

The Cline Buttes Recreation Area (CBRA) Plan received a large number of comments, all of which are important contributions from the public. While some of the comments were not substantive and relevant to the analysis of the proposed action, these comments often raised important questions that the BLM felt would be useful to answer. These include the following:

***Commenter's express the concern that BLM lacks the resources to implement the plan, and that none of the alternatives are viable. Commenter provides the opinion that the area should be closed to motorized use until resources are available to implement and enforce the plan.***

Clarification: The CBRA plan does not represent proposals that are unique or far outside the agencies capability to implement. Implementation of the CBRA plan will require additional land management resources and/or a shift in existing resources. The garnering of these resources, (both agency funds and external funds and partnerships) is more likely with the development of the CBRA plan. BLM will seek increased agency funding, grants and partnerships to implement the CBRA Plan and manage the recreation area.

Closing the entire 50 square mile CBRA is inconsistent with the current management direction in the Upper Deschutes Resource Management Plan (UDRMP). Trail implementation standards in Appendix 1 of the CBRA plan identify options that include temporary closures of areas while trail systems are constructed and non-designated routes are decommissioned. The CBRA plan also identifies a short term, motorized trail system (EA Map 17) that will be implemented and managed as proposed trails are developed, trailheads created, unauthorized access points are closed and non-designated routes are decommissioned. Enforcement is a major need for successful implementation. Enforcement is made more effective by having a designated and signed trail system, and by closing undesigned access points and routes. Enforcement, engineering and education will be used to inform visitors and alter historic use patterns that were not dependent on designated trails and often resulted in resource damage, trespass, and social conflicts between users.

***Commenter's stated that they did not support having gravel trucks travelling south on Barr Road through the CBRA.***

Clarification: Barr Road is a county road, and management of vehicle traffic on this county road is outside the authority of the BLM. The decision to authorize Site N is outside the scope of the CBRA plan and was analyzed under a separate National Environmental Policy Act (NEPA) document prepared by the Federal Highway Administration (FHWA). However, stipulations in the Letter of Consent from BLM to FHWA for use of Site N (and within the material source easement deed) preclude the use of Barr Road south of the Site N as a haul route (EA page 211).

***Commenter asked how BLM would prevent through travel on Barr Road.***

Clarification: Barr Road is a county road. The BLM has no authority to preclude motor vehicle travel by the public on Barr Road. The proposed action includes fencing and gates along both sides of Barr Road and directs recreational visitors to designated trailheads and trails located at the south and north ends of Barr Road, which would tend to decrease the use of the majority of Barr Road. The EA describes stipulations in effect for Site N authorization (EA page 211),

which preclude the use of Barr Road south of Site N as a haul route. These stipulations are included in the easement deed from the FHWA to the State of Oregon (Oregon Department of Transportation). BLM will work with FHWA if they observe non-compliance to the stipulations in the easement deed as outlined in the Letter of Consent.

***Commenter asked why the FAA withdrawal (on the middle butte) shown on Map 5 has increased in size beyond the fenced facility currently existing on the southern butte.***

Clarification: The existing Federal Aviation Administration (FAA) withdrawal is 123 acres, within which a smaller, fenced facility is located (EA page 83). The FAA withdrawal has not been increased in acreage by either the UDRMP or the Cline Buttes Plan.

***Commenter raised concerns regarding the need for coordination between BLM and the Oregon Division of State Lands (DSL) with regards to trail corridors and trailheads on DSL lands.***

Clarification: During the planning process, the BLM coordinated with DSL regarding trail access through this state owned parcel 55. The decision on where a designated trail route occurs on this parcel is outside of BLM's authority. Further consultation with DSL and the lessee (Thornburgh Resort) identified the existing road as the preferred route of the lessee. Additional coordination with DSL will occur during project implementation for authorization and maintenance commitments for final trail development. To BLM's knowledge, hiking access remains available on the remainder of the DSL parcel regardless of which CBRA alternative is selected; although not on trails designated or maintained by the BLM. All action alternatives include a new, replacement trailhead for non-motorized trail use south of the existing parking area on DSL lands (Parcel 37) at Fryrear Road. BLM will work with DSL to remove the existing parking area on DSL lands.

***Commenter asks why CBRA plan maps show gates proposed at the outer edges of State lands managed by Oregon Division of State Lands.***

Clarification: Gates are not proposed on DSL lands in any of the CBRA EA alternatives. The access located at the southwest corner of the northern parcel of the proposed Thornburgh Resort (T 15 S, R 12 E, SE corner of Section 19) is for managed access to the trail system from the Thornburgh property. The gate at the west edge of the Thornburgh property north of the large Central Electric Cooperative (CEC) power line (T 15 S, R 12 E, Section 17) also provides for managed access to the trail system. Neither of these gates, if installed, would block access to state owned lands.

***Commenter asked why gates were identified along the boundaries of Eagle Crest Resort and the proposed Thornburgh Resort.***

Clarification: Gates and access controls around the perimeter of Eagle Crest and the proposed Thornburgh Resort were identified in the action alternatives as these large developments are visitor attractions, contain a large density of residents, and may have publicly accessible areas

and trails. Field survey work during the CBRA plan showed that many Eagle Crest residents and visitors access adjacent BLM lands. Further, both Eagle Crest and Thornburgh property owners/managers requested that access be provided and identified. The identification of the location and type of trail access to BLM administered lands was a Deschutes County condition of approval for the proposed Thornburgh Resort. The approach used for the buttes was similar to the collaboration BLM used for trail access from subdivisions in other portions of the CBRA (EA Page 32). In the case of destination resorts, BLM agrees that these proposed gates/access points should be paid for by the private property owners.

***Commenter expresses the opinion that non-motorized, pedestrian trails common to all alternatives shorts this particular user group.***

Clarification: The CBRA EA considered a reasonable range of alternatives for all user groups, including non-motorized pedestrian trails. The proposed action provides for 14 miles of pedestrian only trails, and a total of 141 miles of designated trail available to pedestrians that are closed to motor vehicle use (EA Page 38). This includes 46 miles of trail shared solely between pedestrians and equestrians. Alternative 4 provides for 26 miles of pedestrian only trails (EA Page 44) and an even larger amount of trails shared between pedestrian and equestrians (80 miles). In addition, for all of the action alternatives the pedestrian use would not be limited to designated trails, but can occur cross-country as well. Given the high mileage of trails available for pedestrian use in all of the action alternatives, this user group would have a multitude of opportunities throughout the CBRA under the action alternatives.

***Commenter's identified the need to make the proposed Fryrear Trailhead larger than the existing trailhead and functional for horse trailers.***

Clarification: The proposed action would include a trailhead at Fryrear Road that would be designed and constructed specifically to accommodate a greater number of horse trailers and greater ease of use (EA page 27).

***Commenter's requested that overnight use by equestrians be allowed at the Tumalo Canal Trailhead.***

Clarification: The proposed action would provide for overnight use at the Tumalo Canal Trailhead (EA Pages 36 - 37).

***Commenter expressed opinion that Alternative 2 would provide relatively few designated trails in a portion of the Maston area and thus protect unique vegetation.***

Clarification: BLM agrees with this comment. Due to the Maston area's designation as "Primary Wildlife Emphasis" in the UDRMP, the BLM sought to keep trail densities to a low level in all of the action alternatives. The creation of designated trailheads, clearly signed and maintained trails, and access controls would help to minimize impacts to the Maston area.

***Commenter expressed desire for a particular type of trail layout on the relic canals in the southern portion of the CBRA, with horses using the bottom of the canal feature and***

***mountain bikes and hikers on the side berms.***

Clarification: BLM agrees that equestrian use should not occur on the berm of the relic canals. However, for all action alternatives, equestrian trails will not be placed at the bottom of relic canal features with mountain bike/pedestrian trails on the berm directly adjacent and above the equestrian trail (EA page 243). In these cases, equestrian trails will be located offset from the entire canal to decrease user conflicts and safety.

***Commenter expressed the opinion that the shared use, non-motorized trails in the southern portion of the CBRA should be shared among both motorized and non-motorized use.***

Clarification: The shared use trail shown in the southwestern portion of the CBRA (Map 6, Alternative 2) would be shared use non-motorized trails, open to equestrians, bicyclists and pedestrians. The CBRA plan provides a range of alternatives that provide for Off-Highway Vehicle (OHV) use in the center and north portions of the recreation area, which is consistent with the UDRMP (UDRMP, Page 116).

***Commenter expressed concern regarding the amount of trash dumping occurring on the buttes.***

Clarification: Dumping is an illegal activity that occurs in a variety of locations on BLM administered lands in Central Oregon. Easy road access due to the 25 miles of public road and many miles of improved and maintained ROW roads increase this problem in the CBRA. For the buttes area, the provision of a designated trailhead and gating or closing other undesignated access points for all action alternatives will reduce dumping in the area.

***The commenter is a hiker and horseback rider and wondered if non-motorized use causes a problem for wildlife. The commenter noted that Fryrear Canyon and Deep Canyon would be closed to all human travel for 7 months (February through August) to protect nesting raptors.***

Clarification: Non-motorized human travel does have the potential to cause harm to nesting and foraging raptors. Golden eagles and prairie falcons are the main raptors of concern and are sensitive to human activity. When people approach nesting raptors, the birds most often fly off of their nests leaving their young and eggs vulnerable to predation and to chilling during inclement weather. Raptors also can be scared away from a favorite perch they use for foraging and resting. As the human population continues to grow and people create more recreational trail systems in raptor habitats we need to be thoughtful on where we locate these trails and how many trails are created so as not to continually impact nest sites and fragment their habitats.

***Commenter states that motorized use has driven out non-motorized uses, and asks how the BLM will restore the recreation experience for non-motorized uses.***

Clarification: All action alternatives provide designated trails for non-motorized uses, establishment of access controls and trailheads, and clearly marked/signed trails. The CBRA plan identifies non-motorized use trails in the Maston area, Buttes, Tumalo Canal Area of

Critical Environmental Concern (ACEC), Deschutes River Canyon and the plateau between Deep Canyon and McKenzie Canyon. In most of these areas a non-motorized recreation experience currently exists or can be provided with a moderate amount of management.

***Commenter expressed a desire to have an area designated specifically for the interpretation of native plants and wildlife.***

Clarification: The UDRMP specifically designated the Tumalo Canal ACEC for interpretive use. Interpretation in this area could include local native plants and wildlife species. Since the UDRMP specified that the trail emphasis in this area is for pedestrian trails, the use of this area for natural resource interpretive use is a particularly good fit. The designation of interpretive areas is outside the scope of the Cline Buttes Plan. However, interpretation in others areas could also be done, through a variety of means and using a variety of partnerships. Trailhead proposals and trail sign guidelines in the plan propose the use of interpretive signs (EA Page 245 – 249).

***Commenter questioned why OHV's are required to stay on designated routes while non-motorized uses can go cross-country.***

Clarification: Travel management direction in the UDRMP (2005) specifies that OHV, mountain bike, and equestrian uses will be managed with designated trails. Therefore, under all action alternatives, OHVs, mountain bikes, and equestrian uses would be limited to designated trails. Pedestrians can travel cross country, although there would be several areas where pedestrian use is seasonally restricted to designated trails (no cross country travel) to minimize impacts to wildlife.

***Commenter expressed knowledge that many trails in the proposed action are shared between mountain bike and equestrian use, and the opinion that they would work hard to resolve any issues that may arise.***

Clarification: Alternative 2 was developed to allow for greater amounts of shared use trails between equestrians, pedestrians and mountain bikers. Alternative 2 would provide this type of trail in the southern and western portions of the planning area, in areas where steepness of slope and high numbers of users may not be as great a factor as trails on the buttes or Maston areas. With implementation of the CBRA plan, the development of active partnerships with trail user groups would help foster communication and minimize conflicts.

***Commenter recommends that BLM rehabilitate undesired routes at the same time that new routes are designated.***

Clarification: In general, BLM agrees with this comment. Appendix 1 (Trail Objectives and Standards, Pages 250 and 251) provides direction for route decommissioning in balance with trail construction in areas of Primary and Secondary Wildlife emphasis, which includes the Maston area and many of the Canyons. This direction applies to all action alternatives. The EA also identifies (EA Pages 250-251) that in areas where the majority of the trail system is based on new construction and a high percentage of existing routes will be decommissioned, short-term

area closures may occur while the trail system is being implemented.

***Commenter states an opinion that there should be no cross-country travel allowed by anyone, including pedestrians.***

Clarification: OHVs, mountain bicyclists, and equestrians are all required to stay on designated trails in the CBRA. The requirement that OHV, mountain bike and equestrian use be managed with designated trails was made in the UDRMP (2005). Pedestrians can travel cross country, although there are several areas where pedestrian use is seasonally restricted to designated trails (no cross country travel) to minimize impacts to wildlife.

***Commenter provides the opinion that ROWs for utilities should be incorporated into OHV trails.***

Clarification: BLM agrees with this concept and all alternatives use utility ROW corridors as part of the trail system for both motorized and non-motorized use trails.

***Commenter expresses the opinion that they should be able to ride trails adjacent to their property for the type of use they prefer.***

Clarification: The UDRMP FEIS directed that motorized, mechanized and equestrian use be managed on a designated trail system. The CBRA plan provides for a variety of trail types for different users. The EA analyzed the effects of access designations (EA Page 162), and noted that access is available to the trail system for all adjacent landowners through pedestrian use. Access to the 50 square mile trail system for other uses is available at many major trailheads dispersed throughout the recreation area and smaller subdivision level access points (EA Page 32). However, given the management direction in the UDRMP to have designated trails (for OHVs, mountain bikes, and equestrians) and to reduce user conflicts, it is unreasonable to expect every property owner can have their individual trail access of the specific type preferred.

***Commenter raises the issue that the EA lacks an adequate description of the lack of enforcement and monitoring for transportation and recreation uses in the area.***

Clarification: The level of current monitoring and enforcement is not a substantive issue with regards to the proposed alternatives. All alternatives provide for conditions within which monitoring and enforcement may successfully occur, by using enforcement in combination with engineering and education to alter existing use patterns and behaviors. Much of the monitoring and education efforts to implement a recreation area plan occur as a result of specific trail and trailhead designations and increased partnerships with user groups.

***Commenter provides the opinion that while BLM addresses effects to deer and elk winter range in the EA, it seems inconsistent to provide trails for winter recreation use in the area if it is important deer and elk winter range.***

Clarification: Under the National Environmental Policy Act (NEPA) the BLM must disclose impacts to the environment that are of concern. During scoping there were concerns about negative impacts to wildlife including deer and elk. Because the planning area contains deer and elk winter range, an analysis of the effects should be described. Even though there is a concern about impacts to wildlife habitats the BLM can make decisions that negatively affect that resource. The NEPA only directs the agency to assess the effects and consider it in the decision process. The EA was developed under the direction of the UDRMP which was assessed with other alternatives under an Environmental Impact Statement. The UDRMP made decisions on where the BLM would place emphasis on one resource over another. As a result, some areas with winter range are allocated a primary wildlife emphasis while others were not. This is part of balancing human interests in the context of multiple-use.