

Scoping



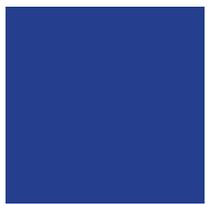
Report



9/2008



Baker RMP



Revision





United States Department of the Interior



Bureau of Land Management



Baker RMP Revision Scoping Report Approval

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United States Department of the Interior



Bureau of Land Management



Greetings:

Enclosed you will find the Baker Resource Management Area scoping report. This report summarizes the comments and concerns we received during the initial scoping period for the Resource Management Plan Revision. Your comments were useful in determining what issues need to be addressed as we revise our current Resource Management Plan.

We greatly appreciate your time and involvement in the planning process, and hope that you will continue to participate. You may contact us at any time using our web site (www.blm.gov/or/districts/vale/plans/bakerrmp), or e-mail address (baker_rmp@blm.gov).

Working together we can generate effective and innovative strategies that will guide your Public Lands into the future. Together we can develop guidance that effectively protects resources and contributes to the lives of those who use and enjoy these lands. Thank you again for your time and support.

Sincerely,



Nancy K. Lull
Field Manager, Baker Resource Area

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Introduction and Background



Profile of the Baker Resource Area

Acres by County

County	% of County	Acres
Asotin	3	14,215
Baker	18	346,290
Malheur	<1	10,219
Morrow	<1	597
Umatilla	<1	12,228
Union	<1	6,329
Wallowa	<1	20,684
Total		428,563

What is the Resource Management Plan (RMP)? The RMP is designed to guide future management actions involving public lands. The Vale District of the Bureau of Land Management (BLM) has recently begun the process of preparing a revised RMP for BLM-managed lands within the Baker Resource Area. The previous RMP, finalized in 1989 is in need of revision to establish new management guidance and to update objectives and policies. The revised plan will provide a comprehensive framework for managing and allocating public lands and resources in the Baker Resource Area for the next 15 to 20 years. It will also serve as the framework from which future, site-specific analyses and decisions are made, regarding which uses and activities are allowable, conditional or prohibited.

More specifically, the Baker RMP revision will establish resource condition goals and objectives; allowable resource uses and levels of production; areas of limited, restricted, or exclusive resource uses; areas for retention or transfer from BLM administration; program constraints and general management practices; specific management plan requirements; and general resource monitoring standards.

What is the Baker Resource Area? The Baker Resource Area covers approximately 428,563 acres of BLM public lands and 4,924,095 acres of subsurface mineral estate. The Baker Resource Area is bordered by the Snake River to the east; the Umatilla National Forest, Oregon-Washington state line, and the Columbia river to the north; and Gilliam, Wheeler, Grant, and Malheur Counties to the west. It is administered by the Baker Resource Area Field Office of the BLM. (See the map on pages 4 and 5)

Why is the Baker RMP being revised? The purpose of the Baker RMP revision is to address resource conditions that have changed since the 1989 RMP, respond to new issues, and provide the Baker Field Office with an updated framework in which to administer public lands. The Baker RMP revision will be a comprehensive plan that provides management guidelines to maintain, improve, or restore resource conditions, and provide for the long term economic needs of local communities.

The Scoping Process

What is scoping? Scoping is the term used in the Council on Environmental Quality (CEQ) Regulations implementing NEPA [40 Code of Federal Regulations (CFR) Parts 1500 et seq.] to define the early and open process for determining the issues to be addressed in the RMP/EIS. The scoping process serves a number of purposes: it provides an avenue to involve the public in identifying significant issues related to potential land management actions, and helps identify issues that are not relevant and can be eliminated from detailed analysis. The list of stakeholders and other interested parties is also confirmed and augmented during the scoping process.

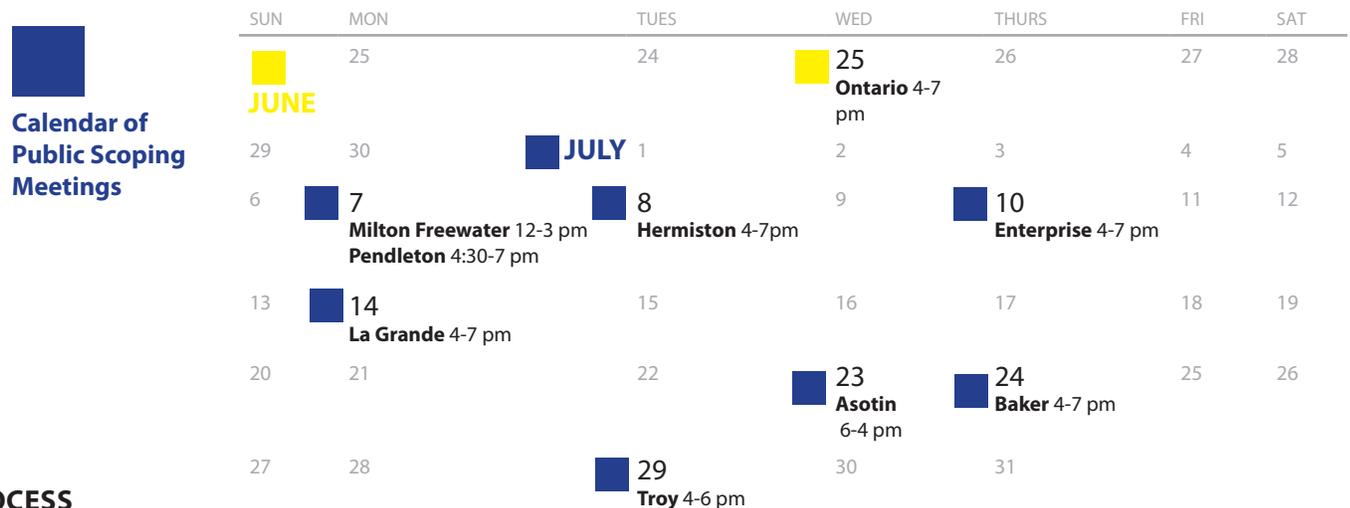
The Baker RMP Scoping Process. Formal scoping began with the publication of the Notice of Intent (NOI), a legal document notifying the public and any affected agencies of the intent to revise and prepare an EIS (Environmental Impact Statement) and included draft planning criteria for review, in the Federal Register on January 15, 2008 [Vol. 73, No. 10 pp. 2520-2521] (see appendix D). Public scoping meetings and comment solicitation began on June 25, 2008 and ended on August 31, 2008, though comments and concerns submitted after the formal scoping period are still welcomed and considered.

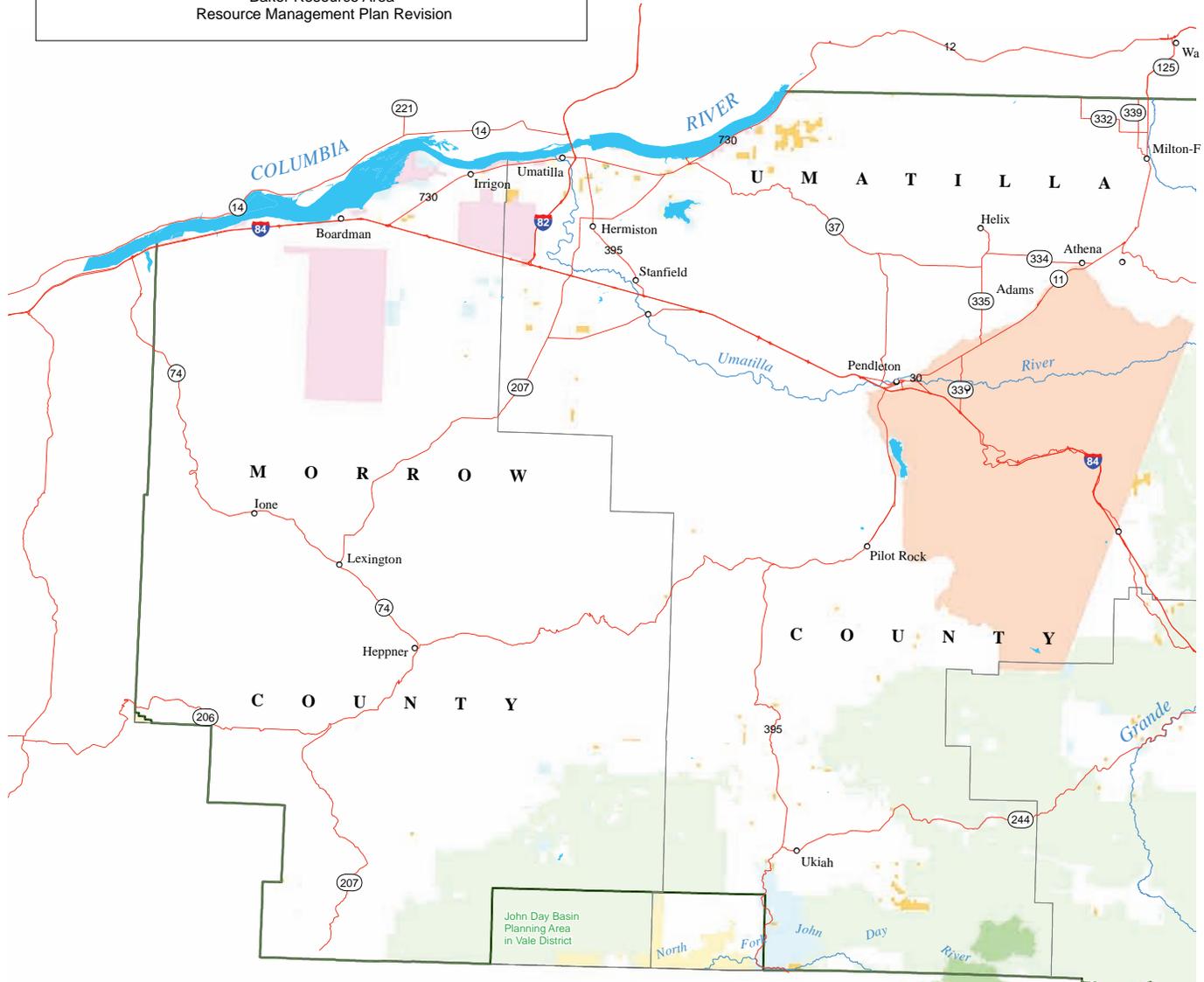
Scoping included scheduled open houses in nine communities, attendance of community government

meetings in six communities (Baker, Union, Wallow, Morrow, John Day, and Irrigon), a web site, a mailing of 1,188 scoping letters soliciting written comments, plus meetings and phone conversations with Federal and State government agencies.

The Baker RMP team leader and field manager also met with Confederated Tribes of the Umatilla (March 27, 2008), Burns Paiute Tribe (March 23, 2008), and the Nez Perce Tribe (June 3, 2008). They also plan to meet with Confederated Tribes of the Colville Reservation, Confederated Tribes of the Warm Springs Reservation, Shoshone-Paiute Tribes, Shoshone-Bannock Tribes, and Fort McDermitt Paiute and Shoshone Tribes once the Analysis of Management Situation (AMS) is complete. Consultation with the tribes will be ongoing as will consultation with National Oceanic and Atmospheric Administration (NOAA) and US Department of Fish and Wildlife. There are no formal government or agency co-operators at this time.

The information obtained from the scoping process is used to define the relevant issues that will be resolved in a range of alternative management actions. The environmental impacts of these alternatives will be addressed in a Draft Environmental Impact Statement (DEIS) made available for public review.





Baker Resource Planning Area

Legend

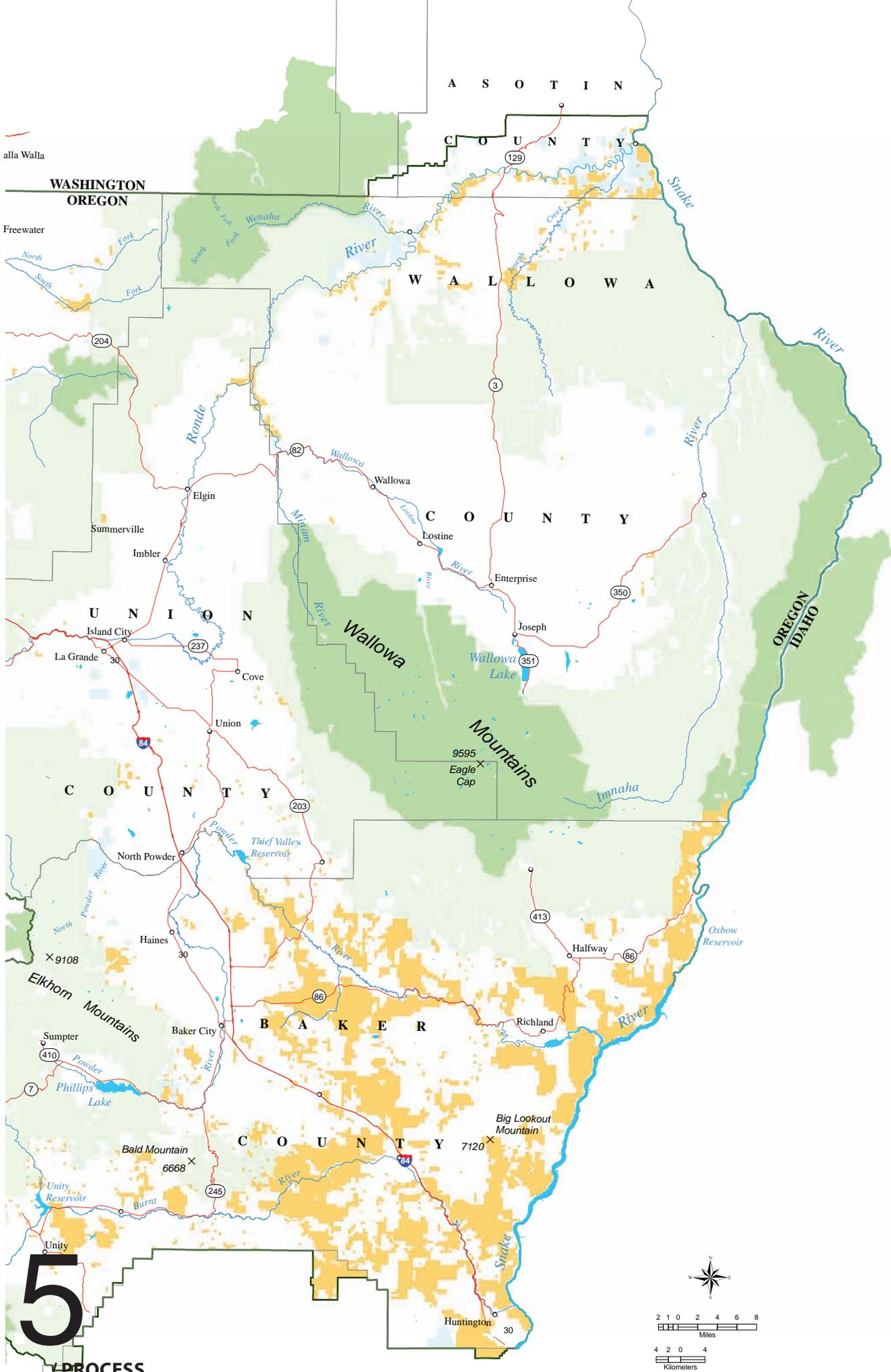
Land Status

- Bureau of Land Management
- Bureau of Reclamation
- U.S. Forest Service
- Bureau of Indian Affairs
- State Lands
- U.S. Dept. of Defense
- Corps of Engineers
- Private or Unknown



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification.





Walla Walla

WASHINGTON
OREGON

A S O T I N

C O U N T Y

129

Snake River

Freewater

North Fork

South Fork

Wenaha

South Fork

Walla Walla River

W A L L O W A

204

Rounde River

82

Wallowa River

Wallowa

Wallowa

Lostine

Enterprise

Enterprise

Joseph

Joseph

Wallowa Lake

Wallowa

C O U N T Y

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Summary of Scoping Meetings



Scoping Meeting Information

A BLM news release was sent to all the newspapers within the proximity of the Baker Resource Management Area, including communities in Washington and Idaho. Open houses were held in 9 communities that the Baker FO personnel felt would be most interested and/or impacted by the revised RMP decisions.

Scoping Meeting Attendance

Meeting	Attendees
Asotin	3
Baker	19
Enterprise	2
Hermiston	5
La Grande	9
Milton-Freewater	12
Ontario	2
Pendleton	2
Troy	6
Total	60

Each open house was set up in a similar fashion. As people arrived at the public meeting they signed in and both the field manager and RMP team lead greeted them. They explained the purpose of the meeting, the RMP process and the purpose of doing the Analysis of the Management Situation. There were several hand-outs and maps available for the public to take including two public scoping packages, the scoping letter, information on Areas of Critical Environmental Concern (ACECs), realty etc. There was no formal presentation since the meeting was an open house that lasted for 2 or 3 hours (depending on the location) and attendees arrived at various times throughout the time period. Each interdisciplinary team member had a station that identified their resource specialty, maps, and posters that showed opportunities for change the specialist had identified from their review of the current RMP. Attendees were encouraged to talk individually with our specialists about any questions or concerns they might have related to the resource area. The public was encouraged to submit their comments and concerns on the comments sheets available. There was a total of 60 attendees from the 9 meetings held.

■ Ontario June 25

Two attended the first open house in Ontario. No concerns or issues were brought up. Following that open house a news release, and a paid ad were placed in local newspapers to encourage attendance. In some communities radio announcements (Pendleton and Hermiston) were aired. Also Ontario, Pendleton and Hermiston had billboard signs that displayed the time, date and location of the meeting.

■ **Milton-Freewater**
July 7

The main topic discussed at the Milton-Freewater meeting was access for the private inholdings up the South Fork of the Walla Walla River (SFWW). Other concerns brought up included: mining, small parcels of BLM land that could be disposed of, the reintroduction of spring chinook salmon into the SFWW, and the possibility of the Forest Service managing the BLM tract of land along the SFWW, since they were closer to the area.

■ **Pendleton**
July 7

Topics brought up in Pendleton included the sale of isolated tracts of BLM land, the protection of the shrub community in Juniper Canyon, special status species, noxious weeds and general grazing concerns.

Hermiston attendees brought up the sale of isolated tracts of BLM land, access to mining claims, access and land tenure, social-economic concerns, law enforcement issues, and travel management.

■ **Hermiston**
July 8

■ **La Grande**
July 14

The La Grande open house attendees discussed energy development proposals, sage grouse habitat needs, grazing, prescribed and wildfire concerns, access issues, travel management, fish habitat concerns, motorized use and general recreation as well as the sale of isolated tracts of BLM land.

The attendees in Enterprise discussed coordination with the county on the plan revision, connectivity issues, habitat con-

■ **Enterprise**
July 10

cerns, conservation management in general, ACEC's and Wild and Scenic Rivers, Wilderness Study Areas (WSA), management strategies, noxious weeds, no net gain to public ownership, social-economic concerns, motorized use and recreation opportunities in general.

■ **Asotin**
July 23

The attendees in Asotin discussed concerns about grazing on newly acquired lands, even if they had been in the past, isolated parcels disposal, noxious weeds, recreational impacts to adjacent private lands, grazing issues, and travel access.

Attendees at the Baker meeting discussed energy development, graz-

■ **Baker**
July 24

ing concerns, mining concerns, travel management, viewsheds, visuals, recreation opportunities, ACECs, noxious weeds, sage grouse habitat, special status species, fire management, habitat connectivity and fragmentation, wilderness characteristics, and the sale of isolated tracts of BLM land.

Troy attendees had concerns about noxious weeds, river recreation, grazing, access to public land, motorized use, "light" pollution from windmills, and motorized use.

■ **Troy**
July 29

Data Used in Scoping

Data Source	Description
Interior Columbia Basin Ecosystem Management Project (ICBEMP)	Winter deer habitat, bald eagle habitat, bighorn sheep habitat, Columbia spotted frog habitat, Washington ground squirrel habitat.
Landfire National Data Center	Fire Regimes, Existing Vegetation Type USFS 2006
Natural Resources Conservation Service (NRCS)	Soil survey data for Oregon and Washington
OR/WA BLM	Oregon/Washington BLM corporate data
Oregon and Washington Natural Heritage Program	Data for sensitive and listed species, Oregon gap analysis
Oregon Department of Environmental Quality (DEQ): Water Quality Division	OR Steams Water Quality 0406
Oregon Department of Fish and Wildlife (ODFW)	Conservation Opportunity Areas
Oregon Department of Geology and Mineral Industries (ODGAMI)	Oregon Geologic Data Compilation- Release 1.1 Geothermal Resources Information Layer for Oregon Release 1
Oregon Nature Conservancy	Ecosystems and salmon portfolios
Streamnet Pacific States Marine Fisheries Commission	Bull trout distribution, summer steelhead and spring chinook
Tri County Weeds (Baker, Union, Wallowa)	Weeds Data
U.S. Fish & Wildlife Service	Critical Habitat for bull trout. Critical Habitat for summer steelhead and spring chinook
U.S. Forest Service	Wallowa Whitman Special Status Species, IMAP Wildland Urban Interface of the Blue Mountains 1/19/2006

Data Gaps

Current ODFW Big Game Winter Range	Realty Withdrawals
Energy Corridors	Roads Data Gaps
Forest Inventories	Sub-Surface Minerals and Split Estates
Malheur County Soil Survey	Utility Lines and Corridors
Native Vegetation and Existing Vegetation	

Future Steps in the Process

The Baker FO will continue to work with the BLM Oregon and Washington District and State Offices as it prepares the RMP/EIS. In particular, the Baker FO will seek concurrence from the BLM Oregon State Director on matters such as issues to be addressed in the RMP, the approach for addressing those issues, and RMP alternatives.

The Baker FO will continue to keep the public, State and Federal agencies and governments informed and involved throughout the development of the plan. The RMP web site email address will be updated as appropriate, and newsletters will be sent as pertinent news becomes available.

The Baker FO welcomes public input at any time during the project. The next steps in the RMP process will be the finalization of the issue statements, finalization of the Desired Future Conditions (DFC) and draft alternatives. Processes for involving the public in these steps are expected to be similar to the processes used during scoping, and may include Open House meetings and/or workshops. The next required public comment period will be upon publication of the Draft RMP/EIS. The draft document will be widely distributed and available on the Baker FO RMP web site. The availability of the draft document will be announced in the Federal Register, and a 90-day public comment period will follow with public meetings held in a variety of locations.



More Information

Baker RMP Web site:

<http://www.blm.gov/or/districts/vale/plans/bakerrmp>

RMP Revision Team Leader:

baker_rmp@blm.gov
(541) 523-1301

Summary of Issues



Issues Identified in the scoping process

Issues Identified

Issue	Number of Comments
Access	8
Air and Water Quality	16
BLM Management	19
Climate Change	5
Economics	7
Energy Development	26
Fire Management	11
Forestry	16
Grazing	19
Monitoring	3
Natural Resources	9
Realty	2
Recreation	18
Special Designations	5
Special Status Species	16
Travel Management	16
Tribal Concerns	4
Vegetation	15
Visual	6
Weeds	12
Wildlife Habitat	21
Miscellaneous	10
Total	264

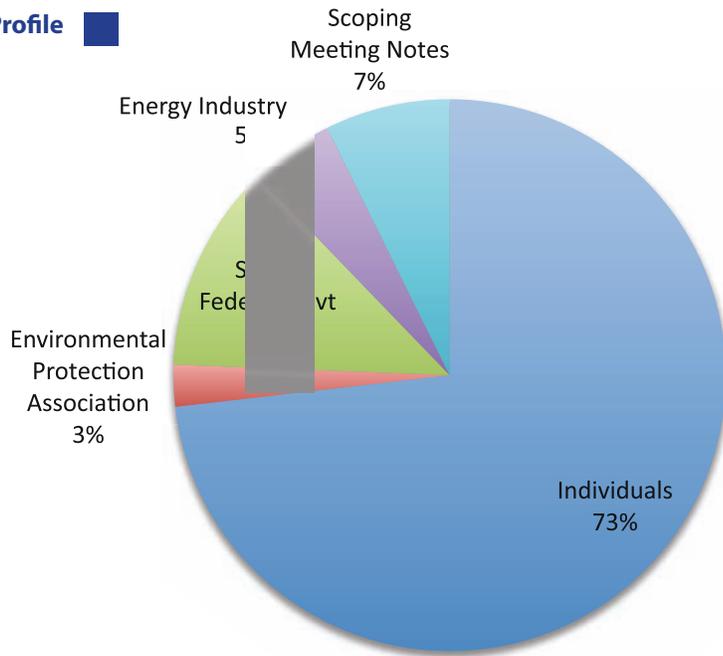
Methodology

The Baker Field Office Scoping period began with the publication of the Notice of Intent (NOI) to Prepare an Environmental Impact Statement in the Federal Register on January 15, 2008 (Vol. 72, No. 10 pp. 2520-2521). Formal scoping ended on August 31, 2008. Although formal scoping ended in August, scoping comments will continue to be accepted and addressed whenever they arrive. New comments may not be reflected in the scoping report, but will be considered in the NEPA process. Forty written responses were received and 264 comments were derived from this scoping effort. Comments were received at our scoping email address, baker_rmp@blm.gov, through the mail, and summary comments were recorded at scoping meetings.

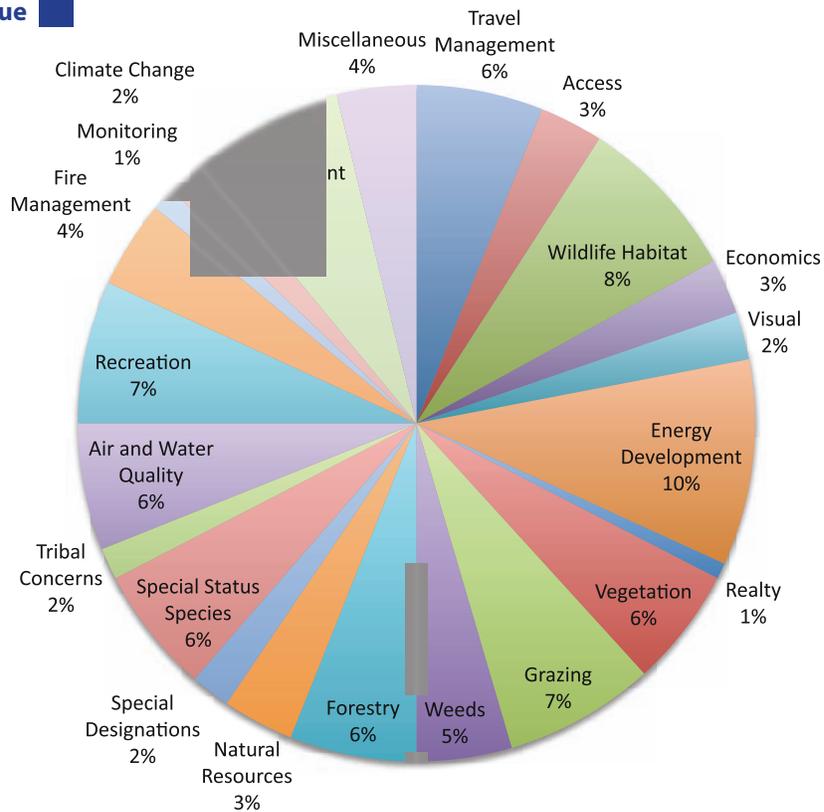
ICF International's CommentWorks software was used for issue sorting. Electronically received comments were directly entered, and hardcopy submissions scanned and converted. The planning team developed preliminary issues prior to the scoping meetings to provide the public with general ideas for issues. A subset of the planning team met and created an issue outline of identified preliminary planning issues. New issues were added to the planning outline as they were found in the scoping comments. Individual comments were excerpted from the scoping letters and assigned to one or more issue categories. A CommentWorks issue report was then generated, grouping comments together by category. The issue categories and comments were incorporated when writing the issue statements for this report. The Interdisciplinary Team (IDT) will finalize issue statements during the month of October.

Nested under each issue category and preliminary issue statement are examples of public concerns the planning issue addresses. Examples were included to show how the planning issue statements are responsive to public input.

Commenter Profile



Scoping Comments by Issue



Planning Issues

Air Quality ■ “How will management activities be conducted to meet or surpass air quality standards?”

“How can the BLM provide access to public land while limiting impacts to natural and cultural resources, reducing user conflicts, and promoting public safety?” ■ **Access and Travel Management**

BLM Management and Land Tenure Adjustments ■ “How can the Baker Field Office manage its scattered land base to meet the public’s need for recreation access, and resource extraction, while protecting and/or enhancing vegetation, soils, and fish and wildlife habitat?”

“How does management of Baker Resource Area land and resources impact climate change?” ■ **Climate Change**

Cultural Resources ■ “How can the Baker Field Office best protect and preserve cultural resources and values?”

Energy and Mineral Development ■ “How will energy and mineral resources be managed within the Baker Resource Management Area?”

“How will fire and fuels management activities be addressed throughout the Baker Field Office area, including within the wildland-urban interface?” ■ **Fire Management**

Forestry ■ “How will BLM maintain or improve forest and woodland communities, and how will woodlands be managed to maintain or improve rangeland and wildlife habitat?”

Grasslands, Sagebrush, Riparian and Wetland Habitats ■ “How will sagebrush steppe, riparian and wetland habitats be managed to maintain, improve, or restore healthy plant communities?”

Grazing ■ “ What Baker Resource Management Area lands should be available or unavailable for livestock grazing and how will these lands be managed to sustain resource values while maintaining stable watersheds and the continued production of forage? ”

“ What types of monitoring will be established to ensure compliance with the plan guidelines and to assess guideline effectiveness? ” ■ **Monitoring**

Recreation ■ “ How will the BLM respond to increasing demands for recreational activities and access to public lands? ”

“ How will the Baker Field Office manage lands to help promote social and economic sustainability and resiliency of local communities? ” ■ **Socio-Economics**

Special Designations ■ “ Where should BLM use special designations to protect or enhance unique resources or recreational experiences? ”

“ How will Baker Resource Management Area lands be managed to promote recovery of listed species and help prevent listing of sensitive species? ” ■ **Special Status Species**

Visual ■ “ Are the current visual resource classes appropriate to predict scenic values , and how will VRM objectives be applied to the planning area to manage different visual resource values? ”

“ How will BLM manage activities to minimize impacts to soil and water resources? ” ■ **Water Quality**

Weeds ■ “ How can the Baker Field Office best reduce the impacts of noxious and invasive weeds to resources and users? ”

“ How will the decision area lands be managed to enhance wild-life, fish and plant habitats? ” ■ **Wildlife Habitat**

Air Quality

“How will management activities be conducted to meet or surpass air quality standards?”

Public comments used to write this planning issue

The public comment that was used to write this issue related to the requirement for all lands within the planning area to be managed according to the National Ambient Air Quality Standards and the Clean Air Act.

Public comments used to write this planning issue

The public comments used to write this planning issue include but are not limited to, non-motorized and motorized use, public access restrictions by private landowners, recognition of increasing recreational demands, and the desire for proper land stewardship.

Access and Travel Management

“How can the BLM provide access to public land while limiting impacts to natural and cultural resources, reducing user conflicts, and promoting public safety?”

Public comments used to write this planning issue

Public comments used to write this planning issue include the desire to block up public lands; disposal of isolated parcels; provision for recreational opportunities; provision for good land stewardship; ensuring no net loss of the land’s biological value; site specific disposal locations; the consideration of energy needs; no gain in Federal acreage; wildlife habitat; recreation potential; and special designation areas.

Considerations in Resolving this issue

What criteria should be used to identify lands appropriate for acquisition, retention and disposal?

What areas should be excluded from or avoided for right-of-way purposes?

BLM Management and Land Tenure Adjustments

“ *How can the Baker Field Office manage its scattered land base to meet the public’s need for recreation access, and resource extraction, while protecting and/or enhancing vegetation, soils, and fish and wildlife habitat?* ”

Climate Change

“ *How does management of Baker Resource Area land and resources impact climate change?* ”

Public comments used to write this planning issue

The public comments used to write this planning issue include concerns about increased greenhouse gas emissions, changes in weather patterns, precipitation rates, and chemical reactions.

Cultural Resources

“*How can the Baker Field Office best protect and preserve cultural resources and values?*”

Considerations in Resolving this issue

How will BLM manage wildland fire to reduce impacts to sage dependent species, private property, cultural resources and timberland?

What should the landscape-level fire management goals and objectives be?

What is the appropriate management response to naturally occurring wildland fires?

When and where should wildland fire use or prescribed fire be an accepted action in meeting overall resource management objectives?

How can fire suppression activities be managed to minimize the adverse effects to resources while providing for public health and safety and protecting private property?

Public comments used to write this planning issue

The public comments used to write these planning issues include but are not limited to, concerns related to the application of fuel treatments, use of models, air quality, the potential to let wildfire burn naturally in certain areas, the risk of catastrophic fire, and impaired ecological conditions.

Public comments used to write this planning issue

The comments used to write this planning issue include concerns about the preservation of traditional cultural properties, historic sites (Oregon Trail), and access to and sustainability of traditional foods.

Considerations in Resolving this issue

Cultural Resources

How will cultural resources, including potential Traditional Cultural Properties (TCP's) be protected and managed?

Native American Concerns and Treaty Rights

How can treaty rights and federal responsibilities best be met and adequately addressed?

How can significant tribal traditional use areas, traditional cultural properties, sacred sites and landscapes be protected?

How can the opportunity for sustainable harvest of traditional foods be protected or enhanced, including water quality, and habitat for cultural plants, game animals, and fisheries?

Fire Management

“*How will fire and fuels management activities be addressed throughout the Baker Field Office area, including within the wildland-urban interface?*”

Public comments used to write this planning issue

This planning issue was developed due to existing applications for rights-of-way for renewable energy development and the potential for additional applications. Additional concerns related to impacts to wildlife, wildlife and plant habitat, the viewsheds, the spread of noxious weeds and safety.

Considerations in Resolving this issue

How will energy and mineral resources be managed within the Baker Resource Management Area?

Considerations with Regard to Realty

Where and how should leasable mineral and energy development be authorized while mitigating impacts to other resources?

What areas are suitable (or best suited) for renewable energy development and right-of-way corridors?

What limitations should/can be placed on further development within existing or new utility, transportation, and communication rights-of-way corridors?

Energy and Mineral Development

“How will energy and mineral resources be managed within the Baker Resource Management Area?”

Considerations with Regard to Minerals

How will mineral authorizations and activities be managed to allow for mineral exploration and development while allowing for multiple use and protection of natural resources?

How should abandoned mine features be managed to protect public safety while providing for wildlife habitat and historic values?

What are the needs of communities located in the Baker Resource Area for mineral materials and the siting of community pits?

What is the need and support for a designated recreational prospecting area?

Public comments used to write this planning issue

Some of the public comments used to write this planning include the desire to protect timberlands, desire to have diverse forests, concerns about wildfire, fuels management, thinning plans, forest health issues, timber harvest and sustained yield.

Considerations in Resolving this issue

How will forest and woodland health be maintained or restored?

How will the various forest resources be managed?

What areas are available and have the capacity for planned sustained-yield timber harvest or special forest product harvest?

Where should juniper and aspen stands be actively managed for improved plant community health?

How should the various forest resources be managed by the Baker Field Office?

Forestry

“ *How will BLM maintain or improve forest and woodland communities, and how will woodlands be managed to maintain or improve rangeland and wildlife habitat?* ”

Grasslands, Sagebrush, Riparian and Wetland Habitats

“ *How will sagebrush steppe, riparian and wetland habitats be managed to maintain, improve, or restore healthy plant communities?* ”

Public comments used to write this planning issue

Some of the public comments used to write this planning issue include, concerns raised about the protection and conservation of grasslands and sagebrush, backcountry experiences in the sagebrush-grassland biomes, sagebrush dependent species, water quality and riparian habitat.

Grazing

“*What Baker Resource Management Area lands should be available or unavailable for livestock grazing and how will these lands be managed to sustain resource values while maintaining stable watersheds and the continued production of forage?*”

Public comments used to write this planning issue

Public comments used to write this planning issue include concerns expressed for the need to monitor the implementation effectiveness of the plan and validate as well as assess the plan objectives; land use allocations; and management actions.

Monitoring

“*What types of monitoring will be established to ensure compliance with the plan guidelines and to assess guideline effectiveness?*”

Recreation

“*How will the BLM respond to increasing demands for recreational activities and access to public lands?*”

Public comments used to write this planning issue

Public comments used to write this planning issue include, socio-economic concerns, livestock grazing impacts on wildlife habitat and the spread of noxious weeds, rangeland health concerns, fire management, and grazing leases on newly acquired lands.

Considerations in Resolving this issue

How will the BLM manage closed allotments, relinquished permits and newly acquired lands?

How should livestock grazing be managed to reduce user conflicts and meet standards for rangeland health?

Public comments used to write this planning issue

Public comments that were used to write this planning issue include non-motorized and motorized use, public access restrictions by private landowners, and availability of variety of recreation experiences.

Socio-Economics

“*How can the Baker Field Office manage its scattered land base to meet the public’s need for recreation access, and resource extraction, while protecting and/or enhancing vegetation, soils, and fish and wildlife habitat?*”

Public comments used to write this planning issue

The public comments that were used to write this planning issue include comments about resource extraction of timber and fuels management for local community benefit, grazing and mineral extraction, and the need to promote ecological integrity.

Considerations in Resolving this issue

What criteria should be used to identify lands appropriate for acquisition, retention and disposal?

What areas should be excluded from or avoided for right-of-way purposes?

Public comments used to write this planning issue

The public comments used to write this planning issue include avoidance of non-WSA wilderness values degradation, protection for special status species, wildland fire, grazing, and noxious weed concerns.

Considerations in Resolving this issue

Are the current special designation management and plans appropriate?

How will Baker Field Office lands outside of current WSAs with wilderness values be identified and managed?

How will the BLM protect wilderness characteristics in existing WSAs?

Special Designations

“*Where should BLM use special designations to protect or enhance unique resources or recreational experiences?*”

■ Special Status Species

“ *How will Baker Resource Management Area lands be managed to promote recovery of listed species and help prevent listing of sensitive species?* ”

Public comments used to write this planning issue

Public comments used to write this planning issue include concern about special status fish, wildlife, and plant species habitat protection, sage grouse concerns and the use of habitat management plans.

Considerations in Resolving this issue

How can habitat fragmentation be minimized for wildlife and plant communities within the decision area?

Public comments used to write this planning issue

The public comments used to develop this issue related to concerns about the effects of energy development on viewsheds and the placement regulations.

■ Visual

“ *Are the current visual resource classes appropriate to predict scenic values , and how will VRM objectives be applied to the planning area to manage different visual resource values?* ”

Water Quality

“*How will BLM manage activities to minimize impacts to soil and water resources?*”

Public comments used to write this planning issue

Some of the public comments used to write this planning issue include the desire for greater effort in controlling noxious weeds on BLM lands adjacent to private parcels, the need to reduce weed infestation impacts, weed vector control, creation and implementation of a comprehensive invasive species detection, monitoring, and control strategy, and, the proliferation of native ecosystems.

Weeds

“*How can the Baker Field Office best reduce the impacts of noxious and invasive weeds to resources and users?*”

Wildlife Habitat

“*How will the BLM respond to increasing demands for recreational activities and access to public lands?*”

Public comments used to write this planning issue

The public comments used for this planning issue include the need to ensure clean water and healthy watersheds while implementing management actions.

Public comments used to write this planning issue

The public comments used to write this planning issue include the desire to preserve connectivity; maintain wildlife migration corridors; acquisition and/or disposal of public lands; the desire to reduce impacts from wildland fire; roads and energy development impacts; and maintenance or improvement of wildlife, fish and plant habitats.

Considerations in Resolving this issue

How can habitat fragmentation be minimized for wildlife and plant communities within the decision area?

Draft Planning Criteria

Preliminary Planning Criteria

BLM planning regulations (43 Code of Federal Regulations 1610) require preparation of planning criteria for all RMPs. Planning criteria are the constraints or ground rules guiding and directing the development of the Plan, and determine how the planning team and the public approach the development of alternatives and ultimately the selection of a Preferred Alternative. Criteria ensure plans are tailored to the identified issues, so unnecessary data collection and analyses are avoided. Planning criteria are based on analyses of information pertinent to the Planning Area, professional judgment, standards prescribed by applicable laws, regulations, and agency guidance, and are the result of consultation and coordination with the public, other Federal, State and local agencies, and Indian tribes.

The preliminary criteria listed below were developed by a BLM interdisciplinary team. The criteria were included in the RMP Federal Register Notice. After public input, criteria become proposed criteria and could be added to or changed as the issues are addressed or new information is presented. The Vale District Manager will approve the issues, criteria, and any changes.

1. The BLM will manage the Baker Resource Area to protect resources in accordance with the Federal Land Policy and Management Act of 1976 (FLPMA, 43 U.S.C. 1701 et seq.), other applicable laws and regulations, and all existing public land laws.

2. The Plan will recognize valid existing rights within the Planning Area and review how valid existing rights are verified. The Plan will outline the process the BLM will use to address applications or notices filed on existing claims or other land use authorizations after the completion of the Plan.

3. Lands covered in the RMP will be public lands, including split estate lands, managed by BLM. Decisions on lands not managed by the BLM will not be made in the RMP except when formal cooperator status is mutually accepted and leads to additional RODs.

4. The BLM will use a collaborative and multi-jurisdictional approach, where possible to jointly determine the desired future conditions of public lands.

5. The Plan will emphasize the protection and enhancement of the Planning Area's biodiversity while at the same time providing the public with opportunities for compatible commodity-based and recreation activities.

6. The socioeconomic impacts of the alternatives will be addressed.

7. The BLM will use current scientific information, research, technologies, and results of inventory, monitoring and coordination to determine appropriate local, and regional management strategies that will enhance or restore impaired ecosystems.

8. The planning process will include an EIS that will comply with NEPA standards.

9. Any land located within the Planning Area's administrative boundary, and subsequently acquired by the BLM, will be managed consistent with the Plan, subject to any constraints associated with the acquisition.

10. The Plan will recognize the State's responsibility to manage wildlife. BLM would consult with ODFW before establishing no-hunting zones or periods for the purposes of protecting public safety, administration, or public use and enjoyment.

11. The Plan will address OHV designation and access, and may identify special use areas. A post-RMP Transportation Management Plan will be completed to address motorized use within the Baker Resource Area.

12. Laws and regulations regulate grazing management. The Plan will incorporate the Rangeland Health Standards and Guidelines. It will provide a strategy for ensuring proper grazing practices are followed within the Planning Area.

13. The planning process will involve American Indian Tribal governments and will provide possible strategies for the protection of recognized traditional uses, if such uses are identified.

14. Decisions in the Plan will strive to be compatible with existing plans and policies of adjacent local, State, Federal, and tribal agencies as long as the decisions are consistent with Federal law governing the administration of public land.

15. In addition to the criteria listed above, the following program specific criteria apply to the RMP/EIS.

i. Air Quality

Under the Clean Air Act, air quality of most of the Planning Area is designated as PSD Class II. BLM lands will be managed cooperatively with other land management agencies and jurisdiction and will be consistent with the Clean Air Act in meeting PSD objectives. BLM will also cooperate in man-

agement of airsheds where visibility protection/ regional haze are issues affecting PSD Class I areas (Eagle Cap and Hells Canyon wilderness areas) and where non-attainment of National Ambient Air Quality Standards occurs within or adjacent to the planning area (La Grande and Wallula, Washington)

ii. Water Quality and Resources

The Federal Water Pollution Control Act of 1977, as amended (Clean Water Act), requires the BLM to be consistent with State nonpoint source management program plans and relevant water quality standards. Section 313 requires compliance with State water quality standards. The Plan will incorporate Best Management Practices (BMPs) or other conservation measures for specific programs and activities. Water quality will be maintained or improved in accordance with State and Federal standards. The plan revision will link with the Water Quality Restoration Plan Process (1997) identified by the Forest Service and BLM protocol for addressing 303(d) listed waters.

iii. Vegetation Management

Vegetation will be managed to provide for biological diversity at the landscape level, to protect and restore native perennial and desirable nonnative perennial species, and to provide for consumptive uses and non-consumptive values, including visual quality and watershed condition. The RMP/EIS will include provisions for plant maintenance, watershed protection and stability, and wildlife habitat and will provide for livestock. Fire and other treatment methods are considered tools to meet vegetation management objectives.

iv. Soil Management

Soil will be managed to protect long-term productivity. BMPs will be incorporated into other programs to minimize soil erosion and compaction resulting from management actions.

■ v. Livestock Management

Livestock forage allocations, established in all agreements and decisions will not be initially revised by this plan. However, the process for determining livestock forage allocations through allotment evaluations and rangeland health assessments will proceed in accordance with BLM regulations and policy.

Grazing management adjustments will occur on a priority basis over the life of the plan through the adaptive management process and subsequent agreements, decisions, or activity plan revisions. Authorization of livestock use in the Planning Area will be subject to change through the life of the plan.

Grazing of public land will be authorized under the principles of multiple-use and sustained yield. Livestock will be managed to restore, protect, or improve public land resources and rangeland productivity and to stabilize the livestock industry dependent on the public range over the long term. Forage will be allocated by allotment for livestock grazing on suitable rangeland based on multiple-use and sustained yield objectives. Existing management systems, including those outlined in Allotment Management Plans (AMPs), will continue until evaluations or rangeland health assessments indicate that change is needed to meet objectives.

■ vi. Fire/Fuels Management

Wildland fire, as a critical natural process, will be integrated into land and resource management planning to assist in the attainment of resource management objectives. Where appropriate, prescribed fire would be used to approximate the desirable level of wildland fire. The use of surface-disturbing equipment to suppress wildland fires in areas such as WSAs and areas containing significant cultural or paleontological values would only be used to the extent necessary to reduce the risk to and protect firefighters, human life, property and resource values. Public land affected by fire will be managed in accordance with multiple-use objectives. Fuels management would focus on reducing fuel loading to ensure healthy, resilient and sustainable forest and rangeland and reduce wildfire risk in urban interface zones and communities at risk.

■ vii. Forest and Woodland Management

Forested areas will be managed under the principles of multiple-use and sustained yield and in accordance with the President's Forest Health Initiative (2002) and Oregon's Eastern Oregon Ecosystem Health Strategy. All juniper and quaking aspen woodlands will be managed to protect long-term biological productivity and diversity and watershed values. The BLM will participate in and take advantage of various partnerships and collaborative efforts, such as the Blue Mountains Demonstration Area that seek to improve ecosystem health at a landscape scale.

■ viii. Special Status Species

The BLM is mandated by law to assist in the conservation and recovery of species listed as Threatened or Endangered or proposed for listing under the Endangered Species Act (ESA) through the PACFISH and INFISH interim guidance. Federal actions that may affect the well being of these species require consultation with the USFWS and/or NOAA Fisheries Service. BLM policy requires that authorized actions do not contribute to the need to list any other Special Status species under the provisions of the ESA. The intent is to avoid the need for future listings of species as threatened or endangered. BLM will continue to manage its lands consistent with existing Biological Opinions and letters of concurrence from USFWS and NOAA Fisheries.

■ ix. Integrated Noxious Weed Management

The BLM will continue its partner relationship with non-governmental organizations and with County, State, and Federal agencies to monitor the locations and spread of noxious weeds, to implement noxious weed control, and to initiate restoration strategies in accordance with the integrated weed management guidelines and design features identified in the Vale District Noxious Weed Management Program. The BLM will assess land prior to acquisition to determine if noxious weeds are present.

■ x. Riparian Areas, Floodplains, and Wetlands

Riparian areas, floodplains, and wetlands will be managed to restore, protect or improve their natural functions relating to water storage, ground water recharge, water quality, and fish and wildlife values.

xi. Areas of Critical Environmental Concern

ACECs may be designated where special management attention is required to protect historical, cultural, or scenic values, natural resources or processes, or human life and safety. Management requirements for ACECs will be identified in the RMP/EIS

xii. National Wild and Scenic Rivers System

As required by law, streams will be evaluated for potential addition to the National Wild and Scenic River System. The evaluation will be conducted according to guidelines published by the Secretaries of Interior and Agriculture on September 7, 1982, and other applicable guidance including W&S River manual 8351. Designated WSRs will be managed in accordance with laws and existing plans.

xiii. Wilderness Study Areas

Wilderness Study Areas designated under authority of FLPMA, Sections 603 and 202, will be managed in accordance with the Interim Management Policy for WSAs. This planning effort will not change existing decisions regarding wilderness suitability for WSAs established under Section 603 and signed by the Secretary of the Interior, to recommend areas as suitable for wilderness designation. New areas could be inventoried for wilderness characteristics during the planning process. Any new inventories of wilderness characteristics will be conducted, if necessary, under the authority of Sections 201 and 202 of FLPMA.

xiv. Recreation

Some areas may be subject to special measures to protect resources or reduce conflicts among uses. Where there is a demonstrated need, the BLM may develop and maintain recreation facilities including campgrounds, picnic areas, interpretive sites, boat access, and trails.

xv. Visual Resources

The BLM will manage public land to protect the quality of scenic (visual) values in accordance with established guidelines. All public land will be designated as VRM Class I, II, III or IV.

xvi. Cultural and Paleontological Resources

Cultural and paleontological resources will be managed to maintain or enhance scientific, interpretive and educational values. Cultural resources will be managed to protect American Indian interests where possible.

xvii. Energy and Minerals

Except where specifically withdrawn to protect resource values, public land will be available for energy and mineral exploration and development subject to applicable Federal and State laws and regulations

xviii. Land Tenure Adjustments

BLM-administered land will be retained in public ownership unless disposal of a particular parcel is determined to serve the public interest. Land may be identified for disposal by sale, exchange, State indemnity selection or other authorized methods. Land types will be identified for acquisition based on public benefits, management considerations, and public access needs. Specific actions that meet land tenure adjustment criteria established in the RMP/EIS will occur with public participation and will be made in consultation with local, County, State, and tribal governments.

xix. Rights-of-Way

Public land will generally be available for land use authorizations including transportation and utility rights-of-way with preference given to existing corridors. Exceptions will include areas specifically prohibited by law or regulation (e.g., WSRs and WSAs) and to other areas identified in the Plan for specific resource values.

xx. Motorized Vehicle Use

Prior to the development of the Travel Management Plan (TMP) all public land will be designated as open, limited to existing or closed for OHV use. Public safety, resource protection, user access needs, and conflict resolution will be considered in assigning these designations.

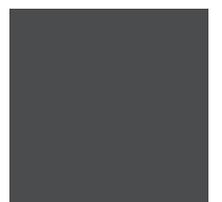
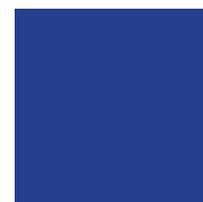
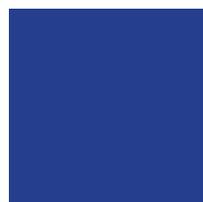
List of

Commenters



Jane Bohn
Laren B. Bright
The Burns Paiute Tribe
Roger Card
Christopher Christie
Frank Clough
Ned Coe
Confederated Tribes of the Umatilla Reservation
John Ehart
John S. Ehart
Bonnie Ehart
Janet Elough
Environmental Protection Agency
Bob Evans
Mike Haberman
Hells Canyon Preservation Council
Horizon Wind Energy
Ed Huggins
Mike Humbert
Matt Kniesel
Carol Larkin

Sam Ledgewood
W.L. Leehe
Ron Lesley
Clifton McReynolds
Richard Mein
David Mildrexler
Marquis Navarre
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Mike Odom
Oregon Department of Fish and Wildlife
Oregon Department of Natural Resources
Oregon Department of Parks and Recreation
Renewable Northwest Project
Carol S. Sams
Bill Tsiatsos
Vestas-American Wind Technology, Inc.
Rich Weaver
Jeff and Dori Wick
Don Widner
Greg Widner
Larry Widner



Appendix A



Executive Summary



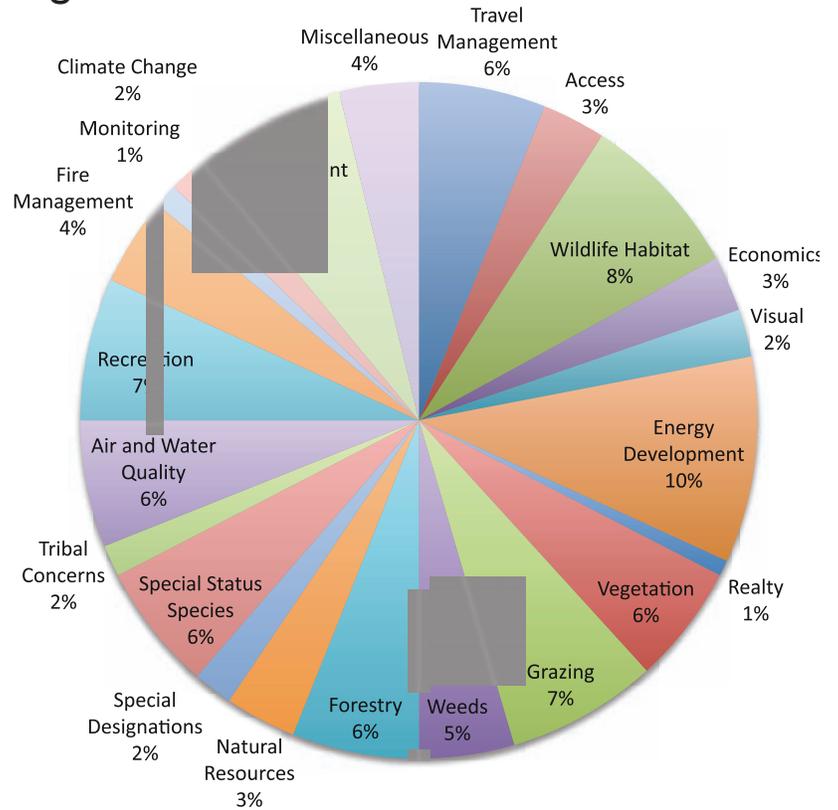
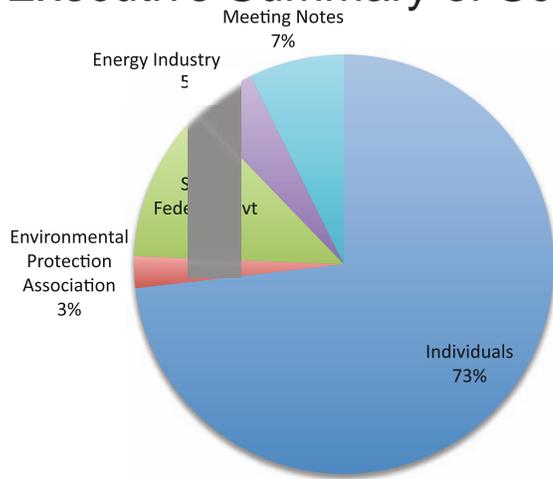
Scoping Report

Baker RMP

Revision



Executive Summary of Scoping Comments



Issues Identified in the scoping process

Issue	Number of Comments
Travel Management	16
Access	8
Wildlife Habitat	21
Economics	7
Visual	6
Energy Development	26
Realty	2
Vegetation	15
Grazing	19
Weeds	12
Forestry	16
Natural Resources	9
Special Designations	5
Special Status Species	16
Tribal Concerns	4
Air and Water Quality	16
Recreation	18
Fire Management	11
Monitoring	3
Climate Change	5
BLM Management	19
Miscellaneous	10
Total	264

Commenter Profile

Type	Count
Individual	30
Environmental Protection Association	1
State/Federal Govt	5
Energy Industry	2
Scoping Meeting Notes	3
Total	41

Summary of Decisions

Decision	Issues
Addressed in EIS	228
Addressed by Policy/EIS	29
Out of Scope	7
Total	264

Scoping Meeting Information

Scoping Meeting Attendance	
Meeting	Attendees
Ontario	2
Milton-Freewater	12
Pendleton	2
Hermiston	5
La Grande	9
Enterprise	2
Asotin	3
Baker	19
Troy	6
Total	60

Appendix B

Scoping



Comments



(by category)



Scoping Report



Baker RMP



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Section 1—Travel Management

■ Carol S. Sams

Individual

Transfer isolated tax lots to surrounding landowners. [...] Since we control access the land is not impacted by the public, 4 wheelers [sic], and other land erosion problems.

■ David Mildrexler

Individual

Travel Management. I suggest a standard that is conservative regarding motorized use.

Fossil fuel-driven recreational activities are not the traditional use of public lands and should not be given priority in any circumstances.

■ Environmental Protection Agency

Federal Government

Water resources

Water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the state of Oregon and Washington (and Tribes with approved water quality standards) to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. The revised RMP/EIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the revised RMP that are listed on the States and Tribes' most current EPA-approved 303(d) lists. The revised RMP/EIS document should describe existing restoration and enhancement efforts for those waters, how the revised RMP will coordinate with on-

going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within impaired waters. Antidegradation provisions of the CWA apply to those water bodies where water quality standards are currently being met. This provision prohibits degrading the water quality unless an analysis shows that important economic and social development necessitates some degradation of water quality. The revised RMP/EIS evaluation should determine how the antidegradation provisions would be met. Public drinking water supplies and/or their source areas often exist in many watersheds. It is possible that source water areas may exist within the Baker Resource Area. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the state for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. As a result, state agencies have been delegated responsibility to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. Since projects under the revised RMP may impact sources of drinking water, EPA recommends that BLM contact Oregon Departments of Environmental Quality and Washington State Department of Ecology to help identify source water protection areas within the planning area. The revised RMP/EIS should: (a) Identify all source water protection areas within the project area. (b) Identify all activities that could potentially affect source water areas. (c) Identify all potential contaminants that may result from the proposed project. (d) Identify all measures that would be taken to protect the source water protection areas in the revised RMP/EIS. As the planning of the revised RMP/EIS continues, EPA recommends that BLM evaluate the impacts roads would have on water bodies in the planning area. In particular, roads contribute more sediments to streams, interrupt the subsurface flow of water, especially where roads cut into steep slopes, may fragment habitats and disturb wildlife, and accelerate noxious weed infestations. The revised RMP/EIS should include data about existing road

networks and evaluate the change in road miles and density that will occur as a result of the revised RMP projects and predicted impacts to water quality by roads. The revised RMP/EIS should note that, under the CWA, any construction project disturbing a land area of one or more acres requires the National Pollutant Discharge Elimination System (NPDES) permit for discharges to waters of the U.S. The revised RMP/EIS should document the plan's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality. The revised RMP projects that would involve construction of facilities and access roads may also compact the soil, thus changing hydrology, runoff characteristics, and affecting flows and delivery of pollutants to water bodies and ecological function of the area. Therefore, the revised RMP/EIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions within the Baker Resource Area. The document should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to 5 groundwater and surface water resources. For groundwater, the potentially affected groundwater basin should be identified and any potential for impacts to springs or other open water bodies and biologic resources should be analyzed.

■ Hells Canyon Preservation Council

Environmental Protection Association

OHV trails that ford riparian areas should also be closed

Roads are a major factor in erosion—especially those in need of repair.

It would then be best for watersheds to decommission any unnecessary roads and convert them back to their natural states.

■ John S. Ehart

Individual

More Recreation use should be made avail-

able: walking trails, horse trails, atv trails, etc. throughout the Blue Mountain Area.

■ **Oregon Department of Fish and Wildlife**
State Government

We recommend the BLM pursue access to these parcels and/or land trades to obtain larger, contiguous blocks of public land.

■ **Ron Lesley**
Individual

... I am very disappointed in finding roads closed that have been open for years, that provided access to the back country

■ **The Nez Perce Tribe**
Scoping Meeting Notes

Also mentioned was the need for access around the Grande Ronde parcels (Rocky Dixon).

Section 1.2—Motorized Use

■ **David Mildrexler**
Individual

It is imperative to be very clear that the wilderness character of lands will be protected from damaging uses such as grazing and motorized recreation.

■ **Hells Canyon Preservation Council**
Environmental Protection Association

Their use should be heavily regulated and focused on certain areas less abundant in natural resources.

■ **Oregon Department of Fish and Wildlife**
State Government

believes these effects are minimized when

OHV travel is limited to roads and trails located and designed for motorized use. As demand for OHV recreational opportunities increases the BLM should develop a revised RMP to manage OHV use and ensure adequate enforcement of regulations.

■ **Ron Lesley**
Individual

I would support the use of ATV's to be used by hunters to retrieve game animals

Section 1.2.2—Maintain existing road and trail system

■ **Environmental Protection Agency**
Federal Government

Water resources

Water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the state of Oregon and Washington (and Tribes with approved water quality standards) to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. The revised RMP/EIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the revised RMP that are listed on the States and Tribes' most current EPA-approved 303(d) lists. The revised RMP/EIS document should describe existing restoration and enhancement efforts for those waters, how the revised RMP will coordinate with ongoing protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within impaired waters. Antidegradation provisions of the CWA apply to those water bodies where water quality standards are

currently being met. This provision prohibits degrading the water quality unless an analysis shows that important economic and social development necessitates some degradation of water quality. The revised RMP/EIS evaluation should determine how the antidegradation provisions would be met. Public drinking water supplies and/or their source areas often exist in many watersheds. It is possible that source water areas may exist within the Baker Resource Area. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the state for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. As a result, state agencies have been delegated responsibility to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. Since projects under the revised RMP may impact sources of drinking water, EPA recommends that BLM contact Oregon Departments of Environmental Quality and Washington State Department of Ecology to help identify source water protection areas within the planning area. The revised RMP/EIS should: (a) Identify all source water protection areas within the project area. (b) Identify all activities that could potentially affect source water areas. (c) Identify all potential contaminants that may result from the proposed project. (d) Identify all measures that would be taken to protect the source water protection areas in the revised RMP/EIS. As the planning of the revised RMP/EIS continues, EPA recommends that BLM evaluate the impacts roads would have on water bodies in the planning area. In particular, roads contribute more sediments to streams, interrupt the subsurface flow of water, especially where roads cut into steep slopes, may fragment habitats and disturb wildlife, and accelerate noxious weed infestations. The revised RMP/EIS should include data about existing road networks and evaluate the change in road miles and density that will occur as a result of the revised RMP projects and predicted impacts to water quality by roads. The revised RMP/EIS should note that, under the CWA, any construction project disturbing

a land area of one or more acres requires the National Pollutant Discharge Elimination System (NPDES) permit for discharges to waters of the U.S. The revised RMP/EIS should document the plan's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality. The revised RMP projects that would involve construction of facilities and access roads may also compact the soil, thus changing hydrology, runoff characteristics, and affecting flows and delivery of pollutants to water bodies and ecological function of the area. Therefore, the revised RMP/EIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions within the Baker Resource Area. The document should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to 5 groundwater and surface water resources. For groundwater, the potentially affected groundwater basin should be identified and any potential for impacts to springs or other open water bodies and biologic resources should be analyzed.

Section 2–Access

South Fork Walla Walla river “inholder access” issue are important considerations which must not be overlooked in a long range Management Plan. This access issue has never been resolved by BLM and must be addressed in any future long range planning process so it will not become secondary to other managed resources. Reasonable access is needed during fire season by full sized and Class II vehicles to provide both fire prevention measures (including future defensible space around the private dwellings), security, and maintenance of the properties.

The South Fork ACEC needs to be reopened so that private access, public use, and invasive plants eradication can be addressed.

■ **Carol S. Sams**
Individual

Transfer isolated tax lots to surrounding landowners. [...] Since we control access the land is not impacted by the public, 4 wheelers [sic], and other land erosion problems.

■ **Confederated Tribes of the Umatilla Reservation**
Scoping Meeting Notes

The tribes have a strong interest in the protection of and access to First Foods, with an emphasis on traditional roots.

■ **Hells Canyon Preservation Council**
Environmental Protection Association

OHV trails that ford riparian areas should also be closed

■ **Oregon Department of Fish and Wildlife**
State Government

We recommend the BLM pursue access to these parcels and/or land trades to obtain larger, contiguous blocks of public land.

■ **Ron Lesley**
Individual

... I am very disappointed in finding roads closed that have been open for years, that provided access to the back country

■ **The Nez Perce Tribe**
Scoping Meeting Notes

Also mentioned was the need for access around the Grande Ronde parcels (Rocky Dixon). Section

3–Wildlife Habitat

■ **David Mildrexler**
Individual

protection of habitat diversity should be a

Preliminary Planning Criteria for the Upland Vegetation and Plant Management and Forest and Woodland Management sections just as it is under the Wildlife Habitat section. Habitat is required by wildlife, and diversity of vegetation structures is critical to maintaining high biodiversity. The Riparian and Wetland Area Management emphasized the need to protect those areas, but as mentioned they only represent a fraction of the landscape. There must be a plan to preserve healthy plant communities on a larger scale.

Wildlife Habitat. I support connectivity

protect ecological integrity, ecosystem processes, biodiversity and connectivity.

Protection of biodiversity should be a key priority/goal in the RMP.

■ **Hells Canyon Preservation Council**
Environmental Protection Association

corridor also fragments animal populations.

Mass herbicide sprayings can also cause harm to animals, both on land and in rivers if the chemicals seep into riparian areas.

■ **Matt Kniesel**
Individual

Range —Improve range management practices that enhance range health and wildlife habitats

Protect, maintain and enhance critical big game ranges which may winter, spring, summer and fall habitats...

Protect, maintain and enhance key habitats and wildlife plant communities such as aspen, riparian zones, wetlands, mountain shrub and sagebrush communities.

■ Oregon Department of Fish and Wildlife State Government

Oregon Conservation Strategy (OCS)–OCS should be used to help BLM make strategic decisions on conservation issues and for guidance on the types of actions most likely to benefit species and habitats. The OCS describes species and habitats of greatest conservation need, identifies key conservation issues facing those at-risk species and habitats, and provides recommendations for actions and opportunities to address them. In addition, Oregon's Greater Sage Grouse Conservation Assessment and Strategy for Oregon, Oregon Plan for Salmon and Watershed Health, Bighorn Sheep and Rocky Mountain Goat Plan, Elk Management Plan, Mule Deer Management Plan, Wolf Plan and Cougar Management Plan should be used to provide guidance in land management for those species.

ODFW supports a science-based plan to address rangeland and grazing management on public lands. Rangelands and grazing should be managed to provide habitat diversity, proper functioning condition of riparian areas, water quality, and adequate forage/habitat for wildlife. Where these conditions have not been met, changes should be made to restore native rangeland habitats and enhance forage quantity/quality for wildlife.

Management activities near fish bearing streams should contain a stream restoration/fish habitat enhancement component. This can include streamside vegetation restoration, large wood placement projects, fish barrier removal (e.g., culvert replacement), and reconnecting or creating off-channel and side-channel refugia habitat.

BLM should consider well-balanced and appropriate programs of vegetation-management activities in the revised RMP to maintain mixed successional stages and vegetation conditions that provide for the full diversity of habitats and species.

There is also a need to consider key ecologi-

cal structural habitat components in the revised RMP. It is important to know how the BLM will provide for them in the managed forest. Key ecological structural habitat components, such as legacy trees, residual live trees, snags, down wood, multi-layered canopies, multiple native tree species, herb/shrub considerations, and gaps are important to many species of wildlife.

Four fire-related concerns are prominent: 1) impaired ecological condition of forest ecosystems in which composition, structure, and processes are outside their historic range of variation, 2) the risk of uncontrollable and catastrophic wildfires that have potential to destroy or modify habitats over large areas, and may also threaten the existence of wildlife populations at risk, 3) the need to integrate wildlife objectives and habitat relationships into agency efforts to aggressively manage fuels on public forests, and 4) the need to integrate wildlife objectives and habitat relationships into burned-area salvage and restoration programs.

ODFW supports a science-based plan to address rangeland and grazing management on public lands. Rangelands and grazing should be managed to provide habitat diversity, proper functioning condition of riparian areas, water quality, and adequate forage/habitat for wildlife. Where these conditions have not been met, changes should be made to restore native rangeland habitats and enhance forage quantity/quality for wildlife.

■ Renewable Northwest Project Energy Industry

The BLM should also plan to work closely with county and state permitting authorities to ensure proposed renewable energy projects are sited with a goal of least environmental impact. Achieving a goal of least environmental impact includes avoiding wildlife and habitat impacts as much as possible and mitigating for unavoidable impacts.

■ The Nez Perce Tribe Scoping Meeting Notes

Keith talked about concerns for Bighorn Sheep especially in the Hell's Canyon area. They don't want domestic sheep grazing anywhere near the bighorn (within a 9 mile radius at least)

Section 3.2–Sagebrush Habitat

■ David Mildrexler Individual

protect biodiversity [...] I suggest more information such as this for other species, such as other imperiled sagebrush birds.

Section 3.3–Fish Habitat

■ Oregon Department of Fish and Wildlife State Government

Management activities near fish bearing streams should contain a stream restoration/fish habitat enhancement component. This can include streamside vegetation restoration, large wood placement projects, fish barrier removal (e.g., culvert replacement), and reconnecting or creating off-channel and side-channel refugia habitat.

■ The Burns Paiute Tribe Scoping Meeting Notes

2) water quality/fish habitat and reintroduction of fish (including the potential for fish reintroduction into Pine Creek off of the Powder River)

■ The Nez Perce Tribe Scoping Meeting Notes

All listed fish areas of importance to the

tribe. The Nez Perce are developing a pro-rogation program on Joseph Creek.

Section 5–Economics

■ **Bob Evans**
Individual

user fees for powerline right of ways and wind turbines be increased substantially

■ **David Mildrexler**
Individual

Socio-economics. This issue needs to be in context of protecting processes that promote ecological integrity. If actions, such as alternative energy development diminish ecological value, they should not be allowed. Timber harvest and cattle grazing should not be at the expense of plant communities, wildlife habitat or aquatic resources.

■ **Jeff and Dori Wick**
Individual

Grazing when done correctly can provide income for the public, prevent fire danger and help feed our country.

■ **Ron Lesley**
Individual

I get real tired of watching big money backed, loud mouths control the timber harvest on BLM [...] land

There is [sic] 30 years of beetle kill & moth killed trees that were never salvaged or permitted to be harvested

We spend millions or billion[s] to react to wildfire

■ **Sam Ledgewood**
Individual

Use land to produce its keep

Section 6–Visual

■ **Bob Evans**
Individual

I am very concerned that wind towers could be placed on ridges ringing the Baker Valley, and be viewable from the valley floor both day and night, or from the National Historic Oregon Trail Interpretive Center.

■ **Ed Huggins**
Individual

I feel that it is very important that these structures be placed in locations where they can NOT be viewed from the Baker Valley.

■ **Jane Bohn**
Individual

objections over the placement of structures on public lands that would impact the view from Baker Valley. I am asking that the BLM consider the visual impact on Baker County residents and attempt to regulate placement of such structures on lands they manage.

I object to wind turbines [...] other towers designed for communication or power transmission, gravel pits, or any other development or structure that would significantly scar the natural beauty of our area. I am writing seeking public comment to limit development on public lands that could impact the Baker Valley viewshed. [...] This could include wind turbines, gravel pits, cell towers or other structures that would limit or obstruct our view.

■ **Jeff and Dori Wick**
Individual

Most people do not mind the looks of these, some actually like the looks of them, but you usually only hear from the loud ex-

trême few who don't like them.

Section 7–Energy Development

■ **Bob Evans**
Individual

I support the limited development of alternative energy sources, such as solar, geothermal and wind power, on public land but with restrictions that protect and preserve other resources,

development on public land should be limited and strongly regulated in the Baker RMP Revision so that its environmental costs don't outweigh its perceived environmental benefits.

I am very concerned that wind towers could be placed on ridges ringing the Baker Valley, and be viewable from the valley floor both day and night, or from the National Historic Oregon Trail Interpretive Center.

user fees for powerline right of ways and wind turbines be increased substantially

■ **David Mildrexler**
Individual

Socio-economics. This issue needs to be in context of protecting processes that promote ecological integrity. If actions, such as alternative energy development diminish ecological value, they should not be allowed. Timber harvest and cattle grazing should not be at the expense of plant communities, wildlife habitat or aquatic resources.

BLM allow fossil fuel development when global warming is synchronously degrading all BLM lands and beyond

■ **Hells Canyon Preservation Council**
Environmental Protection Association

this organization still pleads for further research and support of alternative energy sources instead of supporting the continuing use of harmful fossil fuels.

■ **Horizon Wind Energy**
Energy Industry

The existing RMP–ROD (1989) does not incorporate language specific to wind energy as a resource. We strongly urge the Baker Resource Area to incorporate language into the revised RMP confirming wind energy facilities as an allowable use within the resource area. In addition, we ask that priority consideration be given to areas with a Class III and above wind resource lying outside of protected areas

■ **Jane Bohn**
Individual I object to wind turbines but other towers designed for communication or power transmission, gravel pits, or any other development or structure that would significantly scar the natural beauty of our area.

I am writing seeking public comment to limit development on public lands that could impact the Baker Valley viewshed. [...] This could include wind turbines, gravel pits, cell towers or other structures that would limit or obstruct our view.

■ **Oregon Department of Fish and Wildlife**
State Government

Due to local differences in wildlife concentration and movement patterns, habitats, area topography, facility design, and weather, each proposed development site is unique and requires detailed, individual evaluation.

■ **Renewable Northwest Project**
Energy Industry

RNP urges the BLM to ensure that the RMP clearly defines areas of renewable energy resource potential and keeps these areas

available for potential renewable energy development.

The BLM should also plan to work closely with county and state permitting authorities to ensure proposed renewable energy projects are sited with a goal of least environmental impact. Achieving a goal of least environmental impact includes avoiding wildlife and habitat impacts as much as possible and mitigating for unavoidable impacts.

Section 7.1–Wind Energy

■ **Horizon Wind Energy**
Energy Industry

The existing RMP–ROD (1989) does not incorporate language specific to wind energy as a resource. We strongly urge the Baker Resource Area to incorporate language into the revised RMP confirming wind energy facilities as an allowable use within the resource area. In addition, we ask that priority consideration be given to areas with a Class III and above wind resource lying outside of protected areas

We respectfully request that you take the aforementioned and the following into consideration with regards to wind energy: The BLM Land Use Planning Handbook (H-1601-1) requires “that existing and potential development areas for renewable energy projects be addressed in land use planning efforts. “The United States Department of the Interior issued a Wind Energy Policy (<http://windeis.anl.eov>) which includes Bureau guidance on wind energy development. The Wind Energy Policy Instruction Memorandum (IM 2006-21,6) from August 24, 2006 states, “It is the BLM general policy, consistent with the National Energy Policy of 2001 and the Energy Policy Act of 2005, to encourage development of wind energy in acceptable areas.” The memorandum further encourages field offices to “incorporate wind energy resource development potential in planning,” stating that

“this would provide an opportunity to potentially reduce the amount of additional environmental review and documentation required to process a specific application in the future.”

■ **Jane Bohn**
Individual

I am writing seeking public comment to limit development on public lands that could impact the Baker Valley viewshed. [...] This could include wind turbines, gravel pits, cell towers or other structures that would limit or obstruct our view.

■ **Jeff and Dori Wick**
Individual

Wind power will provide much income to the area and produce clean power without affecting wildlife, grazing or public use. Wind power is much cleaner

Section 7.4–Power Lines

■ **Bob Evans**
Individual

user fees for powerline right of ways and wind turbines be increased substantially

■ **Hells Canyon Preservation Council**
Environmental Protection Association

possible introduction of a power line and the Sunstone LNG pipeline through our public lands. Both of these energy corridors are extremely disruptive and potentially dangerous to humans as well as wildlife.

swatches across forests create massive erosion that chokes streams and rivers with sediment.

[The] corridor also fragments animal populations.

Energy corridors can be more obtusely dangerous as well.

channels are kept as narrow as possible

materials and assembly of the lines should also be closely regulated and monitored by the BLM

energy corridors would be closely monitored for safety standards throughout the duration of their operation.

Section 7.5–Minerals

■ Environmental Protection Agency *Federal Government*

Wetlands and riparian areas

The revised RMP/EIS should describe all waters of the U.S. that could be affected by the revised RMP alternatives, and include maps that clearly identify all waters within the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters. Projects affecting waters of the U.S. would need to comply with CWA Section 404 requirements. Section 404 regulates the discharge of dredged or fill material into waters of the U.S., including wetlands and other special aquatic sites. The U.S. Army Corps of Engineers issues Section 404 permits. If anticipated projects under the revised RMP/EIS would involve discharge of dredged or fill material into waters of the U.S., the revised RMP/EIS should include information regarding alternatives to avoid the discharges or how potential impacts caused by the discharges would be minimized and mitigated. This discussion would include the following elements: (a) Acreage and habitat type of waters of the U.S. [hat would be created or restored. (b) Water sources to maintain the mitigation area. (c) Re-vegetation plans, including the numbers and age of each species to be planted, as well as special techniques that may be necessary for

planting. (d) Maintenance and monitoring plans, including performance standards to determine mitigation success. (e) Size and location of mitigation zones. (f) Parties that would be ultimately responsible for the plan's success. (g) Contingency plans that would be enacted if the original plan fails. Mitigation should be implemented in advance of the impacts to avoid habitat losses due to the lag time between the occurrence of the impact and successful mitigation.

Section 8–Land Tenure Adjustments

■ Bill Tsiatsos *Individual*

(1) Parcel 1 is facing north our boundary fence between ARic Waite and our property. (ISOLATED) Purpose of Purchase: Additional Grazing land

(2) This parcel is included in N.F.S. ground that we rent with warm springs cattle allotment. (Exchange with N.F.S. if Possibly able to Purchase)

(3) This parcel would be of interest for purpose of purchase to exchange with N.F.S. ground that we surround. A benefit to all to square up property!

Section 10–Vegetation

■ Confederated Tribes of the Umatilla Reservation *Scoping Meeting Notes*

The tribes have a strong interest in the protection of and access to First Foods, with an emphasis on traditional roots.

■ David Mildrexler *Individual*

protection of habitat diversity should be a Preliminary Planning Criteria for the Upland Vegetation and Plant Management and Forest and Woodland Management sections just as it is under the Wildlife Habitat section. Habitat is required by wildlife, and diversity of vegetation structures is critical to maintaining high biodiversity. The Riparian and Wetland Area Management emphasized the need to protect those areas, but as mentioned they only represent a fraction of the landscape. There must be a plan to preserve healthy plant communities on a larger scale.

protect biodiversity [...] I suggest more information such as this for other species, such as other imperiled sagebrush birds. Wildland Fire Management. I suggest the formation of a wildland fire use plan for areas that are large enough and remote enough to safely have natural wildland fire such as but not limited to Wilderness Study Areas. I suggest a policy of "let it burn" in these areas when possible. Conservation of plant diversity and habitat patch diversity are components of this priority

■ Hells Canyon Preservation Council *Environmental Protection Association*

we are concerned about the use of OHVs on public land. OHVs destroy vegetation, break down natural land formation, spread weeds, and disturb and fragment animal populations.

Mass herbicide sprayings can also cause harm to animals, both on land and in rivers if the chemicals seep into riparian areas.

■ Matt Kniessel *Individual*

Range —Improve range management practices that enhance range health and wildlife habitats

Protect, maintain and enhance key habi-

tats and wildlife plant communities such as aspen, riparian zones, wetlands, mountain shrub and sagebrush communities.

■ **Oregon Department of Fish and Wildlife**
State Government

ODFW is increasingly concerned about the encroachment of western juniper on many BLM lands. The rapid expansion of western juniper into neighboring plant communities has caused considerable concern due to increased soil erosion, reduced stream flows, reduced forage production; altered wildlife habitat; changes in plant community composition, structure, and biodiversity; and the replacement of mesic and semiarid plant communities with woodlands. The revised RMP should outline an aggressive, landscape level approach to treating the problem.

BLM should consider well-balanced and appropriate programs of vegetation-management activities in the revised RMP to maintain mixed successional stages and vegetation conditions that provide for the full diversity of habitats and species.

There is also a need to consider key ecological structural habitat components in the revised RMP. It is important to know how the BLM will provide for them in the managed forest. Key ecological structural habitat components, such as legacy trees, residual live trees, snags, down wood, multi-layered canopies, multiple native tree species, herb/shrub considerations, and gaps are important to many species of wildlife.

Four fire-related concerns are prominent:

1) impaired ecological condition of forest ecosystems in which composition, structure, and processes are outside their historic range of variation,

2) the risk of uncontrollable and catastrophic wildfires that have potential to destroy or modify habitats over large areas, and may also threaten the existence of wildlife pop-

ulations at risk,

3) the need to integrate wildlife objectives and habitat relationships into agency efforts to aggressively manage fuels on public forests, and

4) the need to integrate wildlife objectives and habitat relationships into burned-area salvage and restoration programs.

ODFW supports a science-based plan to address rangeland and grazing management on public lands. Rangelands and grazing should be managed to provide habitat diversity, proper functioning condition of riparian areas, water quality, and adequate forage/habitat for wildlife. Where these conditions have not been met, changes should be made to restore native rangeland habitats and enhance forage quantity/quality for wildlife.

Section 10.1–Weeds



The South Fork ACEC needs to be reopened so that private access, public use, and invasive plants eradication can be addressed.

■ **Christopher Christie**
Individual

I, and others, don't understand, is why the EIS and BLM doesn't adequately address the cow as vector and a cause of expanding weed populations on public lands.

■ **David Mildrexler**
Individual

Major threats to maintaining very high ecological integrity and good connectiv-

ity are motorized recreation, unsustainable resource extraction and failure to control invasive species such as noxious weeds.

■ **Hells Canyon Preservation Council**
Environmental Protection Association

The most important part, when addressing invasive species, is prevention.

our largest weed carriers, cattle.

we are concerned about the use of OHVs on public land. OHVs destroy vegetation, break down natural land formation, spread weeds, and disturb and fragment animal populations.

Mass herbicide sprayings can also cause harm to animals, both on land and in rivers if the chemicals seep into riparian areas.

An additional threat to sage grouse is noxious weeds

■ **Mike Haberman**
Individual

Step it up with weed control in this area

■ **Oregon Department of Fish and Wildlife**
State Government

BLM must consider creating and implementing comprehensive invasive species detection, monitoring, and control strategies for BLM lands that also consider potential impacts to adjacent private and public lands. The strategies must include an early detection and rapid response program for new invasive species, and include the full range of tools, such as herbicides and biological agents, to eradicate and/or manage invasive species.

■ **The Burns Paiute Tribe**
Scoping Meeting Notes

4) Timing of spraying of noxious weeds and ways to be notified prior to spraying of areas

■ **The Nez Perce Tribe**
Scoping Meeting Notes

They are also concerned about noxious weeds on the northeast end of the FO lands – in particular the “Precious Lands Project” area.

Section 10.2–Forestry

■ **Carol Larkin**
Individual

—more diverse forests

■ **David Mildrexler**
Individual

I am concerned about the Healthy Forests Restoration Act (HFRA) of 2003 and the Healthy Forest Initiative being used to guide vegetation management and treatments. These acts are flawed and based on false assumptions

The condition class approach to prioritizing fuels and subsequent treatments on the landscape is overly general. Please do not follow this one-size-fits all approach.

The model of low-severity surface fires developed for the ponderosa pine forests of the southwestern USA has been highly influential in forest restoration in ponderosa pine and mixed ponderosa pine-Douglas fir forests in the US Rocky Mountains (Baker et al, 2006). However, research on fire history and forest structure, and early historical reports, suggest the low-severity model may only apply in limited geographical areas.

protection of habitat diversity should be a Preliminary Planning Criteria for the Upland Vegetation and Plant Management and Forest and Woodland Management sections just as it is under the Wildlife Habitat section. Habitat is required by wildlife, and diversity of vegetation structures is critical to maintaining high biodiversity. The Riparian and Wetland Area Management emphasized the need to protect those areas, but as mentioned they only represent a fraction of the landscape. There must be a plan to preserve healthy plant communities on a larger scale.

■ **Hells Canyon Preservation Council**
Environmental Protection Association

Natural fire should be preferred to thinning procedures, although such actions can be helpful in WUI areas.

When thinning is required, leave uncut all larger diameter trees, even those that do not meet the 21 inch diameter requirement for old growth.

When fire and thinning plans are being created, not only the location, but also the geography and forest type should be taken into consideration.

swatches across forests create massive erosion that chokes streams and rivers with sediment.

Contributing to that effect would be trees lost as carbon sinks, machinery used on BLM land (whether as functional or recreational), and methane from grazing cattle.

■ **Oregon Department of Fish and Wildlife**
State Government

BLM should consider well-balanced and appropriate programs of vegetation-management activities in the revised RMP to maintain mixed successional stages and vegetation conditions that provide for the full diversity of habitats and species.

There is also a need to consider key ecological structural habitat components in the revised RMP. It is important to know how the BLM will provide for them in the managed forest. Key ecological structural habitat components, such as legacy trees, residual live trees, snags, down wood, multi-layered canopies, multiple native tree species, herb/shrub considerations, and gaps are important to many species of wildlife.

■ **Ron Lesley**
Individual

I get real tired of watching big money backed, loud mouths control the timber harvest on BLM [...] land

There is [sic] 30 years of beetle kill & moth killed trees that were never salvaged or permitted to be harvested

Sustained yield used to be a watch word in the forests. Not any More.

We spend millions or billion[s] to react to wildfire

Section 10.3 Grasslands and Sagebrush

■ **Hell’s Canyon Preservation Council**
Environmental Protection Association

These grasslands need to be protected and conserved.

protection of the sagebrush

■ **David Mildrexler**
Individual

Recreation Management. I suggest adding to Planning Questions, “Are more back-country wildland experiences desired in the types of sagebrush-grassland biomes

prevalent on BLM Baker Resource Area Lands?”

Section 11–Natural Resources

■ **Carol Larkin**
Individual

—more diverse forests

■ **Christopher Christie**
Individual

It was said that the EIS will not address commodity uses, such as cow forage production, but it seems entirely possible cow forage production projects may be hidden behind the “land health” banner.

■ **David Mildrexler**
Individual

protection of habitat diversity should be a Preliminary Planning Criteria for the Upland Vegetation and Plant Management and Forest and Woodland Management sections just as it is under the Wildlife Habitat section. Habitat is required by wildlife, and diversity of vegetation structures is critical to maintaining high biodiversity. The Riparian and Wetland Area Management emphasized the need to protect those areas, but as mentioned they only represent a fraction of the landscape. There must be a plan to preserve healthy plant communities on a larger scale.

natural resources and ecological integrity as the highest objective for its Baker Resource Area lands.

Major threats to maintaining very high ecological integrity and good connectivity are motorized recreation, unsustainable resource extraction and failure to control invasive species such as noxious weeds.

Section 11.1–Ecosystem Connectivity

■ **David Mildrexler**
Individual

connectivity of large wildland areas as the “linchpin” between the Northern Rockies and the Blue Mountains and then onto the Cascades of Oregon.

Wildlife Habitat. I support connectivity

ecological integrity of the region under consideration by the BLM’s RMP very high, it is also a critical connection area between other intact, large ecosystems.

Lands in Baker County are a critical component of a corridor that connects North East Oregon to the Owhyee-Bruneau Canyon lands. Because of climate change and the resultant need of species to migrate both northward in latitude and upward in elevation, it is important to consider the ability of species in the Great Basin to move northward into the BLM lands of Baker County and even the Hells Canyon country (Hannah et al. 2007). I think the impacts of climate change should be separate planning issue.

Section 12–Grazing

■ **Christopher Christie**
Individual

I, and others, don’t understand, is why the EIS and BLM doesn’t adequately address the cow as vector and a cause of expanding weed populations on public lands.

It was said that the EIS will not address commodity uses, such as cow forage production, but it seems entirely possible cow forage production projects may be hidden

behind the “land health” banner.

■ **David Mildrexler**
Individual

Socio-economics. This issue needs to be in context of protecting processes that promote ecological integrity. If actions, such as alternative energy development diminish ecological value, they should not be allowed. Timber harvest and cattle grazing should not be at the expense of plant communities, wildlife habitat or aquatic resources.

Livestock Grazing. I suggest adding the Planning question, “How can livestock grazing be managed to minimize damage to ground nesting birds?”

It is imperative to be very clear that the wilderness character of lands will be protected from damaging uses such as grazing and motorized recreation.

■ **Hells Canyon Preservation Council**
Environmental Protection Association

Tighter grazing monitoring should happen around these important areas to ensure the health of the watershed.

our largest weed carriers, cattle.

grazing should be eliminated on these dwindling natural grass pastures.

Over-grazing must be avoided in order to assure the health of the sagebrush

Contributing to that effect would be trees lost as carbon sinks, machinery used on BLM land (whether as functional or recreational), and methane from grazing cattle.

Cattle themselves can prove a danger to sage grouse when leking or nesting.

■ **Jeff and Dori Wick**
Individual

managed for public use (hiking and hunting), grazing, wind power and cell towers.

Grazing when done correctly can provide income for the public, prevent fire danger and help feed our country.

Wind power will provide much income to the area and produce clean power without affecting wildlife, grazing or public use. Wind power is much cleaner

■ **Matt Kniesel**
Individual

Range —Improve range management practices that enhance range health and wildlife habitats

■ **Mike Haberman**
Individual

be pro-grazing on new lands

■ **Mike Odom**
Individual

Managed livestock grazing has been underutilized on Bureau Lands along the Grande Ronde river corridor. Existing grazing leases have been curtailed all together by the Bureau when not one bit of scientific evidence supports this action. Responsible, targeted livestock grazing should be encouraged and utilized in the revised Resource Management Plan.

■ **Oregon Department of Fish and Wildlife**
State Government

ODFW supports a science-based plan to address rangeland and grazing management on public lands. Rangelands and grazing should be managed to provide habitat diversity, proper functioning condition of riparian areas, water quality, and adequate forage/habitat for wildlife. Where these conditions have not been met, changes

should be made to restore native rangeland habitats and enhance forage quantity/quality for wildlife.

■ **The Nez Perce Tribe**
Scoping Meeting Notes

Keith talked about concerns for Bighorn Sheep especially in the Hell’s Canyon area. They don’t want domestic sheep grazing anywhere near the bighorn (within a 9 mile radius at least)

Section 13—Special Designations

■ **David Mildrexler**
Individual

Wildland Fire Management. I suggest the formation of a wildland fire use plan for areas that are large enough and remote enough to safely have natural wildland fire such as but not limited to Wilderness Study Areas. I suggest a policy of “let it burn” in these areas when possible.

All lands with Wilderness character should be maintained

■ **Department of Natural Resources**
State Government

There are a number of rare plants known from BLM lands in Garfield and Asotin counties, Washington, as well as a number of ecosystem types (e.g., canyon grasslands, mountain mahogany ecosystems) that are of conservation interest in Washington. The Lime Hill area is of particular interest to us as a result of inventory work our scientists conducted a few years ago.

BLM land use designations (e.g., ACEC), whether the features (rare species or priority ecosystem types) are adequately protected, and perhaps most importantly, are there conservation needs on adjacent lands (DNR, WDFW, private) that we (DNR-NHP) could and should pursue.

Section 14—Special Status Species

■ **Carol Larkin**
Individual

—protected habitat for the threatened sage grouse and pygmy rabbit

■ **Environmental Protection Agency**
Federal Government

Endangered Species Act (ESA) Evaluation of the revised RMP/EIS should identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the project area. The draft EIS should describe the critical habitat for the species; identify any impacts the revised RMP will have on the species and their critical habitats; and how the revised RMP will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service (FWS) and National Oceanographic Atmospheric Administration (NOAA). The EIS may need to include a biological assessment and a description of the outcome of consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. BLM actions should promote the recovery of declining populations of species.

■ **Oregon Department of Fish and Wildlife**
State Government

Oregon Conservation Strategy (OCS)—OCS should be used to help BLM make strategic decisions on conservation issues and for guidance on the types of actions most likely to benefit species and habitats. The OCS describes species and habitats of greatest conservation need, identifies key conservation issues facing those at-risk species and habitats, and provides recommendations for actions and opportunities to address them. In addition, Oregon’s Greater Sage Grouse Conservation Assessment and Strategy for Oregon, Oregon Plan for Salmon and Watershed Health, Bighorn Sheep and Rocky Mountain Goat Plan, Elk Management Plan, Mule Deer Management Plan, Wolf Plan and Cougar Management

Plan should be used to provide guidance in land management for those species.

ODFW recommends the revised plan provide specific management practices associated with federal and state listed threatened/endangered species and “strategy species” identified in the OCS.

Section 14.1–Wildlife

■ Hells Canyon Preservation Council *Environmental Protection Association*

preserve the habitat of the pygmy rabbit,

■ Oregon Department of Fish and Wildlife *State Government*

ODFW recommends the revised plan provide specific management practices associated with the following species due to their social, ecological, and economic value:

Sage Grouse

Sage Grouse and their habitat continue to be at-risk across the species’ range. Recreation and utilization of BLM land must be managed to protect and enhance sage grouse and their habitat to prevent federal Endangered Species listing in the future. The revised RMP must provide land managers with tools to improve habitat conditions for this species. The BLM should also consider evaluating how the revised RMP will contribute to the management objectives and habitat, food, and cover needs expressed in the ODFW Greater Sage Grouse Conservation Assessment and Strategy for Oregon.

Native Fish

BLM lands support key habitat for Oregon’s native fish populations. The revised plan must outline an approach to improve riparian area conditions, water quality and other

factors influencing fish.

Bighorn Sheep

Interactions between domestic sheep and wild bighorn sheep continue to be a threat to the existence of wild sheep in Oregon. Any BLM sheep grazing allotments must be evaluated for potential interaction between these species. The BLM should also consider evaluating how the revised RMP will contribute to the management objectives and habitat, cover, and forage needs expressed in the ODFW Bighorn Sheep Management Plan.

Mule Deer and Rocky Mountain Elk

Protection and enhancement of big game winter range is critical to Oregon’s big game populations. Deer and elk winter range needs to be clearly identified and designated in the revised RMP. A well balanced program of vegetation-management activities is also needed to maintain the mix of successional stages and vegetation conditions that provides the appropriate cover and forage relationship for deer and elk. The BLM should consider evaluating how the revised RMP will contribute to the management objectives and habitat, cover, and forage needs expressed in the ODFW Mule Deer Management Plan and Elk Management Plan.

■ The Nez Perce Tribe *Scoping Meeting Notes*

Keith talked about concerns for Bighorn Sheep especially in the Hell’s Canyon area. They don’t want domestic sheep grazing anywhere near the bighorn (within a 9 mile radius at least)

Section 14.1.1–Sage Grouse

■ Carol Larkin *Individual*

—protected habitat for the threatened sage grouse and pygmy rabbit

■ David Mildrexler *Individual*

Recognition of ridge habitat for sage grouse

■ Hells Canyon Preservation Council *Environmental Protection Association*

plight of the sage grouse

protection of the sagebrush

An additional threat to sage grouse is noxious weeds

Cattle themselves can prove a danger to sage grouse when leking or nesting.

Section 14.2–Fish

■ Oregon Department of Fish and Wildlife *State Government*

ODFW recommends the revised plan provide specific management practices associated with the following species due to their social, ecological, and economic value:

Sage Grouse

Sage Grouse and their habitat continue to be at-risk across the species’ range. Recreation and utilization of BLM land must be managed to protect and enhance sage grouse and their habitat to prevent federal Endangered Species listing in the future. The revised RMP must provide land managers with tools to improve habitat conditions for this species. The BLM should also consider evaluating how the revised RMP

will contribute to the management objectives and habitat, food, and cover needs expressed in the ODFW Greater Sage Grouse Conservation Assessment and Strategy for Oregon.

Native Fish

BLM lands support key habitat for Oregon's native fish populations. The revised plan must outline an approach to improve riparian area conditions, water quality and other factors influencing fish.

Bighorn Sheep

Interactions between domestic sheep and wild bighorn sheep continue to be a threat to the existence of wild sheep in Oregon. Any BLM sheep grazing allotments must be evaluated for potential interaction between these species. The BLM should also consider evaluating how the revised RMP will contribute to the management objectives and habitat, cover, and forage needs expressed in the ODFW Bighorn Sheep Management Plan.

Mule Deer and Rocky Mountain Elk

Protection and enhancement of big game winter range is critical to Oregon's big game populations. Deer and elk winter range needs to be clearly identified and designated in the revised RMP. A well balanced program of vegetation-management activities is also needed to maintain the mix of successional stages and vegetation conditions that provides the appropriate cover and forage relationship for deer and elk. The BLM should consider evaluating how the revised RMP will contribute to the management objectives and habitat, cover, and forage needs expressed in the ODFW Mule Deer Management Plan and Elk Management Plan.

Section 14.3—Plants

■ **Department of Natural Resources**
State Government

There are a number of rare plants known from BLM lands in Garfield and Asotin counties, Washington, as well as a number of ecosystem types (e.g., canyon grasslands, mountain mahogany ecosystems) that are of conservation interest in Washington. The Lime Hill area is of particular interest to us as a result of inventory work our scientists conducted a few years ago.

BLM land use designations (e.g., ACEC), whether the features (rare species or priority ecosystem types) are adequately protected, and perhaps most importantly, are there conservation needs on adjacent lands (DNR, WDFW, private) that we (DNR-NHP) could and should pursue.

Section 15—Cultural

■ **Confederated Tribes of the Umatilla Reservation**
Scoping Meeting Notes

The tribes have a strong interest in the protection of and access to First Foods, with an emphasis on traditional roots.

BLM will try to work with CTUIR to identify ways to protect first foods without specifically identifying areas on the map. Ways to do this could include turn out dates, season of use in particular areas, adhering to S&Gs utilization standards, fencing, etc.

■ **Environmental Protection Agency**
Federal Government

Coordination with Tribal Governments for projects under the revised RMP would affect any Tribe's resources. then the RMP/EIS document should describe the process and outcome of government-to-government consultation between BLM and each of tribal government involved, issues that were raised, if any, and how those issues were addressed. Executive Order 13175, Consultation and Coordination with Indian

Tribal Governments (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the U.S. government-to-government relationships with Indian tribes.

■ **The Burns Paiute Tribe**
Scoping Meeting Notes

1) protection of first foods and traditional cultural practice (TCP) areas

Section 16—Water Quality

■ **Environmental Protection Agency**
Federal Government

Water resources

Water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the state of Oregon and Washington (and Tribes with approved water quality standards) to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. The revised RMP/EIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the revised RMP that are listed on the States and Tribes' most current EPA-approved 303(d) lists. The revised RMP/EIS document should describe existing restoration and enhancement efforts for those waters, how the revised RMP will coordinate with ongoing protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within impaired waters. Antidegradation provisions of the CWA apply to those water bodies where water quality standards are currently being met. This provision prohib-

its degrading the water quality unless an analysis shows that important economic and social development necessitates some degradation of water quality. The revised RMP/EIS evaluation should determine how the antidegradation provisions would be met. Public drinking water supplies and/or their source areas often exist in many watersheds. It is possible that source water areas may exist within the Baker Resource Area. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the state for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. As a result, state agencies have been delegated responsibility to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. Since projects under the revised RMP may impact sources of drinking water, EPA recommends that BLM contact Oregon Departments of Environmental Quality and Washington State Department of Ecology to help identify source water protection areas within the planning area. The revised RMP/EIS should: (a) Identify all source water protection areas within the project area. (b) Identify all activities that could potentially affect source water areas. (c) Identify all potential contaminants that may result from the proposed project. (d) Identify all measures that would be taken to protect the source water protection areas in the revised RMP/EIS. As the planning of the revised RMP/EIS continues, EPA recommends that BLM evaluate the impacts roads would have on waterbodies in the planning area. In particular, roads contribute more sediments to streams, interrupt the subsurface flow of water, especially where roads cut into steep slopes, may fragment habitats and disturb wildlife, and accelerate noxious weed infestations. The revised RMP/EIS should include data about existing road networks and evaluate the change in road miles and density that will occur as a result of the revised RMP projects and predicted impacts to water quality by roads. The revised RMP/EIS should note that, under the CWA, any construction project disturbing a land area of one or more acres requires

the National Pollutant Discharge Elimination System (NPDES) permit for discharges to waters of the U.S. The revised RMP/EIS should document the plan's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality. The revised RMP projects that would involve construction of facilities and access roads may also compact the soil, thus changing hydrology, runoff characteristics, and affecting flows and delivery of pollutants to water bodies and ecological function of the area. Therefore, the revised RMP/EIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions within the Baker Resource Area. The document should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to 5 groundwater and surface water resources. For groundwater, the potentially affected groundwater basin should be identified and any potential for impacts to springs or other open water bodies and biologic resources should be analyzed.

Wetlands and Riparian Areas

The revised RMP/EIS should describe all waters of the U.S. that could be affected by the revised RMP alternatives, and include maps that clearly identify all waters within the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters. Projects affecting waters of the U.S. would need to comply with CWA Section 404 requirements. Section 404 regulates the discharge of dredged or fill material into waters of the U.S., including wetlands and other special aquatic sites. The U.S. Army Corps of Engineers issues Section 404 permits. If anticipated projects under the revised RMP/EIS would involve discharge of dredged or fill material into waters of the U.S., the revised RMP/EIS should include information regarding alternatives to avoid the discharges or how potential impacts caused by the discharges would be minimized and mitigated. This discussion would include the following elements: (a) Acreage and habitat type of

waters of the U.S. [hat would be created or restored. (b) Water sources to maintain the mitigation area. (c) Re-vegetation plans, including the numbers and age of each species to be planted, as well as special techniques that may be necessary for planting. (d) Maintenance and monitoring plans, including performance standards to determine mitigation success. (e) Size and location of mitigation zones. (f) Parties that would be ultimately responsible for the plan's success. (g) Contingency plans that would be enacted if the original plan fails. Mitigation should be implemented in advance of the impacts to avoid habitat losses due to the lag time between the occurrence of the impact and successful mitigation.

■ **Carol Larkin** *Individual*

—policies that ensure clean and healthy watersheds

■ **Hells Canyon Preservation Council** *Environmental Protection Association*

Tighter grazing monitoring should happen around these important areas to ensure the health of the watershed.

swatches across forests create massive erosion that chokes streams and rivers with sediment.

We are also interested in watershed quality in the new RMP. One of the greatest threats to the quality of our watersheds is erosion. Erosion comes from many sources. The ones we want to discuss here are those from logging, roads, OHVs, and cattle.

Roads are a major factor in erosion—especially those in need of repair.

It would then be best for watersheds to decommission any unnecessary roads and convert them back to their natural states.

■ **Oregon Department of Fish and Wildlife**
State Government

The revised RMP should address how these areas will be managed to promote natural processes that maintain and restore species diversity, structural complexity, and the recruitment of large wood. To protect water quality, the riparian management strategy in the revised RMP must be similar to, and consistent with, management strategies that have been shown to be sufficient to comply with the federal Clean Water Act and meet state water quality standards.

Section 17–Recreation

■ **David Mildrexler**
Individual

Recreation Management. I suggest adding to Planning Questions, “Are more back country, wildland experiences desired in the types of sagebrush-grassland biomes prevalent on BLM Baker Resource Area lands?”

It is imperative to be very clear that the wilderness character of lands will be protected from damaging uses such as grazing and motorized recreation.

■ **Jeff and Dori Wick**
Individual

managed for public use (hiking and hunting), grazing, wind power and cell towers.

■ **John S. Ehart**
Individual

More recreation use should be made available: walking trails, horse trails, atv trails, etc. throughout the Blue Mountain Area.

■ **Matt Kniesel**
Individual

Identify public land areas where dispersed recreational shooting can continue, along with sites and ranges for current and/or future more concentrated recreational activities.

Section 17.1–Equestrian

■ **John S. Ehart**
Individual

More recreation use should be made available: walking trails, horse trails, atv trails, etc. throughout the Blue Mountain Area.

Section 17.2–Shooting

■ **Matt Kniesel**
Individual

Identify public land areas where dispersed recreational shooting can continue, along with sites and ranges for current and/or future more concentrated recreational activities. Allow the current Virtue Flat Rifle Range that is leased to be sold to the Powder River Sportmen’s Club that has managed it for more than 50 years.

■ **Ron Lesley**
Individual

I would support the use of ATV’s to be used by hunters to retrieve game animals

Section 17.5–OHV

■ **David Mildrexler**
Individual

Major threats to maintaining very high ecological integrity and good connectivity are motorized recreation, unsustainable

resource extraction and failure to control invasive species such as noxious weeds.

■ **Hells Canyon Preservation Council**
Environmental Protection Association

OHV trails that ford riparian areas should also be closed

we are concerned about the use of OHVs on public land. OHVs destroy vegetation, break down natural land formation, spread weeds, and disturb and fragment animal populations.

Their use should be heavily regulated and focused on certain areas less abundant in natural resources.

We support the use of Virtue Flat as an OHV park, and we ask the BLM to strongly encourage OHV activity there, and to strongly discourage it in other areas on BLM land.

■ **John S. Ehart**
Individual

More recreation use should be made available: walking trails, horse trails, atv trails, etc. throughout the Blue Mountain Area.

■ **Oregon Department of Fish and Wildlife**
State Government

believes these effects are minimized when OHV travel is limited to roads and trails located and designed for motorized use. As demand for OHV recreational opportunities increases the BLM should develop a revised RMP to manage OHV use and ensure adequate enforcement of regulations.

■ **Ron Lesley**
Individual

I would support the use of ATV’s to be used by hunters to retrieve game animals

Section 17.6—Recreation open space

David Mildrexler Individual

Recreation Management. I suggest adding to Planning Questions, “Are more back country, wildland experiences desired in the types of sagebrush-grassland biomes prevalent on BLM Baker Resource Area lands?”

Section 19—Fire Management

David Mildrexler Individual

The condition class approach to prioritizing fuels and subsequent treatments on the landscape is overly general. Please do not follow this one-size-fits all approach.

The model of low-severity surface fires developed for the ponderosa pine forests of the southwestern USA has been highly influential in forest restoration in ponderosa pine and mixed ponderosa pine-Douglas fir forests in the US Rocky Mountains (Baker et al, 2006). However, research on fire history and forest structure, and early historical reports, suggest the low-severity model may only apply in limited geographical areas.

Wildland Fire Management. I suggest the formation of a wildland fire use plan for areas that are large enough and remote enough to safely have natural wildland fire such as but not limited to Wilderness Study Areas. I suggest a policy of “let it burn” in these areas when possible.

Environmental Protection Agency Federal Government

Air Quality

The revised RMP/EIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in the planning area and vicinity. The analysis should estimate emissions of criteria pollutants for the Baker Resource Area and discuss the timeframe for release of these emissions over the lifespan of the revised RMP. Also, the document should include analyses of the potential impacts to air quality (including cumulative and indirect impacts) from the revised RMP projects, especially those involving construction activities. The revised RMP/EIS should specify emission sources and quantify these emissions. Such an evaluation is necessary to assure compliance with state and federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality. The revised RMP/EIS should include the following: (a) Detailed information about ambient air conditions, NAAQS, and criteria pollutant non-attainment areas in all areas considered for the airport and adjacent areas. (b) Data on emissions of criteria pollutants from the proposed project and discuss the timeframe for release of these emissions. (c) Specific information about pollutant from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention. (d) An Equipment Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and NO₂ associated with construction activities.

Hells Canyon Preservation Council Environmental Protection Association

We support letting wildfire burn naturally when it is not in WUI areas.

Natural fire should be preferred to thinning

procedures, although such actions can be helpful in WUI areas.

When thinning is required, leave uncut all larger diameter trees, even those that do not meet the 21 inch diameter requirement for old growth.

When fire and thinning plans are being created, not only the location, but also the geography and forest type should be taken into consideration.

Jeff and Dori Wick Individual

Grazing when done correctly can provide income for the public, prevent fire danger and help feed our country.

Oregon Department of Fish and Wildlife State Government

Four fire-related concerns are prominent: 1) impaired ecological condition of forest ecosystems in which composition, structure, and processes are outside their historic range of variation, 2) the risk of uncontrollable and catastrophic wildfires that have potential to destroy or modify habitats over large areas, and may also threaten the existence of wildlife populations at risk, 3) the need to integrate wildlife objectives and habitat relationships into agency efforts to aggressively manage fuels on public forests, and 4) the need to integrate wildlife objectives and habitat relationships into burned-area salvage and restoration programs.

Sam Ledgewood Individual

Use fire management not just fight fire or control fuels

Section 20–Air Quality

■ Environmental Protection Agency *Federal Government*

Air Quality

The revised RMP/EIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in the planning area and vicinity. The analysis should estimate emissions of criteria pollutants for the Baker Resource Area and discuss the timeframe for release of these emissions over the lifespan of the revised RMP. Also, the document should include analyses of the potential impacts to air quality (including cumulative and indirect impacts) from the revised RMP projects, especially those involving construction activities. The revised RMP/EIS should specify emission sources and quantify these emissions. Such an evaluation is necessary to assure compliance with state and federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality. The revised RMP/EIS should include the following: (a) Detailed information about ambient air conditions, NAAQS, and criteria pollutant non-attainment areas in all areas considered for the airport and adjacent areas. (b) Data on emissions of criteria pollutants from the proposed project and discuss the timeframe for release of these emissions. (c) Specific information about pollutant from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention. (d) An Equipment Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and NO₂ associated with construction activities.

Section 25–Monitoring

■ Environmental Protection Agency *Federal Government*

Monitoring Because projects under the revised RMP could potentially impact a variety of resources in the planning area and for an extended period of time, we recommend that the revised RMP projects be designed to include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The revised RMP/EIS should describe the monitoring program and how it would be used as an effective feedback mechanism so that any needed adjustments can be made to projects under the new RMP to meet environmental objectives.

■ Hells Canyon Preservation Council *Environmental Protection Association*

desire a strong monitoring component on all matters addressed, i.e. grazing, water quality, wildlife, maintenance, vegetation, and recreation.

■ Oregon Department of Fish and Wildlife *State Government*

A detailed monitoring strategy supported by appropriate research must be implemented as a key part of the revised RMP. The monitoring strategy must examine key questions related to the implementation, effectiveness, and validity of plan assumptions and objectives, land use allocations and management actions. The revised RMP should commit to adequate monitoring and research to generate and utilize new information as it becomes available, and employ an adaptive management approach to ensure that the best available knowledge and information is acquired and used effectively.

Section 26–Climate Change

■ David Mildrexler *Individual*

BLM allow fossil fuel development when global warming is synchronously degrading all BLM lands and beyond

Lands in Baker County are a critical component of a corridor that connects North East Oregon to the Owyhee-Bruneau Canyon lands. Because of climate change and the resultant need of species to migrate both northward in latitude and upward in elevation, it is important to consider the ability of species in the Great Basin to move northward into the BLM lands of Baker County and even the Hells Canyon country (Hannah et al. 2007). I think the impacts of climate change should be separate planning issue.

■ Environmental Protection Agency *Federal Government*

Climate change effects Currently, there is concern that continued increases in greenhouse gas emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. The revised RMP/EIS document should therefore consider how resources affected by climate change could potentially influence the revised RMP and vice versa, especially within sensitive areas. Also, the revised RMP/EIS should quantify and disclose greenhouse gas emissions from potential activities under the plan and discuss mitigation measures to reduce emissions.

■ Hells Canyon Preservation Council *Environmental Protection Association*

BLM lands' effect on Global Warming

Contributing to that effect would be trees

lost as carbon sinks, machinery used on BLM land (whether as functional or recreational), and methane from grazing cattle.

Section 27–BLM Management

■ Christopher Christie *Individual*

The BLM's approach is a terribly inefficient use of the public's money and land. During the meeting, BLM had noted that the extra 14 herbicides would improve cost efficiencies (an issue), so I mentioned that addressing the causes of disturbance, etc., would do more to increase cost efficiencies, so my hope was that that would be an issue too. I noted that it is standard practice for the agencies to place any inconvenient truth outside the scope of the EIS so that they can do whatever it is they want to do, but that improving cost efficiencies was an issue that they themselves raised.

■ Confederated Tribes of the Umatilla Reservation *Scoping Meeting Notes*

In general good land stewardship is needed to protect BLM natural resources, which includes tribal interests.

■ David Mildrexler *Individual*

protection of habitat diversity should be a Preliminary Planning Criteria for the Upland Vegetation and Plant Management and Forest and Woodland Management sections just as it is under the Wildlife Habitat section. Habitat is required by wildlife, and diversity of vegetation structures is critical to maintaining high biodiversity. The Riparian and Wetland Area Management emphasized the need to protect those areas, but as mentioned they only represent a fraction of the landscape. There must be a plan to preserve healthy plant communities on a larger scale.

BLM allow fossil fuel development when global warming is synchronously degrading all BLM lands and beyond

■ Department of Parks and Recreation *State Government*

I wanted to inform you that the Plexiglas panel on one of the signs was broken and that birds roosting in the rafters had created a mess. We would like to request that the cover be replaced and that bird spikes be placed in the rafters.

■ Environmental Protection Agency *Federal Government*

The new plan should clarify that each of the subsequent individual plans and projects would be subject to separate NEPA analyses.

The revised RMP/EIS should include a range of reasonable alternatives that meet the stated purpose and need for the revised RMP and that are responsive to the issues identified during the scoping process.

Cumulative Effects CEQ definition of cumulative impact is "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." The cumulative impacts analysis should therefore provide the context for understanding the magnitude of the impacts of the alternatives by analyzing the impacts of other past, present, and reasonably foreseeable projects or actions and then considering those cumulative impacts in their entirety. The draft EIS should include and analyze present and reasonably foreseeable projects and actions proximate to the Baker Resource Area and vicinity. Where adverse cumulative impacts may exist, the draft EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. The EIS should clearly identify the resources that may be impacted by cumulative effects, the time

over which impacts are going to occur, and the geographic area that will be impacted by the proposed project. For each resource analyzed, the revised RMP/EIS should: (a) Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date. (b) Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis. (c) Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. For example, what will the future condition of the watershed be? (d) Assess the cumulative impacts contribution of the proposed alternatives to the longterm health of the resource, and provide a specific measure for the projected impact from the proposed alternatives. (e) Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. (f) Identify opportunities to avoid and minimize impacts, including working with other entities.

■ Jane Bohn *Individual*

BLM should strive to protect public lands in their natural state

■ Jeff and Dori Wick *Individual*

We ask the BLM to manage for all groups as they have in the past.

■ Matt Kniessel *Individual*

Allow the current Virtue Flat Rifle Range that is leased to be sold to the Powder River Sportmen's Club that has managed it for more than 50 years.

■ Mike Odom *Individual*

Managed livestock grazing has been un-

derutilized on Bureau Lands along the Grande Ronde river corridor. Existing grazing leases have been curtailed all together by the Bureau when not one bit of scientific evidence supports this action. Responsible, targeted livestock grazing should be encouraged and utilized in the revised Resource Management Plan.

■ **Oregon Department of Fish and Wildlife**
State Government

The revised plan should allow the continued cooperative relationship and incorporate ODFW's

Management activities near fish bearing streams should contain a stream restoration/fish habitat enhancement component. This can include streamside vegetation restoration, large wood placement projects, fish barrier removal (e.g., culvert replacement), and reconnecting or creating off-channel and side-channel refugia habitat.

■ **Ron Lesley**
Individual

Sustained yield used to be a watch work in the forests. Not any More.

We spend millions or billion[s] to react to wildfire

■ **Sam Ledgewood**
Individual

Use land to produce its keep

■ **The Burns Paiute Tribe**
Scoping Meeting Notes

4) Timing of spraying of noxious weeds and ways to be notified prior to spraying of areas

■ **The Nez Perce Tribe**
Scoping Meeting Notes

Need to share GIS data [see 22 - BLM Man-

agement]

Section 28–misc



I feel that BLM did an injustice to the Milton-Freewater public by scheduling a meeting during times when most people are working. Also the local paper was not used to notify the public of the meeting. The Valley Herald is the paper of record for Milton-Freewater but was not used therefore many local people did not attend.

■ **Carol S. Sams**
Individual

Transfer isolated tax lots to surrounding landowners. [...] Since we control access the land is not impacted by the public, 4 wheelers [sic], and other land erosion problems.

■ **Christopher Christie**
Individual

The BLM's approach is a terribly inefficient use of the public's money and land. During the meeting, BLM had noted that the extra 14 herbicides would improve cost efficiencies (an issue), so I mentioned that addressing the causes of disturbance, etc., would do more to increase cost efficiencies, so my hope was that that would be an issue too. I noted that it is standard practice for the agencies to place any inconvenient truth outside the scope of the EIS so that they can do whatever it is they want to do, but that improving cost efficiencies was an issue that they themselves raised.

■ **Department of Parks and Recreations**
State Government

I wanted to inform you that the Plexiglas panel on one the signs was broken and that birds roosting in the rafters had created a mess. We would like to request that the cover be replaced and that bird spikes be placed in the rafters.

■ **Environmental Protection Agency**
Federal Government

The new plan should clarify that each of the subsequent individual plans and projects would be subject to separate NEPA analyses.

The revised RMP/EIS should include a range of reasonable alternatives that meet the stated purpose and need for the revised RMP and that are responsive to the issues identified during the scoping process.

Cumulative Effects CEQ definition of cumulative impact is "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." The cumulative impacts analysis should therefore provide the context for understanding the magnitude of the impacts of the alternatives by analyzing the impacts of other past, present, and reasonably foreseeable projects or actions and then considering those cumulative impacts in their entirety. The draft EIS should include and analyze present and reasonably foreseeable projects and actions proximate to the Baker Resource Area and vicinity. Where adverse cumulative impacts may exist, the draft EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. The EIS should clearly identify the resources that may be impacted by cumulative effects, the time over which impacts are going to occur, and the geographic area that will be impacted by the proposed project. For each resource analyzed, the revised RMP/EIS should: (a) Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date. (b) Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis. (c) Identify the future condition of the resource based on an analysis

of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. For example, what will the future condition of the watershed be? (d) Assess the cumulative impacts contribution of the proposed alternatives to the longterm health of the resource, and provide a specific measure for the projected impact from the proposed alternatives. (e) Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. (f) Identify opportunities to avoid and minimize impacts, including working with other entities.

■ **Matt Kniesel**
Individual

Allow the current Virtue Flat Rifle Range that is leased to be sold to the Powder River Sportmen's Club that has managed it for more than 50 years.

■ **Oregon Department of Fish and Wildlife**
State Government

The revised plan should allow the continued cooperative relationship and incorporate ODFW's [plans]

■ **The Nez Perce Tribe**
Scoping Meeting Notes

Need to share GIS data

■ Appendix C

■ Scoping

Comments (by
letter)



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■ ■ Baker RMP

■ Revision



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Hells Canyon Preservation Council

Environmental Protection Association

To BLM Baker District:

Please accept these comments on the Resource Management Plan revision for the Baker District of the BLM from Hells Canyon Preservation Council (HCPC). HCPC is a private non-profit conservation group based in La Grande, OR concerned with public land management. We advocate for a healthy environment, protection and restoration of the public assets.

One of the subjects we're most concerned about is the ***plight of the sage grouse [see 14.1.1 - sage grouse]***. Most sage grouse habitat in Oregon is located on BLM land, and as the bird's numbers continue to fall, something must be done to protect this unique creature.

The first concern is the ***protection of the sagebrush [see 14.1.1 - sage grouse; 10.3 - Grasslands/Sagebrush]***, which is the grouse's greatest source of food and shelter. ***Over-grazing must be avoided in order to assure the health of the sagebrush [see 12 - Grazing]***. Additionally, the success rate of nesting sage grouse is highest when there is an understory of grass surrounding the sagebrush. Sage grouse use this grass for hiding and catching insects. Cattle avoid grass under sagebrush unless there is nothing else for them to eat, because it is cumbersome to reach. Therefore, if over-grazing is avoided, grouse will have better nesting habitats.

An additional threat to sage grouse is noxious weeds [see 14.1.1 - sage grouse; 10.1 - Weeds]. These weeds, especially cheat grass, displace sagebrush and native forbs, which contain high levels of calcium, phosphorous, and protein that are necessary to grouse hens in order to produce eggs. Cheat grass is also extremely flammable, and fields dominated by the weed have changed the fire cycle of sagebrush

steppe ecosystems from 32-70 years to five years or less. Sagebrush cannot grow large enough to provide adequate habitat for sage grouse within such small intervals.

Cattle themselves can prove a danger to sage grouse when leking or nesting. [see 14.1.1 - sage grouse; 12 - Grazing]

Therefore leks and the area in a four mile radius (within which most grouses nest) should remain ungrazed during the mating and nesting season. If a sage grouse is disturbed during nesting season, the possibility of it re-nesting is much lower than other game birds (only 10-40 percent). If the grouse are undisturbed during their nesting period, there is a much higher chance of a successful brood.

All these restrictions to sagebrush steppe country would not only help the sage grouse, but will also help ***preserve the habitat of the pygmy rabbit, [see 14.1 - Wildlife]*** another species at risk of extirpation.

We are also interested in watershed quality in the new RMP. One of the greatest threats to the quality of our watersheds is erosion. Erosion comes from many sources. The ones we want to discuss here are those from logging, roads, OHVs, and cattle. [see 16 - Water Quality] Logging causes erosion on several levels: first, the loss of the trees themselves, especially on steep slopes, relieves the soil of important anchors to hold it in place. Second, the logging process itself causes erosion from roads built and top-soil upturned or compacted from skids and equipment. Untouched vegetation close to riparian areas provide the most critical protection for watersheds. Therefore riparian barriers are especially important to us. Riparian barriers and healthy riparian vegetation, such as willows, also doubly work against erosion and help to cool the water, which is imperative to native fish. ***Roads are a major factor in erosion—especially those in need of repair. [see 16 - Water Quality]*** It would then be best for watersheds to decommission any unnecessary roads and convert them back to their natural states. ***[see 16 - Water Quality; 1 - Travel Management]***

There would then be more of a budget to

maintain necessary roads, much to the advantage of watersheds and motorists.

OHV trails that ford riparian areas should also be closed [see 17.5 - OHV; 1 - Travel Management; 2 - Access], because such activities break down stream banks, cause erosion, disrupt wildlife, and destroy riparian vegetation. Such destruction should not be performed merely in the name of recreation. ***Cattle also prove a major destroyer of stream banks and riparian integrity. Grazing activity in riparian areas creates contaminates in watersheds from animal wastes and pasture sediment. [see 12 - Grazing]*** This can be easily dealt with by installing fences around or partially blocking riparian areas.

Tighter grazing monitoring should happen around these important areas to ensure the health of the watershed. [see 12 - Grazing; 16 - Water Quality]

A popular issue, especially at this time of year, is wildfire. ***We support letting wildfire burn naturally when it is not in WUI areas. [see 19 - Fire Management]*** After decades of fire suppression, the only way we can return to natural fire cycles is to let it burn—even if some of those fires are stand replacement. The sooner we allow this, the sooner forests can revert back to their natural and historic status. ***Natural fire should be preferred to thinning procedures, although such actions can be helpful in WUI areas. [see 19 - Fire Management; 10.2 - Forestry]*** Fire has many qualities, such as nutrient recycling and habitat creation, which cannot be mimicked by thinning. ***When thinning is required, leave uncut all larger diameter trees, even those that do not meet the 21 inch diameter requirement for old growth. [see 19 - Fire Management; 10.2 - Forestry]*** These larger trees are fire resistant and cool down wildfires. ***When fire and thinning plans are being created, not only the location, but also the geography and forest type should be taken into consideration. [see 19 - Fire Management; 10.2 - Forestry]***

Not all forests in this area should be open

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stands of ponderosa. Some forests on our BLM lands are historically densely packed, mixed conifers. To these forests, stand replacement fires are a natural part of their cycle, and no amount of thinning will change that. These forests should be left to their own natural methods of succession. In the interest of forest health, we will also address noxious weeds. **The most important part, when addressing invasive species, is prevention. [see 10.1 - Weeds]** Once a weed colony is in place, it is often too late to remove it. We need to focus on how to stop these weeds from entering our public lands in the first place. The best way of doing this is by addressing **our largest weed carriers, cattle. [see 10.1 - Weeds; 12 - Grazing]**

Cattle are especially dangerous in the spread of noxious weeds because they not only carry seeds, but they disturb the ground, creating an ideal environment for invasives. Because of noxious weeds, our native grasslands are becoming an increasingly more rare and precious commodity. **These grasslands need to be protected and conserved. [see 10.3 - Grasslands/Sagebrush]** Thus, **grazing should be eliminated on these dwindling natural grass pastures. [see 12 - Grazing]**

Recreation is another concern of ours. Specifically, **we are concerned about the use of OHVs on public land. OHVs destroy vegetation, break down natural land formation, spread weeds, and disturb and fragment animal populations. [see 10 - Vegetation; 17.5 - OHV; 10.1 - Weeds]**

Their use should be heavily regulated and focused on certain areas less abundant in natural resources. [see 1.2 - Motorized Use; 17.5 - OHV] From discussions with BLM staff, we have determined that Virtue Flat is and will be the focus of OHV use on BLM land. **We support the use of Virtue Flat as an OHV park, and we ask the BLM to strongly encourage OHV activity there, and to strongly discourage it in other areas on BLM land. [see 17.5 - OHV]**

While discussing Realty with a BLM staff

member, we also heard of the **possible introduction of a power line and the Sunstone LNG pipeline through our public lands. Both of these energy corridors are extremely disruptive and potentially dangerous to humans as well as wildlife. [see 7.4 - Power Lines]** These lines call for wide channels of clear cutting, ranging from fifty feet to five miles wide. In this swatch of barren land, trees cannot be allowed to grow, and herbicidal treatments to ensure this are common. Along with this treeless corridor, maintenance roads must be built that follow the pipe- or power line, intensifying erosion and habitat fragmentation. These open **swatches across forests create massive erosion that chokes streams and rivers with sediment. [see 16 - Water Quality; 7.4 - Power Lines; 10.2 - Forestry]**

In some cases, like the 2003 Rosenberg to Coos Bay Pipeline, massive mudslides have even occurred. The **corridor also fragments animal populations. [see 7.4 - Power Lines; 3 - Wildlife Habitat]** A large area without any vegetation cover can be an insurmountable for many animals, especially small rodents in danger of raptor predation. **Mass herbicide sprayings can also cause harm to animals, both on land and in rivers if the chemicals seep into riparian areas. [see 10.1 - Weeds; 10 - Vegetation; 3 - Wildlife Habitat]** **Energy corridors can be more obtusely dangerous as well. [see 7.4 - Power Lines]** Ill-managed pipelines have been known to explode, as happened with the Texas Eastern Transmission Corporation Natural Gas Pipeline in Edison, New Jersey. The resulting inferno from that particular blast decimated a nearby apartment structure. The damage such a blast would wreak on fire-repressed forest land would be catastrophic. Power lines can also be a fire danger, able to shower mass amounts of sparks over the forest if poorly maintained.

If the placement of these energy corridors in our BLM lands is inevitable, we ask then that these **channels are kept as narrow as possible [see 7.4 - Power Lines]**. The less space these lines take up, the less the effect on local habitats. The **materials and assembly of the lines should also be closely regulated and monitored by the BLM**

[see 7.4 - Power Lines]. Cheap and shoddy workmanship is not tolerable when dealing with such potentially dangerous materials. It would be also expected that the **energy corridors would be closely monitored for safety standards throughout the duration of their operation. [see 7.4 - Power Lines]** We approve of the placement of the proposed power line along I-84 instead of across forests. However, **this organization still pleads for further research and support of alternative energy sources instead of supporting the continuing use of harmful fossil fuels. [see 7 - Energy Development]**

Along those lines, HCPC is highly interested in **BLM lands' effect on Global Warming [see 26 - Climate Change]**. **Contributing to that effect would be trees lost as carbon sinks, machinery used on BLM land (whether as functional or recreational), and methane from grazing cattle. [see 26 - Climate Change; 12 - Grazing; 10.2 - Forestry]** We would appreciate a BLM report of this issue and a statement detailing BLM's planned reaction.

Finally, we **desire a strong monitoring component on all matters addressed, i.e. grazing, water quality, wildlife, maintenance, vegetation, and recreation. [see 25 - Monitoring]** Careful monitoring will allow the public to understand what is being done on BLM lands, and what the effects of those actions are. It will also tell us if we are on track with our ecological programs, or if they need adjustment to better preserve our public lands and the plants and creatures that dwell within them.

Thank you for the opportunity to comment.

Sincerely,

Larry McLaughlin

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Jeff and Dori Wick

■ Individuals

Hello my name is Jeff Wick, my wife and I own property in Baker county and border BLM property. We would like to comment on the resource management plan. We realize that the BLM has a difficult job of trying to please all of the different use groups. Many times they only hear from the loudest and most extreme groups who would like to just lock up the public lands and do nothing with them or the other extreme side that would like to develop them and put condo's up. We would like to see them **managed for public use (hiking and hunting), grazing, wind power and cell towers.** [see 17 - Recreation; 12 - Grazing] All can be accomplished thru [sic] good management. **Grazing when done correctly can provide income for the public, prevent fire danger and help feed our country.** [see 12 - Grazing; 5 - Economics; 19 - Fire Management]

Wind power will provide much income to the area and produce clean power without affecting wildlife, grazing or public use. Wind power is much cleaner [see 7.1 - Wind Energy; 12 - Grazing] than coal and [is more] environmentally responsible. Most people do not mind the looks

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of these, some actually like the looks of them, but you usually only hear from the loud extreme few who don't like them. [see 6 - Visual]

These are the same people that complain about their power bill or the price of groceries but don't want to have dams, wind towers or coal plants. ***We ask the BLM to manage for all groups as they have in the past. [see 27 - BLM Management]***

Thank you for taking the time to read our comments,

Jeff and Dori Wick

Department of Natural Resources

■ State Government

Dear Ms. Kuehl—

We, the Washington Natural Heritage Program, are interested in providing input into the Baker RMP planning process. ***There are a number of rare plants known from BLM lands in Garfield and Asotin counties, Washington, as well as a number of ecosystem types (e.g., canyon grasslands, mountain mahogany ecosystems) that are of conservation interest in Washington. The Lime Hill area is of particular interest to us as a result of inventory work our scientists conducted a few years ago. [see 13 - Speical Designations; 14.3 - Plants]***

Please let me know how we can get involved in your planning process.

Thanks.

John Gamon, Manager
Natural Heritage Program
Department of Natural Resources

Department of Natural Resources

■ State Government

Roger—

Thanks for the quick response. One thing that we'd like to discuss with you - and whoever else might be appropriate - is the level of conservation that is already provided by existing ***BLM land use designations (e.g., ACEC), whether the features (rare species or priority ecosystem types) are adequately protected, and perhaps most importantly, are there conservation needs on adjacent lands (DNR, WDFW, private) that we (DNR-NHP) could and should pursue. [see 13 - Special Designations; 14.3 - Plants]*** So, in part, we'd like to make sure that you have whatever information and expertise we have and can bring to bear on your planning process. But we also want to refine our own priorities for that region of the state.

What is the time frame for you to receive input for your planning process? Would you be agreeable to meeting with me (and perhaps others from our staff)? We could conceivably come to Baker City, although it might be easier to schedule something if we were to meet somewhere within Washington (Walla Walla, Tri-Cities, Clarkston???) [sic].

As an alternative, particularly if you have a short time-frame, we could perhaps put together a GoToMeeting and share maps via the computer screen while on a conference call.

John Gamon,

Manager
Natural Heritage Program
Department of Natural Resources

Bob Evans

■ Individual

Thank you for the opportunity to comment on the Baker Resource Management Plan Revision. ***I support the limited development of alternative energy sources, such as solar, geothermal and wind power, on public land but with restrictions that protect and preserve other resources, [see 7 - Energy Development]*** including flora and fauna, historic and natural cultural sites, and viewsheds. Windpower is often touted as clean energy but it is not as clean or harmless as it seems for both humans and wildlife, which are greatly affected by noise. Its ***development on public land should be limited and strongly regulated in the Baker RMP Revision so that its environmental costs don't outweigh its perceived environmental benefits. [see 7 - Energy Development]***

The development of natural energy sources should not be considered an outright allowable use on public land, but one that is conditionally allowed after careful consideration of the costs and benefits and evidence that it will not irrevocably destroy other valuable resources, including existing panoramic views. ***I am very concerned that wind towers could be placed on ridges ringing the Baker Valley, and be viewable from the valley floor both day and night, or from the National Historic Oregon Trail Interpretive Center. [see 6 - Visual; 7 - Energy Development]***

I also recommend that wind towers and turbines be considered permanent and not temporary structures; [and] that ***user fees for powerline right of ways and wind turbines be increased substantially [see 7 - Energy Development; 7.4 - Power Lines; 5 - Economics]*** from the existing fee structure as an offset for the loss of other resources and uses.

Sincerely,

Robert Evans

David Mildrexler

■ *Individual*

July 20, 2008

These are comments on the Bureau of Land Management (BLM) Baker Resource Management Plan (RMP).

The public land administered by the BLM in Northeast Oregon is part of a truly incredible region, the Hells Canyon-Wallowa and Blue Mountains Ecosystem. This was the only region in Oregon that received the highest marks for ecological integrity in the Columbia River Basin Assessment. The Hells Canyon-Wallowa Ecosystem is referred to by some that are interested in **connectivity of large wildland areas as the “linchpin” between the Northern Rockies and the Blue Mountains and then onto the Cascades of Oregon.** [see 11.1 - Ecosystem Connectivity]

In other words, not only is the **ecological integrity of the region under consideration by the BLM’s RMP very high, it is also a critical connection area between other intact, large ecosystems.** [see 11.1 - Ecosystem Connectivity] In light of the special significance of the Hells Canyon-Wallowa-Blues Mountain ecosystem, management of the over 425,000 acres of public BLM lands within the Baker County Resource Area should be guided by landscape ecology principles that **protect ecological integrity, ecosystem processes, biodiversity and connectivity.** [see 3 - Wildlife Habitat]

It is important that the BLM emphasizes protection of **natural resources and ecological integrity as the highest objective for its Baker Resource Area lands.** [see 11 - Natural Resources] When natural integrity is upheld, then we can discuss the sustainable use of resources on these lands. I do not agree with the attitude that we can “extract as many resources as possible while maintaining a healthy ecosystem.” This approach is constantly pushing ecosystems to the edge of degradation and too often, over that edge. Ecosystems cannot retain resilience to the multitude of changes brought about by global warm-

ing and continue providing such valuable services such as carbon sequestration, biodiversity, clean water, and recreational opportunities if they are being degraded through resource extraction. **Protection of biodiversity should be a key priority/goal in the RMP.** [see 3 - Wildlife Habitat]

The big game species such as elk, mule deer, whitetail deer and bighorn sheep are ultimately dependent upon the interwoven fabric of biodiversity that upholds the ecosystem. **Conservation of plant diversity and habitat patch diversity are components of this priority** [see 10 - Vegetation] area that needs more emphasis. **Major threats to maintaining very high ecological integrity and good connectivity are motorized recreation, unsustainable resource extraction and failure to control invasive species such as noxious weeds.** [see 17.5 - OHV; 11 - Natural Resources; 10.1 - Weeds]

All lands with Wilderness character should be maintained [see 13 - Special Designations] as such. These Wilderness Study Areas (WSAs), such as those just south of the Hells Canyon National Recreation Area are very important for wildlife habitat and movement throughout the ecosystem. Grasslands provide excellent habitat for big game and are underrepresented in the current Wilderness Preservation System. **It is imperative to be very clear that the wilderness character of lands will be protected from damaging uses such as grazing and motorized recreation.** [see 12 - Grazing; 17 - Recreation; 1.2 - Motorized Use]

Upland Vegetation and Plant Management and Forest and Woodland Management.

Both of these sections that deal with vegetation have Preliminary Planning Criteria that is troublesome and lacking. **I am concerned about the Healthy Forests Restoration Act (HFRA) of 2003 and the Healthy Forest Initiative being used to guide vegetation management and treatments. These acts are flawed and based on false assumptions** [see 10.2 - Forestry] such as that vast areas of the interior Pacific North-

west had the same forest structure typified by open-park like Ponderosa stands with frequent low-intensity fires.

A recent study of mixed-conifer, ponderosa pine forests in Eastern Washington found that evidence for low severity fires as the primary influence, or of abundant old park-like patches, was lacking in both dry and moist mixed conifer forests (Hessburg et al, 2007). The relatively low abundance of old, park-like or similar forest patches, and widespread evidence of partial stand and stand-replacing fire suggested that variable fire severity and non-equilibrium patch dynamics were primarily at work (Hessburg et al, 2007).

Furthermore, the HFRA and HFI approach is that we can define large areas with one broad stroke as out of their historical range of variability and in need of thinning. **The condition class approach to prioritizing fuels and subsequent treatments on the landscape is overly general. Please do not follow this one-size-fits all approach.** [see 19 - Fire Management; 10.2 - Forestry] Rather, I suggest that the BLM looks at each forest stand individually and in context of its surroundings to best determine if management is necessary and what that action would be. **The model of low-severity surface fires developed for the ponderosa pine forests of the southwestern USA has been highly influential in forest restoration in ponderosa pine and mixed ponderosa pine-Douglas fir forests in the US Rocky Mountains (Baker et al, 2006). However, research on fire history and forest structure, and early historical reports, suggest the low-severity model may only apply in limited geographical areas.** [see 10.2 - Forestry; 19 - Fire Management]

I suggest that **protection of habitat diversity should be a Preliminary Planning Criteria for the Upland Vegetation and Plant Management and Forest and Woodland Management sections just as it is under the Wildlife Habitat section. Habitat is required by wildlife, and diversity of vegetation structures is critical to maintaining high biodiversity. The Riparian and Wetland Area Management emphasized**

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the need to protect those areas, but as mentioned they only represent a fraction of the landscape. There must be a plan to preserve healthy plant communities on a larger scale. [see 27 - BLM Management; 10 - Vegetation; 10.2 - Forestry; 3 - Wildlife Habitat; 11 - Natural Resources]

Wildlife Habitat.

I support connectivity [see 11.1 - Ecosystem Connectivity; 3 - Wildlife Habitat] of habitat. Recognition of ridge habitat for sage grouse [see 14.1.1 - sage grouse] is a good example of the kind of information we need to protect biodiversity [...]. I suggest more information such as this for other species, such as other imperiled sagebrush birds. [see 3.2 - Sagebrush Habitat; 10 - Vegetation]

Socio-economics.

This issue needs to be in context of protecting processes that promote ecological integrity. If actions, such as alternative energy development diminish ecological value, they should not be allowed. Timber harvest and cattle grazing should not be at the expense of plant communities, wildlife habitat or aquatic resources. [see 7 - Energy Development; 12 - Grazing; 5 - Economics] Also, think of the larger picture. Why should BLM allow fossil fuel development when global warming is synchronously degrading all BLM lands and beyond [see 27 - BLM Management; 26 - Climate Change; 7 - Energy Development].

Wildland Fire Management.

I suggest the formation of a wildland fire use plan for areas that are large enough and remote enough to safely have natural wildland fire such as but not limited to Wilderness Study Areas. I suggest a policy of "let it burn" in these areas when possible. [see 19 - Fire Management; 13 - Special Designations; 10 - Vegetation] Nothing can replace the effects of wildfire. There

are many beneficial effects of wildfire that I suggest the BLM proactively manages for.

Livestock Grazing.

I suggest adding the Planning question, "How can livestock grazing be managed to minimize damage to ground nesting birds?" [see 12 - Grazing]

Recreation Management.

I suggest adding to Planning Questions, "Are more back country, wildland experiences desired in the types of sagebrush-grassland biomes prevalent on BLM Baker Resource Area lands?" [see 17 - Recreation; 17.6 - Recreation open space; 10.3 - Grasslands/Sagebrush]

Travel Management.

I suggest a standard that is conservative regarding motorized use. [see 1 - Travel Management] In other words, when BLM is unsure whether or not to open an area to motorized use, do not open it. Motorized use is one of the most damaging activities on public lands today and has multiple negative impacts. Fossil fuel-driven recreational activities are not the traditional use of public lands and should not be given priority in any circumstances. [see 1 - Travel Management]

Lands in Baker County are a critical component of a corridor that connects North East Oregon to the Owhyee-Bruneau Canyon lands. Because of climate change and the resultant need of species to migrate both northward in latitude and upward in elevation, it is important to consider the ability of species in the Great Basin to move northward into the BLM lands of Baker County and even the Hells Canyon country (Hannah et al. 2007). I think the impacts of climate change should be separate planning issue. [see 26 - Climate Change; 11.1 - Ecosystem Connectivity]

References

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Hessburg, P.F., Salter, R.B., James, K.M. 2007. Re-examining fire severity relations in pre-managed era mixed conifer forests: inferences from landscape patterns of forest structure. *Landscape Ecology*, 22:5-24.

David Mildrexler

Jane Bohn

■ Individual

Although I will present for the public scoping meeting this evening, I wanted to write and express my concern and **objections over the placement of structures on public lands that would impact the view from Baker Valley. I am asking that the BLM consider the visual impact on Baker County residents and attempt to regulate placement of such structures on lands they manage. [see 6 - Visual]**

Not only do *I object to wind turbines but other towers designed for communication or power transmission, gravel pits, or any other development or structure that would significantly scar the natural beauty of our area. [see 7 - Energy Development; 6 - Visual]* There is a movement to maintain public lands for the benefit of the public for recreation and other purposes. I believe the pros and cons of the effectiveness of wind turbines has yet to be fully de-

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terminated and until our country has more fully explored the green energy issues, it is premature to allow the placement of permanent, unnatural structures that will visually affect habited areas. I believe the ***BLM should strive to protect public lands in their natural state [see 27 - BLM Management]***

However, if such structures are allowed on public lands, please direct them to seldom seen areas.

Thank you.

Jane Bohn

Renewable Northwest Project

■ Energy Industry

August 29, 2008

Thank you for the opportunity to provide comments regarding the Bureau of Land Management (BLM) Baker Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The Renewable Northwest Project (RNP), a non-profit organization, is a broad coalition of public interest organizations and energy companies that actively promotes the development of the region's untapped renewable energy resources.

Since RNP's inception in 1994, we have worked for a clean energy future by partnering with local organizations and energy companies to ensure properly sited renewable energy projects are developed, to actively] promote policies that support renewable energy development, and to encourage utilities and customer groups to invest in new renewable energy.

Oregon has plentiful renewable energy resources, including large portions of the

Vale District Baker Resource Area. Much of the wind energy development to date in Oregon has occurred within the RMP area and we expect additional wind development proposals, including proposals on BLM land, in the near future. Strong solar resource throughout the RMP area and good geothermal resource in the eastern part of the RMP area will likely lead to large-scale solar and geothermal energy development proposals. There are significant environmental and economic benefits of wind energy projects developed in Oregon. For Oregon rate payers, the most significant benefit of renewable energy is that there is no fuel cost. Unlike the dramatic price increases and volatility of fossil fuels, renewable energy offers a stable price over the life of the project with no fuel price volatility. The fact that renewable energy is virtually free of harmful emissions removes additional costs and risks to ratepayers and is key to reducing Oregon's reliance on sources of energy that contribute to poor air quality and global warming. Properly sited renewable energy generation, particularly wind energy generation, can also result in conserving habitat at risk of high-impact development such as housing subdivisions.

Finally, renewable energy generation can greatly benefit the local economy. If more renewable energy projects are built in the state, Oregonians will be able to reap the benefits of local capital investment, rural economic development and job growth. RNP supports the Preplan Analysis' inclusion of the need for changes pertaining to consideration of leasable and renewable energy resources. RNP is also supportive of the Preplan Analysis' mention of the need to evaluate solar, wind and geothermal opportunities.

While these inclusions in the Preplan Analysis are positive, ***RNP urges the BLM to ensure that the RMP clearly defines areas of renewable energy resource potential and keeps these areas available for potential renewable energy development. [see 7 - Energy Development]***

The BLM should also plan to work closely

with county and state permitting authorities to ensure proposed renewable energy projects are sited with a goal of least environmental impact. Achieving a goal of least environmental impact includes avoiding wildlife and habitat impacts as much as possible and mitigating for unavoidable impacts. [see 7 - Energy Development; 3 - Wildlife Habitat]

RNP's representative is currently co-chairing a stakeholder task force to develop voluntary wind energy siting guidelines for the Oregon Columbia Plateau ecoregion and also participating in a work group updating existing wind energy siting guidelines in Washington. We are working closely with environmental organizations, renewable energy developers and state and federal agencies in these processes. Wind projects in the Northwest have a good record with respect to interaction with wildlife and habitat, and we want to learn from the available data and see that trend continue.

Thank you again for the opportunity to comment on the Baker RMP.

Please do not hesitate to contact me with any questions or for more information.

Sincerely,

Suzanne Leta Liou

Senior Policy Advocate

Horizon Wind Energy

■ Energy Industry

Horizon Wind Energy LLC (Horizon) would like to thank the Bureau of Land Management (BLM) for the opportunity to comment on the proposed Baker Resource Area Resource Management Plan (RMP) revision. ***The existing RMP - ROD (1989) does not incorporate language specific to wind energy as a resource. We strongly urge***

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the Baker Resource Area to incorporate language into the revised RMP confirming wind energy facilities as an allowable use within the resource area. In addition, we ask that priority consideration be given to areas with a Class III and above wind resource lying outside of protected areas [see 7 - Energy Development; 7.1 - Wind Energy].

Horizon Wind Energy ("Horizon") is one of the nation's largest wind energy firms; a developer, builder, owner, and operator of wind power projects. Together with its parent company, Energias de Portugal (EDP), we are the 4th-largest owner of wind energy projects in the world. Horizon is proud to have developed more than 1000 megawatts (MW) of operating wind farms in Minnesota, Iowa, Pennsylvania, Oklahoma, New York, and Washington, and are also developing a portfolio of more than 9000 additional MW in over a dozen states. In addition, Horizon will energize another 1000 MW of clean, renewable wind power in 2008 in Illinois, Texas, Oregon, and Minnesota.

As a major stakeholder, Horizon is an active participant in the development of local, state, regional, and national policies across the US. Regarding renewable energy on public lands, Horizon was an active participant in the development of the Bureau of Land Management's Wind Energy Policy. In addition, Horizon is currently managing wind energy testing Rights-of-Way (ROWs) at several locations across the country, including several locations in Oregon and one in the Baker Resource Area, with the Bureau of Land Management. There is already an established federal record showing a national commitment to wind power projects. In addition to the BIM-specific policies supportive of renewable energy, the Energy Policy Act of 2005 (Pt. 109-58).

Section 211 states, "It is the sense of the Congress that the Secretary of the Interior should, before the end of the 10-year period beginning on the date of enactment of this Act, seek to have approved non-hydropower renewable energy projects located on the public lands with a genera-

tion capacity of at least 10,000 megawatts of electricity."

The President Executive Order (E.O.) f-3212 (2001), "Actions to Expedite Energy-Related Projects," established a policy that federal agencies should take appropriate actions, to the extent consistent with applicable law, to expedite projects to increase the production, transmission, or conservation of energy.

The National Energy Policy Development Group (NEPDG) (2001) recommended to the President, as part of the National Energy Policy, that the Departments of the Interior, Energy, Agriculture, and Defense work together to increase renewable energy production.

In addition, more than half of U.S. states have enacted Renewable Portfolio Standard (RPS) legislation. The Oregon Renewable Energy Act (SB 838) passed in 2007 requiring 25% renewable by 2025. This, along with legislation passed in the surrounding states of California, Washington, Montana and Nevada, will significantly increase the demand for regional renewable energy generation over the next ten years.

During your preliminary revision of the Baker Resource Area RMP, we strongly urge the Baker Resource Area to incorporate language into the revised RMP confirming wind energy facilities as an allowable use within the resource area. In addition, we ask that priority consideration be given to areas with a Class III and above wind resource lying outside of protected areas.

We respectfully request that you take the aforementioned and the following into consideration with regards to wind energy: The BLM Land Use Planning Handbook (H-1601-1) requires "that existing and potential development areas for renewable energy projects be addressed in land use planning efforts." The United States Department of the Interior issued a Wind Energy Policy (<http://windeis.anl.eov>) which includes Bureau guidance on

wind energy development. The Wind Energy Policy Instruction Memorandum (IM 2006-21,6) from August 24, 2006 states, "It is the BLM general policy, consistent with the National Energy Policy of 2001 and the Energy Policy Act of 2005, to encourage development of wind energy in acceptable areas." The memorandum further encourages field offices to "incorporate wind energy resource development potential in planning," stating that "this would provide an opportunity to potentially reduce the amount of additional environmental review and documentation required to process a specific application in the future." [see 7.1 - Wind Energy]

When permitting a wind project on federal land, a project must comply with all National Environmental Policy Act requirements. This mechanism ensures that potential project impacts be considered and given "a hard look." Critical habitat areas, national scenic areas, wilderness study areas, and other areas of special management are avoidance areas as already identified by the IM, as well as with best management practices.

Not only is wind energy responsive to each of the criteria identified in the current RMP goals of the "Environmental Preferability of the Alternatives," wind energy has also continually proved that construction and operation of projects can successfully co-exist with wildlife, tourism, recreation, cattle grazing and other common uses of public lands. Furthermore, wind energy projects generate clean energy without polluting the air, soil and water systems.

A final important note regarding the siting of wind energy facilities on BLM and other public and federal lands: Wind energy facilities are democratically located in those geographic areas with adequate resources (i.e. wind), and in this case, accessible transmission.

Horizon Wind Energy would welcome the opportunity to contribute further to the discussions and industry insight in crafting the revisions to the Baker Area Resource

Management Plan. Horizon appreciates the opportunity to comment provided by the Baker BLM. Thank you for continuing to advance the issue of renewable energy development in the United States, and thank you for the opportunity to contribute to the public debate.

Very Sincerely,

Valerie Schafer Franklin

Project Manager

Ed Huggins

■ *Individual*

To whom it may concern,

I am writing to voice my concern about the ability for people or companies to acquire permits to construct towers/structures (such as wind turbines) on BLM land. ***I feel that it is very important that these structures be placed in locations where they can NOT be viewed from the Baker Valley.*** [see 6 - Visual] There is PLENTY of public land where they can put these structures in seldom seen areas that will not impact the views of the public. Feel free to contact me.

Regards,

Ed Huggins

Form Letter

■ *Form Letter*

Your consideration of the following issues will be appreciated in any future planning effort. A statement was made at the Milton-Freewater public scoping meeting that “the long range plan was not designed to address specific issues”. I disagree. Often

Resource Plans lead strategies which may weigh against other specific issues. These issues such as the ***South Fork Walla Walla river “inholder access” issue are important considerations which must not be overlooked in a long range Management Plan. This access issue has never been resolved by BLM and must be addressed in any future long range planning process so it will not become secondary to other managed resources. Reasonable Access is needed during fire season by full sized and Class II vehicles to provide both fire prevention measures (including future defensible space around the private dwellings), security, and maintenance of the properties.*** [see 2 - Access] We feel reasonable access has not been given and that future planning processes will attempt to take away the Inholders rights of access.

By the Bureau of Land Management’s own admission there is a minimal effect by the Inholders. The National Marine Fisheries Service prepared a Biological Opinion addressed impacts to fish over a six month use period and found the impacts to be minimal. Under the Army Corps of Engineer’s Walla Walla River Watershed Study Reconnaissance Report, Planning Objectives for reintroduction of salmon. The CTUIR as sponsors to re-introduce salmon to the South Fork “It should be pointed out that no entity or individual lost a water right or had any “takings” of property rights in the Umatilla Basin during the process of salmon reintroduction.” ANILCA Title XI Section 1110(b) gives inholder a guaranteed right of access to accommodate the inholder’s legitimate needs.

Also during the public scoping a BLM employee was overheard saying that when there is another flood in the south fork private access at crossings would no longer be allowed. This is a threatening and unfounded statement, has no substantiation of resource conflicts, and has no place in a public meeting. This also indicates a bias against inholder rights by BLM employees who have decisional authorities or influence those who do and holds. No fair consideration to Inholder “Rights” can be given under these conditions. ***The South Fork ACEC needs to be reopened so that***

private access, public use, and invasive plants eradication can be addressed. [see 2 - Access; 10.1 - Weeds]

Bridge replacement as referenced by the Army Corps of Engineer’s Walla Walla River Watershed Study Reconnaissance Report needs to be addressed in long range planning and funding requested.

I feel that BLM did an injustice to the Milton-Freewater public by scheduling a meeting during times when most people are working. Also the local paper was not used to notify the public of the meeting. The Valley Herald is the paper of record for Milton-Freewater but was not used therefore many local people did not attend. [see 28 - misc]

Sincerely

Laren B. Bright

Roger Card
Frank Clough
Ned Coe
Bonnie Ehart
John Ehart
Janet Elough
Mike Humbert
W. L. Leehe
Clifton McReynolds
Richard Mein
Marquis Navarre
Rich Weaver
Don Widner
Gred Widner
Larry Widner

Carol Larkin

■ *Individual*

I’m advocating for:

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—*more diverse forests [see 11 - Natural Resources; 10.2 - Forestry]*

—*protected habitat for the threatened sage grouse and pygmy rabbit [see 14.1.1 - sage grouse; 14 - Special Status Species]*

—*policies that ensure clean and healthy watersheds [see 16 - Water Quality]* in the Baker Resource Area.

Carol Larkin

Department of Parks and Recreations

■ State Government

Dear Sir/Madam:

The Oregon Historic Trails Advisory Council (OHTAC) is a nine member, volunteer, citizen advisory body appointed by the Governor to oversee the 16 Historic Trails in Oregon by Executive Order No. EO 98-16. The Oregon Trail is one of those trails.

First of all, we are very appreciative of the BLM's stewardship and promotion of the Oregon Trail resource. The site at Echo Meadow is very special, and of course, the wonderful interpretive center at Flagstaff Hill probably does more for the Oregon Trail than any other factor.

Each year, OITAC takes 3-4 field trips. On these trips, we check on the condition of Trail related interpretation and directional signage. In April of this year, we traveled the Trail from McDonald Ford to Irrigon. Along the way, we stopped at the Fom-mile Canyon interpretive site that is managed by the BLM. The ruts at the site are very evident, and well illustrate the use of the Trail. ***I wanted to inform you that the Plexiglas panel on one the signs was broken and that birds roosting in the rafters had created a mess. We would like to re-***

quest that the cover be replaced and that bird spikes be placed in the rafters. [see 27 - BLM Management; 28 - misc]

[...] Our summer field trip was from Farewell Bend to Baker City. We stopped at the Birch Creek site outside of Farewell Bend, which is managed by the BLM. We noticed that some of the posts at the parking area had been uprooted and that weeds are intruding on portions of the walking path. I have attached photos. Again, the ruts are splendid!

Thank you again for your dedication to the Trail, and I look forward to your response.

Respectfully,

/s/ John Chess

Chair Oregon Historic Trails Advisory Council

Oregon Department of Fish and Wildlife

■ State Government

Thank you for the opportunity for Oregon Department of Fish and Wildlife (ODFW) to participate in the Bureau of Land Management (BLM) Baker Resource Area Resource Management Plan (RMP) revision process.

The mission of ODFW is to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations, and has statutory obligations to manage fish and wildlife resources of Oregon. Resource planning, along with sound habitat management can play an important role in helping ODFW meet its statutory responsibilities as well as the goals and objectives that are identified in Oregon's Conservation Strategy and various species management plans.

Since the current resource management plan was adopted in 1989, many new issues and resource threats have [arisen] that need to be addressed in the plan revision. This scoping letter outlines the Issues and concerns that ODFW would like to see addressed in the revision process:

1) Travel Management

Unregulated use of motorized off-road vehicles (OHV) is a serious issue facing public land managers. The effects of OHVs on wildlife include increased physiological stress, displacement from favored habitat, and habitat fragmentation. Cross country OHV travel can also damage native vegetation and create opportunities for the spread of invasive plants to take hold. ODFW ***believes these effects are minimized when OHV travel is limited to roads and trails located and designed for motorized use. As demand for OHV recreational opportunities increases the BLM should develop a revised RMP to manage OHV use and ensure adequate enforcement of regulations. [see 1.2 - Motorized Use; 17.5 - OHV]***

2) Energy Development

There has been a substantial increase in energy development proposals in Oregon. ODFW is concerned about the impacts of wind, solar and other types of energy development on fish and wildlife and their habitat. Much of the BLM land in the Baker Resource Area is important habitat for sage grouse, big game winter range, and other sensitive habitats and species.

As more facilities are built, the cumulative effects of development may initiate or contribute to the decline of some wildlife populations. The potential harm to these populations from an additional source of mortality or adverse habitat impacts makes careful evaluation of proposed facilities essential. ***Due to local differences in wildlife concentration and movement patterns, habitats, area topography, facility design, and weather, each proposed***

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development site is unique and requires detailed, individual evaluation. [see 7 - Energy Development]

3) Rangeland Management and Grazing

ODFW supports a science-based plan to address rangeland and grazing management on public lands. Rangelands and grazing should be managed to provide habitat diversity, proper functioning condition of riparian area, water quality, and adequate forage/habitat for wildlife. Where these conditions have not been met, changes should be made to restore native rangeland habitats and enhance forage quantity/quality for wildlife. [see 3 - Wildlife Habitat; 10 - Vegetation; 12 - Grazing; 24 - Wildlife Reestablishment]

4) Western Juniper

ODFW is increasingly concerned about the encroachment of western juniper on many BLM lands. The rapid expansion of western juniper into neighboring plant communities has caused considerable concern due to increased soil erosion, reduced stream flows, reduced forage production; altered wildlife habitat; changes in plant community composition, structure, and biodiversity; and the replacement of mesic and semi-arid plant communities with woodlands. The revised RMP should outline an aggressive, landscape level approach to treating the problem. [see 10 - Vegetation]

5) Riparian Area Management

Riparian areas provide essential habitat for fish and wildlife and are also important for maintaining water quality. Riparian and aquatic habitats must be managed to maintain or restore key functions and watershed processes. **The revised RMP should address how these areas will be managed to promote natural processes that maintain and restore species diversity, structural complexity, and the recruitment of large wood. To protect water quality, the**

riparian management strategy in the revised RMP must be similar to, and consistent with, management strategies that have been shown to be sufficient to comply with the federal Clean Water Act and meet state water quality standards. [see 16 - Water Quality]

Management activities near fish bearing streams should contain a stream restoration/fish habitat enhancement component. This can include streamside vegetation restoration, large wood placement projects, fish barrier removal (e.g., culvert replacement), and reconnecting or creating off-channel and side-channel refugia habitat. [see 27 - BLM Management; 3 - Wildlife Habitat; 3.3 - Fish Habitat]

6) Forest Management

BLM should consider well-balanced and appropriate programs of vegetation-management activities in the revised RMP to maintain mixed successional stages and vegetation conditions that provide for the full diversity of habitats and species. [see 10 - Vegetation; 10.2 - Forestry; 3 - Wildlife Habitat]

There is also a need to consider key ecological structural habitat components in the revised RMP. It is important to know how the BLM will provide for them in the managed forest. Key ecological structural habitat components, such as legacy trees, residual live trees, snags, down wood, multi-layered canopies, multiple native tree species, herb/shrub considerations, and gaps are important to many species of wildlife. [see 3 - Wildlife Habitat; 10 - Vegetation; 10.2 - Forestry]

Additionally, decades of management under fuel-exclusion policies have resulted 10 significant change in the condition of public forestlands in Oregon. This situation has major implications for wildlife and habitats. **Four fire-related concerns are prominent: 1) impaired ecological condition of forest ecosystems in which composition, struc-**

ture, and processes are outside their historic range of variation,

2) the risk of uncontrollable and catastrophic wildfires that have potential to destroy or modify habitats over large areas, and may also threaten the existence of wildlife populations at risk,

3) the need to integrate wildlife objectives and habitat relationships into agency efforts to aggressively manage fuels on public forests, and

4) the need to integrate wildlife objectives and habitat relationships into burned-area salvage and restoration programs. [see 19 - Fire Management; 10 - Vegetation; 3 - Wildlife Habitat]

7) Invasive Species (weeds)

Invasive plants continue to cause changes in vegetative communities and loss of wildlife habitat and forage. **BLM must consider creating and implementing comprehensive invasive species detection, monitoring, and control strategies for BLM lands that also consider potential impacts to adjacent private and public lands. The strategies must include an early detection and rapid response program for new invasive species, and include the full range of tools, such as herbicides and biological agents, to eradicate and/or manage invasive species. [see 10.1 - Weeds]**

8) Oregon Conservation Strategy (OCS)

OCS should be used to help BLM make strategic decisions on conservation issues and for guidance on the types of actions most likely to benefit species and habitats. The OCS describes species and habitats of greatest conservation need, identifies key conservation issues facing those at-risk species and habitats, and provides recommendations for actions and opportunities to address them. In addition, Oregon's Greater Sage Grouse

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Conservation Assessment and Strategy for Oregon, Oregon Plan for Salmon and Watershed Health, Bighorn Sheep and Rocky Mountain Goat Plan, Elk Management Plan, Mule Deer Management Plan, Wolf Plan and Cougar Management Plan should be used to provide guidance in land management for those species. [see 14 - Special Status Species; 3 - Wildlife Habitat]

9) Species of Importance

ODFW recommends the revised plan provide specific management practices associated with federal and state listed threatened/endangered species and "strategy species" identified in the OCS. [see 14 - Special Status Species]

In addition, *ODFW recommends the revised plan provide specific management practices associate with the following species due to their social, ecological, and economic value:*

Sage Grouse

Sage Grouse and their habitat continue to be at-risk across the species' range. Recreation and utilization of BLM land must be managed to protect and enhance sage grouse and their habitat to prevent federal Endangered Species listing in the future.

The revised RMP must provide land managers with tools to improve habitat conditions for this species. The BLM should also consider evaluating how the revised RMP will contribute to the management objectives and habitat, food, and cover needs expressed in the ODFW Greater Sage Grouse Conservation Assessment and Strategy for Oregon.

Native Fish

BLM lands support key habitat for Ore-

gon's native fish populations. The revised plan must outline an approach to improve riparian area conditions, water quality and other factors influencing fish.

Bighorn Sheep

Interactions between domestic sheep and wild bighorn sheep continue to be a threat to the existence of wild sheep in Oregon. Any BLM sheep grazing allotments must be evaluated for potential interaction between these species. The BLM should also consider evaluating how the revised RMP will contribute to the management objectives and habitat, cover, and forage needs expressed in the ODFW Bighorn Sheep Management Plan. Mule deer and Rocky Mountain elk protection and enhancement of big game winter range is critical to Oregon's big game populations. Deer and elk winter range needs to be clearly identified and designated in the revised RMP. A well balanced program of vegetation-management activities is also needed to maintain the mix of successional stages and vegetation conditions that provides the appropriate cover and forage relationship for deer and elk. The BLM should consider evaluating how the revised RMP will contribute to the management objectives and habitat, cover, and forage needs expressed in the ODFW Mule Deer Management Plan and Elk Management Plan. [see 14.1 - Wildlife; 14.2 - Fish]

10) Monitoring

A detailed monitoring strategy supported by appropriate research must be implemented as a key part of the revised RMP. The monitoring strategy must examine key questions related to the implementation, effectiveness, and validity of plan assumptions and objectives, land use allocations and management actions. The revised RMP should commit to adequate monitoring and research to generate and utilize new information as it becomes available, and employ an adaptive management approach to ensure that the best available knowledge and information is acquired and used effectively. [see 25 -

Monitoring]

11) Land Access

Since the creation of the current RMP, much of Oregon's private land has been closed to public access. Thousands of acres of BLM land are not legally accessible to the public. Furthermore, in some cases private land-owners are leasing the access and hunting rights to the public's land. ***We recommend the BLM pursue access to these parcels and/or land trades to obtain larger, contiguous blocks of public land. [see 2 - Access; 1 - Travel Management]***

12) Co-management Areas

Through cooperative agreements, ODFW manages several areas of BLM land such as the Auburn Tract of Elkhorn Wildlife Area near Baker City, OR and Power City Wildlife Area near Pendleton, OR. ***The revised plan should allow the continued cooperative relationship and incorporate ODFW's [plans] [see 27 - BLM Management; 28 - misc]***

Thank you again for this opportunity to participate in this planning process.

Sincerely,

Craig Ely

Northeast Regional Manager

Christopher Christie

■ Individual

[This letter was addressed in response to the noxious weed EIS, but contained comments considered pertinent to the RMP revision]

Dear Ken,

bold italic type represents a comment excerpted for use in the scoping analysis

You may remember me from the public meeting about the veg treatments EIS that was held at the Baker City Resource Area BLM office on July 7, 2008. I realize that you have notes and a tape of the meeting, but I thought I should send in a written summary of my brief comments.

My concerns were the following: I spoke with you before the meeting about Hells Canyon Preservation Council & I not getting notice of the veg treatments meeting, even though we are on local BLM mailing lists. At that time rancher Wannie Mackenzie, head of the Malheur County Cattlemen's Assn., said he received 4 notices from varying sources. BLM admitted during the meeting that cows do eat whitetop in a seed stage and pass viable seeds out in cow pies, a fertile germination environment. What ***I, and others, don't understand, is why the EIS and BLM doesn't adequately address the cow as vector and a cause of expanding weed populations on public lands. [see 12 - Grazing; 10.1 - Weeds]*** Not only are they a major cause of the disturbance that helps noxious weeds spread, but they are actually spreading whitetop. and other weeds around the public's landscape.

Instead of addressing this cause of the weed problem, and reacting with appropriate changes in range management, such as reduced stocking levels, quarantine, etc, the BLM proposes to endlessly fight the problem with thousands and thousands of tax-payer dollars by spreading more herbicides on public land. I noted that many environmentalists I had been in contact with had difficulty understanding why BLM works so hard to increase herbicide use when BLM does little or nothing to address, contain or lessen the activities that cause the disturbance which provides the fertile ground for noxious weed expansion—activities that often help seed dispersal. I mentioned that my experience instructed me that grazing had caused the Spread of noxious weeds from the Pahvant Range of central Utah, throughout the Great Basin, to Baker County, OR and on to Washington State (not to mention the coast ranges and deserts of California). I offered to walk with BLM on any allotment in the District to show them what I am talking about if they

are not already aware of the problem (no takers). I told BLM it was hard to take the BLM seriously when they won't address the real causes of weed expansion, and that increased herbicide use and associated costs could ultimately be a waste of time because of that.

The BLM's approach is a terribly inefficient use of the public's money and land. During the meeting, BLM had noted that the extra 14 herbicides would improve cost efficiencies (an issue), so I mentioned that addressing the causes of disturbance, etc., would do more to increase cost efficiencies, so my hope was that that would be an issue too. I noted that it is standard practice for the agencies to place any inconvenient truth outside the scope of the EIS so that they can do whatever it is they want to do, but that improving cost efficiencies was an issue that they themselves raised. [see 27 - BLM Management; 28 - misc]

I also brought up statements in the local paper paraphrasing Vale BLM spokesperson Wilkening, which was that "When whitetop was found in Owyhee Canyon, Wilkening said BLM officials figured they could have stopped the noxious weed with five dollars worth of an herbicide that is on the banned list. BLM tried one of its four Oregon approved chemicals, but whitetop has since spread through the canyon." He agreed that he was paraphrased accurately, even though another BLM official then admitted that indeed, cows were also responsible for spreading whitetop through the canyon. Distortions about the real cause of whitetop spreading in the Owyhee Canyon leaves me to wonder if the public should take what the BLM says and writes with a grain of salt.

Additional concerns: ***It was said that the EIS will not address commodity uses, such as cow forage production, but it seems entirely possible cow forage production projects may be hidden behind the "land health" banner. [see 12 - Grazing; 11 - Natural Resources]***

Mike Woods from the Vale office also used the example of using "Spike" (Thebuthiuron) to alter the age structure of sagebrush to promote habitat for sage grouse. Wouldn't taking the cows off be a better solution for improving sage grouse habitat? Additionally, as Thebuthiuron kills pretty much everything and remains in the soil for 12-15 months, there is the question as to what other damage it would do.

Thank you for considering these concerns in the process of developing the EIS and please keep me on the EIS mailing list.

Sincerely,

Christopher Christie

Mike Haberman

■ Individual

Step it up with weed control in this area [see 10.1 - Weeds], be pro-grazing on new lands [see 12 - Grazing].

Mike Haberman

Matt Kniesel

■ Individual

Realty

Identify public land areas where dispersed recreational shooting can continue, along with sites and ranges for current and/or future more concentrated recreational activities. [see 17.2 - Shooting; 17 - Recreation]

Allow the current Virtue Flat Rifle Range that is leased to be sold to the Powder River Sportmen's Club that has managed it for more than 50 years. [see 17.2 - Shooting; 27 - BLM Management; 28 - misc]

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Range

Improve range management practices that enhance range health and wildlife habitats [see 12 - Grazing; 3 - Wildlife Habitat; 10 - Vegetation]

Wildlife

Protect, maintain and enhance critical big game ranges which may winter, spring, summer and fall habitats... [see 3 - Wildlife Habitat] Protect, maintain and enhance key habitats and wildlife plant communities such as aspen, riparian zones, wetlands, mountain shrub and sagebrush communities. [see 3 - Wildlife Habitat; 10 - Vegetation]

Forestry

Continue forest management practices that promote forest health and enhance wildlife communities and habitats. Reduce the amount of junipers on public lands by cooperating with U.S. Forest Service, Oregon State Forestry, and private land owners and by producing long-term landscape management plans to accomplish this goal.

Ron Lesley

■ Individual

I am a 63 year old native Oregonian who has fished & hunted and enjoyed Oregon's out of doors for over 50 years.

As I expressed to several of you in the La Grande meeting, **I am very disappointed in finding roads closed that have been open for years, that provided access to the back country [see 2 - Access; 1 - Travel Management]**, and I'm not talking wilderness. Part of my enjoyment over the years is to take a road trip and check out the old roads, [to try] to see where they go, old mines, homesteads, etc.

I also mentioned that **I get real tired of watching big money backed, loud mouths control the timber harvest on BLM and Forest Service land [see 5 - Economics; 10.2 - Forestry]**. The forests of N.E. Oregon are set to explode, just as N. California has this year.

There is [sic] 30 years of beetle kill & moth killed trees that were never salvaged or permitted to be harvested [see 5 - Economics; 10.2 - Forestry] for firewood, lumber, pulp or other uses. No wonder we have no lumber industry today.

Sustained Yield used to be a watch word in the forests. Not any More. [see 27 - BLM Management; 10.2 - Forestry]

We spend millions or billion[s] to react to wildfire [see 5 - Economics; 27 - BLM Management; 10.2 - Forestry]

ATV use is another item. They were designed initially to be low impact vehicles. I have a 2 wheel drive model that I like to use for riding old roads and trails to see where they go or maybe use to retrieve a deer or elk, if I am so lucky. **I would support the use of ATV's to be used by hunters to retrieve game animals [see 17.5 - OHV; 17.2 - Shooting; 1.2 - Motorized Use]** during the middle of the day, without rifles in possession, to and from downed animal[s] [to a] larger vehicle on camp.

Carol S. Sams

■ Individual

Ownership Loc. T5N R37 lot 4000 and 4100: Umatilla County, OR must access thru [sic] BLM lot 4200, to reach my property in 4100.

Transfer isolated tax lots to surrounding landowners. We landowners currently manage and protect these small lots. **Since we control access the land is not impacted by the public, 4 wheelers [sic], and other**

land erosion problems. [see 2 - Access; 28 - misc; 1 - Travel Management]

Environmental Impact

There would be no impact since landowner would continue to monitor and protect the land. I am zoned for winter habitat for deer and elk. Bear and cougar also are residents and are not threatened by the habitat.

We are still bound by state and federal regulations and restrictions. Water quality, soil and vegetation samples are taken on occasions by different agencies

Benefits

BLM would be relieved of long trips to monitor twice yearly. [The] county would benefit from collection of taxes. Fire protection would be by [the] Forest Service tax surcharge that landowner pays.

Landowners protect these lots at their own expense. I previously spent \$7100 in 2005 to fence the boundary between myself and BLM.

Clearwater Exchange previously showed interest in transferring the lot 4200 to me but environmental lawsuit blocked a bigger exchange that this lot was tied to. Private ownership of the scattered small lots would be a win win situation for all parties concerned.

Thank you
Carol S. Sams.

Mike Odom

■ Individual

It is my opinion that **managed livestock grazing has been underutilized on Bureau Lands along the Grande Ronde river cor-**

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ridor. Existing grazing leases have been curtailed all together by the Bureau when not one bit of scientific evidence supports this action. Responsible, targeted live-stock grazing should be encouraged and utilized in the revised Resource Management Plan. [see 27 - BLM Management; 12 - Grazing]

Mike Odom

Bill Tsiatsos

■ *Individual*

(1) Parcel 1 is Facing north our boundary fence between Aric Waite and out property. (ISOLATED) Purpose of Purchase: Additional Grazing land

(2) This parcel is included in N.F.S. ground that we Rent with warm springs cattle allotment. (Exchange with N.F.S. if Possibly able to Purchase)

(3) This parcel would be of interest for purpose of purchase to exchange with N.F.S. ground that we surround. A benefit to all to square up property!

Thank you

Bill Tsiatsos

[see 8 - Land Tenure Adjustments]

[map attached]

Jane Bohn

■ *Individual*

To the editor:

I am writing seeking public comment to

limit development on public lands that could impact the Baker Valley viewshed.

BLM is revising its 1989 plan that provides for future management of public lands in Baker and adjoining counties. My concern is development on public lands that will impact the visual aesthetics of Baker Valley. ***This could include wind turbines, gravel pits, cell towers or other structures that would limit or obstruct our view. [see 7 - Energy Development; 7.1 - Wind Energy; 6 - Visual]*** Public lands are available for these uses as long as the applicant complies with BLM regulations and it is not within a wilderness or other protected area.

I live in Western Heights, and the wind turbines near North Powder are visible day and night. It is feasible that the entire eastern horizon from these turbines past the Interpretive Center to the cell towers on the peak and beyond, could be dotted with turbines or other structures. I am not advocating that development on public lands be prohibited. My only plea is for BLM to direct placement of such obstructions so that they are not visible from the valley floor. Obviously we can't control what private landowners do with their property, but we do have a voice with BLM, which manages over 5.1 million acres in Eastern Oregon — plenty of room for out-of-sight development.

BLM is asking for public input. If you are a concerned citizen like myself, please express your opinion by attending the public meeting on Thursday, July 24 between 4 and 7 p.m. at Baker Field Office on 11th Street (behind Cashway Lumber). If you can't make the public meeting, you can mail your comments to the Baker office or email them to blm.gov/or/districts/vale. Public comments will be considered in the development of the draft plan. Opportunities for future comments on the draft plan will be possible, steering BLM to a final plan that will be in place for the next 15 to 20 years. If we want to preserve the uniqueness and scenic surroundings of Baker Valley, we need to direct that obstructions be placed in seldom seen areas. This is your opportunity to help direct what you want to see from your front window.

Jane Bohn

[This letter appeared in the July 22 Issue of the Baker City Herald]

Environmental Protection Agency

■ *Federal Government*

Nancy K. Lull, Manager
Baker Resource Area
Bureau of Land Management
3285 11th St.
Baker Street
Baker City, OR 97814

Dear Ms. Lull:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bureau of Land Management (BLM) Notice of Intent (NOI) to revise a Resource Management Plan (RMP) and the Associated Environmental Impact Statement (EIS) for the Baker Resource Area in Baker, Union, Wallowa, Morrow, and Umatilla Counties in Oregon and in Asotin County, Washington. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

According to the NOI, BLM proposes to revise the existing 1989 Baker Resource Management Plan. The revised planning area would cover nearly 423,000 acres of public land in Vale District administered by BLM. As stated in the NOI, BLM would use an interdisciplinary approach to develop the revision and work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns. We support BLM efforts to revise the existing RMP and develop a new plan that would serve as a comprehensive planning framework that can be used as a guide for development of future individual plans and

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projects. The new plan should clarify that each of the subsequent individual plans and projects would be subject to separate NEPA analyses.

The NOI identifies issues and management concerns with current land management that will be considered in the revised RMP/EIS. They include vegetation management; water quality, aquatic resources, fisheries; special management areas; recreation management; cultural and paleontological resources; socioeconomics and environmental justice; energy and minerals; lands and realty; transportation, including Off Highway Vehicle management and public access; fire and fuels management; wildlife habitat and wildlife. We offer the following scoping comments to inform BLM of issues that EPA believes should be considered as the NEPA process for the revised RMP moves forward.

We appreciate the opportunity to provide comments early in the preparation of the revised RMP/EIS and look forward to continued participation in this process as more information becomes available. If you have questions about our comments, please contact me at (206) 553-6322.

Sincerely

/s/ Theogene Mbabaliye
NEPA Review Unit

Detailed Scoping Comments on the NOI to Revise a Resource Management Plan (RMP) and associated EIS

Purpose and Need

The new plan should clarify that each of the subsequent individual plans and projects would be subject to separate NEPA analyses. [see 27 - BLM Management; 28 - misc] Scoping Comments on the NOI to Revise a Resource Management Plan (RMP) and associated EIS Purpose and Need The revised RMP/EIS should clearly identify the

underlying purpose and need to which BLM is responding to in proposing the alternatives, including the broader public interest and need. The purpose of the proposed action would typically be [the specific objectives of the new RMP, while the need for the plan may be to eliminate a broader underlying problem or take advantage of an opportunity. Thus, the purpose and need should be a clear, objective statement of the rationale for the proposed project, as it provides the framework for identifying project alternatives.

Range of Alternatives

The revised RMP/EIS should include a range of reasonable alternatives that meet the stated purpose and need for the revised RMP and that are responsive to the issues identified during the scoping process. [see 27 - BLM Management; 28 - misc] The Council on Environmental Quality (CEQ) recommends that all reasonable alternatives be considered, even if some of them could be outside (he capability of the applicant or the jurisdiction of the agency. Also, the environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. The potential impacts of each alternative should be quantified to the greatest extent possible. It would also be useful to list each alternative action's impacts and corresponding mitigation measures. EPA encourages selection of feasible alternatives that will minimize environmental degradation.

Environmental Effects

The revised RMP/EIS should include environmental effects and mitigation measures. This would involve delineation and description of the affected environment, indication of resources that would be impacted, the nature of the impacts, and a listing of mitigation measures for the impacts. The following topics are of particular interest to EPA

Water resources

Water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the state of Oregon and Washington (and Tribes with approved water quality standards) to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. The revised RMP/EIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the revised RMP that are listed on the States and Tribes' most current EPA-approved 303(d) lists. The revised RMP/EIS document should describe existing restoration and enhancement efforts for those waters, how the revised RMP will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within impaired waters. Antidegradation provisions of the CWA apply to those water bodies where water quality standards are currently being met. This provision prohibits degrading the water quality unless an analysis shows that important economic and social development necessitates some degradation of water quality. The revised RMP/EIS evaluation should determine how the antidegradation provisions would be met. Public drinking water supplies and/or their source areas often exist in many watersheds. It is possible that source water areas may exist within the Baker Resource Area. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the state for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. As a result, state agencies have been delegated responsibility to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. Since projects un-

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der the revised RMP may impact sources of drinking water, EPA recommends that BLM contact Oregon Departments of Environmental Quality and Washington State Department of Ecology to help identify source water protection areas within the planning area. The revised RMP/EIS should: (a) Identify all source water protection areas within the project area. (b) Identify all activities that could potentially affect source water areas. (c) Identify all potential contaminants that may result from the proposed project. (d) Identify all measures that would be taken to protect the source water protection areas in the revised RMP/EIS. As the planning of the revised RMP/EIS continues, EPA recommends that BLM evaluate the impacts roads would have on water bodies in the planning area. In particular, roads contribute more sediments to streams, interrupt the subsurface flow of water, especially where roads cut into steep slopes, may fragment habitats and disturb wildlife, and accelerate noxious weed infestations. The revised RMP/EIS should include data about existing road networks and evaluate the change in road miles and density that will occur as a result of the revised RMP projects and predicted impacts to water quality by roads. The revised RMP/EIS should note that, under the CWA, any construction project disturbing a land area of one or more acres requires the National Pollutant Discharge Elimination System (NPDES) permit for discharges to waters of the U.S. The revised RMP/EIS should document the plan's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality. The revised RMP projects that would involve construction of facilities and access roads may also compact the soil, thus changing hydrology, runoff characteristics, and affecting flows and delivery of pollutants to water bodies and ecological function of the area. Therefore, the revised RMP/EIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions within the Baker Resource Area. The document should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to 5 groundwater and sur-

face water resources. For groundwater, the potentially affected groundwater basin should be identified and any potential for impacts to springs or other open water bodies and biologic resources should be analyzed. [see 1 - Travel Management; 1.2.2 - Maintain existing road and trail system; 16 - Water Quality]

Wetlands and Riparian areas

The revised RMP/EIS should describe all waters of the U.S. that could be affected by the revised RMP alternatives, and include maps that clearly identify all waters within the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters. Projects affecting waters of the U.S. would need to comply with CWA Section 404 requirements. Section 404 regulates the discharge of dredged or fill material into waters of the U.S., including wetlands and other special aquatic sites. The U.S. Army Corps of Engineers issues Section 404 permits. If anticipated projects under the revised RMP/EIS would involve discharge of dredged or fill material into waters of the U.S., the revised RMP/EIS should include information regarding alternatives to avoid the discharges or how potential impacts caused by the discharges would be minimized and mitigated. This discussion would include the following elements: (a) Acreage and habitat type of waters of the U.S. that would be created or restored. (b) Water sources to maintain the mitigation area. (c) Re-vegetation plans, including the numbers and age of each species to be planted, as well as special techniques that may be necessary for planting. (d) Maintenance and monitoring plans, including performance standards to determine mitigation success. (e) Size and location of mitigation zones. (f) Parties that would be ultimately responsible for the plan's success. (g) Contingency plans that would be enacted if the original plan fails. Mitigation should be implemented in advance of the impacts to avoid habitat losses due to the lag time between the occurrence of the impact and successful mitigation. [see 16 - Water Quality; 7.5 - Minerals]

Air quality

The revised RMP/EIS should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in the planning area and vicinity. The analysis should estimate emissions of criteria pollutants for the Baker Resource Area and discuss the time frame for release of these emissions over the lifespan of the revised RMP. Also, the document should include analyses of the potential impacts to air quality (including cumulative and indirect impacts) from the revised RMP projects, especially those involving construction activities. The revised RMP/EIS should specify emission sources and quantify these emissions. Such an evaluation is necessary to assure compliance with state and federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality. The revised RMP/EIS should include the following: (a) Detailed information about ambient air conditions, NAAQS, and criteria pollutant non-attainment areas in all areas considered for the airport and adjacent areas. (b) Data on emissions of criteria pollutants from the proposed project and discuss the time frame for release of these emissions. (c) Specific information about pollutant from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention. (d) An Equipment Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and NO₂ associated with construction activities. [see 20 - Air Quality; 19 - Fire Management]

Endangered Species Act (ESA)

Evaluation of the revised RMP/EIS should identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the project area. The draft EIS should describe the critical habitat for the species; identify any im-

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pacts the revised RMP will have on the species and their critical habitats; and how the revised RMP will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service (FWS) and National Oceanographic Atmospheric Administration (NOAA). The EIS may need to include a biological assessment and a description of the outcome of consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. BLM actions should promote the recovery of declining populations of species. [see 14 - Special Status Species]

Cumulative Effects

CEQ definition of cumulative impact is “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions.” The cumulative impacts analysis should therefore provide the context for understanding (the magnitude of the impacts of the alternatives by analyzing the impacts of other past, present, and reasonably foreseeable projects or actions and then considering those cumulative impacts in their entirety. The draft EIS should include and analyze present and reasonably foreseeable projects and actions proximate to the Baker Resource Area and vicinity. Where adverse cumulative impacts may exist, the draft EIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. The EIS should clearly identify the resources that may be impacted by cumulative effects, the time over which impacts are going to occur, and the geographic area that will be impacted by the proposed project. For each resource analyzed, the revised RMP/EIS should: (a) Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date. (b) Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or in stasis. (c) Identify

the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. For example, what will the future condition of the watershed be? (d) Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives. (e) Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts. (f) Identify opportunities to avoid and minimize impacts, including working with other entities. [see 27 - BLM Management; 28 - misc]

Climate Change Effects

Currently, there is concern that continued increases in greenhouse gas emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. The revised RMP/EIS document should therefore consider how resources affected by climate change could potentially influence the revised RMP and vice versa, especially within sensitive areas. Also, the revised RMP/EIS should quantify and disclose greenhouse gas emissions from potential activities under the plan and discuss mitigation measures to reduce emissions. [see 26 - Climate Change]

Coordination with Tribal Governments

If projects under the revised RMP would affect any Tribe’s resources, then the RMP/EIS document should describe the process and outcome of government-to-government consultation between BLM and each of tribal government involved, issues that were raised, if any, and how those issues were addressed. Executive Order 13175, Consultation and Coordination with Indian Tribal Governments (November 6, 2000), was issued in order to establish regular and meaningful consultation and

collaboration with tribal officials in the development of federal policies that have tribal implications, and to strengthen the U.S. government-to-government relationships with Indian tribes. [see 15 - Cultural]

Monitoring

Because projects under the revised RMP could potentially impact a variety of resources in the planning area and for an extended period of time, we recommend that the revised RMP projects be designed to include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The revised RMP/EIS should describe the monitoring program and how it would be used as an effective feedback mechanism so that any needed adjustments can be made to projects under the new RMP to meet environmental objectives. [see 25 - Monitoring]

Sam Ledgewood

■ Individual

Use Land to produce its keep [see 5 - Economics; 27 - BLM Management] Use fire management not just fight fire or control fuels [see 19 - Fire Management]

John S. Ehart

■ Individual

More Recreation use should be made available: walking trails, horse trails, atv trails, etc. throughout the Blue Mountain Area. [see 1 - Travel Management; 17 - Recreation; 17.5 - OHV; 17.1 - Equestrian]

Nez Perce Tribe

■ Scoping Meeting Notes

Nez Perce Meeting Notes

June 3, 2008

Nancy Lull and Allison Kuehl met with the Natural Resource Tribal Council – also attending our portion of the meeting were Keith Lorington (wildlife lead), Mike Lopez (Nez Perce legal council—previously position held by Brian Sudenbry) and Dave Johnson – fish department manager.

Nancy and Allison gave them an overview of the RMP process, timeline, particulars of the AMS and asked for any input, issues, or concerns they might have.

Keith talked about concerns for Bighorn Sheep especially in the Hell's Canyon area. They don't want domestic sheep grazing anywhere near the bighorn (within a 9 mile radius at least) [see 14.1 - Wildlife; 12 - Grazing; 3 - Wildlife Habitat]

All listed fish areas of importance to the tribe. The Nez Perce are developing a pro-rogation program on Joseph Creek. [see 3.3 - Fish Habitat]

Dave Lopez proposed to become full co-operators – he was going to find a MOU they've used before. BFO had sent a letter earlier inviting them to be cooperators but did not receive a reply.

They are also concerned about noxious weeds on the northeast end of the FO lands – in particular the "Precious Lands Project" area. [see 10.1 - Weeds]

There is a field trip scheduled out there on June 18th. We have an agreement with the tribe to manage about 1,800 acres of the Precious Lands. ***Also mentioned was the need for access around the Grande Ronde parcels (Rocky Dixon). [see 2 - Access; 1 - Travel Management]***

Need to share GIS data [see 27 - BLM Management; 28 - misc]

Jim Harbeck and Rick Christen are the fish bios in Enterprise

Burns Paiute Tribe

■ *Scoping Meeting Notes*

Burns Paiute Tribe Meeting with Natural Resource Staff and Tribal Member

April 23, 2008

Meeting Attendees: Allison Kuehl (BLM RMP Team Lead), Nancy Lull (BLM Baker Resource Area Field Manager), Lawrence Schwabe (Paiute Tribe Natural Resources Director), David Speten (Wildlife Manager), and Charisse Soucie (Tribal Council Member)

The purpose of the meeting was to explain the Baker RMP process/timeline, and to discuss ideas and to try to answer any questions/concerns that might be brought up the BPT staff and council. The BLM was also seeking to find out or learn from the staff and council what the tribe issues and concerns might be so that these could be recognized and addressed (mitigated as much as possible) early in the RMP process.

No site specific concerns were evident initially – however general concern was raised about:

1) protection of first foods and traditional cultural practice (TCP) areas [see 15 - Cultural]

2) water quality/fish habitat and reintroduction of fish (including the potential for fish reintroduction into Pine Creek off of the Powder River) [see 3.3 - Fish Habitat]

3) No wildlife concerns at this time

4) Timing of spraying of noxious weeds and ways to be notified prior to spraying of areas [see 27 - BLM Management; 10.1 - Weeds]

We briefly discussed BLM plans for travel management, FERC concerns, ACECs etc. Allison said as the BLM moves further into the process she will keep Lawrence "in the loop" as much as he feels the need to be. Once the AMS is published Allison will contact Charisse to schedule a meeting with the tribal council. BLM left maps of the Resource Analysis Area and streams within the RAA.

Confederated Tribes of the Umatilla Reservation

■ *Scoping Meeting Notes*

Confederated Tribes of the Umatilla Reservation Meeting with Natural Resource Staff

March 27, 2008

Meeting Attendees: Allison Kuehl (BLM RMP Team Lead), Nancy Lull (BLM Baker Resource Area Field Manager), Eric Quaempts (NR Director) and Audie Huber (Intergovernmental Affairs Manager)

The purpose of the meeting was to explain the Baker RMP process/timeline, to discuss ideas and to try to answer any questions/concerns that might be brought up the CTUIR staff. Also the BLM was seeking to find out or learn from the CTUIR staff what the tribe issues and concerns might be so that these could be recognized and addressed (mitigated as much as possible) early in the RMP process.

We briefly discussed sage grouse, roads,

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wind energy, social/economic impacts, public/private access, that Section 106 consultation will be done, fisheries work underway and coordination etc.

No site specific areas of concern were identified. ***In general good land stewardship is needed to protect BLM natural resources, which includes tribal interests. [see 27 - BLM Management]*** The RMP will address wise conservation of resources. ***The tribes have a strong interest in the protection of and access to First Foods, with an emphasis on traditional roots. [see 2 - Access; 10 - Vegetation; 15 - Cultural]***

The tribe is currently working with the Umatilla NF on developing a model to identify site condition potential for specific plants and criteria for protection.

BLM will try to work with CTUIR to identify ways to protect first foods without specifically identifying areas on the map. Ways to do this could include turn out dates, season of use in particular areas, adhering to S&Gs utilization standards, fencing, etc. [see 15 - Cultural]

Eric asked that our GIS person contact Stacey Schumacher (their GIS program manager) to give her a summary of our Data Library. BLM was told to contact the Tribal Council to give a major overview once the AMS was completed. BLM should go through Audie to let him know of major milestones – i.e. AMS etc.

For info on the cultural work (first foods) being done with the CTUIR, BLM should contact Delanne Fergeson and David Pow-

ell from the Umatilla NF (also General Land Office –layer for historic map. BLM left maps of the Resource Analysis Area and streams within the RAA.

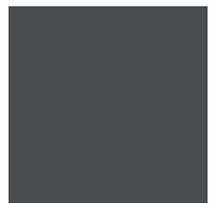
Appendix D



Federal

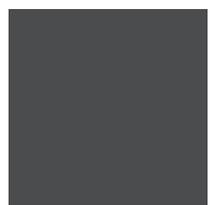


Register



Notice

Scoping Report



Baker RMP



Revision



confidential. The public is not required to respond unless a currently valid OMB control number is displayed.

II. Request for Comments

Please note that all comments received will be available for public review two weeks after publication in the **Federal Register**. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

It is our policy to make all comments available to the public for review at the location listed in the **ADDRESSES** section, room 355–E, during the hours of 7:00 a.m.—4 p.m., EST Monday through Friday except for legal holidays. All comments from organizations or representatives will be available for review. We may withhold comments from review for other reasons.

Request for Comments: The Bureau of Indian Affairs requests your comments on this collection concerning: (a) The necessity of this information collection for the proper performance of the functions of the agency, including whether the information will have practical utility; (b) the accuracy of the agency's estimate of the burden (hours and cost) of the collection of information, including the validity of the methodology and assumptions used; (c) ways we could enhance the quality, utility and clarity of the information to be collected; and (d) ways we could minimize the burden of the collection of the information on the respondents, such as through the use of automated collection techniques or other forms of information technology.

Please note that an agency may not sponsor or request, and an individual need not respond to, a collection of information unless it has a valid OMB Control Number.

OMB Control Number: 1076–0131.

Type of review: [Renewal.]

Title: Department of the Interior, Bureau of Indian Affairs, Indian Child Welfare Act Annual Report, 25 CFR Part 23.4.

Brief Description of collection: Indian tribes are required to collect selected data on Indian child welfare cases and submit them to the Bureau for consolidation. This data is useful on a local level, to the tribes, and tribal organizations that collect it, for case management purposes and on a

nationwide basis for planning and budget purposes.

Respondents: Indian tribes or tribal entities who are operating programs for Indian tribes.

Number of Respondents: 536.

Estimated Time per Response: 30 minutes.

Frequency of Response: Quarterly.

Estimated Annual Burden to Respondents: 1072 hours.

Dated: December 31, 2007.

Carl J. Artman,

Assistant Secretary—Indian Affairs.

[FR Doc. E8–518 Filed 1–14–08; 8:45 am]

BILLING CODE 4310–4J–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[HAG # 8–0020]

Notice of Intent To Revise a Resource Management Plan and the Associated Environmental Impact Statement for the Baker Resource Area of the Vale District

AGENCY: Bureau of Land Management, Interior

ACTION: Notice of intent.

SUMMARY: The Bureau of Land Management (BLM) Field Office, Baker City, Oregon intends to revise a Resource Management Plan (RMP) with an associated Environmental Impact Statement (EIS) for the Baker Resource Area of the Vale District and by this notice is announcing public scoping meetings. The RMP will revise the existing Baker Resource Management Plan of 1989.

DATES: The BLM will announce public scoping meetings to identify relevant issues through local news media, newsletters, and the BLM Web site <http://www.blm.gov/or/districts/vale/index.php> at least 15 days prior to the first meeting. We will provide formal opportunities for public participation upon publication of the Draft RMP/EIS.

ADDRESSES: You may submit comments by any of the following methods:

- *E-mail:* BakerRMP@blm.gov.
- *Fax:* 541–523–1965.
- *Mail:* Bureau of Land Management, Baker Field Office, P.O. Box 947, Baker City, OR 97814.

Documents pertinent to this proposal may be examined at the BLM Baker Field Office.

FOR FURTHER INFORMATION CONTACT: For further information and/or to have your name added to our mailing list, Contact: Allison Kuehl, RMP Team Leader, Telephone: 541–523–1931; E-mail: allison_kuehl@blm.gov.

SUPPLEMENTARY INFORMATION: This document provides notice that the BLM Field Office, Baker City, Oregon, intends to revise an RMP with an associated EIS for the Baker Resource Area and announces public scoping meetings.

The planning area is located in Baker, Union, Wallowa, Morrow, and Umatilla Counties in Oregon and in Asotin County, Washington. This planning activity encompasses approximately 423,000 acres of public land. The plan will fulfill the needs and obligations set forth by the National Environmental Policy Act (NEPA), the Federal Land Policy and Management Act (FLPMA), and BLM management policies. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The purpose of the public scoping process is to determine relevant issues, concerns and ideas that will influence the scope of the environmental analysis and EIS alternatives. These issues also guide the planning process. You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the **ADDRESSES** section above. To be most helpful, you should submit formal scoping comments within 30 days after the last public meeting. The minutes for each scoping meeting will be available to the public and open for 30 days after the meeting to any participant who wishes to clarify the views he or she expressed. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, are available for public inspection in their entirety.

Preliminary issues and management concerns have been identified. They represent the BLM's knowledge to date regarding the existing issues and concerns with current land management. The preliminary issues being considered in this planning effort include: vegetation management; water quality, aquatic resources, fisheries; special management areas; recreation

management; cultural and paleontological resources; socioeconomics and environmental justice; energy and minerals; lands and realty; transportation, including Off Highway Vehicle management, and public access; fire and fuels management; wildlife habitat and wildlife.

After public comments as to what issues the plan should address are gathered, they will be placed in one of three categories:

1. Issues to be resolved in the plan;
2. Issues to be resolved through policy or administrative action; or
3. Issues beyond the scope of this plan.

The BLM will provide an explanation in the plan as to why we placed an issue in category two or three. In addition to these major issues, a number of management questions and concerns will be addressed in the plan. The public is encouraged to help identify these questions and concerns during the scoping phase.

Preliminary planning criteria are:

1. The BLM will manage the Baker Resource Area to protect resources in accordance with the Federal Land Policy and Management Act of 1976 (FLPMA, 43 U.S.C. 1701 *et seq.*), other applicable laws and regulations, and all existing public land laws.

2. The Plan will recognize valid existing rights within the Planning Area and review how valid existing rights are verified. The Plan will outline the process the BLM will use to address applications or notices filed on existing claims or other land use authorizations after the completion of the Plan.

3. Lands covered in the RMP will be public lands, including split estate lands, managed by BLM. Decisions on lands not managed by the BLM will not be made in the RMP except when formal cooperator status is mutually accepted and leads to additional Records of Decision.

4. The BLM will use a collaborative and multi-jurisdictional approach, where possible to jointly determine the desired future conditions of public lands.

5. The Plan will emphasize the protection and enhancement of the Planning Area's biodiversity while at the same time providing the public with opportunities for compatible commodity-based and recreation activities.

6. The socioeconomic impacts of the alternatives will be addressed.

7. The BLM will use current scientific information, research, technologies, and results of inventory, monitoring and coordination to determine appropriate

local, and regional management strategies that will enhance or restore impaired ecosystems.

8. The planning process will include an EIS that will comply with NEPA standards.

9. Any land located within the Planning Area's administrative boundary, and subsequently acquired by the BLM, will be managed consistent with the Plan, subject to any constraints associated with the acquisition.

10. The Plan will recognize the State's responsibility to manage wildlife. The BLM would consult with Oregon Department of Fish and Wildlife before establishing no-hunting zones or periods for the purposes of protecting public safety, administration, or public use and enjoyment.

11. The Plan will address transportation and access, and will identify where better access is warranted, where it should remain as is, and where decreased access is appropriate to protect Planning Area resources.

12. Laws and regulations regulate grazing management. The Plan will incorporate the Rangeland Health Standards and Guidelines. It will provide a strategy to ensure proper grazing practices are followed within the Planning Area.

13. The planning process will involve American Indian Tribal governments and will provide possible strategies for the protection of recognized traditional uses, if such uses are identified.

14. Decisions in the Plan will strive to be compatible with existing plans and policies of adjacent local, State, Federal, and tribal agencies as long as the decisions are consistent with Federal law governing the administration of public land.

The BLM will use an interdisciplinary approach to develop the revision in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: rangeland management, minerals and geology, forestry, fire and fuels, outdoor recreation, archaeology, paleontology, wildlife and fisheries, lands and realty, hydrology, soils, sociology, and economics.

Dated: January 8, 2008.

Nancy K. Lull,

Baker City Field Manager.

[FR Doc. E8-520 Filed 1-14-08; 8:45 am]

BILLING CODE 4310-33-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[MT-060-01-1020-PG]

Notice of Public Meeting; Central Montana Resource Advisory Council

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Public Meeting.

SUMMARY: In accordance with the Federal Land Policy and Management Act and the Federal Advisory Committee Act of 1972, the U.S. Department of the Interior, Bureau of Land Management (BLM) Central Montana Resource Advisory Council (RAC) will meet as indicated below.

DATES: The meeting will be held February 5 & 6, 2008, at the Yogo Inn Conference Room, 211 E. Main Street, in Lewistown, Montana.

The February 5 session will begin at 10 a.m. with a 30-minute public comment period. This meeting is scheduled to adjourn at 5:30 p.m.

The February 6 meeting will begin at 8 a.m. with a 30-minute public comment period and is scheduled to adjourn at 3:30 p.m.

SUPPLEMENTARY INFORMATION: This 15-member council advises the Secretary of the Interior on a variety of management issues associated with public land management in Montana. During these meetings the council will discuss/act upon:

Reviewing the council charter;
 Discussing the consensus format;
 An orientation for current and new members;
 Reviewing the 2008 council work plan;
 A discussion of what the council expects from the BLM;
 A question and answer period with BLM managers and staff;
 Field manager updates;
 Travel planning in the Judith and Moccasin Mountains;
 A fee proposal template from the U.S. Forest Service;
 Oil and gas leasing;
 An update on the monument resource management plan;
 Watershed planning; and
 Administrative details (next meeting agenda, location, etc.).

All RAC meetings are open to the public. The public may present written comments to the RAC. Each formal RAC meeting will also have time allocated for hearing public comments. Depending on the number of persons wishing to comment and time available, the time for individual oral comments may be limited.