
Tribal Interests

Key Points

- An active and ongoing dialogue between BLM representatives and designated Tribal representatives and their leadership contributed to develop analyses. A summary of Tribal listening sessions is included as **Appendix R** and expands upon the issues in this section.
- A large portion of the issues identified by the Tribes are covered under specific resource sections (e.g., Fisheries, Hydrology, Socioeconomics, Invasive Species, and Cultural Resources) though the effects specific to Tribal communities may differ due to the unique relationships that Tribes have with the landscape and its resources. The BLM summarizes these unique and often qualitative effects here whereas the specific resource sections contain the quantitative technical analyses.

Summary of Notable Changes from Draft RMP/EIS

This section includes updated information and expands discussions based upon requests received from Tribes during government-to-government consultation meetings held since the release of the Draft RMP/EIS. These updates reflect expansion and clarification of information and identification of special areas, resources, and issues the Tribes requested be addressed. **Appendix R** also contains elements of this nature.

Issue 1

How would land management actions affect sacred sites and places of traditional religious and cultural importance?

Summary of Analytical Methods

The BLM described in the Planning Criteria how continued management of sacred sites and places of traditional religious and cultural importance of which the BLM is aware would continue through tribal consultation and implementation of the National Historic Preservation Act (54 U.S.C. § 300101 *et seq.*) as well as Executive Order 13007 – Indian Sacred Sites (61 FR 26771, 1996) and the American Indian Religious Freedom Act (42 U.S.C. 1996 *et seq.*).

The Planning Criteria provides more detailed information on analytical assumptions, which is incorporated here by reference (USDI BLM 2014, p. 167).

Background

The National Historic Preservation Act and the 36 CFR 800 – Protection of Historic Properties regulations use the term “properties of traditional religious and cultural importance” to describe geographic places prominent in a particular group’s cultural practices, beliefs, or values that: (1) are widely shared within the group, (2) have been passed down through generations, and (3) have served a recognized role in maintaining the group’s cultural identity for at least 50 years. Through NEPA, the National Historic Preservation Act, and the 36 CFR 800 regulations, Federal agencies are required to consult with potentially affected Tribes in order to identify and evaluate such places that Federal actions may affect.

Executive Order 13007 defines sacred sites as “specific, discrete, narrowly delineated locations on Federal land that are identified by an Indian Tribe, or... authoritative representative of an Indian religion, as sacred by virtue of their established religious significance to, or ceremonial use by, an Indian religion.” A Tribal understanding or definition of sacred sites or sacredness in general is in contrast to the Federal definition. Specifically, a narrowly delineated space does not capture the inherent sacredness of the natural phenomena surrounding it.

Based on Federal definitions, sacred sites are religious or spiritual places and are not limited by age. Places of traditional and cultural importance can be either secular or religious but are limited to being 50 years of age or older under this definition. Different regulations require the BLM to consider these two types of sites, but in both cases, the Federal government is not the entity that determines what sites are sacred or have traditional religious and cultural importance. Tribes (or individuals as described in Executive Order 13007) are the only entities able to identify what sites are important to them. Therefore, consultation with Tribes is necessary to identify and evaluate these sites as well as to help determine how actions may affect the sites and how to resolve adverse effects.

The National Historic Preservation Act and Executive Order 13007 address identification and protection of these types of places. The American Indian Religious Freedom Act works in tandem with these directives to ensure Tribes retain access and the ability to use these places for religious purposes including the practice of ceremonies. The American Indian Religious Freedom Act states that “it shall be the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions of the American Indian..., including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites.”

Affected Environment

There are both sacred sites and places of traditional and cultural importance within and nearby the planning area. As described above, sacred sites and places of traditional and cultural importance are identified by Tribal entities and can be more broadly encompassing than narrowly delineated spaces on the ground. Sacred sites and places of traditional cultural importance not on BLM-administered lands within the planning area and on both BLM and non-BLM-administered lands within near distances of the planning area boundary have the potential to be possibly influenced by management on BLM-administered lands within the decision area. See also Issue 6 in this section for discussions on effects to tribally managed lands.

One example of such a place is Little Pilot Butte, which is located within the Cascade-Siskiyou National Monument.¹²⁵ The site has sacred and religious importance to the Klamath Tribes. It has ceremonial significance to the Tribe that predates the establishment of the monument and continues to be used today.

Tribes or individual Tribal members often keep the location of these sites private; therefore, the BLM does not have knowledge of all the sacred sites and places of traditional and cultural importance located within or in near-distances of the planning area. The BLM manages those sites of which the BLM is aware in consultation with Tribes.

¹²⁵ The Cascade-Siskiyou National Monument is located within the Medford District but is outside of the decision area. BLM-administered lands included within the Little Pilot Butte area are managed in conformance with the Cascade-Siskiyou National Monument’s 2008 Record of Decision and Resource Management Plan (USDI 2008), which will not be affected by this RMP revision.

Environmental Consequences

The BLM would continue to avoid or mitigate effects to those sacred sites and places of traditional cultural importance of which the BLM has knowledge to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions by: (1) accommodating access and ceremonial use of Tribal sacred sites by Tribal religious practitioners; and (2) avoiding adversely affecting the physical integrity of such sacred sites. Any potential effects to these sites would warrant consultation and involvement from the Tribe on how to avoid or mitigate effects. Under all alternatives and the Proposed RMP, the BLM would consult with Tribes early in the project planning process in order to identify currently unknown sites or sensitive areas and thus subsequently mitigate effects as necessary.

Issue 2

How would land management actions affect tribal plant collection, management, and use?

Summary of Analytical Methods

In the absence of data on specific plants of cultural interest along with their locations on the landscape, a quantified analysis of the effects on plant collection, management, and use is not possible to be part of the RMP process. Further site-specific analysis would take place during implementation of the RMP as would early consultation with interested Tribes in the planning process. This is the best way to avoid or mitigate effects to tribal plant collection, management, and use.

Two specific plant habitats were mentioned during consultation with Tribes: (1) upland areas including seasonal wet meadows and scab rock flats that exist primarily in the interior/south of the planning area; and (2) riparian areas primarily within the coastal/north part of the planning area. Multiple Tribes expressed a specific concern regarding the ability to manage for culturally important plants within riparian habitat areas. The Planning Criteria included the broader topic of tribal plant collection and effects to culturally important plants within riparian habitat areas as separate issues (USDI BLM 2014, p. 169), but they are now combined here under the broader topic of tribal plant collection.

While this analysis focuses primarily on riparian habitat areas with some emphasis on the upland areas, it is important to state that tribal plant collection, management, and use is not limited to these areas.

Appendix R includes two lists of common plants with cultural uses. These lists are not exhaustive but provide a large sample of culturally significant plants found in the planning area. Without identifying locations of specific plants and associated types of management required, the analyses can only speak generally to how variation in riparian management across alternatives and the Proposed RMP would affect culturally important plants that live in those habitats. Given that the objective of the Riparian Reserve is to contribute to the conservation and recovery of ESA-listed fish species and their habitats and provide for conservation of Bureau Special Status fish and other riparian-associated species, treatments within riparian areas are restricted.

For culturally important plants existing within the interior/south, the habitats, management, and threats to those plants may differ from those within riparian habitat areas of the coastal/north part of the planning area. A summary list of those plants identified as culturally important to the Klamath Tribes has been included at the end of **Appendix R**. Effects are determined through Tribal consultation on project activities.

The Planning Criteria provides more detailed information on analytical assumptions, methods and techniques, and geographic and temporal scales, which is hereby incorporated by reference (USDI BLM 2014, pp. 166, 169).

Affected Environment

BLM-administered lands in western Oregon provide an abundant variety of plants that Tribal members collect and sometimes manage for traditional uses. Tribal members collect plant materials to make baskets, hats, regalia, tools, and other objects of Tribal culture, as well as use for food and medicine. Valued plants require active management in order for them to produce the desired material product. Two common treatments used for management of culturally important plants are conducting prescribed fire and thinning denser forested areas to promote the growth of shrubs and a diversity of other species.

The Coos Bay District has agreements with the Coquille Indian Tribe and the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians that allow collection of specific plants on designated BLM-administered lands. The BLM and other Tribes in western Oregon are currently working together to draft agreements for tribal plant collection.

Environmental Consequences

The primary impacts to culturally important plants found in the interior/south of the planning area are due to grazing, juniper cutting, piling and burning, invasive species, and herbicide use. Without more detailed information on specific locations of plants and planned actions, analysis is not feasible. **Appendix R** contains a plant list provided by the Klamath Tribes that includes culturally important plants. Consultation with Tribes prior to planning and implementing project activities is the most effective way to analyze and potentially mitigate effects to culturally important plants.

Under all alternatives and the Proposed RMP, the BLM would permit prescribed fire within the Eastside Management Area – Riparian Reserve for vegetation management to the extent that it conforms to the management objectives and direction for the Riparian Reserve. **Appendix B** contains specific details on management in the Riparian Reserve.

Eastside Management Area – Riparian Reserve

In all action alternatives and the Proposed RMP, the Riparian Reserve along perennial and fish-bearing streams would encompass 150 feet on each side of the stream channel in forested areas in the Klamath Falls Field Office east of Highway 97. Some specific management direction relative to management of culturally important plants includes—

- Thinning and other silvicultural treatments; and
- No mechanical treatments within 60 feet of the stream channel under Alternatives A, B, C, and D; no vegetation treatments using ground-based machinery within 75 feet of the stream channel under the Proposed RMP.

In all action alternatives and the Proposed RMP, the Eastside Management Area – Riparian Reserve along non-fish-bearing intermittent streams, all lakes, all natural ponds, and wetlands > 1 acre would be 100 feet each side of the water feature. The Proposed RMP additionally establishes a 100-foot Eastside Management Area – Riparian Reserve around constructed water impoundments > 1 acre and constructed ponds > 1 acre. Some specific management direction relative to culturally important plants includes—

- Thinning and other treatments to support large tree development;
- No mechanical treatments within 35 feet on either side of the water feature under Alternatives A, B, C, and D; and
- No vegetation treatments using ground-based machinery within 50 feet of lakes, natural ponds, or wetlands under the Proposed RMP.

In Alternatives A, B, C, and D, the Eastside Management Area – Riparian Reserve width along all constructed impoundments and ponds, and wetlands < 1 acre is the extent of riparian vegetation. Under

the Proposed RMP, the Eastside Management Area – Riparian Reserve width is 25 feet on each side of the water feature around wetlands < 1 acre, constructed impoundments < 1 acre, and constructed ponds < 1 acre. Some specific management direction relative to management of culturally important plants includes—

- Thinning and other treatments to speed the development of potential natural vegetation communities;
- No mechanical treatments within 35 feet either side of the water feature under Alternatives A, B, C, and D; and
- No vegetation treatments using ground-based machinery within 50 feet of wetlands under the Proposed RMP.

Under all alternatives and the Proposed RMP for all water feature types, the following includes some specific management direction relative to management of culturally important plants:

- Managing livestock grazing to levels that allow for maintenance and development of riparian plant communities
- Removing conifers where they compete with the natural vegetation community

Riparian Reserve

In Alternative A, the Riparian Reserve along fish-bearing streams and perennial non-fish-bearing streams would have an inner zone of 0–120 feet; on non-fish-bearing intermittent streams, the inner zone is 0–50 feet. The BLM would not conduct thinning within these inner zones. The outer zones for all fish-bearing and perennial non-fish-bearing streams would be 120 feet to one site-potential tree height and 50 feet to one site-potential tree height on non-fish-bearing intermittent streams. The BLM would conduct thinning in the outer zone for the purposes of providing wood to streams. Tree felling is limited to safety and stream restoration activities. The BLM would not conduct thinning for timber volume.

In Alternative B, the Riparian Reserve along fish-bearing streams and perennial non-fish-bearing streams would have an inner zone of 0–60 feet; on non-fish-bearing intermittent streams the inner zone is 0–50 feet. The BLM would not conduct thinning within these inner zones with the exception of safety, treatment of disease, or dry forest resiliency. The outer zones for all fish-bearing and perennial non-fish-bearing streams would be 60 feet to one site-potential tree height and 50–100 feet on non-fish-bearing intermittent streams. The BLM would conduct thinning for development of understory plants; and to increase diversity of riparian species.

In Alternative C, the Riparian Reserve along fish-bearing streams and perennial non-fish-bearing streams would have an inner zone of 0–60 feet; on non-fish-bearing intermittent streams, the inner zone would be 0–50 feet. The BLM would not conduct thinning within these inner zones except for safety, treatment of disease, or dry forest resiliency. The outer zones for all fish-bearing and perennial non-fish-bearing streams would be 60–150 feet. The BLM would conduct thinning for development of understory plants; and to increase diversity of riparian species.

In Alternative D, the Riparian Reserve along all streams would have an inner zone of 0–120 feet. The BLM would not conduct thinning within this inner zone except for safety, instream restoration, treatment of disease, or dry forest resiliency. The outer zone for all streams is 120 feet to one site-potential tree height. The BLM would conduct thinning in the outer zone to provide wood to streams and to reduce fuel in drier forests.

The Proposed RMP manages the Riparian Reserve differently by watershed classes. In Class I subwatersheds, the Riparian Reserve along fish-bearing and perennial streams would have an inner zone of 0–120 feet; on non-fish-bearing intermittent streams, the inner zone would be 0–50 feet. The BLM

would not conduct thinning within these inner zones except for sudden oak death treatments and individual tree cutting or tipping as described in the management direction. The middle zone for non-fish-bearing streams is 50–120 feet. The BLM would conduct thinning within this zone for the purposes of providing wood to streams. Removal of cut trees would only be allowed for safety or operational reasons. The outer zone for fish-bearing and perennial streams and non-fish-bearing intermittent streams is 120 feet to one site-potential tree height. The BLM would conduct thinning in the outer zone for the purpose of providing wood to streams.

In Class II subwatersheds, the Riparian Reserve along fish-bearing and perennial streams would have an inner zone of 0–120 feet; on non-fish-bearing intermittent streams, the inner zone would be 0–50 feet. The BLM would not conduct thinning within these inner zones except for sudden oak death treatments and individual tree cutting or tipping as described in the management direction. The outer zone for fish-bearing and perennial streams is 120 feet to one site-potential tree height; on non-fish-bearing intermittent streams, the outer zone would be 50 feet to one site-potential tree height. The BLM would conduct thinning in the outer zone for the development of understory plants; and to increase the diversity of riparian species.

In Class III subwatersheds, the Riparian Reserve along fish-bearing and perennial streams would have an inner zone of 0–120 feet; on non-fish-bearing intermittent streams, the full Riparian Reserve width would be 0–50 feet. The BLM would not conduct thinning within these zones except for sudden oak death treatments and individual tree cutting or tipping as described in the management direction. The outer zone for fish-bearing and perennial streams is 120 feet to one site-potential tree height. The BLM would conduct thinning in the outer zone for the development of understory plants; and to increase the diversity of riparian species.

In conclusion, Alternatives B and C, and the Proposed RMP would be most conducive to the type of management needed for culturally important plants in these areas because the management direction allows for the widest range of management practices.

Early consultation with Tribes prior to project implementation would identify those plants that are important for traditional uses, and the BLM could reduce or eliminate effects to these resources. Identifying plant-gathering locations can also reduce or eliminate effects by project design or mitigation.

Issue 3

How would land management actions affect the visibility of the historic Siletz reservation boundary?

Summary of Analytical Methods

For this analysis, the BLM compared the extent to which each alternative and the Proposed RMP would be able to maintain a visible boundary between the BLM-administered lands and the historic Siletz reservation boundary. To do this, the BLM calculated the total linear miles of BLM-administered lands touching the historic reservation boundary minus the total number of linear miles of those same BLM-administered lands that are in land use allocations with clear-cutting. This analysis is based on the assumption that tree retention would allow the BLM to maintain a visible boundary while harvest without tree retention would not.

The Planning Criteria provides more detailed information on analytical assumptions, methods and techniques, and geographic and temporal scales, which is incorporated here by reference (USDI BLM 2014, p. 169).

Background

President Franklin Pierce signed an Executive Order on November 9, 1855 to create a permanent reservation for the Coast and Willamette Valley Tribes. The original Coast Reservation spanned from Cape Lookout in the north to the Siltcoos River in the south and the eastern edge of Range 9 West, covering 1.1 million acres. A series of Executive Orders and Congressional Acts in 1865, 1875, and 1894 reduced the Coast Reservation. The historic reservation boundary spans approximately 155 miles along its northern, western, and southern boundaries. About 31 of those miles overlap BLM-administered lands.

Affected Environment

There is interest from Siletz Tribal members to be able to go to areas on the landscape and physically see the historic reservation boundary where feasible. The BLM does not currently have practices in place to maintain visibility along the 31 miles of the historic boundary that runs between the BLM and the historic Coast Reservation. However, there are patches of visibility that currently exist along this historic boundary. These patches occur in some areas where forested BLM-administered lands are adjacent to private timberlands.

Environmental Consequences

For Alternatives A and C, only one land use allocation, the High Intensity Timber Area, proposes clear-cutting within the decision area. All other land use allocations have timber harvest methods that include the ability to retain ‘leave trees’ that could be used to mark a boundary. The High Intensity Timber Area land use allocation is not included within the No Action alternative, Alternatives B and D, or the Proposed RMP; therefore, all 31 miles of BLM-administered lands touching that boundary would have the ability to retain leave trees during harvest activities.

In Alternatives A and C, some lands with High Intensity Timber Area land use allocation touch the historic Coast Reservation boundary. In Alternative A, 1.24 miles of High Intensity Timber Area lands touch this boundary leaving over 29 miles available for leave tree retention. In Alternative C, 10.12 miles of High Intensity Timber Area lands touch the historic boundary leaving almost 20 of the 31 miles available for leave tree retention.

In conclusion, BLM-administered lands touch approximately 20 percent of the historic Coast Reservation boundary. The No Action alternative, Alternatives B and D, and the Proposed RMP would allow for leave tree retention on all of the boundary miles in order to have a visible boundary for the historic reservation. Alternative A would allow leave tree retention on 96 percent and Alternative C would allow leave tree retention on 67 percent of the boundary.

Issue 4

How would land management actions affect lamprey, fish, and fish passage?

Summary of Analytical Methods

Large wood, stream temperature, sediment, and water flow have the greatest influence on aquatic habitat to support fish populations. The BLM analysis of the effects to fish and their habitat are in the Fisheries section in this chapter. Additionally, BLM road construction may contribute sediment delivery to streams, and that analysis is covered in the Hydrology section of this chapter.

The Planning Criteria provides more detailed information on analytical assumptions, methods and techniques, and geographic and temporal scales, which is incorporated here by reference (USDI BLM 2014, pp. 49–55, 65–88, 166–167).

Affected Environment

Salmon, lampreys, and other fish are a traditional cultural food for Tribes with interests in the planning area, and their population decline is a concern for those Tribes. Data on lamprey within the planning area is largely unavailable, and while they are not an ESA-listed species, a number of professional fish biologists have noted a reduction in the population.

Environmental Consequences

The alternatives and the Proposed RMP have very similar potential effects to salmon and lamprey. The Fisheries and Hydrology sections of this chapter contain analyses of the alternatives and the Proposed RMP for effects to fish and water, respectively.

Implementation of any of the alternatives and the Proposed RMP would not affect fish passage within the decision area because 97 percent of the large, fish-passage culverts are in good condition. The majority of fish barriers within the planning area are on private lands.

Issue 5

How would land management actions affect migrating mule deer and resident deer and elk populations?

Summary of Analytical Methods

The BLM analyzed the effects to deer and elk based on the availability of high-quality forage habitat by alternative and the Proposed RMP. The Early Successional forest stage represents high-quality forage habitat for this analysis. Deer and elk populations rely on the shrubs and forbs available in this habitat type for survival and successful reproduction.

The Planning Criteria provides more detailed information on analytical assumptions, methods and techniques, and geographic and temporal scales, which is incorporated here by reference (USDI BLM 2014, pp. 167, 201, and 202).

Affected Environment

Multiple Tribes expressed interest and concern over declining populations of migrating mule deer as well as resident deer and elk populations. Deer and elk are important to Tribes as a traditional food source for the traditional cultural practice of hunting, and for their place in the larger eco-system. Declining timber harvests on Federal land in western Oregon have reduced the amount of early successional forests that the deer and elk rely upon for high-quality forage. The Wildlife section in this chapter specific to deer and elk provides a more detailed description of the current picture of deer and elk populations within the planning area.

Environmental Consequences

Under the No Action Alternative, Alternatives A, B, and C, and the Proposed RMP, higher-quality forage habitat would increase for deer and elk populations on BLM-administered lands in 50 years. This increase in habitat is correlated to the combination of size of the Harvest Land Base and the harvesting methods

used in those alternatives and the Proposed RMP, thus creating more Early Successional habitat within the decision area. These four alternatives and the Proposed RMP would thus improve conditions for this tribally important resource. In Alternative D, the BLM contribution to higher-quality forage habitat would remain unchanged if not decrease slightly over time. The Wildlife section in this chapter contains analysis specific to deer and elk, which provides a more thorough description of effects.

Issue 6

How would land management actions affect historic trail routes?

Summary of Analytical Methods

The BLM considers historic trail routes as a type of cultural resource. The Cultural and Paleontological Resources section in this chapter provides a description of the analytical methodology used to analyze effects to cultural resources and the results of that analysis. Historic trail routes also include, but are not limited to, those designated by Congress as National Historic Trails. The National Trails System section in this chapter provides a more detailed analysis of the Oregon National Historic Trail and the California National Historic Trail-Applegate Trail Routes, the two national historic trail routes within the decision area.

The Planning Criteria provides more detailed information on analytical assumptions, methods and techniques, and geographic and temporal scales, which is incorporated here by reference (USDI BLM 2014, pp. 41–43 and 167–168).

Affected Environment

Federal agencies and others have identified, recorded, and evaluated a portion of the historic trail routes within the planning area. These sites are linear features on the landscape and exist in a variety of conditions. The General Land Office created some of the earliest documentation available for trails. Some Native American travel routes were later incorporated into European settler travel routes, trails, roads for the Forest Service and other Federal agencies, and railroad grades for hauling lumber, passengers, and freight. The National Register of Historic Places lists some prominent trails, such as the Oregon Trail. The Salem District has at least six recorded historic trail routes. In order to identify important historic trail routes, the BLM must consult with interested Tribes in addition to conducting research of historic records.

Environmental Consequences

Identification, recording, and evaluation of historic trail routes would help avoid or mitigate effects to historic trail routes. The BLM does not have all historic trail routes recorded and will need to consult with Tribes in order to identify trail routes important to them. The Cultural and Paleontological Resources section of this chapter provides a more detailed analysis of effects to cultural resources.

Issue 7

How would land management actions affect neighboring tribally managed lands?

Summary of Analytical Methods

This issue touches upon many other issues analyzed in this chapter. Numerous land management actions could potentially affect neighboring tribally managed lands.

The Planning Criteria provides more detailed information on analytical assumptions, methods and techniques, and geographic and temporal scales, which is incorporated here by reference (USDI BLM 2014, p. 168).

Affected Environment

Tribally managed lands exist throughout the planning area. Multiple Tribes have lands adjacent to BLM-administered lands. Some management actions or inaction may result in effects to neighboring lands. Effects to neighboring lands can stem from—

- The spread of invasive species;
- The occurrence of wildfire; and
- Public access to tribally managed lands or places of importance to Tribes.

Additionally, the Coquille Forest managed by the Coquille Tribe is “subject to the standards and guidelines of Federal forest plans on adjacent or nearby Federal lands, now and in the future” per Title V of the Oregon Resource Conservation Act of 1996 (Public Law 104-208). This means that the adopted BLM RMP that applies to the Coos Bay District will also apply to the Coquille Forest in that it will establish the suite of possible management approaches available for the Coquille Forest. However, the BLM RMP will not determine which specific land use allocations apply to which specific portions of the Coquille Forest or the rate or extent of timber harvest on the Coquille Forest.

Environmental Consequences

To the extent Tribal lands border BLM-administered lands, the effects previously listed could occur and are explained further here. BLM management actions comprise only a portion of the potential affects to tribally managed lands. The effects to neighboring tribally managed lands also depend on the type of management taking place on those lands.

For invasive species, the BLM would continue to implement measures to prevent, detect, and control new invasive species infestations as well as use manual, mechanical, cultural, chemical, and biological treatments to manage invasive species infestations. The Invasive Species section of this chapter describes the analysis of BLM management considered for control and prevention of invasive plant species, invasive aquatic species, and sudden oak death. This analysis generally found Alternatives B and C to present the highest risk for spread of invasive plant species, invasive aquatic species, and sudden oak death.

Concerning wildfire, the BLM would manage for fire-resilient landscapes and would continue to suppress wildfire where it threatens health and human safety. There is no accurate way to predict the exact location and timing of wildfires. However, management within dry forests would include treatments that reduce flame lengths and decrease the probability of crown fire potential, which would provide for more effective and safer fire suppression opportunities. All alternatives and the Proposed RMP include fuels reduction strategies to varying degrees in dry forests.

In general, BLM land management actions would not affect access to tribally managed lands, although alternatives and the Proposed RMP with more roads may allow for more access opportunities, and those with fewer roads may limit access opportunities. The effects of the range of alternatives and the Proposed RMP on the BLM-managed transportation system are described in Issue 2 of the Trails and Travel Management section of this chapter, including analytical estimates of roadwork needs based upon management activities within the first decade (**Table 3-239**). The No Action alternative and Alternatives B and C would potentially provide the most opportunities for access whereas Alternatives A and D would provide the least opportunities for access. The Proposed RMP has the third lowest number of miles of

new road construction. It would provide more access opportunities than Alternatives A and D but less than the No Action alternative and Alternatives C and D.

Table 3-239. Mileage of new road construction and road renovation or improvement

Alternative/ Proposed RMP	Total Estimated New Road Construction (Miles)	Total Estimated Road Renovation (Miles)	Total Estimated Road Improvement (Miles)
No Action	637	6,667	311
Alt. A	299	3,669	223
Alt. B	531	5,098	287
Alt. C	699	7,495	526
Alt. D	240	4,295	161
PRMP	437	4,295	246

It is important to note that Tribes have the ability to petition the Secretary of the Interior as authorized by Public Law 108-278 (also known as the Tribal Forest Protection Act of 2004) to conduct activities to achieve land management goals for Federal land. These activities must be on BLM-administered lands adjacent to Tribal forestland where BLM-administered lands pose the threat of fire or disease or is in need of restoration activities. Therefore, if BLM land management activities present a threat to neighboring tribally managed forestlands, the Tribes can request to take action to remedy the threat.

As noted, the Coquille Tribe manages the Coquille Forest “subject to the standards and guidelines of Federal forest plans on adjacent or nearby Federal lands, now and in the future” per Title V of the Oregon Resource Conservation Act of 1996 (Pub. L. 104-208). The analysis of effects to BLM-administered lands of the alternatives and the Proposed RMP generally reflects how these alternatives and the Proposed RMP would affect resources on the Coquille Forest. For example, if the Coquille Tribe elects to manage a portion of the Coquille Forest as Late-Successional Reserve, their Late-Successional Reserve management would have similar site-specific effects as Late-Successional Reserve management on BLM-administered lands because it would follow the same management direction. However, it is not possible for the BLM to identify specific effects of the BLM RMP on the Coquille Tribe stemming from the management of the Coquille Forest. As noted, the BLM RMP will not determine which specific land use allocations apply to which specific portions of the Coquille Forest or the rate or extent of timber harvest on the Coquille Forest. Absent such information, the BLM cannot ascribe any particular effect of the BLM RMP on the Coquille Tribe as a result of the BLM RMP establishing potential management approaches available for the Coquille Forest.

Issue 8

What are the social and economic effects of land management actions on Tribal communities?

Summary of Analytical Methods

The Socioeconomics section looks at the social and economic effects of the alternatives and the Proposed RMP on communities within the planning area. Since Tribes are distinct communities that have Tribal members who live within the planning area, they also would be subject to these effects. Issue 2 of the Socioeconomics section looks at how the alternatives the Proposed RMP affect economic activity derived from BLM-administered lands. In addition, as part of the development of the affected environment portion of Issue 5 of the Socioeconomics section, the BLM collected data and interviewed community

representatives throughout the planning area. While only two of the seven Tribes participated in the interviews, the information was broadly useful.

The Planning Criteria provides detailed information on analytical assumptions, methods, and techniques, and the geographic and temporal scales for all five socioeconomic issues presented (USDI BLM 2014, pp. 130–148).

Affected Environment

Federally recognized Tribes within the planning area represent distinct communities, and are subject to the economic conditions of the planning area. Issue 2 in the Socioeconomics section provides a detailed description of the current condition of employment, unemployment, and earnings in the planning area. Using employment as an example, since 2001 total employment in the planning area has grown by 7.2 percent. However, since 2007, which was the peak of economic activity before the 2007–2009 recession, employment is down by 3.3 percent. Generally, throughout the planning area, district model areas show positive employment growth since 2001 ranging from 2.7 percent in the Coos Bay area to 9.8 percent in Salem-Portland. Klamath Falls (-2.7 percent) and Roseburg (-3.9 percent) are down from their 2001 levels. All model areas are down from their peak in 2007, ranging from Roseburg (-10.7 percent) to Salem-Portland (-0.1 percent).

Issue 5 of the Socioeconomics section also analyzes the effects of the alternatives the Proposed RMP on the capacity and resiliency of different types of communities in the planning area including Tribal communities. While this analysis included Tribal communities in the data used to evaluate effects, no community-specific conclusions were possible to be drawn at the scale of analysis conducted. As such, no specific conclusions to Tribal communities are made. Despite the lack of conclusions being made specific to Tribal communities' capacity or resiliency, Tribal representatives have specifically expressed concerns with the data used (Census data) reflecting Tribal communities' capacity and resiliency. The Socioeconomics section identifies that the data used is the best available but acknowledges and describes limitations to the data. The Cooperating Agency Advisory Group's Tribal Working Group further developed the following statement to specifically identify Tribal concerns and clarify any potential inaccuracies to Tribal communities reflected by data limitations:

There are varying acreages of O&C lands located within the ancestral homelands of the seven western Oregon Tribes. Management of these lands has a direct impact on the cultural interests, traditional lifeways, and economic wellbeing of Tribal members.

As defined in the Socioeconomics section (Issue 5), capacity and resiliency from a social sciences perspective is a measure of a community's or group of people's ability to respond to certain events such as natural disasters, major economic change, external and internal stresses and to take advantage of opportunities to meet needs. However, it must be well communicated and understood that when applying a measure of capacity and resiliency to Tribes, that meaning may appropriately be interpreted differently.

Census data and the developed metrics used in this analysis become problematic when assessing Tribal capacity and resiliency. Oregon Tribes which had their federal status terminated in the 1950s and then were restored to federal recognition in the 1980s do not have a single reservation where all Tribal members live. The Congressional Acts restoring these Tribes established multiple county service areas where the Tribes have historical and cultural interests and where many Tribal members reside. These county service areas also have legal meaning for Tribal members to receive governmental services. The census data and metrics when applied to counties and cities focuses on a specific geographic location and the population living in this area. Using this same approach for the identified Tribal reservations is

inaccurate because the focus for Tribes is a distinct group of people with special legal status living in multiple county locations. Applying the developed metrics to only Tribal members living on the specified reservation and in the respective county location gives conclusions which most likely are not reflective of the total Tribal population.

In respect to historic resiliency, Tribes have demonstrated perseverance and resiliency to the highest degree. Tribes have endured over two hundred years of devastation following the European occupation of native lands in North America. Tribes have also adapted to adverse actions, laws, and policies of the United States government. Tribal people are still here, and in many cases, thriving – preserving culture, raising families, executing government functions, and significantly contributing to native and non-native people and their communities. Given that, it becomes clear that resiliency takes on a unique meaning when applied to Tribes.

For Tribes and their members there is also a culture dimension when determining capacity and resiliency. Those with strong ties to Tribal culture and active in traditional lifeways may have a very robust sense of capacity and resiliency, which is not reflected by the non-Tribal analytical model used in this analysis.

Environmental Consequences

The Socioeconomics section, particularly Issue 2, contains a full description of the socioeconomic effects of the alternatives the Proposed RMP. With respect to effects, all the alternatives and the Proposed RMP, except for Alternative D, would result in an increase in BLM-based jobs and earnings compared to what would have been generated in 2012 in the absence of Secure Rural Schools payments (i.e., if earnings and jobs were just based on jobs and earnings derived from the BLM's actual management of the land in 2012).

Issue 9

How would land management actions affect water quality?

Summary of Analytical Methods

The analysis of water quality is in the Hydrology section of this chapter. This analysis focuses primarily on sediment delivery and stream temperature.

The Planning Criteria provides more detailed information on analytical assumptions, methods and techniques, and geographic and temporal scales, which is incorporated here by reference (USDI BLM 2014, pp. 65–89 and 168–169).

Affected Environment

Tribes have identified more than one issue surrounding water quality. Water quality is important as drinking water as well as for fish and other aquatic species and their habitats.

Environmental Consequences

The Hydrology analysis reveals that there is very little effect to water under the alternatives or the Proposed RMP and that there is a modest difference between potential changes in stream temperature between the alternatives the Proposed RMP. The Oregon Department of Environmental Quality (ODEQ)

regulates effects to drinking water, and the BLM would remain compliant with those regulations. Under all alternatives the Proposed RMP, the BLM would—

- Maintain water quality and stream flows within the range of natural variability, protect aquatic biodiversity, and provide quality water for contact recreation and drinking water sources;
- Meet ODEQ water quality targets for 303(d) water bodies with approved Total Maximum Daily Loads;
- Maintain high-quality water and contribute to the restoration of degraded water quality downstream of BLM-administered lands; and
- Maintain high-quality waters within ODEQ designated source water protection watersheds.

Issues Considered but not Analyzed in Detail

How would land management actions affect tribal resource collection of obsidian, chert, and other rocks and minerals for noncommercial purposes?

The decision area does not contain any identified locations for obsidian collection; therefore, analysis of effects is not possible. Chert and other non-modified rocks and minerals to include obsidian can be collected anywhere within the decision area, except developed recreation areas or where it is otherwise prohibited and posted per 43 CFR 8365.1–5. In the absence of specific locations identified for collection, an analysis of effects is not possible.

References

- USDI BLM. 2008. Cascade-Siskiyou National Monument Record of Decision and Resource Management Plan. Bureau of Land Management, Medford District Office, Medford, OR. http://www.blm.gov/or/districts/medford/plans/files/CSNM%20ROD%20and%20RMP_8-15-08.pdf.
- . 2014. Resource Management Plans for Western Oregon Planning Criteria. Bureau of Land Management, Oregon/Washington State Office, Portland, OR. <http://www.blm.gov/or/plans/rmpswesternoregon/files/rmp-criteria.pdf>.