Decision Record
Oregon Badlands Wilderness Management Plan Environmental Assessment

NEPA Register # DOI-BLM-OR-P060-2011-0030-EA
U.S. Department of the Interior, Bureau of Land Management
Prineville District
3050 NE Third Street
Prineville, OR 97754

Background

The Bureau of Land Management (BLM) prepared an Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed Oregon Badlands Wilderness Management Plan and EA: NEPA Register # DOI-BLM-OR-P060-2011-0030-EA.

BLM policy requires that a wilderness plan be completed for each designated wilderness. The plan provides guidance for preserving and enhancing wilderness values, while offering opportunities for solitude and primitive recreation, and managing other land uses and activities.

The EA analyzed four alternatives that addressed issues such as: the location and design of trailheads, the number and placement of trails, equestrian and hiking use off designated trails and other management actions. The EA also established limitations or requirements for types of uses such as dogs and commercial stock animals.

Actions included in this Decision Record were analyzed in the EA, available at: http://www.blm.gov/or/districts/prineville/plans/index.php. An updated map of the Oregon Badlands Wilderness (OBW) Management Plan, access trail system and trailheads is now available on this website.

Public, tribal and other involvement

On March 12, 2012 BLM held a public meeting in Bend, Oregon, to share information about the proposed Wilderness Management Plan and EA and request public scoping comments.

The BLM mailed a scoping letter presenting the proposed action to individuals, groups, local and state governments and Indian tribes. During this scoping period, BLM received 50 comment letters.

The BLM again requested public comments in September, 2013, on the Draft Oregon Badlands Wilderness Management Plan and EA. The availability of the EA was advertised in the Central Oregonian newspaper. Over 100 notification letters to those on the original scoping list and also to others who expressed interest since scoping. During the public review period for the EA, the BLM received 29 comment letters, e-mails, or phone calls. These comments and the BLM's response are available for review at the Prineville District and are posted on the BLM website.

Based on these comments, the BLM made the following minor changes to the EA to clarify intent:

- Changed the table reference from Table 1, to Table 2, on page 40 of the EA, and updated this table to correct minor errors or omissions.
- Added "SEC.1704 LAND EXCHANGES" on page 92 of the EA, following the end of Sec. 1703(b) (2) regarding releases.
- Omitted Appendix B (page 95). The diagram showing wire spacing of 4-strand fence was not correct. The correct fence spacing is on page 39 of the OBW Management Plan. These changes do not alter the alternatives or the conclusions of the analysis; therefore the BLM did not re-circulate the EA for public review, although we did re-post the revised EA to our public website.

Proposed or selected alternative

Based on the analysis documented in the EA and FONSI, it is my decision to implement Alternative 2, Proposed Action with some elements from Alternative 3 and 4, because this combination best meets the purpose and need of the project. Mileages in this document are approximate.

Travel, Transportation and Access

Trails (Combination of Alternatives 2 and 3)

Over 53 miles of designated trail will result from retaining 43 miles of old two track routes, converting 6.7 miles of roads to trails, re-routing 1.8 miles of trail and constructing 2.1 miles of new trail. Specific locations and actions are listed below.

- Trail Re-routes: A 0.9 mile portion of the Dry River trail beginning at the Dry River Trailhead will be re-routed away from the Right-of-Way (ROW) road and 0.9 miles of Larry Chitwood Trail will be rerouted away from private land.
- BLM will work with private landowners for trail access through private lands on the southern portion of the Dry River Trail. If these efforts are not successful, a short trail reroute around private lands will be constructed. This reroute would be approximately 1.0 mile long, north of two adjacent private lands, using former vehicle routes as much as possible to connect the Dry River and Badlands Rock trail segments together.
- Interior trail re-routes totaling 1.5 miles will move the Dry River and Larry Chitwood trails away from private lands.
- Vehicle Barriers: In the event that the Central Oregon Irrigation District (COID) canal is piped, a barrier will be constructed to prevent motor vehicle trespass.
- New Trails: Approximately 1.9 miles of new single-track connector trail will be constructed between the Larry Chitwood and the north end of Flatiron Rock Trails. A new trail segment will also be constructed approximately 0.25 miles long; connecting existing two track routes to form the Nighthawk Trail loop around Reynolds Pond. (Map 8).
- Roads to Trails: Four former vehicle routes totaling 6.7 miles will be converted to designated non-motorized trails, connecting Larry Chitwood, Flatiron Rock, Tumulus, and Black Lava trails. Approximately 3.6 miles of two track routes will be converted to trails outside of the OBW. Approximately 2 miles of trail outside

of the OBW will be constructed or converted from existing two-track routes to connect Reynolds Pond with the Tumulus Trailhead (EA Map 6).

- Trail Removal and Restoration: BLM will rehabilitate up to 62 miles of old two track routes not part of the designated trail system that are dead-ended, and old duplicate two track routes within close proximity of each other through active or passive actions (as described in Alternative 2). Seven former two track routes totaling 7.9 miles outside the OBW will be closed. Sand and High Desert trails (5.3 miles) will be removed from the trail system map but will remain available for livestock water haul use. A segment of the Dry River Trail totaling one mile and short segments of duplicate trail will be removed from the designated trail system. Any references to these former trail segments will be removed from BLM visitor maps, literature and website.
- Footpaths: Foot-worn hiking paths will continue to be available for use. Creation of new foot-worn paths will be discouraged. Foot-worn paths will not be maintained and will not be displayed on maps.

Trailheads (TH): (Combination of actions from Alternatives 2 and 3)

- Larry Chitwood TH will be moved away from private property, southwest of its present location near Obernolte Road. It will encompass approximately three acres of public land. Parking will be constructed for 10 sedan-sized vehicles and six stock trailers, as well as a turn-around space.
- Flatiron Rock and Badlands Rock TH will retain existing vehicle capacities and footprints.
- Dry River TH will be modified to accommodate five sedan-sized vehicles and two trailer parking spaces. A turn around will also be provided.
- The Reynolds Pond TH footprint will be defined with parking for up to 20 vehicles and up to six stock trailers.

- All THs would be hardened and compacted with gravel, but not paved. No changes will occur to the Badlands Rock TH.
- Camping will be allowed only at Reynolds Pond TH.
- Length of stay will not exceed 14 consecutive days.
- One Americans with Disabilities Act accessible paved parking space will be provided at the Reynolds Pond and the Larry Chitwood THs.
- Tumulus TH will be moved 0.8 miles away from the OBW to an existing access point on Dodds Road at milepost six and will be developed with parking for six vehicles.
- Stock trailers will be allowed at all trailheads except Flatiron Rock and Tumulus.
- The High Desert TH along the eastern boundary and the unnamed TH south of the Badlands Rock TH will not be developed.

Special Recreation Permits (Combination of Alternatives 2 and 3)

- Special Recreation Permits (SRPs) will be authorized only for wilderness-dependent activities and educational studies. Adaptive activities for those with physical limitations may also be considered.
- SRP permittees and their employees or agents who conduct permitted activities are required to have at least one person certified as a Leave-No-Trace Trainer by the National Outdoor Leadership School to instruct clients on specific wilderness ethics and low impact techniques.
- All groups working with BLM must stay below the group size threshold of 12 or less unless issued an SRP for a group up to 20. If any group uses an activity for financial gain it would be considered commercial use and would require a SRP. The BLM will determine if a SRP is needed for groups less than 12, based on the proposed activity, season of use and potential impacts.
- Parking for SRP holders may be limited at trailheads to reduce crowding.

Signs

The BLM may install signs or kiosks at access points for resource protection, trail and interpretive information, or visitor safety as needed. Wooden directional signs will be installed at key interior trail junctions. Metal or wood signs will be used to define the boundary. To discourage damage to restoration sites, small signs will be installed on a case-by-case basis for short-term periods and will be removed upon successful restoration. This action was considered in Alternatives 1, 2 and 3.

Campfires

Campfires are allowed, using dead and down woody debris. Visitors are encouraged to use camp stoves. (Combination of Alternatives 1, 2, and 3).

Use of Stock Animals

- Commercial and organized group stock users will be limited to the designated trail system. All other stock users can travel cross-country, but are encouraged to use the designated trail system (Combination of Alternatives 2 and 3).

Dogs

People are required to keep their dogs leashed at THs and within 500 feet of these locations. Owners will be required to remove dog waste within 10 feet of trails, at THs and in parking areas (Actions from Alternative 2).

Rock Climbing

Technical rock climbing (climbing with the use of rope to ascend or descend rock) is allowed with the following guidelines (Actions from Alternatives 2, 3 and 4):

- No new fixed anchor routes will be established.
- Existing fixed anchor routes will be removed as discovered.
- Placement of temporary anchors (those left less than 24 hours) will be permitted and must not cause undue damage to the rock.
- Rock alterations by chipping, chiseling, sculpting, drilling, defacing, dry tooling, trundling, or gluing/epoxying of holds (hand and foot) will not be permitted.

- Brushing away or removing vegetation of any type to clear a climbing route is prohibited.
- Only water-soluble white chalk or chalk that matches the basalt rock color will be used for technical rock climbing, as colored chalk can permanently stain rock.
- Caching of climbing gear will not be allowed over 24 hours.

Livestock Grazing (Actions from Alternatives 2, 3, and 4).

- Approximately 3.1 miles of existing interior fence will be relocated to the southeast, western, and northwestern boundaries of the OBW, resulting in Rambo North and South pastures being converted to Rambo East and West. Rambo East will be located entirely within the OBW. Rambo West will be located entirely outside to minimize fence lines within the OBW and to establish a boundary line.
- Approximately 6.1 miles of fence will be constructed along the eastern boundary of the OBW.
- Fences will be replaced or repaired or (if not needed) removed.
- Standard solid color t-posts or wood posts will be used for the OBW boundary fence. Interior fence will be wood posts whenever possible or solid color metal t-posts in rocky locations.

Wildlife

The Hobbywood guzzler in the southeast portion will be moved to a location outside of the OBW. Guzzler remnants off the Flatiron Rock Trail will be removed. No colored vinyl fence markers will be placed on the top wire of new or rebuilt interior fences (Actions from Alternative 2).

Cultural Resources

Cultural resource historic refuse dump sites at or near trailheads and in the interior will be inventoried and evaluated for their National Register eligibility. If these sites are determined ineligible they will be removed along with other refuse less than 50 years old. (Actions from Alternative 2).

Designated trails are designed to direct visitors away from cultural resource sites. Camouflaging trails with vegetation and wood debris in and around significant archaeological sites will enhance protection and preservation. Continued stewardship and coordination with local heritage groups will also help monitor impacts to cultural resources through time.

Fire Management

All wildfires, natural or human caused will have a management response. All human caused fires will be suppressed. Some naturally ignited wildfires may be allowed to continue burning to meet wilderness and resource management objectives, if there is no threat to human life or property (Actions from Alternative 2 and 3).

Compliance

The proposed action is consistent with the Upper Deschutes Resource Management Plan/Record of Decision (2005), existing BLM manuals, existing decisions, and the Wilderness Act. A number of uses and actions will continue in the area, regardless of the alternative selected. These actions are listed in Attachment 1.

The Upper Deschutes Record of Decision is available at the Prineville District public website:
http://www.blm.gov/or/districts/prineville/plans/prinevillermp.php.

Rationale for the Decision

I selected a combination of actions to preserve wilderness characteristics: untrammeled quality, outstanding opportunities for solitude or primitive, unconfined recreation, and undeveloped and primeval character and naturalness.

Another consideration was how well the actions improve the recreational experience: minimize social conflict and rehabilitate old two track routes or trails not part of the designated trail system.

Costs for implementation and maintenance for trailhead improvements, development were considered, along with the potential for the actions to be

successful. Public input in letters, e-mails, and comments were also considered.

My decision to start implementation by conducting cultural clearances for debris sites is to help preserve long-term wilderness character. Naturalness of the OBW will be improved by constructing and designating new trails that connect existing trail loops and converting two-track routes to single track trails. These actions will increase potential opportunities for solitude by dispersing visitors. Primitive recreation opportunities will also be increased by providing better trail connectivity from trailheads and connecting existing trail loops.

Based on the analysis of potential impacts contained in the EA, I have determined in the FONSI that the project will not have a significant impact on the human environment within the meaning of Section 102(2) (c) of the National Environmental Policy Act of 1969 (FONSI pages 1-4). Thus, an EA is the appropriate level of analysis, and an Environmental Impact Statement will not be prepared.

Appeal Opportunities

This decision constitutes my final decision. Any person adversely affected by this decision may appeal to the U.S. Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals (Board) in accordance with the regulations contained in 43 CFR, Part 4 and Form 1842-1 (form available at BLM address on front page of this document). If you file an appeal, your notice of appeal must be filed at 3050 N.E. Third Street, Prineville, OR 97754 within 30 days from receipt of this decision.

Only signed hard copies of a notice of appeal will be accepted; faxed or emailed appeals will not be considered. The appellant has the burden of showing that the decision appealed from is in error. Any request for stay of this decision in accordance with 43 CFR 4.21 must be filed with your appeal. If your notice of appeal does not include a statement of reasons, one must be filed with the Board within thirty (30) days after the notice of appeal was filed.

A copy of your notice of appeal and any statement of reasons, written arguments, or briefs, must also be served upon the Regional Solicitor, Pacific Northwest Region, U.S. Department of the Interior, 805 SW Broadway, Suite 600, Portland, Oregon 97232. Service must be accomplished within fifteen (15) days after filing in order to be in compliance with appeal regulations.

A petition for stay of a decision pending appeal shall show sufficient justification based on the following standards: (1) The relative harm to the parties if the stay is granted or denied; (2) The likelihood of the appellant's success on the merits; (3) The likelihood of immediate and irreparable harm if the stay is not granted; and (4) Whether the public interest favors granting the stay.

Molly Brown 2/6/14

Molly Brown Date
Field Manager, Deschutes Resource Area

Attachment 1
Management direction relevant to the OBW

Upper Deschutes Record of Decision and Resource Management Plan (2005):

- Maximum 20 people per organized group (both commercial and non-commercial) (p. 109)
- Group use authorizations may be required for all organized group activities involving 12 or more participants, and may also be required for organized groups involving less than 12 participants depending upon factors including but not limited to: proposed activity, season of use, and potential impacts. SRPs are required for organized groups of 12 or more individuals (maximum group size is 20) (p. 109).
- All Special Recreation Permits (SRPs) are issued by BLM to authorize specific uses or activities on public lands, with specific conditions, stipulations and time periods for their authorized use.
- Permits may be issued for commercial, non-commercial and organized use. SRPs are also considered on a case-by-case basis.
- An SRP may be required for organized groups not on an inventoried route. Management of organized group use would emphasize the use of designated trails (p. 109).
- SRPs involving commercial stock use such as horses, llamas, or goats would be limited to the designated trail system (p. 109).
- Firearm discharge is not allowed unless legally hunting (p. 72). Within ¼ mile of Badlands Rock, there is a seasonal closure to all firearm discharge (p. 72).
- Target shooting and the use of paintball guns are not allowed (p. 72).
- Rockhounding and collection of decorative stone are not allowed. (p. 71).
- Recent guidance from the BLM's Washington Office prohibits physical items associated with spatial games such as geocaches within designated wilderness. A physical geocache is any physical installation left behind by the person who installs it for the purpose of geocaching. Leaving items in wilderness violates Section 4(c) of the Wilderness Act

of 1964. Placement of physical items such as long-term camping equipment, physical geocaches and letterboxes is not allowed.

- Wildfire management is to provide an appropriate management response on all wildland fires, with emphasis on firefighter and public safety. When assigning priorities, decisions will be based on relative values to be protected commensurate with fire management costs (p. 63). Appropriate responses would be developed following the initial report for wildland fires in the planning area and include a range of specific actions, including monitoring, confinement, initial attack and suppression/extinguishment, or wildfire management with multiple objectives.
- Fuels objectives will be consistent with special management objectives for specific areas (p. 64). Additional guidance will be from the Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy (2009) and the Central Oregon Fire Management Service Fire Management Plan (2012).

BLM Manual Direction:

- The sale or barter of any trapped animal or their fur or other derivative product is prohibited (Manual 6340, 1-63).
- Game carriers and wheeled transports, including bicycles, are prohibited (Manual 6340, 1-14).
- Hang-gliding and Para-sailing/gliding are not allowed (Manual 6340, 1-14).
- Livestock grazing will continue where it has been authorized by a grazing permit or grazing lease for land within a wilderness, and the use was established before Congress established the wilderness area, under Section 4(d)(4)(2) of the Act (Manual 6340, 1-27-28., 8. Grazing).
- Relict, unused, non-historic, livestock grazing improvements such as fences, feeders, troughs, and stock tanks would be removed upon discovery (Manual 6340, 1-40).
- Any fence construction or reconstruction will use BLM wildlife friendly fence standards to enable wildlife movement; all fences will be 4-wire and have smooth wire on the top and bottom. The bottom wire will be

16 inches from the ground. The next two wires will be barbed and have 6 inch gaps. The top wire will be 12 inches above the 3rd wire. The total fence will be 40 inches high.

- Use of wildland fire Minimum Impact Suppression Tactics guidelines is followed (Manual 6340, 1-25).
- SRPs would not be issued for competitive use events or vending (commercial enterprise) (Manual 6340, Section 1.6(C) (13) ((d) (3) and BLM Wilderness Management Regulations at 43 CFR 6302.20(a) and (I)).
- Commercial stock users are required to feed stock animals certified weed-free feed 24 hours prior to entering wilderness; required to use only pelletized or stock certified weed-free hay and feed while on public lands (BLM IM OR-2011-019; Federal Register, Volume 75, Number 159, August 18, 2010). Recreational stock users are also required to use only pelletized or stock certified weed free hay and feed.
- According to BLM Special Recreation Permit Regulations in Manual 6340, Section 1.6(c)(4), commercial enterprises are prohibited in wilderness areas, except for valid existing rights and as otherwise provided for in Section 4(d) of the Wilderness Act. Section 4(d)(6) allows those commercial services necessary for activities that are proper for realizing the recreational or other wilderness purposes of the areas. For example, an overnight pack trip to a distant valley to experience wilderness solitude may be dependent on a wilderness setting and therefore would likely satisfy the statutory requirement that the service is proper for realizing the wilderness purposes of the area.
- SRPs may be denied based on potential impacts to wilderness resources; wilderness character; a prohibited activity in wilderness; public health and safety; the applicant's past performance; non-wilderness-dependent activity, or the inability of the managing office to manage or monitor the proposed use. (SRP Handbook H-2930-1, p. 16).
- In response to excessive resource damage, the number of SRPs authorized for outfitter-guides may be reduced or may not be issued. (SRP Handbook H-2930-1, p. 16).

- Signs identifying the OBW boundary are installed. Wilderness access points may have signs and/or kiosks for resource protection, trail and interpretive information, as needed (Manual 6340).
- Trails within the OBW are maintained in accordance with policies and standards found in BLM Manual 9114 (Trails), National Wilderness Policy, and Manual 6340 (Management of Designated Wilderness Areas).
- Dispersed "Leave-No-Trace" travel is allowed across the OBW. (Manual 6340,1-42)
- Campfire rings are removed upon discovery (Manual 6340, 1-22).
- Hunting and trapping, compatible with wilderness management (i.e. without use of motorized vehicles or mechanical transport), are managed by the Oregon Department of Fish and Wildlife. (Title 43 Code of Federal Regulations, Part 24-Department of the Interior Fish and Wildlife Policy: State-Federal Relationship).

The Omnibus Public Land Management Act of 2009 excluded 5.9 miles of the Dry River trail from the OBW. This 5.9 mile, 25-foot wide corridor is to be managed as potential wilderness, until an authorized non-conforming use (specifically authorized to a named individual for dog sled training under Public Law 111-11, Title 1, Subtitle I) of the trail ceases.

When the use ceases, BLM will issue a Federal Register notice and the corridor will be designated as wilderness and incorporated into the OBW.

Oregon Badlands Wilderness Management Plan: Access, Trail System, and Trailheads

Legend

- Trail
- Designated Motorized Road
- Administrative Use Road
- Highway
- Major Roads
- Minor Roads
- Trailhead
- Oregon Badlands Wilderness

Administered Lands

- Bureau of Land Management
- State of Oregon
- Private

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Miles

February 2014

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

PRINEVILLE DISTRICT

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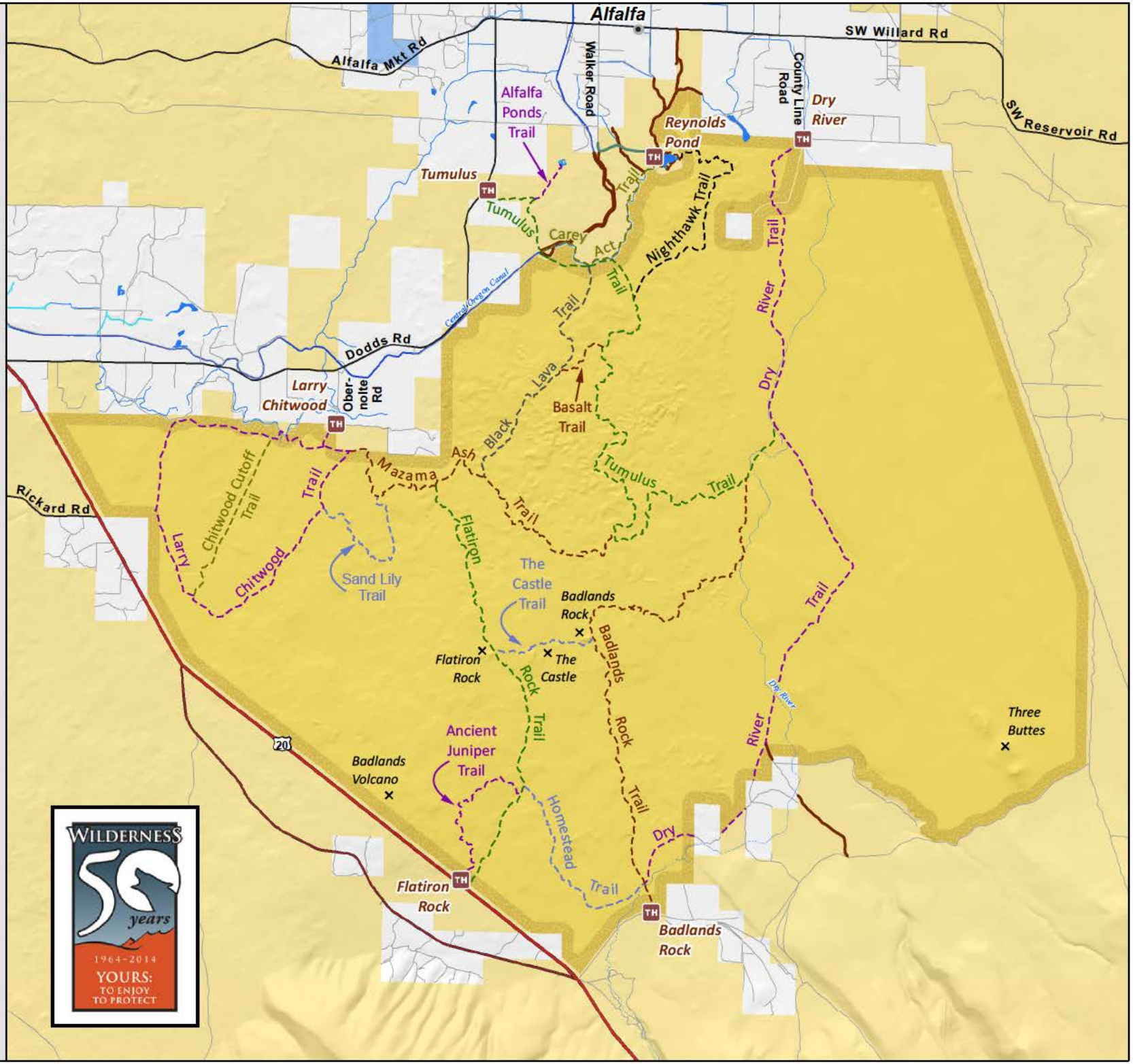

Comments Received on the Oregon Badlands Wilderness Management Plan Environmental Assessment
January 31, 2014

The Prineville District, BLM received 29 comment letters during the 30 day public comment period that ended September 30, 2013. Most of the comments (19) came via email. Comments are sorted according to issue or resource categories (access, trails and routes, wilderness experience, wildlife, parking, etc.). Where there are several similar comments, they have been grouped under one summary statement, followed by a BLM response and sample individual comment quotes. When there were repetitive statements or questions , only one representative quote per topic was extracted and answered.

Brackets [like this] contain words that have been added to clarify the comment. Dots . . . indicate words have been left out for brevity. The BLM responses focus on comments that suggest: A) new alternatives or portions of alternatives that would meet the purpose and need described in Chapter 1 of the EA; B) information that was not considered in the analysis; C) faulty effects analysis; D) failure to follow law, regulation or policy; or E) corrections and clarifications. Comments often included a vote for a specific alternative or were generic in nature and did not apply to this project; these comments are noted but not responded to unless they also make one or more of the suggestions described above.

Alternative Development

The BLM should not include Alternative 1 (the No Action Alternative) because it doesn't meet the Wilderness Policy to protect Wilderness.

BLM Response:
The three action alternatives would provide a higher level of protection to wilderness values than the No-Action Alternative. However, the BLM National Environmental Policy Act Handbook (H-1790-1) directs that BLM when writing Environmental Assessments to have a No Action alternative because it "…provides a useful baseline for comparison of environmental effects (including cumulative effects) and demonstrates the consequences of not meeting the need for action…" section 6.6.2, page 51.

Sample comments:
"The No Action Alternative doesn't meet the Wilderness Policy to protect Wilderness."

BLM should develop a plan (alternative) that limits development and promotes long term beneficial effects to wilderness to ensure the OBW will be available for generations.

BLM Response:
The EA does have an alternative that limits development. The Proposed Action preserves wilderness character by limiting the size and number of trailheads (hereafter referred to as THs) as well as designated trail mileage. The Proposed Action provides the balance between Alternative 1 "No Action" and the Alternative 3 proposal for more trail development and less two- track route rehabilitation.

Sample comments:
"A plan that limits development and promotes long-term beneficial effects to wilderness character ensures Oregon Badlands Wilderness will be available to hikers, campers and stock for generations to come. Conversely, a plan that is excessive with change and development will not ensure the lands are preserved and protected in their natural condition."

Wilderness Character and Experience

BLM should reconfigure fence lines within the OBW to minimize human structures in the wilderness.

BLM Response:
The Proposed Action removes 3.1 miles of fence within the OBW. Other fences within the interior are necessary to manage livestock within allocated allotments and pastures.

Sample comments:
"We support the proposed action to reconfigure the Rambo allotment to minimize fence lines within the wilderness."

BLM should analyze a range of alternatives that limits the use of motorized vehicles for administrative use to prevent degradation of OBW solitude and naturalness.

BLM Response:
Under all alternatives, the BLM will limit the use of motorized vehicles by using the Minimum Requirement Decision Guide Analysis for any proposed administrative use and motorized use approved in the grazing permit authorization. BLM will ensure these actions are consistent with the Oregon Badlands Wilderness Management Plan (OBWMP) and BLM Wilderness Management Manual 6340, (7/3/12), page 1-28, e. Use of motorized equipment.

Sample comments:
"…encourage BLM to analyze a range of alternatives to appropriately limit the use of motorized vehicles for administrative actions to prevent unnecessary degradation of solitude and naturalness."

"Analysis of a range of alternatives in the EA for the WMP will also ensure that BLM is consistent with the NEPA requirements outlined in BLM Manual 6340 for the extraordinary circumstance of motorized use in the Wilderness."

BLM should recognize that equestrian riders value solitude as much as hikers in the OBW.

BLM Response:
The Proposed Action requires only commercial and organized equestrian groups to remain on the designated trail system. All other visitors can travel cross-country or use the designated trail system. The Proposed Action provides opportunities for solitude to all visitors and unconfined recreation for non-commercial use.

Sample comments:
"There is reference to increasing the solitude experience for hikers by restricting equestrian users to designated trails, [these Alts should not be selected because] us horse riders would like to think our solitude experience is just as worthy as a person hiking with a dog in the OBW."

Resource Protection and Restoration

The BLM should take no action in the OBW because it is a very delicate environment.

BLM Response:
We agree that the OBW is a delicate environment. The range of management actions that are analyzed in the EA consider a variety of options that we feel would protect wilderness values.

Sample comments:
"[The Badlands] is a very delicate environment. It is just fine the way it is, leave it alone."

The BLM should restrict rock climbing to protect natural formations.

BLM Response:
Alternative 1 (No Action) allowed continued rock climbing with no protection of rock features. Alternatives 2, 3 and 4 analyzed the effects of continued rock climbing on rock features and identified management actions that protect natural formations by only allowing temporary anchors and water soluble chalk. Alternatives 2,3, and 4 also prohibit new permanent anchors, the alteration of rock formations, removal of vegetation and limits gear caching to no longer than 24 hours. Prohibiting rock climbing would not be necessary if Alternatives 2, 3, or 4 were selected. The restrictions in these alternatives protect the natural formations while allowing this primitive recreation activity.

Sample comments:
"Alternative 4 should restrict rock climbing to protect natural formation"

BLM should relocate guzzlers outside of the OBW to protect wilderness land values.

BLM Response:
We analyzed this action in the Proposed Action and in Alternative 4, which relocates the Hobbywood guzzler and removes pieces of the guzzler near the Flatiron Rock Trail outside the OBW. These actions would allow BLM to use vehicles to maintain and fill one guzzler water tank to provide water for wildlife, while protecting wilderness values.

Sample comments:
"The relocation of wildlife guzzlers appears likely to…offer further protection of wilderness lands."

The BLM should retain water sources in the OBW to provide water for wildlife.

BLM Response:
There are no natural springs or any other natural water source within the OBW. Alternatives 1 and 3 propose leaving the Hobbywood guzzler and remnants of the other guzzler inside the OBW. Since motorized vehicles are prohibited, water for wildlife would only be available under these two alternatives if precipitation replenishes the Hobbywood guzzler. The Proposed Action and Alternative 4 propose moving the Hobbywood wildlife guzzler and removing pieces of the broken nonfunctioning guzzler near the Flatiron trail to public lands outside the wilderness area. Water trucks would fill the Hobbywood water tank outside of the OBW under these two alternatives, providing water sources for wildlife.

Sample comments:
"Leaving the watering stations or even expanding this if practicable would greatly enhance wildlife viewing possibilities."

"Keep the Wildlife guzzlers that are in place and mostly self-sustaining for much needed water in the badlands for all Wildlife."

The BLM should use fencing to protect wilderness land values.

BLM Response:
The Proposed Action and Alternative 4 analyzed an additional 6.1 miles of new fence along the eastern boundary to increase protection of wilderness values by discouraging unauthorized Off-Highway Vehicle (OHV) trespass.

Sample comments:
"The construction of new fencing appears likely to… offer further protection of wilderness lands."

BLM should rehabilitate former vehicle routes in the OBW in a manner that is unnoticeable as possible to visitors as a means of erasing signs of past use. BLM should limit the use of "vertical mulching" to areas where it is necessary to prevent motorized vehicle trespass to preserve the appearance of naturalness in the OBW.

BLM Response:
The No Action (Alternative 1) Alternative would not restore any trails. Alternative 3 would restore duplicate trails and Alternative 4 only removes short duplicate trails. The Proposed Action proposes to use the most natural appearing route restoration technique possible to restore public lands affected by past vehicle use, including the use of vertical mulching. Vertical mulching is defined as transplanting native vegetation, reseeding with native seed mix and using trail design features such as drainage dips or waterbars. The Proposed Action would limit the use of vertical mulching to retain the natural appearance of the OBW. This technique can be used in a manner that still retains the natural appearance of the OBW. Other effective rehabilitation methods are defined on pages 22-23 of the OBW EA.

Sample comments:
"The use of "vertical mulching" should be minimal in order to preserve naturalness and should be prioritized for sites where it is necessary to prevent motorized vehicle trespass."

The BLM should remove "erosion control" from list of available restoration methods or specify erosion control methods that could be used to ensure that they would be less intrusive on wilderness character.

BLM Response:
Straw bales and light terracing as control methods are not mentioned as erosion control methods in the OBW EA. They were mentioned in the Draft OBW Management Plan, but have been deleted.

Sample comments:
"The erosion control methods outlined on page 22 of the EA, such as placing straw bales or creating light terracing, are inappropriate and unnecessary in the relatively flat terrain of the Badlands. The BLM should remove "erosion control" from list of available restoration methods or specify erosion control methods that could be used to ensure that they would be less intrusive on wilderness character."

The BLM should avoid spending funding on restoring former road and trail segments because these sites will be naturally reclaimed over time.

BLM Response:
We agree that many trails and vehicle routes not part of the designated trail system are hard to see and will continue to be naturally reclaimed. However, there are some routes and trails that will need to be rehabilitated. Under the Proposed Action, BLM would work with volunteer partner groups to minimize costs to the government for rehabilitation of former roads and trail segments not part of the designated trail system. Alternative 1 (No Action) Alternative

would not restore any former road or trail segments. Alternative 3 would remove duplicate trails and Alternative 4 would only restore small trail segments.

Sample comments:
"We do NOT agree that BLM needs to spend the taxpayer's dollars on removal and restoration of former roads and trail segments. Many of these trails are almost invisible already and with time the rest will be naturally reclaimed."

"Rehabilitating former vehicle routes is an important step to erasing signs of historical abuses in the Badlands, it [is] important to do so in a way that will be largely unnoticeable to visitors and will not leave lasting evidence of the hand on the landscape."

Trailheads and Parking Areas

BLM should not spend money to develop any additional parking areas for trailer parking.

BLM Response:
Alternative 1 (No Action) would have no changes to existing THs. The Proposed Action and Alternative 3 propose to harden and if necessary expand all THs except the Tumulus, Flatiron Rock and Badlands Rock trailheads, so additional parking areas for trail parking would be developed and funds would be spent for these improvements. Alternative 4 would be the same as Alternatives 2 and 3, but no TH would be expanded. Parking capacities for these alternatives are listed in Table 2 of the OBW EA.

The Proposed Action and Alternative 3 would relocate the Larry Chitwood TH in the northwest portion of OBW. This relocation would resolve existing social conflicts between OBW visitors and private landowners. Parking would be provided for 10 vehicles and 6 stock trailers.

Alternatives 1 and 4 would not relocate the Larry Chitwood Trailhead and no funds would be spent for additional parking areas for trailer parking.

Sample comments:
"With trailers limited to two areas it would not require dollars nor time to expand any other area."

BLM should limit trailers to the Badlands Rock and Dry River THs which would provide a north and south trailer parking option while separating use between riders and other users.

BLM Response:
All alternatives continue to provide a north and south trailer option by retaining the existing Reynolds Pond, Dry River and Badlands Rock trailheads. These existing THs would continue to provide access into the OBW on the north and south entrances, resulting in dispersed visitor

use throughout the area. Trailer parking is not allowed under all alternatives at Flatiron Rock and the Tumulus THs due to their small size.

The Larry Chitwood TH also provides a north trailer option but the parking area is not developed under Alternative 1 (No Action) and Alternative 4. Conflicts would continue to occur with adjacent private land owners under these alternatives. The Proposed Action and Alternative 3 would relocate the Larry Chitwood TH and provide adequate vehicle and trailer parking in the northwest part of the OBW for use by riders and other users.

Sample comments:
"Limit trailers to Badlands Rock TH and Dry River TH where adequate room is available for trailers. Also another benefit is you have trailers at both north and south sides of the Badlands and will or can reduce conflict between animals and hikers."

"[consider changing Alternative 4 to] limit trailers to Badlands Rock TH and [Dry] River TH where adequate room is available for trailers. Also, another benefit is you have trailers at both North and South sides of Badlands and will or can reduce conflict between animals and hikers."

BLM should develop and locate THs in a location and manner that protects private land from trespass and damage.

BLM Response:
It's not possible to locate the Dry River TH facility ¼ mile away from BLM and private land ownership boundaries, due to BLM land configuration. The final Dry River TH design would include a 20 foot buffer between public and private land.

Alternative 3 analyzes a High Desert TH off of the George Millican Road, along the eastern boundary of the OBW. This TH was not included as part of the Proposed Action, due to its remote location and maintenance costs.

Sample comments:
"All THs should be located at least ¼ mile from any privately owned land… [To avoid people camping, shooting and trespassing on private land.]"

"There are two good roads off of Geo Millican Highway that could be used to develop THs that would not infringe upon anyone's private property. These proposed sites could give plenty of access from the east as well as supply plenty of room for horse trailers to park as well as campers and hiker."

"The Larry Chitwood TH is in a "farm residential area"…larger campgrounds [should not be near residences.]"

"We support the proposed action to reroute the beginning of the Dry River trail to avoid the right of way accessing a private inholding on the north end of the wilderness area."

"Either [post signs at the entrance to private property] stating something to the effect OK to walk through, keep to the road, respect [the] property, etc. OR construct a trail around…[private property] and avoid it altogether. We believe construction of a single track trail around…private property is preferable."

BLM should not improve THs because they would draw more people to the OBW who will vandalize the sites.

BLM Response:
The Proposed Action and Alternative 3 propose improvements at existing THs to prevent motorized vehicle intrusion, protect resources and provide access to the OBW. The No Action and Alternative 4 do not propose to improve THs. All THs would continue be monitored by BLM and volunteer groups. We have found that most visitors to special management areas value these public lands and do not vandalize them.

Sample comments:
"If you improve…THs, you are inviting the public to use…THs for free camping…I don't believe BLM should spend money to improve these THs and draw more people to the badland, just to have all the work destroyed."

The BLM should maintain the primitive nature of the OBW THs by only using gravel surface on the existing footprints.

BLM Response:
We have clarified the EA so it is clear that hardening of THs in any alternative would not include paving, with the exception of one ADA accessible paved parking space at the Reynolds Pond and Larry Chitwood THs.

Sample comments:
"BLM [should] retain as much of the primitive nature of these THs as possible. The proposed action states that "THs would be hardened using the existing footprint," but should further specify that only gravel surface would be used and that the THs will not be paved."

The BLM should precisely define and map the existing footprint of the THs to limit future expansion.

BLM Response:
TH vehicle and trailer capacities for all THs were determined in the Environmental Assessment for the OBW and are summarized in Table 2 of the EA. Designated THs will be mapped and designed to accommodate the vehicle and trailer capacities that were intentionally limited to avoid over use and prevent resource damage.

Sample comments:
"The "existing footprint" of these areas should be precisely mapped and defined to limit future expansion due to a lack of information about original size and condition."

The BLM should avoid moving the Tumulus TH from its current location to avoid adversely impacting visitor use and enjoyment of this trail.

BLM Response:
Alternatives 1 and 4 do not propose moving the Tumulus Trailhead. The Proposed Action and Alternative 3 identified the need to relocate the Tumulus TH because the old Tumulus TH no longer exists. It is still gated by the Central Oregon Irrigation District (COID). Expensive radio telemetry equipment was stolen and the COID gate has been ripped down several times.

Under the Proposed Action and Alternative 3, the Tumulus TH would be re-located off Dodd's Road at Mile Post 6. This TH would be for visitors hiking into the OBW and not horse riders, due to the COID canal barrier and the limited size. The added mile hike into the OBW is mostly hardpan and lava, so hiking to the OBW would not be difficult.

Unauthorized motorized use has resulted in trucks and motorcycles crossing the canal when dry at the existing Tumulus TH, causing bank damage and unauthorized entry.. Although Alternatives 1 does not propose to build barriers to prevent unauthorized vehicle entry, the Proposed Action and Alternatives 3 and 4 do propose to build barriers if necessary to prevent unauthorized vehicle and motorcycle entry.

Sample comments:
"The BLM [should] keep the Tumulus TH at its current location. We are concerned that moving this TH to the proposed location on Dodds Rd. and removing the old TH will adversely impact the use and enjoyment of the Tumulus trail."

"Moving the [Tumulus] TH to Dodds Rd [will make] this access road easier to find but the extension of the trail system through land outside the wilderness boundary will result in a less interesting and scenic experience for trail users."

"Signage along Dodds Rd. and at junctures could be utilized to make the [Tumulus] TH easier to find, and a slight expansion and improvement of the TH footprint could allow for better utilization of the available parking spaces."

"Moving the [Tumulus] TH 1 mile north will make it much more difficult for hikers to reach the heart of the Badlands…the plan to change these THs will make it much more difficult for me to use the Badlands."

"Leave Tumulus TH where it is currently located. The uninteresting mile or so walk from a TH at Mile Marker 6 would mitigate against a beginning quality experience hiking. There is enough space at the current location to enlarge and still retain the primitive characteristic of the area."

BLM should design THs to spread visitation evenly throughout the OBW and to reduce crowding.

BLM Response:
BLM agrees. All alternatives continue to provide THs in different locations around the perimeter of the OBW. Equestrian and hiking visitors have several choices for accessing this area. Having six THs, rather than one or two would help spread visitor use. The Proposed Action and Alternative 3 would harden all THs except the Badlands Rock TH and design TH for specific vehicle and stock trailer capacities (See Table 2 in the OBW EA). The Proposed Action and Alternative 3 would also alleviate equestrian trailer crowding at the Badlands Rock TH by relocating the Larry Chitwood TH. The No Action (Alternative 1) and Alternative 4 do not relocate this TH.

Sample comments:
"It is important to spread visitation more evenly throughout the OBW to reduce crowding at popular THs along Highway 20."

"We endorse full implementation of Proposed Action 3 which would harden three THs, relocate one TH, expand parking at one TH and construct 2 new THs. This option would disperse use."

BLM should limit the amount of parking, especially for horse trailers because too many users are detrimental to wilderness values.

BLM Response:
TH vehicle and trailer capacities were determined in the OBW EA and are summarized for the Proposed Action and Alternatives 3 and 4 in Table 2. No vehicle and trailer capacities were identified in the No Action (Alternative 1) alternative. Vehicle and trailer capacities are intentionally limited in the Proposed Action and Alternatives 3 and 4, to avoid over use and prevent resource damage.

Sample comments:
"My biggest concern is too much expansion of parking, especially for horse trailers. Room for 2-3 trailers are adequate at appropriate THs. Too many horses will be detrimental, relative to human feet, especially when horses leave the trail."

BLM should develop new THs and expand existing THs to accommodate trucks and trailers to meet the current demand for parking.

BLM Response:
The Proposed Action and Alternatives 3 and 4 would provide additional trailer parking at the Reynolds Pond and Dry River THs, as described in Table 2 of the OBW EA. The Proposed Action and Alternative 3 would provide more parking and would result in more dispersed use throughout the trail system than the No Action (Alternative 1) and Alternative 4 that do not provide for TH expansion or additional parking.

The Proposed Action and Alternative 3 relocate and expand the vehicle and trailer capacity at the Larry Chitwood TH. The No Action (Alternative 1) and Alternative 4 leave the Larry Chitwood TH as it exists with no trailer parking improvements.

Sample comments:
"New and expanded THs that can accommodate trucks and horse trailers are badly needed. At this time people visiting the Chitwood TH are restricted to parking on the side of the road in order to access the trail system for that location."
Trails and Routes (in the Badlands)

The BLM should not maintain roads because the Badlands terrain is sensitive and fragile.

BLM Response:
All former vehicle routes were closed to motorized use, so no road maintenance will ever occur with wilderness designation. All alternatives provide for administrative use of vehicles by BLM, or for range administration, but no road maintenance is authorized. All alternatives continue to authorize maintenance of a road leading to a 40 acre inholding that is cherry-stemmed out of the OBW that will continue to be maintained for access into that private land.

Sample comments:
"The badlands terrain is sensitive and fragile. Do not maintain roads and limit trails to specific sites of interest."

The BLM should limit trails to those that only go to specific sites of interest in the OBW to protect sensitive terrain and identify key points of interest in the Badlands and only establish trails to these areas.

BLM Response:
The designated trail system for all alternatives is based largely on existing, former vehicle routes. Many of these routes were created to go to specific sites, such as Badlands Rock and Castle Rock. Many key points of interest are near or adjacent to the designated trail system and are shown on user maps, such as Badlands, Flatiron and Castle Rocks.

Some features may not be identified to provide a sense of discovery that contributes to a wilderness experience. Under all alternatives BLM will not mark all features on maps and will not mark or sign any features within the OBW. Other trails will remain, or will be created, to form loops and concentrate the majority of use on those designated trails. Leave-No-Trace hiking techniques would be encouraged by users to prevent the creation of new trails when exploring off of the designated system.

Sample comments:
"The badlands terrain is sensitive and fragile. Do not maintain roads and limit trails to specific sites of interest."

Sample comments:
"Key points of interest within the Badlands need to be identified and establish trails that will connect."

BLM should use fencing to control visitors and protect private properties.

BLM Response:
The Proposed Action and Alternatives 3 and 4 propose to remove 3.1 miles of interior fence in the OBW for internal livestock control. The Proposed Action and Alternatives 3 and 4 would construct 6.1 miles of boundary fencing to control motorized use intrusion and prevent trespass. The No Action Alternative would not construct or remove fences.

Sample comments:
"Schedule fencing that will assist in controlling flow of visitors and protect private properties."

BLM should subtly obscure any trails that access sensitive sites to preserve those areas.

BLM Response:
The designated trail system was designed under all alternatives to avoid sensitive sites. BLM will continue to work with partner groups to ensure that sensitive sites are monitored and protected. Footpaths leading to sensitive sites will continue to be camouflaged or erased as necessary.

Sample comments:
"Access trails [should be] subtly obstructed… [To preserve sensitive sites.]"

The BLM should consider naming a trail after Jim Witty, as a tribute to him.

BLM Response:
All trails within the OBW have been named using geologic, historic or wildlife references, under all alternatives. Trail names can be viewed on the Prineville District BLM website. In 2008, before the OBW was designated as wilderness, BLM identified and named a trail after Larry Chitwood, in honor of his geologic research within the OBW.

Sample comments:
"BLM [should] consider naming the new connector trail between the Flatiron Rock and Larry Chitwood trails after Jim Witty, who wrote for the Bend Bulletin for many years and who introduced many readers to the wonders of the Badlands."

"The new trail proposed by the BLM was previously identified by ONDA and the Friends of Oregon Badlands Wilderness as a fitting tribute to Jim, because it was one of his favorite places in the Badlands. …this trail [should] be officially named the "Jim Witty Trail" through the WMP."

The BLM should consider rerouting the south end of the Dry River trail where it runs through private property to avoid confusion over access.

BLM Response:
BLM is in agreement with the comments suggesting BLM construct a non-motorized trail through, or around private land for ensuring long-term public access on the south end of the Dry River Trail.

The Proposed Action and Alternative 3 proposed and analyzed a trail re-route around adjacent private land if efforts to work with private landowners for trail access through these lands are not successful. The OBW Decision Record provides management direction for BLM to build a short trail reroute around private lands. This reroute would be approximately 1.0 mile long, using former vehicle routes to connect the Dry River and Badlands Rock trail segments together and off private land.

Sample comments:
"The BLM could also consider a reroute of the south end of [the Dry River] trail where it runs through a private property a short distance after its juncture with the Badlands Rock Trail. The private landowner has the entrance to his property signed as private and this often confuses trail users who end up turning back rather than risk trespassing."

"Either [post signs at the entrance to private property] stating something to the effect OK to walk through, keep to the road, respect [the] property, etc. OR construct a trail around… [private property] and avoid it altogether. We believe construction of a single track trail around…private property is preferable."

The BLM should allow equestrians to use the 62 miles of existing but non-designated trails to avoid congestion and detracting from visitors' wilderness expectations.

BLM Response:
The Proposed Action and Alternative 3 do not restrict non-commercial equestrian or pedestrian use off of the designated trail system. Cross country equestrian use is allowed, but visitors are encouraged when travelling cross-country to avoid riding on old motorized routes that are in the process of being rehabilitated. The No Action (Alternative 1) and Alternative 4 limit equestrian use to the 43 mile designated trail system.

Sample comments:
"The wording [in Alt. 4] "up to 62 miles of routes not part of the designated trail system would be rehabilitated" is clear to me, branches and signage would be placed on 62 miles of existing trails and we users would be prohibited or discouraged from using 62 miles of existing routes not officially designated as trails by BLM. Equestrian users would be legally prohibited from using these trails; this would result in severe congestion on the official trail system. This is not what folks expect when visiting a wilderness area."

"Alternative 1 affects horse riders much the same as 2 and 4. Equestrian riders would be restricted to "designated trails" making it against the law to use any of the 62 miles of existing undesignated trails for horse riding. Thus resulting in mounted riders being forced to use trails being used by hikers and dog walkers. In the end, the unnecessary congestion will result in conflicts between different user groups and likely some personal injuries causes by folks falling off horses and or dogs and their owners being possibly kicked by horses not used to passing by unleashed dogs."

BLM should allow visitors to use all existing trails because there is no evidence of degradation from use.

BLM Response:
Under the Proposed Action and Alternative 3, cross-country travel would be allowed throughout the Badlands by non-commercial users. The No Action (Alternative 1) and Alternative 4 limit equestrian use to the 43 mile designated trail system. Opportunities for cross country hiking are provided under all alternatives. Under the Proposed Action and Alternatives 3 and 4, hiking and equestrian use on existing two track routes not part of the designated trail system is discouraged as they rehabilitate, thereby improving wilderness character within the OBW. The No Action (Alternative 1) alternative does not discourage use on existing two track routes not part of the designated trail system.

Sample comments:
"To allow users to continue to use all the existing trails seems reasonable to me. I have hiked and rode horses in the badlands since the mid-70s and there is no additional visible degradation from folks using all the existing trails that I can see."

BLM should allow equestrians to use more than the 43 miles of designated trails in Alternative 2 because allowing horses cross country but not on trails doesn't make sense.

BLM Response:
The logic for encouraging cross-country travel rather than using former vehicle routes is that it would disperse the impacts and allow the former routes to rehabilitate. The Proposed Action and Alternatives 3 and 4 provide for casual cross-country travel, because a few horses at a time do not create a permanent scar and disappear over a short amount of time. Continued concentrated use on the former vehicle routes does not allow them to rehabilitate over time. All alternatives discourage the creation of new foot worn paths and none of the alternatives maintain or display foot worn paths on maps.

Effects to naturalness are minimized under all alternatives by requiring all commercial SRP holders with stock to remain on the designated trail system. The No Action (Alternative 1) and Alternative 4 also limit equestrian use to the 43 mile designated trail system. The Proposed Action and Alternative 3 would not limit non-commercial and non-organized group stock users to the designated trail system but they would be encouraged to do so.

Sample comments:"
Alternative 2 is a bit restrictive; it prevents horse riders from riding anywhere except the 53 miles of designated trails…I don't get the logic; you can travel cross country but cannot use a trail that's been used for 50 years or more."

User/Resource Conflicts

BLM should not allow dogs in the OBW since they chase away small animals.

BLM Response:
The EA has analyzed alternatives ranging from restricting dogs at all times to allowing dogs off leash beyond 500 feet of THs and parking areas. The No Action (Alternative 1) Alternative and Alternative 3 do not restrict dogs at all and do not require removing dog waste within 10 feet of trails and within 500 feet of THs and parking areas.

The Proposed Action requires dogs to be leashed within 500 feet of THs and parking areas. Dogs are allowed off leash in the OBW. Owners are required to remove dog waste within 10 feet of trails and within 500 feet of THs and parking areas.

Alternative 4 restricts dogs at all times within the OBW. Under this alternative, dogs would not be allowed off leash in the OBW, including THs. Leashed dogs would not be able to chase small mammals or reptiles. This restriction would have the same effect as not allowing dogs in this area. Under Alternative 4, dog owners would also be required to remove dog waste within the OBW and at all THs.

Sample comments:
"No dogs should be allowed since they chase away small mammals and reptiles."

"Dogs should be prohibited in OBW, or at least, always on leash, but not allowed to run free… Some dogs would likely harass wildlife."

BLM should require dogs to be on leash in the OBW to avoid conflicts with other users and detracting from the wilderness experience.

BLM Response:
The EA analyzed a range of alternatives regarding potential conflicts between dogs and other users. The Proposed Action avoids conflicts with other users by requiring dogs to be leashed within 500 feet of THs and parking area but off leash elsewhere in the OBW. Owners would be required to remove dog waste within 10 feet of trails and within 500 feet of THs and parking areas.

Alternative 4 restricts dogs at all times within the OBW. Under this alternative, dogs would not be allowed off leash in the OBW, including THs. This restriction would have the same

effect as not allowing dogs in this area. Under Alternative 4, dog owners would also be required to remove dog waste within the OBW and at all THs.

The No Action (Alternative 1) Alternative and Alternative 3 do not restrict dogs and do not require removing dog waste within 10 feet of trails and within 500 feet of THs and parking areas.

Sample comments:
"…since dogs chase away small mammals and reptiles… [Dogs] should always be on leash.

"Dogs should be prohibited in OBW, or at least, always on leash, but not allowed to run free…in OBW unleashed dogs reduce wilderness character and are a distraction to visitors as well as the dog owners."

BLM should allow dogs to be on a leash <u>or under their owner's control</u> at THs because requiring leashes is arbitrary, unnecessary and unenforceable.

BLM Response:
The EA analyzed a range of alternatives allowing or not allowing dogs on a leash and under their owner's control. The No Action (Alternative 1) Alternative does not restrict dogs in the OBW and does not require the removal of dog waste. Owners with dogs that do not respond well to voice commands would be encouraged to be keep them leashed at all times. Harassment of wildlife is against Oregon state law and could be enforced by Oregon State Police or BLM Law Enforcement.

The Proposed Action avoids conflicts with other users by requiring dogs to be leashed within 500 feet of THs, parking areas and within 10 feet of designated trails. Alternative 3 allows dogs off leash at trailheads and in the rest of the OBW. Dog owners are not required to remove dog waste under this alternative. Alternative 4 does not allow dogs off-leash in the OBW or at TH and parking areas. Dog owners are required to remove dog waste within the OBW and from all trailheads and all parking areas.

Sample comments:
"…restricting dogs to be under control at THs would minimize conflict between dog and equine owners and other users… [however that restriction]… is arbitrary, unnecessary and unenforceable… a revision we hope you will consider is that "dogs must be on leash or under its owner's control at the TH…owners with dogs that cannot be kept under control while away from the TH will be encouraged to leash them…through educational signage, emphasis on Leave No Trace principals."

BLM should allow dogs under their owner's control at THs because it is too difficult for equestrian riders to hold a leash and ride/lead a horse to the required distance from the TH.

BLM Response:
BLM recognizes that it is difficult for visitors with horses to leash their dog at the same time. A range of alternatives was developed and analyzed in the EA to provide several management options regarding dog restrictions in the OBW. The No Action (Alternative 1) Alternative does not restrict dogs in the OBW and does not require the removal of dog waste. Owners with dogs that do not respond well to voice commands would be encouraged to be keep them leashed at all times.

The Proposed Action avoids conflicts with other users by requiring dogs to be leashed within 500 feet of THs and parking areas. Dogs are allowed off leash in the OBW. Owners are required to remove dog waste within 10 feet of trails and within 500 feet of THs and parking areas.

Alternative 3 allows dogs off leash at trailheads and in the OBW. Dog owners are not required to remove dog waste under this alternative. Alternative 4 does not allow dogs off-leash in the OBW or at TH and parking areas. Dog owners are required to remove dog waste within the OBW and from all trailheads and all parking areas.

BLM employees have observed that most equestrian owners with dogs do have their dogs under control. However other visitors with dogs often do not respond well to horses or other dogs off leash even when their owner thought their dog was controllable by voice command.

Sample comments:
"Under [the] condition [of requiring a dog to be on leash within 500' of a TH], an equestrian with a dog would have to either walk both the horse and the dog on "leashes/lead ropes" until they get to the 500' limit. Or they would have to hold the dogs leash while mounted on the Horse for that distance…a revision we hope you will consider is that "dogs must be on leash or under its owner's control at the TH…"

BLM should require dog owners to remove dog waste from TH improved surfaces only because removing waste within 500' of THs and 10 ' of trails is arbitrary, unnecessary and unenforceable.

BLM Response:
The OBW experiences a very high number of visitors with dogs. Additionally, most dogs will defecate upon arrival or within 500 feet of the TH. The EA considered and analyzed a range of alternatives that included having no restrictions on dogs in the OBW, to restricting dogs at all times. If dog restrictions are implemented, monitoring will tell if they are effective and enforceable.

The No Action (Alternative 1) Alternative and Alternative 3 do not require the removal of dog waste. The Proposed Action would prevent an abundance of dog waste at THs and parking areas by requiring all dog waste to be removed at these areas and within 10 feet of designated trails within the OBW. The benefits of requiring dog waste removal at THs and within 10 feet of designated trails would be to help maintain the wilderness character of the OBW. Alternative 4 requires dog waste to be removed from all trailheads and parking areas and within the OBW.

Sample comments:
"The restriction to 500' of the TH and the expanded requirements to remove dog waste out to that distance and within 10' of the trail is arbitrary, unnecessary and unenforceable… a revision we hope you will consider is that "owners are required to remove the dog waste from TH improved surface."…owners will be encouraged through educational signage, emphasis on Leave No Trace principals to remove their dog's waste from the tread of trails. "

Livestock Grazing

BLM should re-evaluate all livestock grazing allotments using the Grazing Matrix to determine if these allotments, or specific pastures within the allotments, qualify for voluntary retirement under the 2005 Upper Deschutes RMP to minimize interactions between recreational wilderness users and livestock.

BLM Response:
Recommendations to re-evaluate allotments using the BLM Grazing Matrix is not consistent with the Purpose and Need and is outside the scope of this EA. Page 39 of the OBW EA quoted the BLM policy that livestock grazing will continue where it has been authorized by a grazing permit or grazing lease for land within a wilderness, and the use was established before Congress established the wilderness area. Sections 4(d)(4)(2) of The Wilderness Act (BLM Manual 6340, 1-40).

Sample comments:
"We encourage the BLM to consider the following actions to further minimize interactions between recreational wilderness users and livestock… we recommend that the BLM re-evaluate all livestock grazing allotments using the Grazing Matrix to determine if these allotments, or specific pastures within the allotments, qualify for voluntary retirement under the 2005 Upper Deschutes RMP."

Water hauling

BLM should explore alternate water hauling routes that would provide the same level of service while minimizing the impacts of motorized vehicles on visitors' wilderness experience.

BLM Response:
Water haul use will continue regardless of the alternative(s) selected as the Proposed Action. BLM is not aware of any other existing vehicle routes that would provide better access for water haul use than the ones historically used for this purpose.
Vehicle routes currently used for water hauling have been used for over 30 years and provide the most efficient routes to water trough locations. BLM has worked with the grazing permittee to minimize miles of water haul routes within the OBW. The old vehicle route along the fence line between the North and South Pastures and the High Desert Trail are not suitable water haul routes due to their rocky nature and the difficulty for heavy water trucks to navigate these routes.

Sample comments:
*"[Water hauling] can detract significantly from the experience of wilderness users when water trucks are encountered on trails during the grazing season. To reduce these encounters, we recommend that the BLM explore alternative water hauling routes that will maintain the same necessary level of water for livestock. Two routes that we believe could serve this purpose are the old vehicle route along the current fence line between the North Pasture and South Pasture of the Rambo Allotment, or High Desert Trail, which BLM proposes for closure under Alternative 2."*Refuse

BLM should remove all refuse from the OBW that is not eligible for inclusion in the National Register of Historic Places (NRHP) because it detracts from visitors' wilderness experience.

BLM Response:
The No Action (Alternative 1)Alternative and Alternative 3 proposed leaving cultural resource historic refuse dump sites at trailheads in place. The Proposed Action and Alternative 4 propose to remove historic refuse sites that are ineligible for inclusion into the National Register of Historic Places (NRHP), after inventory and evaluation occurs.

Regardless of the alternative selected, BLM will continue to work with volunteer partner groups to locate and map refuse dumps throughout the OBW. Each site must be evaluated separately. It is not possible for BLM to set specific time periods for evaluating historic refuse dump sites for the NRHP, due to unknown funding for this cultural resource work.

Other archaeological projects may also compete with getting dump site evaluations completed. Volunteer partner groups will be authorized to remove debris any time a site is cleared for removal. BLM agrees that some sites detract from the wilderness experience; however we are mandated by law to evaluate each site for historical and cultural significance.

Sample comments:
"All refuse in OBW which is not eligible for inclusion in the National Register of Historic Places should be removed, regardless of whether it is 50 years or older. All the refuse I've seen in OBW appears to be garbage of no historic value which gives visitors a negative impression."

"Many of the refuse sites, especially those near trails, include loose wire, glass, rusty cans and maybe other hazards…also seriously detract from any "wilderness experience..." if any of the sites is found to be ineligible for inclusion in NRHP the refuse will be removed…there should be a [two year] deadline for the process for evaluation of the sites for NRHP."

"We feel that the refuse dumps, as so rightfully called in the WMP, should be removed. These dumps are an eyesore and detract from the wilderness experience. Protection of artifacts, such as arrowheads, yes, protection of old sardine cans, bedsprings, and bully beef tins, no."

BLM should remove all refuse in a timely manner from the OBW that is not eligible for inclusion in the National Register of Historic Places because it presents a safety hazard to visitors.

BLM Response:
BLM would make refuse dump sites near THs and along trails a priority for clearance and potential removal. However, It is not possible for BLM to set specific time periods for evaluating historic refuse dump sites for NRHP, due to unknown funding for this cultural resource work. Other archaeological projects may also compete with getting these dump site evaluations completed. These sites are easily recognized on the ground and can easily be avoided.

Sample comments
"Many of the refuse sites, especially those near trails, include loose wire, glass, rusty cans and maybe other hazards that could cause serious injury to a horse or rider…if any of the sites is found to be ineligible for inclusion in NRHP the refuse will be removed…there should be a [two year] deadline for the process for evaluation of the sites for NRHP."

Campfires

BLM should require visitors to use camp stoves to avoid using wood in campfires that should be allowed to decompose naturally.

BLM Response:
The No Action (Alternative 1) alternative, Proposed Action and Alternative 3 allows campfires using dead and down woody debris. Visitors are encouraged but not required to use camp stoves. Alternative 4 prohibits campfire use. Some visitors use fires for warming in the winter, rather than for cooking. Regardless of the alternative selected, BLM will continue to emphasize Leave No Trace principles to minimize effects.

Sample comments:
"Campfires [should] be prohibited and visitors encouraged to use camp stoves instead. The wood which would be used in campfires should be allowed to decompose naturally as part of the ecosystem. Although some visitors using campfires would probably follow the leave-no-trace rule, almost surely others would not."

Horses

BLM should prevent horses from leaving the trail system because too many horses are detrimental to wilderness values.

BLM Response:
The EA does not limit the number of visitors or horses in the OBW, although group size is limit. The No Action (Alternative 1). Alternative 1 and Alternative 4 limit all equestrian use to the designated mile trail system. The Proposed Action and Alternative 3 require commercial Special Recreation Permit (SRP) holders with stock to remain on the designated trail system. Under all alternatives, effects to wilderness values are limited by requiring commercial and organized group equestrian users to remain on the designated system. Non-commercial and unorganized equestrian and hiking visitors are encouraged, but not required to use the designated trail system. All other stock users are not required to remain on the designated trail system. Visitors seeking a more remote wilderness experience can travel cross-country. Allowing non–commercial and non-organized equestrians to ride cross-country minimizes effects to wilderness values by dispersing users throughout the area.

Sample comments:
"Too many horses will be detrimental, relative to human feet, especially when horses leave the trail. Make such departures illegal."

BLM should make a TH for hikers only to allow for one area of separate use.

BLM Response:
The Tumulus and Flatiron THs cannot accommodate visitors with stock animals under all alternatives due to their limited size. The Proposed Action and Alternative 3 analyzed moving the existing Tumulus TH 0.8 miles away from the OBW to an existing access point on Dodd's Road at milepost six. Under these two alternatives this TH would be developed with parking for six vehicles and an existing two track route will be converted to a single track trail connecting the Reynolds Pond and Tumulus THs together. The No Action (Alternative 1) Alternative and Alternative 4 analyzed not moving or changing this existing TH.

Sample comments:

"The proposed changes seem to cater primarily to horse use. How about leaving one TH for us hikers?"

BLM should require that equestrian users remove stock waste from THs as part of Leave-No-Trace principles.

BLM Response:
BLM did not consider removing stock waste in any alternative. BLM does support Leave No Trace and Tread Lightly guidance. We will consider appropriate signage to be posted at THs open to stock trailers and encourage stock waste removal at THs.

Sample comments:
"We would suggest…to add a requirement that equestrian users remove stock waste from TH parking areas. We believe this can be accomplished through the installation of signs instructing riders to pick up after their horses and haul their manure home…we educate members to "leave no trace" of horse activity at the TH…so we would support BLM's efforts to help educate the rest of the equestrian community."

Error corrections/Outside the Scope/Other

This category includes comments that do not necessarily need a response, such as votes for a particular alternative, and comments that suggest corrections to the EA.

> *"Restricting the badlands from any motorized use was a positive step in protecting the land from being harmed from plant damage and creating a peaceful quiet place to enjoy nature."*
>
> *"Alternatives (p. 37): The reference to Table 1 was meant to be Table 2."*
>
> *"Appendix A (p. 90): On page 92 following the end of section 170(b) (2) regarding releases, "SEC. 1704. LAND EXCHANGES" is missing."*
>
> *"Appendix B (p. 95): the diagram of 4-strand fence shows different dimensions than the dimensions shown on page 39 in paragraph 3… It is not clear which dimensions are correct."*
>
> *"I support Alternative 2. It seems to me that it allows for restoration without precluding practical use."*
>
> *"The Badlands terrain is fragile and sensitive to any off road or trail traffic. A plan that respects this fact and still allows public access should use Alternative 4, Human Activity Least Present."*
>
> *"Alternative 4 [should not be selected because it is] more appropriate for a large wilderness area far removed from a city like Bend Oregon where you have hundreds of thousands of annual visitors looking to enjoy the great outdoors."*