seasonal use has yet to be explored.	A range of nonmotorized and motorized recreation experiences will be considered for the Sand Dunes and Lost Forest area through the design OHV alternatives that are analyzed in detail.
636	Rec Group	ACEC	79	T Harris	7/22/2003	Keno	OR		12	4	This commentary is more specific to the ACEC at Fossil Lake/Sand Dunes/Lost Forest Area, but I will be offering pertinent information on the rest of the North Lake Recreation Management Area.	No response needed.
637	Rec Group	Public Involvement	80	T Harris	3/28/2005	Keno	OR		1	4	Please accept this as preliminary comment on the (North Lake Special) Recreation Area Planning in question. Good showing of interested folk with most concerned about continued or increased road/trail accommodation for their interest area.	No response needed.
638	Rec Group	North Lake Special Recreation Area Planning	80	T Harris	3/28/2005	Keno	OR		2	1	One specific request for increased parking for horse trailers at the foot of the Black Hills was voiced. The answer indicated that increased use in the Black Hills would be improper. The query was not about the Black Hills, but about a convenient trail head to facilitate the trail use on the many roads surrounding the Black Hills. Pretty reasonable request, I thought.	Recreational activities within the Black Hills ACEC are currently limited to day use only, and several roads in the area were closed to motorized use by decisions in the Lakeview RMP (2003). These closed routes, as well as remaining open motorized routes, are currently open to hiking and equestrian use. The development of a parking area on the edge or just outside the ACEC boundary for horse trailers or hikers would be considered in at least one alternative in the North Lake RAMP and CTMP sections of the RMP amendment.
639	Rec Group	Travel Management Planning	80	T Harris	3/28/2005	Keno	OR		3	1	Good questions about the loss of signing and the need to know not only where they were, but whether they were on public or private. They are not even concerned about being on Forestry or BLM, really, they just want the rules to be the same. If a map product were developed that indicated acceptable use trails/roads (a designated trail) and possibly an indication of continuity from BLM to USF road/trail numbers, the user would be happy. Could be a great goal for the project!	Road signage needs will be addressed in the CTMP.
640	Rec Group	Non-Responsive	80	T Harris	3/28/2005	Keno	OR		4	7	The future of the Backscatter site may be worth pursuing. Should the site antennae and associated equipment, buildings, etc. be destined for removal, perhaps the wells, water systems, power and other attributes could be evaluated for future recreation use. The assumption here is, that the site will be freed from the withdrawal status.	The former Backscatter Radar site is now under the jurisdiction of the Government Services Administration and will not be addressed further in the RMP amendment.
641	Rec Group	North Lake Special Recreation Area Planning	80	T Harris	3/28/2005	Keno	OR		5	4	While it makes good sense to pursue the North Lake Recreation Plan, it does create a public perception dilemma. Admittedly, the area deserves planning consideration with its many destination sites and the inevitable increase in numbers. Even the designation of roads/trails is a product of sound planning and is generally accepted by the public.	No response needed.
642	Rec Group	Environmental Law and Policy	80	T Harris	3/28/2005	Keno	OR		6	1	I mistakenly looked to this (RAMP) planning effort as a model for the rest of the Lakeview Resource Planning Area. It appears to not be the case. The remainder of the resource area will retain the "open" designation it now suffers. A situation dilemma appears when the recreating public travels to the south of the Recreation Area Planning where the "open" designation exists. If they exit to the north, they will be in Forest Service where the "open" designation is rapidly disappearing and also, where the road/trail numbers change.	Since the time this letter was originally submitted, the BLM has decided to address the North Lake RAMP within the context of a broader plan amendment effort. A range of OHV area designations will be considered in the RMP amendment.
643	Rec Group	Environmental Law and Policy	80	T Harris	3/28/2005	Keno	OR		7	1	This (North Lake RAMP) may be a planning improvement but it is too selective. The public needs planning efforts that are bi-partisan and reflect common values, rules and signing. Otherwise the recreating public is left with unanswered questions of what, where and when.	While it does make sense to attempt to develop plans in a more coordinated fashion, the fact remains that such plans are funded and developed under different laws and regulations by different agencies with different priorities.

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644	Rec Group	Environmental Law and Policy	80	T Harris	3/28/2005	Keno	OR		8	1	It would seem that at a time when BLM and USFS are co-locating and could share values on a daily basis, we could settle on a more cohesive plan where the needs of the customer are recognized in a more universal fashion. That failing, we will be subjected to those knee-jerk decisions, which like most hasty decisions, inadequately cover the immediate problems and complicate long-range concerns.	While it does make sense to attempt to develop land use plans in a more coordinated or landscape fashion, regardless of jurisdiction, the fact remains that such plans are funded and developed under different laws and regulations by different agencies.
645	Rec Group	Environmental Law and Policy	80	T Harris	3/28/2005	Keno	OR		9	4	I might seem a bit critical here, but after 50 years of scrutiny, it seems we have a good plan for a small area but when viewed over the landscape, it is a Band-Aid approach for a broken bone.	This comment represents personal opinion and no response needed.
646	Rec Group	Public Involvement	80	T Harris	3/28/2005	Keno	OR		10	4	I think the open house approach to the public that has been broached is an excellent idea to secure as much comment on thoughts and comments relating to roads and trails as you can. I would hope you continue with that idea.	This comment represents personal observation and no response needed.
647	Rec Group	Non-Responsive	80	T Harris	3/28/2005	Keno	OR		11	4	Thanks for the opportunity to comment	No response needed.
648	Rec Group	ACEC	81	T Harris & D Leever	10/21/2005	Keno	OR		1	4	This proposed amendment applies to a parcel of land identified as portions of T26S R19E Sections 1, 2, 11, 12, and 24 and proposes a change in the eastern and northern boundary defining the OHV closure to the Fossil Lake ACEC.	No response needed.
649	Rec Group	ACEC	81	T Harris & D Leever	10/21/2005	Keno	OR		2	4	During the comment period for the Lakeview Resource Management Plan (RMP), on August 6, @ a tour with the South Eastern Oregon Resource Advisory Council (SEORAC) and key players from Bureau of Land Management (BLM) took place in the affected area to discuss recreational and archaeological concerns regarding the proposed use of a portion of the Fossil Lake ACEC. The RMP denoted a change in the established border between the area specified as an open designation for OHV use and the closed portion of the Fossil Lake ACEC for protection of archaeology sites. The purpose of the change was to delineate a new boundary easterly of the existing boundary to the section line between sections 1, 12, 13, and 24 of T26S R19E and sections 6, 7, 18, and 19 of T26R20E.	No response needed. However, it is important to clarify that the Fossil Lake closure was expanded to protect paleontological resources on or near the surface. Cultural resources are also known to exist in the area.
650	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		3	7	This boundary change would have denied the OHV community access to a series of dunes located in section 1 and 2 of T26S R19E which are contiguous to the main Christmas Valley dune complex and also denied access to an additional isolated dune complex located in a portion of sections 11 of T26S R19E, this being one of the more popular dune complexes in the Christmas Valley Dunes. The recreational community requested that the north end of the new boundary be modified to allow access to these dune complexes. The purpose of this request for the boundary change was to allow access to both the contiguous dunes to the north of the closure in sections 1 and 2 and the isolated dune complex in section 11 with minimal impact on the Fossil Lake archaeological sites. The isolated complex features steep climbs, several sand bowls and other attributes highly prized by the OHV recreational users. The understanding at that time was that the boundary would be modified to create a new northerly boundary south of the dunes in sections 1 and 2 and to provide a corridor from the dunes in section 1 and 2 to the isolated complex in section 11. A boundary would also be defined around the isolated complex in section 11. This would provide for access to both the northerly dunes area in sections 1 and 2 and the isolated complex in section 11 . See attached map and refer to the area defined as Area A.	BLM previously responded to this comment by separate letter in 2005 that clarified it intended to modify the closure boundary in sections 1 and 2 only, but would not further reduce the closure by moving it further west into Section 11. The modified boundary agreed to at this field meeting was the boundary shown in Map SMA-9A of the Lakeview RMP/ROD in 2003.
651	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		4	7	A subsequent change by BLM was made which allowed access to the contiguous series of dunes along the northerly border in sections 1 and 2, but still denied access to the dune complex located in a portion of section 11. Regrettably, the fact that the change did not address the problem of access to the isolated dune complex was not noticed until after the RMP was final and the new boundary was physically laid out on the ground.	BLM previously responded to this comment by separate letter in 2005 that clarified it intended to modify the closure boundary in sections 1 and 2 only, but would not further reduce the closure by moving it further west into Section 11. The modified boundary agreed to at this field meeting was the boundary shown in Map SMA-9A of the Lakeview RMP/ROD in 2003.

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652	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		5	4	The OHV recreation enthusiasts and BLM personnel met once again, on June 13th, 2005 to discuss the oversight and discuss possible solutions to the problem. Several options were discussed for providing an access to the complex from the northerly boundary of the closure which would require both ingress and egress to the dune complex by this 1 proposed route as was intended in the original agreement. An additional option was suggested by the OHV enthusiasts to also offer a narrow corridor to access the complex through section 12 from the southeast which would make it possible to have a continuous through route so one would not have to backtrack to leave the complex. This proposed route traversed several existing dunes and existing trails with minimal impact upon the sensitive deflation basins where the archaeology site are located. It was the agreed that by providing for alternate access to the southeast that this would most likely result in minimizing potential boundary violations since well defined access routes would be available from both ends of the complex.	No response needed. However, it is important to clarify that the Fossil Lake closure was expanded to protect paleontological resources on or near the surface. Cultural resources are also known to exist in the area.
653	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		6	7	On a later date August 27 and 28, 2005, Tom Harris and Dick Leever from the Four Runners 4WD Club, a member club of Pacific Northwest Four Wheel Drive Association (PNW), made an additional trip to outline the dune complex and delineate the proposed trails. The boundary of the complex and several proposed trails leading from the complex were delineated and are shown on the attached map, the RMP Proposed Amendment. As a result of that work the OHV community is requesting BLM to consider several proposed alternatives to allow use of the dunes complex area.	BLM previously responded to this request by separate letter in 2005 that it could not take on a new plan amendment effort at that time to address new OHV alternatives within the Fossil Lake closure. BLM reiterated its position at that time that the expanded closure was needed to protect paleontological resources on or near the surface. Re-opening the closed area would require substantial mitigation costs on an annual basis. BLM also noted that 87% of the total bare dunes areas within the Sand Dunes complex remain open to OHV use.
654	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		7	1	The proposed amendment is to provide access to the area in question with minimal impact to the existing archaeological sites leaving the majority of the deflation basins closed to OHV use. While we are sensitive to what sand dune movement may uncover in archaeological treasure, we are also aware that the incremental movement of the dunes may take a great many years. Meanwhile, we need environmentally sound alternatives for motorized recreation and the Christmas Valley Sand Dunes are one of few remaining places where this growing recreation can take place with minimal impact on the environment.	It is important to clarify that the Fossil Lake closure was expanded to protect paleontological resources on or near the surface. Cultural resources are also known to exist in the area.
655	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		8	7	If this proposal is accepted, Region 6 of the PNW4WDA is prepared to volunteer the labor for the installation and upkeep of the boundary fence. We need a more serious approach to mitigation than we have seen in the RMP. We see room for change here and stand ready to volunteer stewardship to its successful implementation as we have for the last 25 years.	BLM appreciates the offer for assistance in installing and maintaining the closure boundary fence. However, BLM previously responded by separate letter in 2005 that re-opening the closed area would require substantial mitigation costs on an annual basis.
656	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		9	4	Furthering one resource at the expense of another is not good management. It is better accomplished by providing for multiple use and we feel this proposal goes a long way toward reaching that goal.	This comment represents personal opinion and requires no response.
657	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		10	4	We have provided a workforce in the Christmas Valley area for many years in the dunes area, Black Hills, Duncan Reservoir, Crack-in-the-Ground, and Derrick Caves in concert with BLM staff.	BLM acknowledges and appreciates your past volunteer efforts in these areas.
658	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		11	3	In recent years, three of us have purchased nearly 100 contiguous acres adjacent to Lost Forest and the Sand Dunes. We didn't buy the property as a monetary investment although we could have doubled our money the first year, but rather to secure access and camping for, but not limited to, motorized recreation. We don't demand a fee for itinerate use, but ask those who utilize our property to treat it like their own and adhere to basic rules, i.e.; speed limits, no firewood cutting, no litter, etc. We have experienced a very positive and favorable trend in these regards.	No response needed.

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659	Rec Group	Travel Management	81	T Harris & D Leever	10/21/2005	Keno	OR		12	4	We have recently approached your recreation staff to help us to change traffic flow from camp(s) to dunes using part of our properties. The purpose is to focus traffic flows to acceptable avenues for dust, speed control, safety considerations and to reduce pioneering of pirated trails through the sagebrush to the dunes. The attendant plus values are to pull the associated traffic away from Lost Forest RNA and ISA and to regain camping area on our properties lost to a series of nuisance related high speed highways and, at the same time, create a buffer zone adjacent to the Lost Forest.	Due to the turn-over in recreation staff in recent years, current BLM staff are uncertain if this issue has been addressed on the ground.
660	Rec Group	Non-Responsive	81	T Harris & D Leever	10/21/2005	Keno	OR		13	4	We believe that we have demonstrated a stewardship and ownership that embraces both private and public lands and have actively pursued those values common to both entities. We do, therefore, believe that we can actively pursue a better and more complete protection of those values, not only in the Sand Dunes and Lost Forest, but in the Fossil Area as well.	No response needed.
661	Rec Group	North Lake Special Recreation Area Planning	81	T Harris & D Leever	10/21/2005	Keno	OR		14	4	Your present course is to draw a line in the sand and erect a sand fence that will defy maintenance and control. We have already seen those results. We need to pursue something that makes a little more sense to both sides and we are certainly willing to let monitoring sort it all out. We see ourselves as being involved in that process, as well.	No response needed.
662	Rec Group	OHV Support	81	T Harris & D Leever	10/21/2005	Keno	OR		15	1	Below are four alternatives we would like to have considered for an amendment to the existing RMP. 1) Preferred Alternative A: An area open to OHVs consisting of the area depicted on the attached drawing as Area A and Area B including access from the north which includes the dune complex in section 11 and the series of dunes located in section 12 southeast of the complex and trail B as access routes from the southeast to the proposed areas. 2) Alternative B: An area open to OHVs consisting of the area depicted on the attached drawing as Area A and Area B including access from the north which includes the dune complex in section 11 and the series of dunes located in section 12 southeast of the complex and the trail C as access routes from the east to the proposed areas. 3) Alternative C: An area open to OHVs consisting of the area depicted on the attached drawing as Area A including access from the north which includes the dune complex and the trails A-B in section 12 providing access from the southeast. 4) Alternative D: An area open to OHVs consisting of the area depicted on the attached drawing as Area A including access from the north which includes the dune complex and trails A-C providing access from the northeast.	These alternatives do not meet the Purpose and Need for the RMP Amendment, but will be addressed in Chapter 2.