Proposed Three Rivers Resource Management Plan and Final Environmental Impact Statement

Volume II - Appendices
As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interest of all our people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. administration.
U.S. Department of the Interior
Bureau of Land Management

Proposed
Three Rivers
Resource Management Plan

Final
Environmental Impact
Statement

Prepared by
Burns District Office

State Director, Oregon/Washington

District Manager, Burns
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## Appendix 2

Comment Letters and Responses                                                                                           All
Table 1. General Best Forest Management Practices

The following Best Forest Management Practices (BFMP) are taken from the Oregon Statewide Planning Manuals, the Oregon Forest Practice Rules (Oregon Department of Forestry, 1980) and Guidelines for Stream Protection (Oregon State Game Commission). Generally, BFMP applications were selected to avoid rather than mitigate impacts. In addition, all road standards and designs will correspond to BLM Manual 9113.

Road System

Logging road locations, particularly on sensitive areas, should be evaluated by a forester, soil scientist, wildlife biologist, and other specialists as needed. The location should be fitted to the topography to minimize cut and fill situations. In areas of important big game habitat, consultation with the wildlife biologist will be necessary to reduce impacts on wildlife, particularly in areas such as ridgelines, saddles and upper drainage heads. Where alternative locations are not possible, incorporate mitigating measures into road development plans. Avoid stream crossings, if possible. If not possible, minimize approach cuts and fills and channel disturbance and maintain stream bank vegetation.

Where possible, locate roads on benches and ridges to minimize erosion; except under special circumstances such as occurrence of rock bluffs, keep roads out of stream courses. Roads should be high enough to prevent silting to the stream.

Do not locate stream crossings strictly on a grade basis. Choose a stable site and adjust grade to it, when possible.

Keep stream disturbance to an absolute minimum.

If necessary, include short road segments with steeper grades, consistent with traffic needs and safety, to avoid problem areas or to take advantage of terrain features.

For timber harvest spur roads, take advantage of natural landing areas (flatter, better drained, open areas) to reduce soil disturbance associated with log landings and temporary work roads.

Vary road grades where possible to reduce concentrated flow in road drainage ditches and to reduce erosion on road surfaces.

Design drainage ditches, water bars, drain dips, culvert placement, etc., in a manner that will disperse runoff and minimize cut and fill erosion.

Install culverts or drain dips frequently enough to avoid accumulations of water that will cause erosion or road ditches and the area below the culvert and drain dip outlets.

In bridge location, plan to avoid relocation of the stream channel. Where the stream must be changed, use riprap, vegetative cover, or other means to reduce soil movement into stream.

Seed (revegetate) cuts and fills the first fall season following disturbance.

Deposit excess material in stable locations well above the high-water level and never into the stream channel. Do not allow any material, including sidecast soil, stumps, logs or other material to be deposited into a stream.

Hold wet-weather road building to a minimum, particularly on poorly drained, erodible soils which may drain mud directly to streams.

Build fills in lifts to ensure optimum compaction and minimize slumpage. Avoid the inclusion of slash, logs and other organic debris in fills.

On primary roads wherever serious erosion is likely, large cut-and-fill slopes should be stabilized with plant cover as soon as possible. Local experience will indicate the best practices and species to use.

Appendix I-3
Table 1. General Best Forest Management Practices (continued)

Generally, berms should be removed or at least broken frequently to allow lateral drainage to nonerodible areas. Berms are desirable on large erodible fills to prevent drainage from the road crown down the center of the fill section.

Plan ditch gradients steep enough (generally greater than 2 percent) to prevent sediment deposition.

When installing culverts and drain dips, avoid changes in channel orientation and place these structures to conform to the natural channel gradient. Design culverts for maximum stream flow (e.g., 25-year discharge).

Skew culvert approximately 30 degrees toward the inflow to provide better inlet efficiency.

Provide rock or other basins at the outlet of culverts and rock the drain dips if economically feasible.

In building bridge footings and abutments, limit machine work as much as possible to avoid disturbing the stream. This initial work often greatly increases turbidity and sediment movement. The toes of fills on larger creek crossings should be protected above the high-water line to prevent soil movement.

Unless no other source is available, gravel should not be taken from streambeds except from dry gravel bars. Washing of gravel into streams will normally cause sedimentation and should be avoided.

In some areas, alternating inslope and outslope sections can be built into the road, especially if road grades are rolled to dispose of road surface flow.

Obtain all necessary permits for stream crossings before beginning activities.

Maintain all roads immediately after logging and the primary roads whenever necessary by cleaning ditch lines, blading debris from empty landings, trimming damaged culvert ends and cleaning out culvert openings.

Grade the primary road surfaces as often as necessary to retain the original surface drainage (either insloped or outsloped). Take care to avoid casting graded material over the fill slope. Monitor surface drainage during wet periods and close the road if necessary to avoid undue damage.

Haul all excess material removed by maintenance operations to safe disposal areas. Apply stabilization measures on disposal sites if necessary to assure that erosion and sedimentation do not occur.

Vary the steepness of slopes on cut and fill slopes commensurate with the strength of the soil and bedrock material as established by an engineering geologist or other specialist in soil mechanics.

Control roadside brush only to the extent required for good road maintenance and safety.

Soil Protection and Water Quality

Time logging activities to the season in which soil damage can be kept to acceptable limits.

Design and locate skid trail and skidding operations to avoid across ridge and across drainage operation, and minimize soil compaction.

Install water bars on skid trails when logging is finished (forester and/or soil scientist will provide assistance as requested or needed).

Avoid trapping and turning small streams out of their natural beds into tractor trails and landings.
Generally, confine tractor skidding operations to slopes of less than 35 percent. Leave appropriate snags and/or large dead trees for wildlife, as per current BLM Snag Management Policy Guidelines and Agriculture Handbook No. 553 (USDA, 1979).

If debris should enter any stream, such debris shall be removed concurrently with the yarding operation and before removal of equipment from the project site. Removal of debris shall be accomplished in such a manner that natural streambed conditions and stream bank vegetation are not disturbed.

Provide variable width no-cut/no-skid buffers for all perennial streams, springs and seeps as well as for nonperennial streams, springs and seeps which significantly impact water quality in perennial waters.

Avoid falling and yarding operations into or across any stream. Use yarding methods that minimize soil disturbance in the watershed as much as practicable.

Maintain native vegetation on primary disturbed areas (temporary roads, skid trails, landings, etc.) by seeding with diverse native grass varieties.

**Silvicultural**

Reforest all cutover lands (either natural regeneration or artificial regeneration) with a commercial species to minimum stocking levels (100-150 trees/acre within 5-15 years). The differences in stocking level numbers are related to the differences in site class. For more detail refer to the BLM TPCC Manual 5250.

Slash disposal will be done in a manner conducive to revegetation and advantageous to wildlife. Slash will be burned when necessary and such burning will be in conformance with State air pollution regulations.

Logging units will be laid out in a manner that would reduce the risk of windthrow. The selection of trees in shelterwoods will be made in a manner that would improve the genetic composition of the reforested stand. Disturbed areas will be artificially reforested when natural forest regeneration cannot be reasonably expected in 5-15 years.

Yarding practices to be employed during the planning period consist of tractor systems, ground and partial suspension cable systems and full suspension systems which include cable and aerial. Each system impacts ground vegetation to different degrees relative to the soil disturbance resulting from the harvest system used. For example, the tractor system would cause the greatest impact to existing vegetation and an aerial full suspension system would cause the least disturbance.
Guidelines for protection of fish habitat and water quality in logging operations have been developed as a result of the Alsea watershed research program and related studies. They include the following:

1. Extremely small headwater streams can be important spawning and rearing areas for salmon and trout and need protection. Even streambeds that are dry in the summer can be valuable spawning tributaries at other times of the year. Also, logging activities in headwaters can affect downstream areas.

2. A formal procedure for reviewing timber harvest operations, in the planning stages as well as during logging, entered into by participating private, State and Federal groups should be an integral part of any logging program.

3. Stream clearance requirements, and their enforcement, are essential.
   (a) Every effort should be made to prevent logging debris from falling into stream channels. If any debris does get into a channel, the fishery biologist or hydrologist should determine which debris will be removed to maintain adequate dissolved oxygen levels in surface water and keep migration routes open.
   (b) The method of stream clearance and timing of the operation are also important. Heavy equipment should not normally be used in a stream, and the channel should not be altered. Consultation with the focal State fishery biologist can aid in determining what material should be removed from a stream, and the best time for removal.

4. Streamside vegetation should be protected and remain standing in all logging operations where fish, wildlife and water quality considerations are involved or can be affected in downstream areas.
   (a) Streamside vegetation provides shade to the stream and minimizes water temperature increases.
   (b) Commercial conifers do not necessarily have to be left. Shrubs and other less valuable species can, in many cases, provide adequate shade if the conifers can be removed without destroying such vegetation or damaging streambanks. In some areas, commercial timber may have to remain to protect other watershed values or await the technological development of other removal methods.
   (c) Areas of vegetation left along a stream do not have to be a certain width. Often a relatively narrow vegetative unit will provide the necessary fish habitat protection unless other factors such as wildlife habitat enhancement and scenic corridors are involved.
   (d) Protecting streamside vegetation serves many purposes. Maintaining a vegetation unit requires care in falling and yarding timber away from the stream, and will reduce stream clearance needs and dissolved oxygen problems in surface and subgravel waters.

5. Avoid falling trees into or across streams.

6. Logs should not be yarded through streams.
   (a) Yarding logs through streams deposits organic and inorganic debris and sediment in the channel, breaks down streambanks and streamside vegetation, and contributes to dissolved oxygen and sediment changes in surface and subgravel environments.
   (b) Use yarding methods that minimize soil disturbance in the watershed.
   (c) Landings should not be located in the stream channel.
   (d) Logs should be yarded uphill and away from the stream.
Table 2. Summary of Recommended Practices for Stream Protection (continued)

The Society of American Foresters\textsuperscript{1} Columbia River Section, Water Management Committee\textsuperscript{2} has developed a list of recommended logging practices for watershed protection in western Oregon. The recommendations reflect concern for the impact of roads on stream sediment levels and emphasize proper road location, construction and maintenance. Although available in the Journal of Forestry for more than 10 years, many logging operations have not incorporated the practices into their programs. Therefore, in an attempt to get wider distribution of the Water Management Committee's suggested practices, most of its recommendations follow verbatim.

Road Location and Design

1. Where possible, locate roads on benches and ridges to minimize erosion; except under special circumstances such as occurrence of rock bluffs, keep roads out of stream courses. Roads should be high enough to prevent sifting to the stream.

2. Keep road gradients low except where short, steep sections are needed to take advantage of favorable topography and to avoid excessive cut and fill. Minimize the effect of higher gradients by reducing the distance between culverts to prevent the accumulation of water in the ditches.

3. Roads leaving landings should have short lengths of slightly adverse grade if possible. They should not have steep pitches of favorable grade which might drain off mud from the landings into streams.

4. Allow flexibility in road design so that in construction a minimum of soil is moved. Adjust the radius of curves in critical areas to achieve this objective.

5. Take advantage of well-drained soils and horizontal rock formations for greater stability, and avoid areas where seeps, clay beds, concave slopes, alluvial fans and steep dipping rock layers indicate the possibility of slides.

6. Consider the proper angle of repose for cuts and fills in designing roads on varying types of soils and rock materials. Consistent with these demands, make road cuts reasonably steep in order to minimize surface exposed to erosion.

7. In bridge location plan to avoid relocation of the stream channel. Where the stream must be changed, use riprap, vegetative cover or other means to reduce soil movement into stream.

8. Install culverts at crossings of all drainage ways except small streams and seeps which can be safely diverted to ditches. Use culverts with sufficient capacity to carry the largest flow expected.

9. Route the road drainage (whether from culverts, cross drainage or ditches) onto the forest floor, preferably on benches so that sediment can settle out before drainage water reaches stream channels.

10. Take drainage water out of ditches at intervals short enough to prevent ditch erosion. Detour it from above unstable areas to avoid saturation, slumping and erosion.

Road Construction

1. Plan the pioneering stage of road construction to avoid soil erosion and slumpage. As an example, culm log crossings can be provided where culverts will be placed on the completed road. Avoid pioneering too far ahead of final construction.

2. Uncompleted road grades which may be subject to considerable washing before final grading should be outsloped or cross-drained.

3. Hold wet-weather road building to a minimum, particularly on poorly drained, erodible soils which may drain mud directly to streams.

Appendix I-8
### Table 2. Summary of Recommended Practices for Stream Protection (continued)

<table>
<thead>
<tr>
<th>No.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.</td>
<td>Build fills in lifts to ensure optimum compaction and minimize slumpage. Avoid the inclusion of slash, logs and other organic debris in fills.</td>
</tr>
<tr>
<td>5.</td>
<td>Excess fill material should not be dumped within the high-waterzone of streams where floods can pick it up or where it will flow immediately into the stream; end-haul such material.</td>
</tr>
<tr>
<td>6.</td>
<td>Where slide areas can be predicted from past experience, their effects should be minimized by such measures as flatter backslopes and deeper ditches. On slopes gentle enough to hold the fill, avoid disturbance of underground water courses by building on the fill and providing adequate subdrainage.</td>
</tr>
<tr>
<td>7.</td>
<td>On primary roads with steep slopes and full benching, consider the use of cribbing to avoid severe disturbance to unstable slopes.</td>
</tr>
<tr>
<td>8.</td>
<td>On primary roads wherever serious erosion is likely, large cut-and-fill slopes should be stabilized with plant cover as soon as possible. Local experience will indicate the best practices and species to use.</td>
</tr>
<tr>
<td>9.</td>
<td>Avoid channel changes or disturbance of stream channels. Where necessary, complete the channel change and riprap the sides before turning water into the new channel.</td>
</tr>
<tr>
<td>10.</td>
<td>In building bridge footings and abutments, limit machine work as much as possible to avoid disturbing the stream. This initial work often greatly increases turbidity and sediment movement. The toes of fills on larger creek crossings should be protected above the high-water line to prevent soil movement.</td>
</tr>
<tr>
<td>11.</td>
<td>Unless no other source is available, gravel should not be taken from streambeds except from dry gravel bars. Washing of gravel into streams will normally cause sedimentation and should be avoided.</td>
</tr>
<tr>
<td>12.</td>
<td>Culverts should be properly installed in the stream channel allowing for suitable bed, adequate size, frequency and grade. Inlets and outlets should be protected. Aprons should be installed where needed.</td>
</tr>
<tr>
<td>13.</td>
<td>Where necessary, protect the upper ends of culverts to prevent fill erosion into them. On erodible soil materials, extend culverts beyond the fills or install permanent aprons below them to disperse flows and prevent gullying.</td>
</tr>
<tr>
<td>14.</td>
<td>Ditches should be of adequate depth and side slope to carry all water and to prevent sloughage.</td>
</tr>
</tbody>
</table>

### Road Maintenance

<table>
<thead>
<tr>
<th>No.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Keep roads well crowned ahead of wet weather so they will drain properly and not become waterways.</td>
</tr>
<tr>
<td>2.</td>
<td>During current operations, roads should be graded and ditched to avoid interruption to drainage from road centers to the ditches.</td>
</tr>
<tr>
<td>3.</td>
<td>After the first rain in the fall, check roads to reduce drainage problems.</td>
</tr>
<tr>
<td>4.</td>
<td>During periods of heavy rainfall, examine road surfaces to assure that drainage from wheel ruts is properly diverted to drainage ditches. During such periods it may be worthwhile to provide personnel to patrol the roads and to do hand drainage work.</td>
</tr>
<tr>
<td>5.</td>
<td>Provide frequent cross-drains on all temporary roads in the fall to prevent erosion of road and fill.</td>
</tr>
<tr>
<td>6.</td>
<td>Generally, berms should be removed or at least broken frequently to allow lateral drainage to nonerodible areas. Berms are desirable on large erodible fills to prevent drainage from the road crown down the center of the fill section.</td>
</tr>
</tbody>
</table>

Appendix I-9
Table 2. Summary of Recommended Practices for Stream Protection (continued)

7. In using graders to clean out drainage ditches, avoid undercutting the side slopes.

8. Culvert inlets should be inspected and cleaned prior to the rainy season and periodically during that season. For at least 50 feet above culverts the streamchannels should be cleared of wood materials that might clog the culverts. The outflow should be kept clear also.

9. Install trash racks well above inlets to culverts where experience shows the necessity. Keep the racks cleaned out.

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1 Written permission to reprint this material has been granted by the editorial staff of the Journal of Forestry.
2 A complete copy of the article and qualifying statements by the Committee is available in the Journal of Forestry, Vol. 57, No. 6, June 1966. Portions of the article not included in this pamphlet relate to introductory statements, logging operations and post-operational cleanup and maintenance. The Committee is currently reviewing and updating its recommendations, which will reflect increased concern about the effects of logging on fish habitat and water quality.
3 Timing of bridge construction and culvert installation is important. During the summer, streamflows are low and impacts on fishery resources can be minimal and localized. At that time, migration of juveniles to the ocean and adults returning to spawn would thus not be disrupted. (Author’s footnote.)
4 Until recently the importance of small streams was not fully documented. Culverts should be installed on all small streams supporting anadromous fish. (Author’s footnote.)
5 Culvert crossings placed in a stream in the spring can eliminate the downstream migration of fingerlings to the ocean. (Author’s footnote.)
6 A permit is now required to remove more than 50 yards of gravel from the bed or bank of any water in Oregon (O.R.S. 541.605 to 541.660). Permits are issued under the authority of the Director of the Division of State Lands and coordinated with a number of other state agencies. (Author’s footnote.)
7 Culvert density curves and stream velocity requirements for salmon and trout are available from the Oregon Department of Fish and Wildlife. (Author’s footnote.)
## Table 3. Stream Segments Proposed for Livestock Removal

<table>
<thead>
<tr>
<th>Stream Name</th>
<th>Allot</th>
<th>Miles</th>
<th>Acres</th>
<th>Cond.</th>
<th>Trend</th>
<th>Allot. No.</th>
<th>Special Status Species</th>
</tr>
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<tbody>
<tr>
<td>Claw Creek</td>
<td>Claw Creek</td>
<td>2.30</td>
<td>12.0</td>
<td>Poor</td>
<td>Static</td>
<td>7010</td>
<td>RB/MS²</td>
</tr>
<tr>
<td>Skull Creek</td>
<td>Skull Creek</td>
<td>3.50</td>
<td>23.5</td>
<td>Poor</td>
<td>Static</td>
<td>7030</td>
<td>RB</td>
</tr>
<tr>
<td>Buzzard Creek</td>
<td>W.Warm Springs</td>
<td>1.50</td>
<td>14.0</td>
<td>Poor</td>
<td>Static</td>
<td>7002</td>
<td>—</td>
</tr>
<tr>
<td>Alder Creek</td>
<td>Alder Creek</td>
<td>4.80</td>
<td>15.0</td>
<td>Poor</td>
<td>Static</td>
<td>5536</td>
<td>RB</td>
</tr>
<tr>
<td>Bluebucket Cr.</td>
<td>Moff et Table</td>
<td>1.05</td>
<td>3.0</td>
<td>Poor</td>
<td>Static</td>
<td>5511</td>
<td>RB</td>
</tr>
<tr>
<td>Coleman Creek</td>
<td>Alder Creek</td>
<td>4.35</td>
<td>24.0</td>
<td>Poor</td>
<td>Static</td>
<td>5536</td>
<td>RB</td>
</tr>
<tr>
<td>Stinkingwater Creek</td>
<td>Dawson Butte</td>
<td>0.50</td>
<td>3.0</td>
<td>Poor</td>
<td>Static</td>
<td>5524</td>
<td>RB</td>
</tr>
<tr>
<td></td>
<td>Stinkingwater Mountain</td>
<td>1.25</td>
<td>5.0</td>
<td>Poor</td>
<td>Static</td>
<td>5531</td>
<td>RB</td>
</tr>
<tr>
<td></td>
<td>Mountain</td>
<td>0.50</td>
<td>3.0</td>
<td>Poor</td>
<td>Static</td>
<td>5532</td>
<td>RB</td>
</tr>
<tr>
<td>Smyth Creek</td>
<td>Smyth Creek</td>
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<td>10.0</td>
<td>Poor</td>
<td>Static</td>
<td>5307</td>
<td>RB/MS</td>
</tr>
<tr>
<td>Warm Sprgs Cr.</td>
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<td>3.00</td>
<td>12.0</td>
<td>Poor</td>
<td>Downward</td>
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<td>RB</td>
</tr>
<tr>
<td></td>
<td>Texaco Basin</td>
<td>1.00</td>
<td>4.0</td>
<td>Poor</td>
<td>Static</td>
<td>5566</td>
<td>RB</td>
</tr>
</tbody>
</table>

¹This table pertains to Management Actions WL 6.1, SSS 2.1 (Table 2.12), WQ 1.4 and AH 1.2.
²RB indicates Redband Trout, MS indicates Malheur Mottled Sculpin.
Several riparian pastures within the planning area have exhibited “speedy” riparian recovery with a short duration (less than 30 days) early (prior to June 1) grazing system (see glossary for definition of “speedy” riparian recovery). However, in some instances an early turn out riparian pasture or pastures within an allotment is not practical or may be cost prohibitive.

An effort has been made throughout the planning process to develop cost-effective (based on past funding and future projects) strategies to meet the overall Bureau objective of 75 percent of all riparian areas in good or better condition by 1997 (Fish and Wildlife 2000, A Plan for the Future, 1987). With these constraints in mind, a 10 percent utilization level for riparian vegetation and a 50 percent utilization level of herbaceous riparian vegetation were established. These levels were intended for riparian areas which could not fit into an early grazing system and would be independent of one another (i.e., if either was reached, the livestock would be removed from the pasture).

The 30 percent herbaceous upland vegetation utilization was arrived at from current utilization levels on upland vegetation within some of the existing riparian pastures. It was felt that 30 percent utilization on upland herbaceous vegetation was the most that would be reached before one of the other utilization levels as reached in the riparian pasture. However, some improved riparian conditions have been achieved with greater than 30 percent upland herbaceous vegetation utilization, therefore, the upland utilization levels for any particular pasture will be consistent with upland utilization levels prescribed for the particular allotment.

### Inventory

During the summers of 1979 and 1981, riparian inventories were conducted on streamside riparian habitat in the Riley and Drewsey Planning Units, respectively. Two hundred pace toe pointtransects were run on sites representative of stream segments. Segments were determined based on changes of overstory and understory dominant plants and, where possible, a change in potential. Data collected included: vegetative species composition, shrub and tree canopy height and percent cover, slope, wildlife species present, stream gradient, dominant and codominant overstory and understory species, and canopy distribution and potential. These data were used as they relate to potential to determine condition. This was not done on a straight percentage of potential basis because the different components of riparian habitat have different degrees of importance for particular wildlife species. An example of this is the South Fork of the Malheur River. The herbaceous riparian vegetation is in good condition but tree and shrub components are virtually absent. This streamside riparian was rated as fair overall.

Permanent photo trend points were established at each of these segments. These photos have been retaken periodically. The photos along stream sections where management has changed to favor riparian have been taken more frequently than the photos at points where conditions are not expected to change. The photos from these points are used to show visible change over time. Trend has been established by this change over time.

Streams that currently have no condition or trend listed have no data and will be inventoried as funding becomes available. If these areas do not meet the BLM definition of riparian they will be dropped from consideration.

### Table 4. Riparian Areas Grazing Systems and Inventory

<table>
<thead>
<tr>
<th>Riparian Areas Grazing Systems and Inventory</th>
</tr>
</thead>
<tbody>
<tr>
<td>Several riparian pastures within the planning area have exhibited “speedy” riparian recovery with a short duration (less than 30 days) early (prior to June 1) grazing system (see glossary for definition of “speedy” riparian recovery). However, in some instances an early turn out riparian pasture or pastures within an allotment is not practical or may be cost prohibitive.</td>
</tr>
<tr>
<td>An effort has been made throughout the planning process to develop cost-effective (based on past funding and future projects) strategies to meet the overall Bureau objective of 75 percent of all riparian areas in good or better condition by 1997 (Fish and Wildlife 2000, A Plan for the Future, 1987). With these constraints in mind, a 10 percent utilization level for riparian vegetation and a 50 percent utilization level of herbaceous riparian vegetation were established. These levels were intended for riparian areas which could not fit into an early grazing system and would be independent of one another (i.e., if either was reached, the livestock would be removed from the pasture).</td>
</tr>
<tr>
<td>The 30 percent herbaceous upland vegetation utilization was arrived at from current utilization levels on upland vegetation within some of the existing riparian pastures. It was felt that 30 percent utilization on upland herbaceous vegetation was the most that would be reached before one of the other utilization levels as reached in the riparian pasture. However, some improved riparian conditions have been achieved with greater than 30 percent upland herbaceous vegetation utilization, therefore, the upland utilization levels for any particular pasture will be consistent with upland utilization levels prescribed for the particular allotment.</td>
</tr>
<tr>
<td>During the summers of 1979 and 1981, riparian inventories were conducted on streamside riparian habitat in the Riley and Drewsey Planning Units, respectively. Two hundred pace toe point transects were run on sites representative of stream segments. Segments were determined based on changes of overstory and understory dominant plants and, where possible, a change in potential. Data collected included: vegetative species composition, shrub and tree canopy height and percent cover, slope, wildlife species present, stream gradient, dominant and codominant overstory and understory species, and canopy distribution and potential. These data were used as they relate to potential to determine condition. This was not done on a straight percentage of potential basis because the different components of riparian habitat have different degrees of importance for particular wildlife species. An example of this is the South Fork of the Malheur River. The herbaceous riparian vegetation is in good condition but tree and shrub components are virtually absent. This streamside riparian was rated as fair overall.</td>
</tr>
<tr>
<td>Permanent photo trend points were established at each of these segments. These photos have been retaken periodically. The photos along stream sections where management has changed to favor riparian have been taken more frequently than the photos at points where conditions are not expected to change. The photos from these points are used to show visible change over time. Trend has been established by this change over time.</td>
</tr>
<tr>
<td>Streams that currently have no condition or trend listed have no data and will be inventoried as funding becomes available. If these areas do not meet the BLM definition of riparian they will be dropped from consideration.</td>
</tr>
</tbody>
</table>
## Table 5. Stream Segments Proposed for Immediate Grazing System Implementation

<table>
<thead>
<tr>
<th>Stream Name</th>
<th>Allot</th>
<th>Miles</th>
<th>Acres</th>
<th>Cond.</th>
<th>Trend</th>
<th>Ailot. No.</th>
<th>Special Status Species</th>
</tr>
</thead>
<tbody>
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<td>RB</td>
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<td>Silvies Canyon</td>
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<td>4.0</td>
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<td>26.2</td>
<td></td>
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<td>Down</td>
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<td>RB</td>
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<td>24.0</td>
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<td>Down</td>
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<td>35.0</td>
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<td>Poor</td>
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<td>RB/MS</td>
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<td>7009</td>
<td>RB/MS</td>
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<td>Alder Creek</td>
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</table>
Table 5. Stream Segments Proposed for Immediate Grazing System Implementation (cont.)

<table>
<thead>
<tr>
<th>Stream Name</th>
<th>Allot.</th>
<th>Miles</th>
<th>Acres</th>
<th>Cond.</th>
<th>Trend</th>
<th>Allot. No.</th>
<th>Special Status Species</th>
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</thead>
<tbody>
<tr>
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<td>5.0</td>
<td>Fair</td>
<td>Downward</td>
<td>5532</td>
<td>RB</td>
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<td></td>
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<td>4.0</td>
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<td>Static</td>
<td>5307</td>
<td>RB/MS</td>
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<td></td>
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<td>5309</td>
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<td>Fair</td>
<td>Downward</td>
<td>5310</td>
<td>RB/MS</td>
</tr>
<tr>
<td></td>
<td>Riddle Coyote</td>
<td>3.30</td>
<td>12.0</td>
<td>Fair</td>
<td>Downward</td>
<td>5329</td>
<td>RB/MS</td>
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<tr>
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<td>10.0</td>
<td>Fair</td>
<td>Downward</td>
<td>5327</td>
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<tr>
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<td>12.0</td>
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<td>RB</td>
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<td>3.0</td>
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<td>RB/MS</td>
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<tr>
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<td>6.0</td>
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<td>5310</td>
<td>RB/MS</td>
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<tr>
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<td>7.0</td>
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<td>Static</td>
<td>5329</td>
<td>RB/MS</td>
</tr>
<tr>
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<td>8.0</td>
<td>Fair</td>
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*This table pertains to Management Actions WL 6.2, SS 2.1 (Table 2.12), WQ 1.5 and AH 1.3.*
Table 6. Stream Segments Proposed for Case-by-Case Grazing System Implementation

<table>
<thead>
<tr>
<th>Stream Name</th>
<th>Allot</th>
<th>Miles</th>
<th>Acres</th>
<th>Cond.</th>
<th>Trend</th>
<th>Allot. No.</th>
<th>Special Status Species</th>
</tr>
</thead>
<tbody>
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<td>Poison Creek</td>
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<td>Static</td>
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<td>RB</td>
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<tr>
<td>Claw Creek</td>
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<td>4.0</td>
<td>Poor</td>
<td>Down</td>
<td>7011</td>
<td>RB/MS</td>
</tr>
<tr>
<td>Beaver Cam Cr.</td>
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<td>Static</td>
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<td>RB</td>
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<td>Moff et Table</td>
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<td>RB</td>
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<td>2.0</td>
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*This table pertains to Management Actions WL 6.3, SS 2.1 (Table 2.12).
Table 7. Stream Segments Which Lack Sufficient Data for Grazing System Implementation

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<th>Stream Name</th>
<th>Allot</th>
<th>Miles</th>
<th>Acres</th>
<th>Cond.*</th>
<th>Trend</th>
<th>Allot No.</th>
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<td>?</td>
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<td>Silvies</td>
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<td>?</td>
<td>4143</td>
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<tr>
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<td>East Creek- Pine Hill</td>
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<td>0.5</td>
<td>2.0</td>
<td>?</td>
<td>?</td>
<td>5308</td>
</tr>
<tr>
<td></td>
<td>Smyth Creek</td>
<td>1.5</td>
<td>5.0</td>
<td>?</td>
<td>?</td>
<td>5307</td>
</tr>
</tbody>
</table>

* Riparian condition and trend are unknown for these segments.
Table 8. Actions Proposed in the Three Rivers Portion of the Burns District Wetlands HMP.

- Construct four islands in Dry Lake to improve nesting and loafing areas for waterfowl.
- Build a dam at Ryegrass Spring to create a brood pond.
- Construct five water spreading ditches at Ryegrass Spring to create meadow habitat for nesting and feeding wetland species.
- Construct one-half mile of dikes with water control structures at Lake-on-the Trail to provide brood water throughout the summer.
- Construct eight islands on Lake-on-the-Trail to provide increased opportunities for Canada goose nesting.
- Transplant a large variety of emergents around the lakeshore at Lake-on-the-Trail to provide good quality nesting habitat for ducks.
- Construct a dike at West Chain Lake to provide year long water and 30 acres of nesting cover for wetland species. Fence this area.
- Build a fence around unnamed Silver Lake Pond in T. 25 S., R. 28 E., Sec. 29 to provide good quality nesting cover.
- Inventory Nordell, Sheep, Dry and Weaver Lakes to determine feasibility of improvements to provide year long water and nesting cover.
- Implement actions to improve Silvies Valley wetlands for waterfowl as opportunities arise.
Table 9. Allotment Management Summaries - Introduction

The following collection of summaries provides multiple-use information for each allotment in the Resource Area. Pertinent information is organized in four general sections 1) Allotment Identification, 2) Grazing Administration, 3) Identified Resource Conflicts/Concerns and Management Objectives, and 4) Constraints.

**Allotment Identification** - This section identifies each allotment by name and allotment number. The Selective Management Category (M, I, C) is identified and acreage within the allotment is provided.

**Grazing Administration Information** - This section provides basic information on the grazing license and other forage demands within the allotment including active preference, suspended nonuse, total preference, exchange of use and average actual use (see Glossary). The reader will also note that Carrying Capacity has been determined on 18 allotments through the monitoring and an allotment evaluation process and uses a minimum of 3 years of monitoring data. Presentation of the evaluation results on these 18 allotments was distributed to the public in June of 1989 in the Riley Rangeland Program Summary Update. Note: Blanks under acres or AUM’s indicate the value of 0.

**Identified Resource Conflicts/Concerns and Management Objectives** - This section presents the major resource conflicts or concerns that have been identified in each allotment through public input and interdisciplinary team interactions. For each conflict/concern identified, management objective for its resolution has been developed. This section forms the basis for establishing or revising Allotment Management Plans during the implementation of the RMP. This section also forms the basis for the direct integration of other resource values into the allotment monitoring and evaluation process.

**Constraints** - This section presents multiple-use constraints that may affect the nature and degree of change that can be imposed on the allotment through rangeland improvements and other potential surface-disturbing actions.

<table>
<thead>
<tr>
<th>Allotment Name: Poison Creek</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,237</td>
<td>Allot. No.: 4040</td>
<td>Mgmt. Category: C</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Acres:</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference: 248</td>
<td></td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td></td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 248</td>
<td></td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use: 248</td>
<td></td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Riparian or aquatic habitat is in less than good habitat condition.

Wetlands habitat in less than satisfactory condition.

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Improve wetlands habitat condition to satisfactory or better.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)
Table 9. Allotment Management Summaries (continued)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Hi Desert</th>
<th>Allot. No.: 4096</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>400</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>80</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>80</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>80</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Management Conflicts/Concerns Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Trout Creek</th>
<th>Allot. No.: 4097</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,839</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>568</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>568</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>309</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

### Allotment Name: East Cr.-Pine Hill

<table>
<thead>
<tr>
<th>Public Acres:</th>
<th>1,840</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allot. No.: 4098</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 374</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 374</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use: 349</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>Water quality does not currently meet water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

CONTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-25
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Abraham's Draw</th>
<th>Allot. No.: 4126</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 40</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)
Active Preference: 8 Deer:
Suspended Nonuse: 0 Elk:
Total Preference: 8 Antelope:
Average Actual Use: 8 Horses:

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: White</th>
<th>Allot. No.: 4138</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 80</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)
Active Preference: 10 Deer:
Suspended Nonuse: 0 Elk:
Total Preference: 10 Antelope:
Average Actual Use: 10 Horses:

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Silvies</th>
<th>Allot. No.: 4143</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong></td>
<td>11,035</td>
<td>Other Acres:</td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>2,500</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>2,500</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>1,642</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Management Objectives**

- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Improve wetlands habitat condition to satisfactory or better.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**Constraints**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: King Mountain</th>
<th>Allot. No.: 4180</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>160</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Unallotted grazing area.

**Management Objectives**

Issue temporary nonrenewable license unless allotted.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

<table>
<thead>
<tr>
<th>Allotment Name: Harney-Crane</th>
<th>Allot. No.: 5001</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>480</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: *Rorippa columbiae*, long-billed curlew.

**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-28
## Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Silvies</th>
<th>Allot. No.: 4143</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 11,035</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

### Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference: 2,500</th>
<th>Suspended Nonuse: 0</th>
<th>Total Preference: 2,500</th>
<th>Average Actual Use: 1,642</th>
</tr>
</thead>
</table>

### Other Forage Demands (AUMs)

- **Deer**: 75
- **Elk**: 75
- **Antelope**: 75
- **Horses**: 75
- **Total**: 150

### Identified Resource Conflicts/Concerns

- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- Wetlands habitat in less than satisfactory condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: *redband* trout, *Allium campanulatum*
- Water quality does not currently meet DEQ water quality standards for beneficial uses.

### Management Objectives

- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Improve wetlands habitat condition to satisfactory or better.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

### Constraints

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Catterson Sec. 13</th>
<th>Allot. No.: 5002</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 160</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)

- Active Preference: 9 Deer:
- Suspended Nonuse: 0 Elk:
- Total Preference: 9 Antelope:
- Average Actual Use: 9 Horses:
- Total:

#### Identified Resource

- Conflicts/Concerns
- Management

#### Objectives

#### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Malheur Slough</th>
<th>Allot. No.: 5003</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 799</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)

- Active Preference: 66 Deer:
- Suspended Nonuse: 0 Elk:
- Total Preference: 66 Antelope:
- Average Actual Use: 66 Horses:
- Total:

#### Identified Resource

- Conflicts/Concerns
- Management

#### Objectives

#### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Withers’ FFR</th>
<th>Allot. No.: 5005</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong></td>
<td>190</td>
<td><strong>Other Acres:</strong></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>22</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>22</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>22</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Devine Ridge</th>
<th>Allot. No.: 5101</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong></td>
<td>8,642</td>
<td><strong>Other Acres:</strong></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>1,307</td>
<td>Deer: 43</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk: 16</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>1,307</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>44</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>993</td>
<td>Total: 60</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, *redband* trout

**Management Objectives**

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Appendix I-30
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CONSTRAINTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.</td>
</tr>
<tr>
<td>Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.</td>
</tr>
<tr>
<td>Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Allotment Name: Prather Creek</th>
<th>Allot. No.: 5102</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,025</td>
<td>Other Acres: 763</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Deer: 8</td>
<td>Elk:</td>
</tr>
<tr>
<td>Active Preference: 41</td>
<td>Antelope: 1</td>
<td>Horses:</td>
</tr>
<tr>
<td>Suspended Nonuse: 13</td>
<td>Total: 9</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 54</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 76</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment</th>
<th>Name: Lime Klin/Sec. 30</th>
<th>Allot. No.: 5103</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>3,314</td>
<td>Other Acres:</td>
<td>141</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>224</td>
<td>Deer:</td>
<td>4</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>161</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference:</td>
<td>385</td>
<td>Antelope:</td>
<td>1</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>193</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
<td>5</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-32
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Soldier Creek</th>
<th>Allot. No.: 5104</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,673</td>
<td>Other Acres: 2,290</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference: | 102 | Deer: |
| Suspended Nonuse: | 98 | Elk: 8 |
| Total Preference: | 200 | Antelope: 1 |
| Exchange of Use: | 163 | Horses: |
| Average Actual Use: | 275 | Total: 24 |

Other Forage Demands (AUMs)

| Other Forage Demands (AUMs) | Deer: 15 | Elk: 8 | Antelope: 1 | Horses: |

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Camp Harney</th>
<th>Allot. No.: 5105</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 13,423</td>
<td>Other Acres: 3,342</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Deer: 71</td>
<td>Elk: 52</td>
</tr>
<tr>
<td>Active Preference: 953</td>
<td>Suspended Nonuse: 639</td>
<td>Antelope: 2</td>
</tr>
<tr>
<td>Total Preference: 1,592</td>
<td>Average Actual Use: 973</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- Active erosion occurs in the allotment.
- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, bald eagle, redband trout, Malheur mottled sculpin.

**Management Objectives**

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Improve and maintain erosion condition in moderate or better erosion condition.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

- Species officially listed as Threatened or Endangered under the Endangered Species Act and/or their critical habitat occur within the allotment. Consult with USFWS on all actions which may affect the species and mitigate all management practices to avoid adversely affecting the species.
- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.
- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-34
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Cow Creek</th>
<th>Allot. No.: 5106</th>
<th>Mgmt. Category: 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,024</td>
<td>Other Acres: 2,009</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Item</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference</td>
<td>230</td>
</tr>
<tr>
<td>Suspended Nonuse</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference</td>
<td>230</td>
</tr>
<tr>
<td>Exchange of Use</td>
<td>240</td>
</tr>
<tr>
<td>Average Actual Use</td>
<td>359</td>
</tr>
</tbody>
</table>

Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th>Animal</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer</td>
<td>8</td>
</tr>
<tr>
<td>Elk</td>
<td>12</td>
</tr>
<tr>
<td>Antelope</td>
<td>1</td>
</tr>
<tr>
<td>Horses</td>
<td>21</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: ManningField</th>
<th>Allot. No.: 5107</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 120</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)

| Active Preference: 10 | Deer: 2 |
| Suspended Nonuse: 0   | Elk:  
| Total Preference: 10  | Antelope: |
| Average Actual Use: 10 | Horses: Total: |

Identified Resource Management Conflicts/Concerns Objectives

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: PurdyFFR</th>
<th>Allot. No.: 5109</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 104</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)

| Active Preference: 15 | Deer: |
| Suspended Nonuse: 0   | Elk: |
| Total Preference: 15  | Antelope: |
| Average Actual Use: 15 | Horses: Total: |

Identified Resource Management Conflicts/Concerns Objectives

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
<table>
<thead>
<tr>
<th>Allotment Name: Reed FFR</th>
<th>Allot. No.: 5110</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>255</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)\textit{Other Forage Demands (AUMs)}

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>18</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended \textit{Nonuse}:</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Identified Resource Conflicts/Concerns | Management Objectives |

\textbf{CONSTRAINTS}

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

<table>
<thead>
<tr>
<th>Allotment Name: Temple FFR</th>
<th>Allot. No.: 5111</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>350</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)\textit{Other Forage Demands (AUMs)}

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>28</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended \textit{Nonuse}:</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Identified Resource Conflicts/Concerns | Management Objectives |

\textbf{CONSTRAINTS}

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Smith FFR</th>
<th>Allot. No.: 5112</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>120</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Allotment Name: Smith FFR</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Deer:</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>15</td>
<td>Elk:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>15</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>15</td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Rattlesnake FFR</th>
<th>Allot. No.: 5113</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>60</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Allotment Name: Rattlesnake FFR</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Deer:</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>0</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>6</td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

Unallotted grazing area.

Issue temporary nonrenewable license unless allotted.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-38
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Coleman Creek</th>
<th>Allot. No.: 5201</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,766</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Other Acres:</td>
<td>3,133</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>424</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>101</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>525</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>248</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Hunter</th>
<th>Allot. No.: 5202</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,778</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3,777</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>453</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>453</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>56</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>405</td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>23</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

**Management Objectives**

Allocate forage to meet elk forage demands.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Catterson</th>
<th>Allot. No.: 5203</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>640</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>640</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>125</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>125</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>125</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>16</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

**Management Objectives**

Allocate forage to meet elk forage demands.

Appendix I-40
### Table 9. Allotment Management Summaries (continued)

#### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Slocum</th>
<th>Allot. No.: 5204</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,912</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>300</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>300</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>560</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>487</td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

**Management Objectives**

Allocate forage to meet elk forage demands.

<table>
<thead>
<tr>
<th>Allotment Name: Venator</th>
<th>Allot. No.: 5205</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,589</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>320</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>320</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>480</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>655</td>
<td>Total:</td>
</tr>
</tbody>
</table>
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: redband trout</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Stockade FFR</th>
<th>Allot. No.: 5206</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,041</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 162</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 162</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 162</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

Appendix I-42
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: redband trout</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
</tbody>
</table>

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

<table>
<thead>
<tr>
<th>Allotment Name: Coyote Creek</th>
<th>Allot. No.: 5207</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,077</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>110</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>14</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>124</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>144</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Emmerson</th>
<th>Allot. No.: 5208</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,850</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>258</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>258</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>147</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>346</td>
<td>Total:</td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Crane</th>
<th>Allot. No.: 5209</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,935</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>236</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>236</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>113</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>376</td>
<td>Total:</td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-44
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Beckley Home</th>
<th>Allot. No.: 5211</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,814</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Active Preference</th>
<th>Suspended Nonuse</th>
<th>Total Preference</th>
<th>Average Actual Use</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>113</td>
<td>0</td>
<td>113</td>
<td>113</td>
</tr>
</tbody>
</table>

Deer: 3  
Elk: 3  
Antelope: 2  
Horses: 5  
Total: 6

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

---

<table>
<thead>
<tr>
<th>Allotment Name: Mahon Ranch</th>
<th>Allot. No.: 5212</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>4,577</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Active Preference</th>
<th>Suspended Nonuse</th>
<th>Total Preference</th>
<th>Average Actual Use</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>329</td>
<td>0</td>
<td>329</td>
<td>313</td>
</tr>
</tbody>
</table>

Deer: 3  
Elk: 3  
Antelope: 3  
Horses: 6  
Total: 6

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-45
**Table 9. Allotment Management Summaries (continued)**

<table>
<thead>
<tr>
<th>Allotment Name: Beaver Creek</th>
<th>Allot. No.: 5213</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>8,812</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference: | 1,018 | Deer: | 9 |
| Suspended Nonuse: | 206 | Elk: |
| Total Preference: | 1,224 | Antelope: | 3 |
| Exchange of Use: | 970 | Horses: |
| Average Actual Use: | 1,474 | Total: | 12 |

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Hamilton</th>
<th>Allot. No.: 5214</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,437</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference: | 245 | Deer: | 2 |
| Suspended Nonuse: | 0 | Elk: |
| Total Preference: | 245 | Antelope: | 3 |
| Exchange of Use: | 245 | Horses: |
| Average Actual Use: | 722 | Total: | 5 |

Appendix I-46
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Davies</th>
<th>Allot. No.: 5215</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>Other Acres:</td>
<td>3,442</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3,500</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>Deer:</td>
<td>253</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk:</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
<td>253</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>Horses:</td>
<td>234</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Total:</td>
<td>451</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-47
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Quier FFR</th>
<th>Allot. No.: 5216</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 150</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 0</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 5</td>
<td>Horses:</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Unallotted grazing area.

**Management Objectives**

Issue temporary nonrenewable license unless allotted.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Thompson FFR</th>
<th>Allot. No.: 5217</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 471</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 77</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 77</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 54</td>
<td>Horses:</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-48
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Bennett FFR</th>
<th>Allot. No.: 5218</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 320</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Preference: 18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Forage Demands (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deer:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elk:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antelope:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Horses:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identified Resource</td>
<td>Management</td>
<td></td>
</tr>
<tr>
<td>Conflicts/Concerns</td>
<td>Objectives</td>
<td></td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Hamilton FFR</th>
<th>Allot. No.: 5219</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 120</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 19</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Preference: 19</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 19</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Forage Demands (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deer:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elk:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antelope:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Horses:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identified Resource</td>
<td>Management</td>
<td></td>
</tr>
<tr>
<td>Conflicts/Concerns</td>
<td>Objectives</td>
<td></td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Princeton</th>
<th>Allot. No.: 5301</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>17,528</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4,260</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>2,532</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>2,532</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>124</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>5,515</td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, *Rorippa columbiae*.

**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Big Bird</th>
<th>Allot. No.: 5302</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,567</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>418</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>418</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>418</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>947</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

Appendix I-50
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
</tbody>
</table>

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Dry Lake</th>
<th>Allot. No.: 5303</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 37,949</td>
<td>Other Acres: 5,848</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference: 5,228</th>
<th>Suspended Nonuse: 0</th>
<th>Total Preference: 5,228</th>
<th>Average Actual Use: 11,421</th>
</tr>
</thead>
</table>

Other Forage Demands (AUMs)

| Deer: 37 | Elk: 0 | Antelope: 5 | Horses: 42 | Total: 42 |

Identified Resource Conflicts/Concerns

Wetlands habitat in less than satisfactory condition.

Playa habitat occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, Ferruginous hawk, redband trout

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Crow's Nest</th>
<th>Allot. No.: 5305</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,921</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 0</td>
<td>Deer: 2</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Antelope: 4</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 1,307</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 6</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew

**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Rocky Ford</th>
<th>Allot. No.: 5306</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 4,457</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 900</td>
<td>Deer: 1</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 900</td>
<td>Antelope: 4</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 1,607</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 5</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, Ferruginous hawk

**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-52
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Smyth Creek</th>
<th>Allot. No.: 5307</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>20,417</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Other: 3,622</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>1,919</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Deer: 61</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>1,919</td>
<td>Elk: 104</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>1,988</td>
<td>Antelope: 5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Horses: 492</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total: 794</td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- Limiting big game habitat in unsatisfactory habitat condition.
- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- **Playa** habitat occurs in the allotment.
- The Kiger Mustang Area of Critical Environmental concern occurs within allotment.
- The allotment contains all or a portion of the Kiger Wild Horse Herd Management Area.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, **redband** trout, Malheur mottled sculpin

#### Management Objectives

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Improve and maintain big game habitat in satisfactory habitat condition.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Incorporate **playa** management objectives into allotment management as such objectives are developed.
- Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.
- Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.
- Protect special status species or its habitat from impact by BLM-authorized actions.
Table 9. Allotment Management Summaries (continued)

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded. Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Kiger</th>
<th>Allot. No.: 5308</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 8,720</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 856</td>
<td>Deer: 26</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 36</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 856</td>
<td>Antelope: 2</td>
<td></td>
</tr>
<tr>
<td>Exchange of Use: 215</td>
<td>Horses: 360</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 1,100</td>
<td>Total: 424</td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

The allotment contains all or a portion of the Kiger Wild Horse Herd Management Area.

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

The Kiger Mustang Area of Critical Environmental Concern occurs within allotment.

Management Objectives

Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.

Appendix I-54
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded. Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Happy Valley</th>
<th>Allot. No.: 5309</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>17,356</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 2,107 Deer: 25  
Suspended Nonuse: 291 Elk: 88  
Total Preference: 2,398 Antelope: 4  
Exchange of Use: 52 Horses: 132  
Average Actual Use: 2,146 Total: 117

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, Ferruginous hawk, redband trout, Malheur mottled sculpin

Riparian or aquatic habitat is in less than good habitat condition.

**Management Objectives**

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.
The Kiger Mustang Area of Critical Environmental Concern occurs within allotment. Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan. The allotment contains all or a portion of the Kiger Wild Horse Herd Management Area. Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

**Table 9. Allotment Management Summaries (continued)**

<table>
<thead>
<tr>
<th>Allotment Name: Riddle Mountain</th>
<th>Allot. No.: 5310</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>20,228</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4,053</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>3,095</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>291</td>
<td>Deer:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>3,386</td>
<td>Elk:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>248</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>3,026</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>371</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

Limiting big game habitat in unsatisfactory habitat condition.

No forage allocations for elk use in the allotment have been made.

Playa habitat occurs in the allotment.

**Management Objectives**

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

Incorporate playa management objectives into allotment management as such objectives are developed.

Appendix I-56
Table 9. Allotment Management Summaries (continued)

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin

Protect special status species or its habitat from impact by BLM-authorized actions.

Riparian or aquatic habitat is in less than good habitat condition.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Virginia Valley FFRAAllot. No.: 5311

Public Acres: 160

Mgmt. Category: C

Other Acres:

Grazing Administration Info. (AUMs)

Active Preference: 0

Suspended Nonuse: 0

Total Preference: 0

Average Actual Use: 0

Other Forage Demands (AUMs)

Deer:

Elk:

Antelope:

Horses:

Total:

Identified Resource Conflicts/Concerns

Unallotted grazing area.

Management Objectives

Issue temporary nonrenewable license unless allotted

Appendix I-57
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Burnt Flat</th>
<th>Allot. No.: 5313</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 30,388</td>
<td>Other Acres:</td>
<td>Other Acres: 4,580</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Allotment Management Summaries</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>3,863</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>3,863</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>571</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>3,676</td>
</tr>
</tbody>
</table>

Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th>Deer:</th>
</tr>
</thead>
<tbody>
<tr>
<td>83</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Elk:</th>
</tr>
</thead>
<tbody>
<tr>
<td>64</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Antelope:</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Horses:</th>
</tr>
</thead>
<tbody>
<tr>
<td>672</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>834</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

The allotment contains all or a portion of the Riddle Mountain Wild Horse Herd Management Area.

No forage allocations for elk use in the allotment have been made.

Playa habitat occurs in the allotment.

The Kiger Mustang Area of Critical Environmental Concern occurs within allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, Ferruginous hawk

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.

Allocate forage to meet elk forage demands.

Incorporate playa management objectives into allotment management as such objectives are developed.

Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Wilderness Study Area occurs within allotment. All management activities must conform to Interim Management Protection policy and be mitigated, as needed, to ensure nonimpairment of wilderness values.

Appendix l-58
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Baker FFR</th>
<th>Allot. No.: 5314</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>360</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

- **Grazing Administration Info. (AUMs)**
  - Active Preference: 0
  - Suspended Nonuse: 0
  - Total Preference: 0
  - Average Actual Use: 24

- **Other Forage Demands (AUMs)**
  - Deer: 0
  - Elk: 0
  - Antelope: 0
  - Horses: 0
  - Total: 0

#### Identified Resource Conflicts/Concerns
- Unallotted grazing area.

#### Management Objectives
- Issue temporary nonrenewable license unless allotted.

#### CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

---

<table>
<thead>
<tr>
<th>Allotment Name: Virginia Valley Allot. No.: 5316</th>
<th>Mgmt. Category: M</th>
<th>Other Acres: 1,993</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 16,263</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Grazing Administration Info. (AUMs)**
  - Active Preference: 3,640
  - Suspended Nonuse: 0
  - Total Preference: 3,640
  - Exchange of Use: 155
  - Average Actual Use: 4,747

- **Other Forage Demands (AUMs)**
  - Deer: 20
  - Elk: 8
  - Antelope: 8
  - Horses: 28
  - Total: 28

#### Identified Resource Conflicts/Concerns

#### Management Objectives

#### CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Hatt Butte</th>
<th>Allot. No.: 5317</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,560</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>103</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>103</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>103</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 8.5 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Black Butte</th>
<th>Allot. No.: 5318</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>760</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>95</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>95</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>10</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>85</td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-60
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Driveway</th>
<th>Allot. No.: 5319</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,680</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 0</td>
<td>Deer: 0</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 0</td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Antelope: 0</td>
</tr>
<tr>
<td>Average Actual Use: 0</td>
<td>Horses: 0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trailing use only.</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Kegler FFR</th>
<th>Allot. No.: 5320</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>160</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 16</td>
<td>Deer: 0</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 0</td>
</tr>
<tr>
<td>Total Preference: 16</td>
<td>Antelope: 0</td>
</tr>
<tr>
<td>Average Actual Use: 16</td>
<td>Horses: 0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Hamilton Ind. Allot. No.: 5321</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,122</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (\text{AUMs})</td>
<td>Other Forage Demands (\text{AUMs})</td>
</tr>
<tr>
<td>Active Preference: 150</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 150</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use: 150</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Driveway</th>
<th>Allot. No.: 5319</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,680</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference: 0</td>
<td>Deer: 0</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 0</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Antelope: 0</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 0</td>
<td>Horses: 0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 0</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Kegler FFR</th>
<th>Allot. No.: 5320</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 160</td>
<td>Other Acres: 600</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 16</td>
<td>Deer: 0</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 0</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 16</td>
<td>Antelope: 0</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 16</td>
<td>Horses: 0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 0</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-61
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Riddle FFR</th>
<th>Allot. No.: 5324</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>160</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference:  5  
Suspended Nonuse:  0  
Total Preference:  5  
Average Actual Use:  5  
Other Forage Demands (AUMs)  
Deer:  
Elk:  
Antelope:  
Horses:  
Total:  

Identified Resource Conflicts/Concerns  
Management Objectives

CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Marshall Diamond FFR</th>
<th>Allot. No.: 5325</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>320</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference:  40  
Suspended Nonuse:  0  
Total Preference:  40  
Average Actual Use:  40  
Other Forage Demands (AUMs)  
Deer:  
Elk:  
Antelope:  
Horses:  
Total:  

Identified Resource Conflicts/Concerns  
Management Objectives

CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Jenkins N. Lake FFR Allot. No.: 5326</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 80</td>
<td><strong>Other Acres:</strong></td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td><strong>Other Forage Demands (AUMs)</strong></td>
</tr>
<tr>
<td><strong>Active Preference:</strong> 30</td>
<td><strong>Deer:</strong></td>
</tr>
<tr>
<td><strong>Suspended Nonuse:</strong> 0</td>
<td><strong>Elk:</strong></td>
</tr>
<tr>
<td><strong>Total Preference:</strong> 30</td>
<td><strong>Antelope:</strong></td>
</tr>
<tr>
<td><strong>Average Actual Use:</strong> 30</td>
<td><strong>Horses:</strong></td>
</tr>
</tbody>
</table>

**Grazing Administration Info.**

**Active Preference:**

**Suspended Nonuse:**

**Total Preference:**

**Average Actual Use:**

**Other Forage Demands (AUMs):**

**Deer:**

**Elk:**

**Antelope:**

**Horses:**

**Total:**

---

### Identified Resource Conflicts/Concerns

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

### Allotment Name: Jenkins B. Flat FFR Allot. No.: 5327

<table>
<thead>
<tr>
<th><strong>Public Acres:</strong> 1,480</th>
<th><strong>Mgmt. Category:</strong> C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td><strong>Other Forage Demands (AUMs)</strong></td>
</tr>
<tr>
<td><strong>Active Preference:</strong> 283</td>
<td><strong>Deer:</strong></td>
</tr>
<tr>
<td><strong>Suspended Nonuse:</strong> 0</td>
<td><strong>Elk:</strong></td>
</tr>
<tr>
<td><strong>Total Preference:</strong> 283</td>
<td><strong>Antelope:</strong></td>
</tr>
<tr>
<td><strong>Average Actual Use:</strong> 283</td>
<td><strong>Horses:</strong></td>
</tr>
</tbody>
</table>

**Grazing Administration Info.**

**Active Preference:**

**Suspended Nonuse:**

**Total Preference:**

**Average Actual Use:**

**Other Forage Demands (AUMs):**

**Deer:**

**Elk:**

**Antelope:**

**Horses:**

**Total:**

---

### Identified Resource Conflicts/Concerns

**Management Objectives**

**CONSTRAINTS**

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Protect special status species or its habitat from impact by BLM-authorized actions.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Wilderness Study Area occurs within allotment. All management activities must conform to Interim Management Protection policy and be mitigated, as needed, to ensure nonimpairment of wilderness values.

Appendix I-65
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Fisher FFR</th>
<th>Allot. No.: 5328</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>320</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference:       | 46               | Other Forage Demands (AUMs) |
| Suspended Nonuse:        | 0                | Deer:                        |
| Total Preference:        | 46               | Elk:                         |
| Average Actual Use:      | 46               | Antelope:                    |

Identified Resource
Conflicts/Concerns
Management Objectives

CONSTRANTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Riddle-Coyote</th>
<th>Allot. No.: 5329</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>446</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1,998</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)¹

| Active Preference:       | 0                | Other Forage Demands (AUMs) |
| Suspended Nonuse:        | 0                | Deer:                        |
| Total Preference:        | 0                | Elk:                         |
| Average Actual Use:      | 0                | Antelope:                    |

¹Newly acquired allotment. Insufficient data to determine forage availability

Identified Resource
Conflicts/Concerns
Management Objectives

Water quality does not currently meet DEQ water quality standards for beneficial uses.

| Water quality does not currently meet DEQ water quality standards for beneficial uses. |
| No forage allocations for elk use in the allotment have been made. |

| Management Objectives | Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality. |
| Allocate forage to meet elk forage demands. |

Appendix 1-66
Table 9. Allotment Management Summaries (continued)

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRANTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Deep Creek</th>
<th>Allot. No.: 5330</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 648</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference: 128</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Total Preference: 128</td>
<td>Elk:</td>
</tr>
<tr>
<td>Average Actual Use: 128</td>
<td>Antelope:</td>
</tr>
<tr>
<td></td>
<td>Horses:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM-authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRANTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: East Cow CreekAllot. No.: 5501</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 5,641</td>
<td>Other Acres: 2,603</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 809</td>
<td>Deer: 10</td>
</tr>
<tr>
<td>Suspended Nonuse: 32</td>
<td>Elk: 12</td>
</tr>
<tr>
<td>Total Preference: 841</td>
<td>Antelope: 2</td>
</tr>
<tr>
<td>Exchange of Use: 294</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use: 856</td>
<td>Total: 24</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active erosion occurs in the allotment.</td>
<td>Improve and maintain erosion condition in moderate or better erosion condition.</td>
</tr>
<tr>
<td>Limiting big game habitat in unsatisfactory habitat condition.</td>
<td>Improve and maintain big game habitat in satisfactory habitat condition.</td>
</tr>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
</tbody>
</table>

Appendix I-68
Table 9. Allotment Management Summaries (continued)

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded. Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Rock Creek</th>
<th>Allot. No.: 5502</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>4,849</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2,322</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>568</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>184</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>702</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>501</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>9</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Management Objectives

Improve and maintain erosion condition in moderate or better erosion condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-69
Table 9. Allotment Management Summaries (continued)

Allotment Name: Pine Creek

Public Acres: 21,930

Grazing Administration Info. (AUMs)
Active Preference: 2,410
Suspended Nonuse: 971
Total Preference: 3,381
Average Actual Use: 1,421

Other Acres: 13,406

Cattle: 4

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Improve and maintain erosion condition in moderate or better erosion condition.

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRANTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-70
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: State Field</th>
<th>Allot. No.: 5504</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>568</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>98</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>98</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>98</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

The Biscuitroot Cultural Area of Critical Environmental Concern occurs within allotment.

**Management Objectives**

- Protect special status species or its habitat from impact by BLM-authorized actions.
- Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Little Muddy Creek</th>
<th>Allot. No.: 5505</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>7,261</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>962</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>262</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>1,224</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>143</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>536</td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>128</td>
</tr>
</tbody>
</table>

Appendix I-71
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

### Allotment Name: Muddy Creek

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>Deer: 38</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk: 20</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Total: 58</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
</tbody>
</table>

Appendix I-72
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Wolf Creek</th>
<th>Allot. No.: 5507</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 830</td>
<td>Other Acres: 600</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Deer: 20</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Elk: 12</td>
</tr>
<tr>
<td>Active Preference: 136</td>
<td></td>
<td>Antelope: 3</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td></td>
<td>Horses:</td>
</tr>
<tr>
<td>Total Preference: 136</td>
<td></td>
<td>Total: 35</td>
</tr>
<tr>
<td>Average Actual Use: 293</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Management Objectives

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Baker-Knowles</th>
<th>Allot. No.: 5508</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 845</td>
<td>Other Acres:</td>
<td>11</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 58
- Suspended Nonuse: 82
- Total Preference: 140
- Exchange of Use: 3
- Average Actual Use: 53

Other Forage Demands (AUMs)

- Deer: 7
- Elk: 8
- Antelope: 
- Horses: 
- Total: 15

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

**Management Objectives**

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

<table>
<thead>
<tr>
<th>Allotment Name: Williams Dripp Spring</th>
<th>Allot. No.: 5509</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,345</td>
<td>Other Acres:</td>
<td>8</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 176
- Suspended Nonuse: 67
- Total Preference: 243
- Exchange of Use: 64
- Average Actual Use: 272

Other Forage Demands (AUMs)

- Deer: 7
- Elk: 8
- Antelope: 
- Horses: 
- Total: 15

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

**Management Objectives**

Allocate forage to meet elk forage demands.
Table 9. Allotment Management Summaries (continued)

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Jones Dripp Spring</th>
<th>Allot. No.: 5510</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 757</td>
<td>Other Acres: 245</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 120  
Suspended Nonuse: 0  
Total Preference: 120  
Exchange of Use: 33  
Average Actual Use: 121  

Other Forage Demands (AUMs)  
Deer: 7  
Elk: 8  
Antelope:  
Horses:  
Total: 15  

Identified Resource Conflicts/Concerns  
No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Moffet Table</th>
<th>Allot. No.: 5511</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 16,412</td>
<td>Other Acres: 2,817</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 1,885</td>
<td>Deer: 202</td>
</tr>
<tr>
<td>Suspended Nonuse: 1,273</td>
<td>Elk: 172</td>
</tr>
<tr>
<td>Total Preference: 3,158</td>
<td>Antelope: 3</td>
</tr>
<tr>
<td>Exchange of Use: 23</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use: 1,238</td>
<td>Total: 377</td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- River segment nominated for inclusion in the Wild and Scenic River system.
- Limiting big game habitat in unsatisfactory habitat condition.
- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout.

#### Management Objectives

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Adjust livestock grazing management within river corridor to conform with study report and/or river management plan upon Congressional approval of river segment for inclusion in Wild and Scenic River system.
- Improve and maintain big game habitat in satisfactory habitat condition.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

Appendix I-76
Table 9. Allotment Management Summaries (continued)

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Wilderness Study Area occurs within allotment. All management activities must conform to Interim Management Protection policy and be mitigated, as needed, to ensure nonimpairment of wilderness values.

<table>
<thead>
<tr>
<th>Allotment Name: Clark's River</th>
<th>Allot. No.: 5512</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 318</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 40</td>
<td>Deer: 18</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 40</td>
<td>Antelope: 1</td>
<td></td>
</tr>
<tr>
<td>Exchange of Use: 40</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 40</td>
<td>Total: 19</td>
<td></td>
</tr>
</tbody>
</table>

** Identified Resource Management Objectives **

**CONSTRAINTS**

Ensure that vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Shelley</th>
<th>Allot. No.: 5513</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 5,199</td>
<td>Other Acres:</td>
<td>620</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 600</td>
<td>Deer: 15</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 4</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 600</td>
<td>Antelope: 1</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 555</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 20</td>
<td></td>
</tr>
</tbody>
</table>
Table 9. Allotment Management Summaries (continued)

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment:

sage grouse

**Management Objectives**

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

### Allotment Name: Coal Mine Creek

<table>
<thead>
<tr>
<th>Public Acres:</th>
<th>5,217</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allot. No.:</td>
<td>5514</td>
</tr>
<tr>
<td>Mgmt. Category:</td>
<td>I 54</td>
</tr>
<tr>
<td>Other Acres:</td>
<td>54</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

| Active Preference: | 452 |
| Suspended Nonuse:  | 54  |
| Total Preference:  | 506 |
| Average Actual Use:| 198 |

**Other Forage Demands (AUMs)**

| Deer:          | 19  |
| Elk:           | 1   |
| Antelope:      |     |
| Horses:        |     |
| Total:         | 20  |

**Identified Resource Conflicts/Concerns**

Active erosion occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment:

sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve and maintain erosion condition in moderate or better erosion condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-78
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Mule Creek</th>
<th>Allot. No.: 5515</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>5,604</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1,591</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>411</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>527</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>938</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>333</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>72</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Management Objectives

- Improve surface water quality on public public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.
- Ensure substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Birch Creek</th>
<th>Allot. No.: 5516</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,340</td>
<td>Other Acres:</td>
<td>40</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 243</td>
<td>Deer:</td>
<td>31</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td>20</td>
</tr>
<tr>
<td>Total Preference: 243</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 209</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td>51</td>
</tr>
</tbody>
</table>

#### Identified Resource

- **Conflicts/Concerns**
  - Limiting big game habitat in unsatisfactory habitat condition.
  - No forage allocations for elk use in the allotment have been made.
  - Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

#### Management Objectives

- Improve and maintain big game habitat in satisfactory habitat condition.
- Allocate forage to meet elk forage demands.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### CONSTRAINTS

Ensure that vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Otis Mountain</th>
<th>Allot. No.: 5517</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 12,991</td>
<td>Other Acres:</td>
<td>1,166</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 1,738</td>
<td>Deer:</td>
<td>100</td>
</tr>
<tr>
<td>Suspended Nonuse: 776</td>
<td>Elk:</td>
<td>72</td>
</tr>
<tr>
<td>Total Preference: 2,514</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 899</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td>172</td>
</tr>
</tbody>
</table>

Appendix I-80
Table 9. Allotment Management Summaries (continued)

Conflicts/Concerns
Limiting big game habitat in unsatisfactory habitat condition.
No forage allocations for elk use in the allotment have been made.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Objectives
Improve and maintain big game habitat in satisfactory habitat condition.
Allocate forage to meet elk forage demands.
Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Newell Field
Public Acres: 990
Allot. No.: 5518
Mgmt. Category: C
Other Acres: 800

Grazing Administration info. (AUMs)
Active Preference: 155
Suspended Nonuse: 0
Total Preference: 155
Average Actual Use: 155

Other Forage Demands (AUMs)
Deer: 3
Elk: Antelope: 3
Horses: Total: 3

Identified Resource
Conflicts/Concerns
Management
Objectives

Appendix i-81
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Big Upson</th>
<th>Allot. No.: 5519</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>220</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration info. (AUMs)

| Active Preference:          | 42               | Deer:             |
| Suspended Nonuse:            | 0                | Elk:              |
| Total Preference:            | 42               | Antelope:         |
| Average Actual Use:          | 42               | Horses:           |

Total:

Identified Resource Conflicts/Concerns

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Little Upson</th>
<th>Allot. No.: 5520</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>100</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference:          | 24               | Deer:             |
| Suspended Nonuse:            | 0                | Elk:              |
| Total Preference:            | 24               | Antelope:         |
| Average Actual Use:          | 24               | Horses:           |

Total:

Identified Resource Conflicts/Concerns

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-82
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Rocky Basin</th>
<th>Allot. No.: 5521</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>3,775</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>467</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>467</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>416</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

CONTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Cottonwood Creek</th>
<th>Allot. No.: 5522</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>8,397</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>996</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>186</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>1,182</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>143</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>227</td>
<td>Total:</td>
</tr>
</tbody>
</table>

Appendix I-83
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, <em>redband</em> trout</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
</tbody>
</table>

#### CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limittreatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reducethe variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Tub Spring/Hart</th>
<th>Allot. No.: 5523</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 5,478</td>
<td>Other Acres:</td>
<td>215</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

| Active Preference: 1,002 | Deer: |
| Suspended Nonuse: 53     | Elk:  |
| Total Preference: 1,055  | Antelope: |
| Average Actual Use: 919  | Horses: |

**Identified Resource Conflicts/Concerns**

<table>
<thead>
<tr>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adjust allotment capacities and management system, as needed, to address minerals development impacts.</td>
</tr>
</tbody>
</table>

Appendix I-84
Table 9. Allotment Management Summaries (continued)

**CONSTRANTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Dawson Butte</th>
<th>Allot. No.: 5524</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 3,837</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

| Active Preference: 614 | Suspended Nonuse: 0 | Total Preference: 614 | Average Actual Use: 555 |

**Other Forage Demands (AUMs)**

| Deer: | Elk: | Antelope: 6 | Horses: |

**Management Objectives**

- **Identified Resource Conflicts/Concerns**
  - Water quality does not currently meet DEQ water quality standards for beneficial uses.
  - Active erosion occurs in the allotment.
  - Riparian or aquatic habitat is in less than good habitat condition.
  - At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout
  - Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

- **Management Objectives**
  - Improve and maintain erosion condition in moderate or better erosion condition.
  - Improve and maintain riparian or aquatic habitat in good or better habitat condition.
  - Protect special status species or its habitat from impact by BLM-authorized actions.
  - Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRANTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-85
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Mill Gulch</th>
<th>Allot. No.: 5525</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,281</td>
<td>Other Acres: 640</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference: 525 | Suspended Nonuse: 0 | Total Preference: 525 | Exchange of Use: 67 | Average Actual Use: 563 |

Other Forage Demands (AUMs)

| Deer: | Elk: | Antelope: | Horses: |

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

Active erosion occurs in the allotment.

Substantial surface acreage within allotment affected by mineral development activities.

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Improve and maintain erosion condition in moderate or better erosion condition.

Adjust allotment capacities and management system, as needed, to address minerals development impacts.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Chalk Hills</th>
<th>Allot. No.: 5526</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 9,262</td>
<td>Other Acres: 1,130</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration info. (AUMs)

| Active Preference: 936 | Suspended Nonuse: 762 | Total Preference: 1,698 | Exchange of Use: 87 | Average Actual Use: 850 |

Other Forage Demands (AUMs)

| Deer: 54 | Elk: | Antelope: | Horses: |

Appendix I-86
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active erosion occurs in the allotment.</td>
<td>improve and maintain erosion condition in moderate or better erosion condition.</td>
</tr>
<tr>
<td>Substantial surface acreage within allotment affected by mineral development activities.</td>
<td>Adjust allotment capacities and management system, as needed, to address minerals development impacts.</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

---

<table>
<thead>
<tr>
<th>Allotment Name: Riverside FFR</th>
<th>Allot. No.: 5527</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 255</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 35</td>
<td>Deer: 6</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 35</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 35</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 6</td>
<td></td>
</tr>
</tbody>
</table>

**CONTRASTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Cooler</th>
<th>Allot. No.: 5528</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>5,020</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

**Grazing Administration info. (AUMs)**

<table>
<thead>
<tr>
<th>Active Preference:</th>
<th>530</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>530</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>531</td>
</tr>
</tbody>
</table>

**Other Forage Demands (AUMs)**

| Deer: | 11 |
| Elk:  | 1  |
| Antelope: | 1 |
| Horses: | 12 |

**Identified Resource Conflicts/Concerns**

Active erosion occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, *Trifolium leibergii*

**Management Objectives**

- Improve and maintain erosion condition in moderate or better erosion condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.

**CONRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: House Butte</th>
<th>Allot. No.: 5529</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>22,857</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

<table>
<thead>
<tr>
<th>Active Preference:</th>
<th>2,085</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse:</td>
<td>912</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>2,997</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>93</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>2,219</td>
</tr>
</tbody>
</table>

**Other Forage Demands (AUMs)**

| Deer: | 107 |
| Elk:  |     |
| Antelope: | 6  |
| Horses: |     |
| Total: | 113 |

Appendix I-88
Table 9. Allotment Management Summaries (continued)

**Identified Resource Conflicts/Concerns**

The Biscuitroot Cultural Area of Critical Environmental Concern occurs within allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

**CONRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: River</th>
<th>Allot. No.: 5530</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>24,422</td>
<td>Other Acres: 2,760</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>1,649</td>
<td>Deer: 33</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>973</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>2,622</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>180</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>839</td>
<td>Total: 33</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

Active erosion occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, bighorn sheep, redband trout, *Trifolium leibergii*, *Lupinus biddlei*

Riparian or aquatic habitat is in less than good habitat condition.

**Management Objectives**

Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.

Protect special status species or its habitat from impact by BLM-authorized actions.

**Management Objectives**

Improve water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Improve and maintain erosion condition in moderate or better erosion condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.
CONRADNTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

### Allotment Name: Stinkingwater

<table>
<thead>
<tr>
<th>Public Acres:</th>
<th>23,461</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allot. No.:</td>
<td>5531</td>
</tr>
<tr>
<td>Mgmt. Category:</td>
<td>I</td>
</tr>
<tr>
<td>Other Acres:</td>
<td>1,413</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

| Active Preference: | 2,857 |
| Suspended Nonuse:   | 1,659 |
| Total Preference:   | 4,516 |
| Exchange of Use:    | 37   |
| Average Actual Use: | 3,137 |

**Other Forage Demands (AUMs)**

| Deer: | 23 |
| Elk:  | 28 |
| Antelope: | 15 |
| Horses: | 240 |
| Total: | 306 |

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, bighorn sheep

Limiting big game habitat in unsatisfactory habitat condition.

No forage allocations for elk use in the allotment have been made.

The Biscuitroot Cultural Area of Critical Environmental Concern occurs within allotment.

**Management Objectives**

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Protect special status species or its habitat from impact by BLM-authorized actions.

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.

Appendix I-90
The allotment contains all or a portion of the Stinkingwater Wild Horse Herd Management Area.

Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.

Allotment Name: Stinkingwater (Cont’d)

Riparian or aquatic habitat is in less than good habitat condition.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

CONTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Mountain</th>
<th>Allot. No.: 5532</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>37,811</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>3,374</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>1,567</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>4,941</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>298</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>3,059</td>
<td>Total:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

Limiting big game habitat in unsatisfactory habitat condition.

The Biscuitroot Cultural Area of Critical Environmental Concern occurs within allotment.

The allotment contains all or a portion of the Stinkingwater Wild Horse Herd Management Area.

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Improve and maintain big game habitat in satisfactory habitat condition.

Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.

Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.
Table 9. Allotment Management Summaries (continued)

No forage allocations for elk use in the allotment have been made.
Allocate forage to meet elk forage demands.

Riparian or aquatic habitat is in less than good habitat condition.
Improve and maintain riparian or aquatic habitat in good or better habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout
Protect special status species or its habitat from impact by BLM-authorized actions.

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.
Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Buchanan</th>
<th>Allot. No.: 5533</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,328</td>
<td>Other Acres: 2,698</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 152
- Suspended Nonuse: 131
- Total Preference: 283
- Exchange of Use: 160
- Average Actual Use: 368

Other Forage Demands (AUMs)

- Deer: 2
- Elk: 2
- Antelope: 2
- Horses: 4

Management Objectives

Identified Resource Conflicts/Concerns

The Biscuitroot Cultural Area of Critical Environmental Concern occurs within allotment.

Appendix I-92
Table 9. Allotment Management Summaries (continued)

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Mahon Creek</th>
<th>Allot. No.: 5534</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,625</td>
<td>Other Acres:</td>
<td>80</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 273</td>
<td>Deer: 22</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 184</td>
<td>Elk: 12</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 457</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 292</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 34</td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-93
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Miller Canyon</th>
<th>Allot. No.: 5535</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 6,198</td>
<td>Other Acres: 850</td>
<td></td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

- Active Preference: 450
- Suspended Nonuse: 153
- Total Preference: 603
- Average Actual Use: 330

**Other Forage Demands (AUMs)**

- Deer: 51
- Elk: 12
- Antelope: 63

**Management Objectives**

- Allocate forage to meet elk forage demands.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONFLICTS/CONCERNS**

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

- Allocating forage to meet elk forage demands.
- Protecting special status species or its habitat from impact by BLM-authorized actions.
- Maintaining or improving rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Allotment contains all or a portion of a Wild Horse Herd Management Area. Management actions must be mitigated, as needed, to ensure free-roaming nature of the herd.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Alder Creek</th>
<th>Allot. No.: 5536</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>29,809</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>2,584</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>2,584</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>337</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>3,015</td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

- **Water quality** does not currently meet DEQ water quality standards for beneficial uses.

- Limiting big game habitat in unsatisfactory habitat condition.

- No forage allocations for elk use in the allotment have been made.

- Riparian or aquatic habitat is in less than good habitat condition.

- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, **redband** trout, bald eagle

- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

- Improve and maintain big game habitat in satisfactory habitat condition.

- **Allocate forage** to meet elk forage demands.

- Improve and maintain riparian or aquatic habitat in good or better habitat condition.

- Protect special status species or its habitat from impact by BLM-authorized actions.

- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

- Species officially listed as Threatened or Endangered under the Endangered Species Act and/or their critical habitat occur within the allotment. Consult with USFWS on all actions which may affect the species and mitigate all management practices to avoid adversely affecting the species.

- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
## Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Buck Mountain</th>
<th>Allot. No.: 5537</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>14,849</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>1,515</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>421</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>1,936</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>175</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>1,852</td>
</tr>
</tbody>
</table>

### Identified Resource Conflicts/Concerns

- Water quality does not currently meet DEQ water quality standards for beneficial uses.

### Management Objectives

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

### Management Objectives

- Allocate forage to meet elk forage demands.

- Protect special status species or its habitat from impact by BLM-authorized actions.

### CONSTRAINTS

- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Riverside</th>
<th>Allot. No.: 5538</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 15,588</td>
<td><strong>Other Acres:</strong> 4,884</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 1,949  
Suspended Nonuse: 807  
Total Preference: 2,756  
Exchange of Use: 728  
Average Actual Use: 2,514

Other Forage Demands (AUMs)  
Deer: 27  
Elk: 11  
Antelope: 38  
Horses: 38  
Total: 38

**Identified Resource Conflicts/Concerns**
At this time, the following special status species or its habitat is known to exist within the allotment: *Lupinus biddlei*

**Management Objectives**
Protect special status species or its habitat from impact by BLM-authorized actions.

Intensive recreation use occurs within the allotment.

Incorporate recreation management objectives into overall allotment management system.

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-97
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: W&amp;C Blaylock FFR</th>
<th>Allot. No.: 5539</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 410</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 30</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Preference: 30</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 30</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Other Forage Demands (AUMs)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deer: 26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elk:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antelope:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Horses:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total: 26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Lute Field</th>
<th>Allot. No.: 5540</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 225</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 13</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Preference: 13</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 13</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Other Forage Demands (AUMs)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deer: 26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elk:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antelope:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Horses:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Home Ranch Exclosure</th>
<th>Allot. No.: 5541</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,233</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>100</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>100</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>100</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
<tr>
<td>Identified Resource Conflicts/Concerns</td>
<td></td>
<td>Management Objectives</td>
</tr>
<tr>
<td>CONSTRAINTS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Allotment Name: Marshall FFR</th>
<th>Allot. No.: 5542</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>302</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>13</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>13</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>13</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
<tr>
<td>Identified Resource Conflicts/Concerns</td>
<td></td>
<td>Management Objectives</td>
</tr>
<tr>
<td>CONSTRAINTS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Appendix I-99
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Devine Flat Field</th>
<th>Allot. No.: 5543</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 788</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 118</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 118</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 118</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Brooks Field</th>
<th>Allot. No.: 5544</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 520</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 50</td>
<td>Deer:</td>
<td>42</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 50</td>
<td>Antelope:</td>
<td>1</td>
</tr>
<tr>
<td>Average Actual Use: 50</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td>43</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-100
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Sunshine Field</th>
<th>Allot. No.: 5545</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 463</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 52
- Suspended Nonuse: 0
- Total Preference: 52
- Average Actual Use: 52

Other Forage Demands (AUMs)

- Deer: 0
- Elk: 0
- Antelope: 0
- Horses: 0
- Total: 0

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Druitt Field and FFR Allot. No.: 5546</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 746</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 30
- Suspended Nonuse: 0
- Total Preference: 30
- Average Actual Use: 30

Other Forage Demands (AUMs)

- Deer: 15
- Elk: 0
- Antelope: 1
- Horses: 0
- Total: 16

Identified Resource Conflicts/Concerns

Management Objectives

At this time, the following special status species or its habitat is known to exist within the allotment:

- sage grouse

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Lake Field</th>
<th>Allot. No.: 5547</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>30</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>3</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>3</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>3</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Management Objectives**

Adjust allotment capacities and management system, as needed, to address minerals development impacts.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Griffin FFR</th>
<th>Allot. No.: 5548</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>450</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>56</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>56</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>56</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Management Objectives**

Adjust allotment capacities and management system, as needed, to address minerals development impacts.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-102
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Howards FFR</th>
<th>Allot. No.: 5549</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>392</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>30</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>30</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>30</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

#### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Jordan's FFR</th>
<th>Allot. No.: 5550</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>60</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>6</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>6</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>6</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

#### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Lillard’s FFR</th>
<th>Allot. No.: 5551</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 40</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference: 7</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Total Preference: 7</td>
<td>Elk:</td>
</tr>
<tr>
<td>Average Actual Use: 17</td>
<td>Antelope:</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Miller FFR A</th>
<th>Allot. No.: 5552</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 320</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference: 20</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Total Preference: 20</td>
<td>Elk:</td>
</tr>
<tr>
<td>Average Actual Use: 20</td>
<td>Antelope:</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Miller FFR B</th>
<th>Allot. No.: 5553</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 40</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 5</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 5</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 5</td>
<td>Horses:</td>
<td></td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

<table>
<thead>
<tr>
<th>Management Objectives</th>
</tr>
</thead>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

<table>
<thead>
<tr>
<th>Allotment Name: J.Fran Miller FFR</th>
<th>Allot. No.: 5554</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 049</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 25</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 25</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 25</td>
<td>Horses:</td>
<td></td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

<table>
<thead>
<tr>
<th>Management Objectives</th>
</tr>
</thead>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Ott FFR</th>
<th>Allot. No.: 5555</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 64</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
</tbody>
</table>

#### Grazing Administration Info. (AUMs)
- **Active Preference:** 5
- **Suspended Nonuse:** 0
- **Total Preference:** 5
- **Average Actual Use:** 5

#### Other Forage Demands (AUMs)
- **Deer:**
- **Elk:**
- **Antelope:**
- **Horses:**
- **Total:**

#### Identified Resource Conflicts/Concerns

#### Management Objectives

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

<table>
<thead>
<tr>
<th>Allotment Name: Pine Creek FFR</th>
<th>Allot. No.: 5556</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 1,298</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
</tbody>
</table>

#### Grazing Administration Info. (AUMs)
- **Active Preference:** 180
- **Suspended Nonuse:** 0
- **Total Preference:** 180
- **Average Actual Use:** 180

#### Other Forage Demands (AUMs)
- **Deer:**
- **Elk:**
- **Antelope:**
- **Horses:**
- **Total:**

#### Identified Resource Conflicts/Concerns

#### Management Objectives

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

Appendix I-106
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: J&amp;G Kane FFR</th>
<th>Allot. No.: 5557</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 110</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 5</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 5</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 5</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

**CONFLICTS/CONCERNS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: J&amp;GFFR</th>
<th>Allot. No.: 5558</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 130</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 33</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 33</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 33</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

**CONFLICTS/CONCERNS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Sword’s FFR</th>
<th>Allot. No.: 5559</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 172</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 32</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 32</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 32</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

**CONFLICTS/CONCERNS**

- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Vicker’s FFR</th>
<th>Allot. No.: 5560</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,740</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 191</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 191</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 191</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

**CONFLICTS/CONCERNS**

- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Appendix I-108
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Wilber FFR</th>
<th>Allot. No.: 5561</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,335</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**
- Active Preference: 125
- Suspended Nonuse: 0
- Total Preference: 125
- Average Actual Use: 125

**Other Forage Demands (AUMs)**
- Deer: 125
- Elk: 25
- Antelope: 0
- Horses: 125

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Williams' FFR</th>
<th>Allot. No.: 5562</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>200</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**
- Active Preference: 24
- Suspended Nonuse: 0
- Total Preference: 24
- Average Actual Use: 24

**Other Forage Demands (AUMs)**
- Deer: 24
- Elk: 0
- Antelope: 24
- Horses: 24

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Arnold's FFR</th>
<th>Allot. No.: 5563</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 230</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)
- Active Preference: 23
- Suspended Nonuse: 0
- Total Preference: 23
- Average Actual Use: 23

Other Forage Demands (AUMs)
- Deer: 23
- Elk: 0
- Antelope: 23
- Horses: 23

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

---

<table>
<thead>
<tr>
<th>Allotment Name: Wheeler Basin</th>
<th>Allot. No.: 5564</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 4,981</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)
- Active Preference: 618
- Suspended Nonuse: 342
- Total Preference: 960
- Average Actual Use: 737

Other Forage Demands (AUMs)
- Deer: 14
- Elk: 14
- Antelope: 14
- Horses: 14

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Wilber FFR</th>
<th>Allot. No.: 5561</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 1,335</td>
<td><strong>Allot. No.:</strong> 5561</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 1,335</td>
<td><strong>Allot. No.:</strong> 5561</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 1,335</td>
<td><strong>Allot. No.:</strong> 5561</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 1,335</td>
<td><strong>Allot. No.:</strong> 5561</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 1,335</td>
<td><strong>Allot. No.:</strong> 5561</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 1,335</td>
<td><strong>Allot. No.:</strong> 5561</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td><strong>Other Forage Demands (AUMs)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Active Preference:</strong> 125</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Suspended Nonuse:</strong> 0</td>
<td><strong>Total Preference:</strong> 125</td>
<td></td>
</tr>
<tr>
<td><strong>Total Preference:</strong> 125</td>
<td><strong>Average Actual Use:</strong> 125</td>
<td></td>
</tr>
<tr>
<td><strong>Average Actual Use:</strong> 125</td>
<td><strong>Total:</strong></td>
<td></td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Williams' FFR</th>
<th>Allot. No.: 5562</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 200</td>
<td><strong>Allot. No.:</strong> 5562</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 200</td>
<td><strong>Allot. No.:</strong> 5562</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 200</td>
<td><strong>Allot. No.:</strong> 5562</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 200</td>
<td><strong>Allot. No.:</strong> 5562</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Allotment Name:</strong></td>
<td><strong>Mgmt. Category:</strong> C</td>
<td></td>
</tr>
<tr>
<td><strong>Public Acres:</strong> 200</td>
<td><strong>Allot. No.:</strong> 5562</td>
<td><strong>Mgmt. Category:</strong> C</td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td><strong>Other Forage Demands (AUMs)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Active Preference:</strong> 24</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Suspended Nonuse:</strong> 0</td>
<td><strong>Total Preference:</strong> 24</td>
<td></td>
</tr>
<tr>
<td><strong>Total Preference:</strong> 24</td>
<td><strong>Average Actual Use:</strong> 24</td>
<td></td>
</tr>
<tr>
<td><strong>Average Actual Use:</strong> 24</td>
<td><strong>Total:</strong></td>
<td></td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Upton Mountain</th>
<th>Allot. No.: 5565</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 13,761</td>
<td>Other Acres:</td>
<td>354</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 1,615</td>
<td>Deer: 6</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 771</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 2,386</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 1,404</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 6</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Active erosion occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, bighorn sheep

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve and maintain erosion condition in moderate or better erosion condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
## Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Texaco Basin</th>
<th>Allot. No.: 5566</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 10,714</td>
<td>Other Acres:</td>
<td>440</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 1,900</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse: 900</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 2,800</td>
<td>Antelope: 9</td>
</tr>
<tr>
<td>Exchange of Use: 22</td>
<td>Horses: 100</td>
</tr>
<tr>
<td>Average Actual Use: 2,525</td>
<td>Total: 109</td>
</tr>
</tbody>
</table>

### Identified Resource Conflicts/Concerns
- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- Riparian or aquatic habitat is in less than good habitat condition.
- Wetlands habitat in less than satisfactory condition.
- Intensive recreation use occurs within the allotment.
- The allotment contains all or a portion of the Stinkingwater Wild Horse Herd Management Area.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Lupinus biddei, bighorn sheep

### Management Objectives
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Improve wetlands habitat condition to satisfactory or better.
- Incorporate recreation management objectives into overall allotment management system.
- Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.
- Protect special status species or its habitat from impact by BLM-authorized actions.

### CONSTRAINTS

Area influencing perennial water occurs within the allotment, Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Miler FFR</th>
<th>Allot. No.: 5567</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>160</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>16</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>16</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>16</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**CONFLICTS/CONCERNS**

None specified.

**OBJECTIVES**

None specified.

---

<table>
<thead>
<tr>
<th>Allotment Name: Bryon’s FFR</th>
<th>Allot. No.: 5568</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>40</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>6</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>6</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>6</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**CONFLICTS/CONCERNS**

None specified.

**OBJECTIVES**

None specified.

---

**CONSTRUCTIONS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Floyd’s FFR</th>
<th>Allot. No.: 5569</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 40</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) | Other Forage Demands (AUMs) |
Active Preference: 2               | Deer:                   |
Suspended Nonuse: 0                | Elk:                    |
Total Preference: 2                | Antelope:               |
Average Actual Use: 2              | Horses:                 |

Identified Resource Conflicts/Concerns |
Management Objectives

CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: River FFR</th>
<th>Allot. No.: 5570</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 290</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) | Other Forage Demands (AUMs) |
Active Preference: 60              | Deer:                   |
Suspended Nonuse: 0                | Elk:                    |
Total Preference: 60               | Antelope:               |
Average Actual Use: 60             | Horses:                 |

Identified Resource Conflicts/Concerns |
Management Objectives

CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Lamb Ranch</th>
<th>Allot. No.: 5571</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 2,246</td>
<td><strong>Other Acres:</strong></td>
<td></td>
</tr>
</tbody>
</table>

#### Grazing Administration Info. (AUMs)

| Active Preference: 246 | Suspended Nonuse: 0 | Total Preference: 246 | Average Actual Use: 246 |

#### Other Forage Demands (AUMs)

| Deer: | Elk: | Antelope: | Horses: |

#### Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

#### Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### Constraints

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name</th>
<th>Allot. No.</th>
<th>Mgmt. Category</th>
<th>Public Acres</th>
<th>Other Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>Krueger FFR</td>
<td>5572</td>
<td>C</td>
<td>80</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference</td>
<td>8</td>
</tr>
<tr>
<td>Suspended Nonuse</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference</td>
<td>8</td>
</tr>
<tr>
<td>Exchange of Use</td>
<td>4</td>
</tr>
<tr>
<td>Average Actual Use</td>
<td>12</td>
</tr>
</tbody>
</table>

Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer</td>
<td></td>
</tr>
<tr>
<td>Elk</td>
<td></td>
</tr>
<tr>
<td>Antelope</td>
<td></td>
</tr>
<tr>
<td>Horses</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Unallotted grazing area.

Management Objectives

Issue temporary nonrenewable license unless allotted.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name</th>
<th>Allot. No.</th>
<th>Mgmt. Category</th>
<th>Public Acres</th>
<th>Other Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Warm Springs</td>
<td>7001</td>
<td>I</td>
<td>181,390</td>
<td>17,547</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference</td>
<td>8,225</td>
</tr>
<tr>
<td>Suspended Nonuse</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference</td>
<td>8,225</td>
</tr>
<tr>
<td>Exchange of Use</td>
<td>40</td>
</tr>
<tr>
<td>*Carrying Capacity</td>
<td>12,292</td>
</tr>
<tr>
<td>Average Actual Use</td>
<td>12,989</td>
</tr>
</tbody>
</table>

Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer</td>
<td>80</td>
</tr>
<tr>
<td>Elk</td>
<td>99</td>
</tr>
<tr>
<td>Antelope</td>
<td>1,200</td>
</tr>
<tr>
<td>Horses</td>
<td>1,379</td>
</tr>
<tr>
<td>Total</td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Limiting big game habitat in unsatisfactory habitat condition

Playa habitat occurs in the allotment.

Management Objectives

Improve and maintain big game habitat in satisfactory habitat condition.

Incorporate playa management objectives into allotment management as such objectives are developed.

Appendix I-116
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, snowy plover, Malheur wirelettuce, sage grouse</th>
<th>Protect special status species or its habitat from impact by BLM-authorized actions.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The South Narrows Area of Critical Environmental Concern occurs within allotment.</td>
<td>Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by activity plans associated with Stephanomeria malheurensis.</td>
</tr>
<tr>
<td>The allotment contains all or a portion of the Warm Springs Wild Horse Herd Management Area.</td>
<td>Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.</td>
</tr>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>The Foster Flat RNA/ACEC occurs within the allotment.</td>
<td>Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.</td>
</tr>
<tr>
<td>Active erosion occurs in the allotment.</td>
<td>Improve and maintain erosion condition in moderate or better erosion condition.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Species officially listed as Threatened or Endangered under the Endangered Species Act and/or their critical habitat occur within the allotment. Consult with USFWS on all actions which may affect the species and mitigate all management practices to avoid adversely affecting the species.

Deer winter range occurs within the allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: West Warm Springs</th>
<th>Alter.No.: 7002</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 295,549</td>
<td>Other Acres:</td>
<td>11,119</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 11,167</td>
<td>Deer: 116</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 11,167</td>
<td>Antelope: 38</td>
</tr>
<tr>
<td>Exchange of Use: 110</td>
<td>Horses: 1,224</td>
</tr>
<tr>
<td>Average Actual Use: 5,114</td>
<td>Total: 1,378</td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

- Riparian or aquatic habitat is in less than good habitat condition.
- **Playa** habitat occurs in the allotment.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, snowy plover.
- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- The allotment contains all or a portion of the Warm Springs Wild Horse Herd Management Area.
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

#### Management Objectives

- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Incorporate **playa** management objectives into allotment management as such objectives are developed.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### CONSTRAINTS

- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.
- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: East Wagontire</th>
<th>Allot. No.: 7003</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 118,232</td>
<td>Other Acres:</td>
<td>80,962</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 8,281</td>
<td>Deer: 86</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 8,281</td>
<td>Antelope: 7</td>
<td></td>
</tr>
<tr>
<td>Exchange of Use: 518</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 6,913</td>
<td>Total: 93</td>
<td></td>
</tr>
</tbody>
</table>

### Identified Resource Conflicts/Concerns

Limiting big game habitat in unsatisfactory habitat condition.

**Playa** habitat occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

### Management Objectives

Improve and maintain big game habitat in satisfactory habitat condition.

Incorporate **playa** management objectives into allotment management as such objectives are developed.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: West Wagontire</th>
<th>Allot. No.: 7004</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 66,718</td>
<td>Other Acres: 3,929</td>
<td></td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

<table>
<thead>
<tr>
<th>Active Preference:</th>
<th>7,493</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>7,493</td>
</tr>
<tr>
<td>&quot;Carrying Capacity&quot;:</td>
<td>4.648</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>5,682</td>
</tr>
</tbody>
</table>

**Other Forage Demands (AUMs)**

<table>
<thead>
<tr>
<th>Deer:</th>
<th>73</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elk:</td>
<td>9</td>
</tr>
<tr>
<td>Antelope:</td>
<td>9</td>
</tr>
<tr>
<td>Horses:</td>
<td>82</td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

- Limiting big game habitat in unsatisfactory habitat condition.
- Playa habitat occurs in the allotment.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

#### Management Objectives

- Improve and maintain big game habitat in satisfactory habitat condition.
- Incorporate playa management objectives into allotment management as such objectives are developed.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### CONSTRAINTS

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

* Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Glass Butte</th>
<th>Allot. No.: 7005</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 7,613</td>
<td>Other Acres: 953</td>
<td></td>
</tr>
</tbody>
</table>

#### Grazing Administration Info. (AUMs)
- **Active Preference:** 1,058
- **Suspended Nonuse:** 0
- **Total Preference:** 1,058
- **Exchange of Use:** 84
- **Carrying Capacity:** 518
- **Average Actual Use:** 791

#### Other Forage Demands (AUMs)
- **Deer:** 12
- **Elk:**
- **Antelope:** 5
- **Horses:**
- **Total:** 17

#### Identified Resource Conflicts/Concerns
- Limiting big game habitat in unsatisfactory habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse
- Substantial surface acreage within allotment affected by mineral development activities.
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

#### Management Objectives
- Improve and maintain big game habitat in satisfactory habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Adjust allotment capacities and management system, as needed, to address minerals development impacts.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### CONSTRAINTS
- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

* *Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Rimrock Lake</th>
<th>Allot. No.: 7006</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 21,815</td>
<td>Other Acres: 619</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference: 1,775 | Suspended Nonuse: 32 |
| Total Preference: 1,807 | *Carrying Capacity: 1,308 |
| Average Actual Use: 1,345 | Other Forage Demands (AUMs) |
| Deer: 25 | Elk: |
| Antelope: 4 | Horses: |
| Total: 29 |

Identified Resource Conflicts/Concerns

Limiting big game habitat in unsatisfactory habitat condition.

Playa habitat occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Improve and maintain big game habitat in satisfactory habitat condition.

Incorporate playa management objectives into allotment management as such objectives are developed.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

Constraints

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

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Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Hat Butte</th>
<th>Allot. No.: 7007</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>18,338</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identiﬁed Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limiting big game habitat in unsatisfactory habitat condition.</td>
<td>Improve and maintain big game habitat in satisfactory habitat condition.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

CONSTRAINTS

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Sheep Lake-Shields</th>
<th>Allot. No.: 7008</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>13,202</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Total:</td>
</tr>
</tbody>
</table>
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>Playa habitat occurs in the allotment.</td>
<td>Incorporate <em>playa</em> management objectives into allotment management as such objectives are developed.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Dry Lake</th>
<th>Allot. No.: 7009</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>20,249</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6,337</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>3,099</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>102</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>3,201</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>116</td>
<td>Horses:</td>
</tr>
<tr>
<td>*Carrying Capacity:</td>
<td>2,638</td>
<td>Total:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>2,158</td>
<td>107</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limiting big game habitat in unsatisfactory habitat condition.</td>
<td>Improve and maintain big game habitat in satisfactory habitat condition.</td>
</tr>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
</tbody>
</table>

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### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Condition</th>
<th>Recommended Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>Wetlands habitat in less than satisfactory condition.</td>
<td>Improve wetlands habitat condition to satisfactory or better.</td>
</tr>
<tr>
<td><strong>Playa</strong> habitat occurs in the allotment.</td>
<td>Incorporate <strong>playa</strong> management objectives into allotment management as such objectives are developed.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, bald eagle, <strong>redband</strong> trout, Malheur mottled sculpin</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>Active erosion occurs in the allotment.</td>
<td>Improve and maintain erosion condition in moderate or better erosion condition.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

### CONSTRAINTS

Species officially listed as Threatened or Endangered under the Endangered Species Act and/or their critical habitat occur within the allotment. Consult with USFWS on all actions which may affect the species and mitigate all management practices to avoid adversely affecting the species.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Claw Creek</th>
<th>Allot. No.: 7010</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 24,244</td>
<td>Other Acres: 9,313</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 2,962
- Suspended Nonuse: 141
- Total Preference: 3,103
- Exchange of Use: 131
- *Carrying Capacity: 1,241
- Average Actual Use: 1,175

Other Forage Demands (AUMs)

- Deer: 160
- Elk: 96
- Antelope: 141
- Horses: 131
- Total: 256

Identified Resource Conflicts/Concerns

- Limiting big game habitat in unsatisfactory habitat condition.
- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin, bald eagle
- Dry Mountain RNA/Area of Critical Environmental Concern Extension occurs within allotment.
- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

- Improve and maintain big game habitat in satisfactory habitat condition.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

- Species officially listed as Threatened or Endangered under the Endangered Species Act and/or their critical habitat occur within the allotment. Consult with USFWS on all actions which may affect the species and mitigate all management practices to avoid adversely affecting the species.
- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

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Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

<table>
<thead>
<tr>
<th>Allotment Name: Upper Valley</th>
<th>Allot. No.: 7011</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,745</td>
<td>Other Acres: 5,155</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 254</td>
<td>Deer: 3</td>
</tr>
<tr>
<td>Suspended Nonuse: 11</td>
<td>Elk: 3</td>
</tr>
<tr>
<td>Total Preference: 265</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use: 265</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td>Total: 6</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin

Water quality does not currently meet DEQ water quality standards for beneficial uses.

**Management Objectives**

Allocate forage to meet elk forage demands.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Packsaddle</th>
<th>Allot. No.: 7012</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,366</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>316</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>16</td>
<td>Deer:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>332</td>
<td>Elk:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>239</td>
<td>Antelope:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- Active erosion occurs in the allotment.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, **redband** trout, Malheur mottled sculpin

*Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.*

**Management Objectives**

- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Improve and maintain erosion condition in moderate or better erosion condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

'Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

<table>
<thead>
<tr>
<th>Allotment Name: Upper Valley</th>
<th>Allot. No.: 7011</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,745</td>
<td>Other Acres:</td>
<td>5,155</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

| Active Preference: 254   | Deer:            | 3 |
| Suspended Nonuse: 11      | Elk:             | 3 |
| Total Preference: 265     | Antelope:        |   |
| Average Actual Use: 265    | Horses:          |   |
|                            | Total:           | 6 |

Other Forage Demands (AUMs)

To meet elk forage demands.

To improve and maintain riparian or aquatic habitat in good or better habitat condition.

To protect special status species or its habitat from impact by BLM-authorized actions.

To improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin

Water quality does not currently meet DEQ water quality standards for beneficial uses.

**Management Objectives**

Allocate forage to meet elk forage demands.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Packsaddle</th>
<th>Allot. No.: 7012</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 2,368</td>
<td><strong>Other Acres:</strong> 647</td>
<td></td>
</tr>
</tbody>
</table>

### Grazing Administration Info. (AUMs)
- Active Preference: 316
- Suspended Nonuse: 16
- Total Preference: 332
- Average Actual Use: 239

### Other Forage Demands (AUMs)
- Deer: 10
- Elk: 22
- Antelope: 8
- Horses: 40

#### Identified Resource Conflicts/Concerns

- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- Active erosion occurs in the allotment.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin

#### Management Objectives

- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Improve and maintain erosion condition in moderate or better erosion condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### Constraints

- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Zoglmann</th>
<th>Allot. No.: 7013</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>2,240</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 160</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse: 1</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 161</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use: 173</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use: 155</td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

No forage allocations for elk use in the allotment have been made.

**Management Objectives**

Allocate forage to meet elk forage demands.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Badger Spring</th>
<th>Allot. No.: 7014</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>11,043</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 1,048</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse: 55</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 1,103</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use: 93</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use: 629</td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Appendix I-I 29
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Second Flat  
Public Acres: 8,921  
Allot. No.: 7015  
Other Acres: 1,281  
Mgmt. Category: I

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 622</td>
<td>Deer: 45</td>
</tr>
<tr>
<td>Suspended Nonuse: 32</td>
<td>Elk: 35</td>
</tr>
<tr>
<td>Total Preference: 725</td>
<td>Antelope: 11</td>
</tr>
<tr>
<td>Exchange of Use: 30</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use: 429</td>
<td>Total: 91</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Zoglmann</th>
<th>Allot. No.: 7013</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,246</td>
<td>Other Acres: 1,600</td>
<td></td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**
- Active Preference: 160
- Suspended Nonuse: 1
- Total Preference: 161
- Exchange of Use: 173
- Average Actual Use: 155

**Other Forage Demands (AUMs)**
- Deer: 10
- Elk: 12
- Antelope: 62

**Identified Resource Conflicts/Concerns**
- No forage allocations for elk use in the allotment have been made.

**Management Objectives**
- Allocate forage to meet elk forage demands.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Badger Spring</th>
<th>Allot. No.: 7014</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 11,043</td>
<td>Other Acres: 920</td>
<td>920</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**
- Active Preference: 1,048
- Suspended Nonuse: 55
- Total Preference: 1,103
- Exchange of Use: 93
- Average Actual Use: 629

**Other Forage Demands (AUMs)**
- Deer: 68
- Elk: 92
- Antelope: 68
- Horses: 160
- Total: 160
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Cluster</th>
<th>Allot. No.: 7017</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>7,843</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
</tr>
<tr>
<td>*Carrying Capacity:</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Total:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
<td></td>
</tr>
<tr>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
<td></td>
</tr>
</tbody>
</table>

**CONCONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

* Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

<table>
<thead>
<tr>
<th>Allotment Name: Silver Lake</th>
<th>Allot. No.: 7018</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>16,933</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>Total:</td>
</tr>
</tbody>
</table>

Appendix I-132
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Juniper Ridge</th>
<th>Allot. No.: 7016</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 26,784</td>
<td>Other Acres: 2,412</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 2,041  
Suspended Nonuse: 0  
Total Preference: 2,076  
Exchange of Use: 30  
*Carrying Capacity: 1,102  
Average Actual Use: 1.073

Other Forage Demands (AUMs)  
Deer: 34  
Elk: 0  
Antelope: 4  
Horses:  
Total: 38

**Identified Resource Conflicts/Concerns**

Limiting big game habitat in unsatisfactory habitat condition.

Playa habitat occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, Allium brandegei

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve and maintain big game habitat in satisfactory habitat condition.

Incorporate playa management objectives into allotment management as such objectives are developed.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**Constraints**

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Cluster</th>
<th>Allot. No.: 7017</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 7,843</td>
<td><strong>Allot. No.:</strong> 7017</td>
<td><strong>Mgmt. Category:</strong> M</td>
</tr>
<tr>
<td><strong>Other Acres:</strong> 13,697</td>
<td><strong>Other Acres:</strong> 13,697</td>
<td><strong>Mgmt. Category:</strong> M</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

- **Active Preference:** 548
- **Suspended Nonuse:** 0
- **Total Preference:** 548
- **Average Actual Use:** 315

**Other Forage Demands (AUMs)**

- **Deer:** 5
- **Elk:**
- **Antelope:** 1
- **Horses:**
- **Total:** 6

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment:

- sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

<table>
<thead>
<tr>
<th>Allotment Name: Silver Lake</th>
<th>Allot. No.: 7018</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 16,933</td>
<td><strong>Allot. No.:</strong> 7018</td>
<td><strong>Mgmt. Category:</strong> I</td>
</tr>
<tr>
<td><strong>Other Acres:</strong> 978</td>
<td><strong>Other Acres:</strong> 978</td>
<td><strong>Mgmt. Category:</strong> I</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

- **Active Preference:** 1,755
- **Suspended Nonuse:** 0
- **Total Preference:** 1,755
- **Exchange of Use:** 36
- **Average Actual Use:** 1,406

**Other Forage Demands (AUMs)**

- **Deer:** 5
- **Elk:**
- **Antelope:** 2
- **Horses:**
- **Total:** 7

Appendix I-132
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetlands habitat in less than satisfactory condition.</td>
<td>Improve wetlands habitat condition to satisfactory or better.</td>
</tr>
<tr>
<td>Playa habitat occurs in the allotment.</td>
<td>Incorporate playa management objectives into allotment management as such objectives are developed.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, snowy plover</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

---

**Allotment Name: Palomino Buttes**

<table>
<thead>
<tr>
<th>Public Acres:</th>
<th>48,266</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allot. No.:</td>
<td>7019</td>
</tr>
<tr>
<td>Mgmt. Category:</td>
<td>I</td>
</tr>
<tr>
<td>Other Acres:</td>
<td>1,734</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>2,806</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>89</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>2,895</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>24</td>
</tr>
<tr>
<td>*Carrying Capacity:</td>
<td>3,041</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>3,280</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

The allotment contains all or a portion of the Palomino Buttes Wild Horse Herd Management Area. **Management Objectives**

Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.
LIMITING big game habitat in unsatisfactory habitat condition.

Playa habitat occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, Ferruginous hawk, Eriogonum cusicki

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Improve and maintain big game habitat in satisfactory habitat condition.

Incorporate playa management objectives into allotment management as such objectives are developed.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

* Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Sand Hollow</th>
<th>Allot. No.: 7020</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 10,240</td>
<td>Other Acres:</td>
<td>5,650</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 532</td>
<td>Deer: 33</td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 532</td>
<td>Antelope: 9</td>
</tr>
<tr>
<td>Average Actual Use: 512</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td>Total: 42</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

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**Management Objectives**

Protect special status species or its habitat from impact by BLM-authorized actions.
Table 9. Allotment Management Summaries (continued)

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded. Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRANTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Weaver Lake</th>
<th>Allot. No.: 7021</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>23,323</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>1,396</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>73</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>1,469</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>1,595</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

Playa habitat occurs in the allotment.

The allotment contains all or a portion of the Palomino Buttes Wild Horse Herd Management Area.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, Ferruginous hawk

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Incorporate playa management objectives into allotment management as such objectives are developed.

Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)
Table 9. Allotment Management Summaries (continued)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Dog Mountain</th>
<th>Allot. No.: 7022</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 5,120</td>
<td>Other Acres:</td>
<td>735</td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>176</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>176</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>0</td>
</tr>
</tbody>
</table>

**Other Forage Demands (AUMs)**

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>27</td>
<td></td>
<td></td>
<td></td>
<td>27</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: West Sagehen</th>
<th>Allot. No.: 7023</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 13,461</td>
<td>Other Acres: 495</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Demand</th>
<th>AUMs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>1,911</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>70</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>1,981</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>77</td>
</tr>
<tr>
<td>*Carrying Capacity:</td>
<td>1,010</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>1,120</td>
</tr>
</tbody>
</table>

Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th>Demand</th>
<th>AUMs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer:</td>
<td>64</td>
</tr>
<tr>
<td>Elk:</td>
<td>32</td>
</tr>
<tr>
<td>Antelope:</td>
<td>7</td>
</tr>
<tr>
<td>Horses:</td>
<td>103</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Limiting big game habitat in unsatisfactory habitat condition.

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, *Eriogonum cusickii*

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by ELM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: East Sagehen</th>
<th>Allot. No.: 7024</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 23,796</td>
<td>Other Acres: 5,033</td>
<td></td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

<table>
<thead>
<tr>
<th>Preference</th>
<th>Suspended Nonuse</th>
<th>Total Preference</th>
<th>Exchange of Use</th>
<th>*Carrying Capacity</th>
<th>Average Actual Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer: 2,510</td>
<td>108</td>
<td>2,618</td>
<td>15</td>
<td>1,791</td>
<td>1,596</td>
</tr>
<tr>
<td>Elk: 108</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Antelope: 4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Horses:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Other Forage Demands (AUMs)**

<table>
<thead>
<tr>
<th>Deer</th>
<th>Elk</th>
<th>Antelope</th>
<th>Horses</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>105</td>
<td>22</td>
<td>4</td>
<td></td>
<td>131</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

- Active erosion occurs in the allotment.
- Limiting big game habitat in unsatisfactory habitat condition.
- No forage allocations for elk use in the allotment have been made.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, *Eriogonum cusickii*
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

- Improve and maintain erosion condition in moderate or better erosion condition.
- Improve and maintain big game habitat in satisfactory habitat condition.
- Allocate forage to meet elk forage demands.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Horton Mill</th>
<th>Allot. No.: 7026</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 3,520</td>
<td>Other Acres: 810</td>
<td></td>
</tr>
</tbody>
</table>

#### Grazing Administration Info. (AUMs)

| Active Preference: 503 | Deer: 15 |
| Suspended Nonuse: 200   | Elk:     |
| Total Preference: 703   | Antelope: 1 |
| Exchange of Use: 17     | Horses:   |
| Average Actual Use: 305 | Total: 16 |

#### Identified Resource Conflicts/Concerns
- Active erosion occurs in the allotment.
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

#### Identified Resource Management Objectives
- Improve and maintain erosion condition in moderate or better erosion condition.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### CONSTRAINTS
- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

---

<table>
<thead>
<tr>
<th>Allotment Name: Emigrant Creek</th>
<th>Allot. No.: 7027</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 225</td>
<td>Other Acres: 1,360</td>
<td></td>
</tr>
</tbody>
</table>

#### Grazing Administration Info. (AUMs)

| Active Preference: 112 | Deer: 1 |
| Suspended Nonuse: 0     | Elk:    |
| Total Preference: 112   | Antelope: |
| Average Actual Use: 250 | Horses: |

**Deer: 15**

**Elk:**

**Antelope:**

**Horses:**

**Total:**
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Gouldin</th>
<th>Allot. No.: 7025</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 4,091</td>
<td>Other Acres:</td>
<td>2,350</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

Active Preference: 567
Suspended Nonuse: 28
Total Preference: 595
Exchange of Use: 189
*Carrying Capacity: 501
Average Actual Use: 432

Other Forage Demands (AUMs)

Deer: 43
Elk: 28
Antelope: 595
Horses: 189
Total: 43

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.
Intensive recreation use occurs within the allotment.
Limiting big game habitat in unsatisfactory habitat condition.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Improve and maintain erosion condition in moderate or better erosion condition.
Incorporate recreation management objectives into overall allotment management system.
Improve and maintain big game habitat in satisfactory habitat condition.
Protect special status species or its habitat from impact by BLM-authorized actions.
Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Appendix I-139
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Horton Mill</th>
<th>Allot. No.: 7026</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 3,520</td>
<td>Other Acres: 810</td>
<td></td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 503</td>
<td>Deer: 15</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 200</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 703</td>
<td>Antelope: 1</td>
<td></td>
</tr>
<tr>
<td>Exchange of Use: 17</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 305</td>
<td>Total: 16</td>
<td></td>
</tr>
</tbody>
</table>

#### Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

#### Management Objectives

- Improve and maintain erosion condition in moderate or better erosion condition.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

#### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Emigrant Creek</th>
<th>Allot. No.: 7027</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 225</td>
<td>Other Acres: 1,360</td>
<td></td>
</tr>
<tr>
<td><strong>Grazing Administration info. (AUMs)</strong></td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 112</td>
<td>Deer: 1</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 112</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 250</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

Appendix I-140
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: redband trout</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Stinger Creek</th>
<th>Allot. No.: 7028</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 50</td>
<td>Other Acres: 265</td>
<td>Other Forage Demands (AUMs)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Preference: 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Spring Creek</th>
<th>Allot. No.: 7029</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,509</td>
<td>Other Acres: 990</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 51
- Suspended Nonuse: 0
- Total Preference: 51
- *Carrying Capacity: 100
- Average Actual Use: 32

Other Forage Demands (AUMs)

- Deer: 13
- Elk: 24
- Antelope: 8
- Horses: 386

Identified Resource Conflicts/Concerns

- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- Riparian or aquatic habitat is in less than good habitat condition.

Management Objectives

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Constraints

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

<table>
<thead>
<tr>
<th>Allotment Name: Skull Creek</th>
<th>Allot. No.: 7030</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 27,500</td>
<td>Other Acres: 10,414</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 2,458
- Suspended Nonuse: 1,130
- Total Preference: 3,588
- *Carrying Capacity: 2,871
- Average Actual Use: 1,823

Other Forage Demands (AUMs)

- Deer: 354
- Elk: 24
- Antelope: 8
- Horses: 386

Appendix I-142
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>Active erosion occurs in the allotment.</td>
<td>Improve and maintain erosion condition in moderate or better erosion condition.</td>
</tr>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: redband trout, sage grouse</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Hay Creek</th>
<th>Allot. No.: 7031</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>5,754</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>585</td>
<td>Deer: 29</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk: 20</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>585</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>540</td>
<td>Horses: 49</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: redband trout.

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Hotchkiss</th>
<th>Allot. No.: 7032</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>415</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

- **Grazing Administration Info. (AUMs)**
  - Active Preference: 26
  - Suspended Nonuse: 0
  - Total Preference: 26
  - Average Actual Use: 22

- **Other Forage Demands (AUMs)**
  - Deer: 3
  - Elk: 0
  - Antelope: 0
  - Horses: 0

**Identified Resource Conflicts/Concerns**
- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: redband trout

**Management Objectives**
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**
- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.
- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reducethevariety of plant species or communities in abundances necessary for their continued existence and normal functioning.
- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Silvies River</th>
<th>Allot. No.: 7033</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,044</td>
<td>Other Acres: 699</td>
<td></td>
</tr>
</tbody>
</table>

**Grazing Administration Info. (AUMs)**

<table>
<thead>
<tr>
<th>Active Preference:</th>
<th>Deer:</th>
</tr>
</thead>
<tbody>
<tr>
<td>245</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Suspended Nonuse: 0</th>
<th>Elk:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>24</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total Preference: 245</th>
<th>Antelope:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Exchange of Use: 309</th>
<th>Horses:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>*Carrying Capacity: 301</th>
<th>Total: 28</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Average Actual Use: 189</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: redband trout
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

**CONTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation*
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Scat Field</th>
<th>Allot. No.: 7034</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>837</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1,826</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>96</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>96</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>181</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Management Objectives**

No forage allocations for elk use in the allotment have been made.

Allocate forage to meet elk forage demands.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size, Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Silvies Meadows</th>
<th>Allot. No.: 7035</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,356</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3,150</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>158</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>158</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>411</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

**Management Objectives**

Water quality does not currently meet DEQI water quality standards for beneficial uses.

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Appendix I-147
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Scat Field</th>
<th>Allot. No.: 7034</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>837</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>96</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>96</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>181</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns
No forage allocations for elk use in the allotment have been made.

Management Objectives
Allocate forage to meet elk forage demands.

CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Silvies Meadows</th>
<th>Allot. No.: 7035</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>1,356</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>158</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>158</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>411</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns
Water quality does not currently meet DEQ water quality standards for beneficial uses.

Management Objectives
Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
Table 9. Allotment Management Summaries (continued)

No forage allocations for elk use in the allotment have been made.

Allocate forage to meet elk forage demands.

Riparian or aquatic habitat is in less than good habitat condition.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: redband trout

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Hayes</th>
<th>Allot. No.: 7036</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>5,400</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

Active Preference: 329
Suspends Nonuse: 761
Total Preference: 1,090
Exchange of Use: 77
Average Actual Use: 262

Other Forage Demands (AUMs)

Deer: 68
Elk:
Antelope:
Horses:
Total: 68

Identified Resource Conflicts/Concerns

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Management Objectives

Protect special status species or its habitat from impact by BLM-authorized actions.

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

Appendix I-148
### Table 9. Allotment Management Summaries (continued)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Coal Pit Springs</th>
<th>Allot. No.: 7037</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,895</td>
<td>Other Acres:</td>
<td>6,890</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 370</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 105</td>
<td>Deer: 29</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 475</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 265</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 29</td>
<td></td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Active erosion occurs in the allotment.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

**Management Objectives**

Improve and maintain erosion condition in moderate or better erosion condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Curry Gordon</th>
<th>Allot. No.: 7038</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 729</td>
<td>Other Acres:</td>
<td>340</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 72</td>
<td>Deer: 10</td>
</tr>
<tr>
<td>Suspended Nonuse: 31</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 103</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use: 18</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use: 69</td>
<td>Total: 10</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse.

**Management Objectives**

- Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Cave Gulch</th>
<th>Allot. No.: 7039</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 2,004</td>
<td>Other Acres:</td>
<td>35</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grazing Administration Info. (AUMs)</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference: 210</td>
<td>Deer: 30</td>
</tr>
<tr>
<td>Suspended Nonuse: 140</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference: 350</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use: 144</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td>Total: 30</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

**Management Objectives**

Appendix I-I 50
Table 9. Allotment Management Summaries (continued)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Landing Creek</th>
<th>Allot. No.: 7040</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>3,614</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>189</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>740</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>740</td>
<td>Antelope:</td>
</tr>
<tr>
<td>*Carrying Capacity:</td>
<td>310</td>
<td>Horses:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>172</td>
<td>Total:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>75</td>
</tr>
</tbody>
</table>

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment:
sage grouse, redband trout

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

**Management Objectives**

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)
Table 9. Allotment Management Summaries (continued)

CONSTRAINTS
Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

<table>
<thead>
<tr>
<th>Allotment Name: East Silvies</th>
<th>Allot. No.: 7041</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 4,294</td>
<td>Other Acres:</td>
<td>965</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)
- Active Preference: 594
- Suspended Nonuse: 0
- Total Preference: 594
- Average Actual Use: 712

Other Forage Demands (AUMs)
- Deer: 50
- Elk: 32
- Antelope: 82

Identified Resource Conflicts/Concerns
Water quality does not currently meet DEQ water quality standards for beneficial uses.

Active erosion occurs in the allotment.

No forage allocations for elk use in the allotment have been made.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: redband trout

Management Objectives
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Improve and maintain erosion condition in moderate or better erosion condition.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.

Appendix I-152
Table 9. Allotment Management Summaries (continued)

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded. Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS
Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Dole Smith</th>
<th>Allot. No.: 7042</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 445</td>
<td>Other Acres: 1,565</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference: 25</td>
<td>Deer: 3</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 6</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 25</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 53</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total: 9</td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns
No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Management Objectives
Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Lone Pine</th>
<th>Allot. No.: 7043</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>15,131</td>
<td>Other Acres:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>370</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>2,137</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>2,137</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Exchange of Use:</td>
<td>20</td>
<td>Horses:</td>
</tr>
<tr>
<td>*Carrying Capacity:</td>
<td>1,854</td>
<td>Total:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>1,585</td>
<td></td>
</tr>
</tbody>
</table>

### Identified Resource Conflicts/Concerns

- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- No forage allocations for elk use in the allotment have been made.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin
- Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

### Management Objectives

- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Allocate forage to meet elk forage demands.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.
- Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

### CONSTRAINTS

- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Appendix I-154
Table 9. Allotment Management Summaries (continued)

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded. Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Dole Smith</th>
<th>Allot. No.: 7042</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>445</td>
<td>Other Acres: 1,565</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>25</td>
<td>3</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk: 6</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>25</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>53</td>
<td>Horses:</td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Lone Pine</th>
<th>Allot. No.: 7043</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Acres:</strong> 15,131</td>
<td><strong>Other Acres:</strong></td>
<td>370</td>
</tr>
<tr>
<td><strong>Allot. No.:</strong> 7043</td>
<td><strong>Mgmt. Category:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Grazing Administration Info. (AUMs)</strong></td>
<td><strong>Other Forage Demands (AUMs)</strong></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 2,137</td>
<td>Deer: 135</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk: 20</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 2,137</td>
<td>Antelope: 8</td>
<td></td>
</tr>
<tr>
<td>Exchange of Use: 20</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td><em>Carrying Capacity:</em> 1,854</td>
<td>Total: 163</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 1,585</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Identified Resource

<table>
<thead>
<tr>
<th>Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water quality does not currently meet DEQ water quality standards for beneficial uses.</td>
<td>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</td>
</tr>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
<tr>
<td>Riparian or aquatic habitat is in less than good habitat condition.</td>
<td>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</td>
</tr>
<tr>
<td>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin</td>
<td>Protect special status species or its habitat from impact by BLM-authorized actions.</td>
</tr>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

#### CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Appendix I-154
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Cowing</th>
<th>Allot. No.: 7044</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>260</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 20  
Suspended Nonuse: 0  
Total Preference: 20  
Average Actual Use: 20

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
</tbody>
</table>

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Whiting</th>
<th>Allot. No.: 7045</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>399</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 46  
Suspended Nonuse: 0  
Total Preference: 48  
Average Actual Use: 48

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>No forage allocations for elk use in the allotment have been made.</td>
<td>Allocate forage to meet elk forage demands.</td>
</tr>
</tbody>
</table>

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
<table>
<thead>
<tr>
<th>Allotment Name: Baker Hill Field</th>
<th>Allot. No.: 7046</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 188</td>
<td>Other Acres: 522</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Preference:</td>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
</tbody>
</table>

Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

Management Objectives

Allocate forage to meet elk forage demands.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Peabody</th>
<th>Allot. No.: 7047</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 268</td>
<td>Other Acres: 1,514</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Preference:</td>
<td>60</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Preference:</td>
<td>60</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>67</td>
<td></td>
<td></td>
<td></td>
<td>4</td>
</tr>
</tbody>
</table>

Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th></th>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>2</td>
<td>1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

Management Objectives

Allocate forage to meet elk forage demands.
Table 9. Allotment Management Summaries (continued)

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Varien Canyon</th>
<th>Allot. No.: 7048</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 317</td>
<td>Other Acres:</td>
<td>2,696</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 14  
Suspended Nonuse: 0  
Total Preference: 14  
Average Actual Use: 14

Other Forage Demands (AUMs)  
Deer: 6  
Elk: 4  
Antelope:  
Horses:  
Total: 10

**Identified Resource Conflicts/Concerns**  
Water quality does not currently meet DEQ water quality standards for beneficial uses.

No forage allocations for elk use in the allotment have been made.

**Management Objectives**  
Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Allocate forage to meet elk forage demands.

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Forks of Poison Creek Allot. No.: 7049</th>
<th>Mgmt. Category: 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 3,431</td>
<td>Other Acres: 178</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)

Active Preference: 648 Deer: 31
Suspended Nonuse: 0 Elk: 13
Total Preference: 648 Antelope:
Average Actual Use: 340 Horses:
Total: 44

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Clemens</th>
<th>Allot. No.: 7050</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>466</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 57 
Suspended Nonuse: 0 
Total Preference: 57 
Average Actual Use: 67

Other Forage Demands (AUMs)  
Deer: 4

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Sawtooth MNF</th>
<th>Allot. No.: 7051</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>535</td>
<td>Other Acres:</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)  
Active Preference: 32 
Suspended Nonuse: 0 
Total Preference: 32 
Average Actual Use: 25

Other Forage Demands (AUMs)  
Deer: 4

Identified Resource Conflicts/Concerns

Management Objectives

Water quality does not currently meet DEQ water quality standards for beneficial uses.

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
Riparian or aquatic habitat is in less than good habitat condition. Improve and maintain riparian or aquatic habitat in good or better habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: redband trout.

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Lone Pine Field</th>
<th>Allot. No.: 7052</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 160</td>
<td>Other Acres: 320</td>
<td></td>
</tr>
</tbody>
</table>

### Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference:</th>
<th>Suspended Nonuse:</th>
<th>Total Preference:</th>
<th>Average Actual Use:</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>0</td>
<td>6</td>
<td>30</td>
</tr>
</tbody>
</table>

### Other Forage Demands (AUMs)

<table>
<thead>
<tr>
<th>Deer:</th>
<th>Elk:</th>
<th>Antelope:</th>
<th>Horses:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

### Identified Resource Conflicts/Concerns

### Management Objectives

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Appendix I-1 60
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Silvies Canyon</th>
<th>Allot. No.: 7053</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 925</td>
<td>Other Acres: 15</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)
- Active Preference: 100
- Suspended Nonuse: 0
- Total Preference: 100
- Average Actual Use: 112

Other Forage Demands (AUMs)
- Deer: 10

Identified Resource Conflicts/Concerns
- Water quality does not currently meet DEQ water quality standards for beneficial uses.
- Riparian or aquatic habitat is in less than good habitat condition.
- At this time, the following special status species or its habitat is known to exist within the allotment: redband trout

Management Objectives
- Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
- Improve and maintain riparian or aquatic habitat in good or better habitat condition.
- Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS
- Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.
- Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
- Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Cricket Creek</th>
<th>Allot. No.: 7054</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 970</td>
<td>Other Acres:</td>
<td>480</td>
</tr>
<tr>
<td>Other Forage Demands (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 40</td>
<td>Deer: 6</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 40</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 156</td>
<td>Horses:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
</table>

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Double “O”</th>
<th>Allot. No.: 7056</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 4,317</td>
<td>Other Acres:</td>
<td>3,236</td>
</tr>
<tr>
<td>Other Forage Demands (AUMs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Active Preference: 0</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>*Carrying Capacity: 1,320</td>
<td>Horses:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 847</td>
<td>Total:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
</table>

At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

*Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

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### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Wright’s Point</th>
<th>Allot. No.: 7057</th>
<th>Mgmt. Category: M</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 590</td>
<td>Other Acres:</td>
<td>80</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference: 0</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Average Actual Use: 40</td>
<td>Antelope:</td>
</tr>
</tbody>
</table>

**Management Objectives**

Establish management system.

**Unallotted** grazing area.

**CONTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Narrows</th>
<th>Allot. No.: 7058</th>
<th>Mgmt. Category: I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 1,876</td>
<td>Other Acres:</td>
<td>910</td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

<table>
<thead>
<tr>
<th>Active Preference: 82</th>
<th>Other Forage Demands (AUMs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Total Preference: 82</td>
<td>Elk:</td>
</tr>
<tr>
<td>Average Actual Use: 449</td>
<td>Antelope:</td>
</tr>
<tr>
<td></td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</td>
<td>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</td>
</tr>
</tbody>
</table>

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Carp</th>
<th>Allot. No.: 7059</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>646</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference:</td>
<td>0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>0</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>21</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Identified Resource Conflicts/Concerns</th>
<th>Management Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unallotted grazing area.</td>
<td>Issue temporary nonrenewable license unless allotted.</td>
</tr>
</tbody>
</table>

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Castle</th>
<th>Allot. No.: 7060</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 751</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) | Other Forage Demands (AUMs) |
Active Preference: 0 | Deer: 5 |
Suspended Nonuse: 0 | Elk: |
Total Preference: 0 | Antelope: |
Average Actual Use: 7 | Horses: 1 |
Total: 6 |

**Identified Resource Conflicts/Concerns**
Unallotted grazing area.

**Management Objectives**
Issue temporary nonrenewable license unless allotted.

**CONSTRAINTS**
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Bulger</th>
<th>Allot. No.: 7061</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 320</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs) | Other Forage Demands (AUMs) |
Active Preference: 0 | Deer: 0 |
Suspended Nonuse: 0 | Elk: 0 |
Total Preference: 0 | Antelope: 0 |
Average Actual Use: 0 | Horses: 0 |
Total: 0 |

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Devine Canyon</th>
<th>Allot. No.: 7080</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>
| Grazing Administration Info. (AUMs) | Other Forage Demands (AUMs) |峻
| Active Preference:           | 0               | Deer: 5          |
| Suspended Nonuse:            | 0               | Elk:             |
| Total Preference:            | 0               | Antelope:        |
| Average Actual Use:          | 0               | Horses:          |
|                              |                 | Total: 5         |

**Identified Resource Conflicts/Concerns**

Water quality does not currently meet DEQ water quality standards for beneficial uses.

At this time, the following special status species or its habitat is known to exist within the allotment: redband trout, Malheur mottled sculpin

No authorized grazing use.

**Management Objectives**

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Protect special status species or its habitat from impact by BLM-authorized actions.

**CONSTRAINTS**

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Harney Basin</th>
<th>Allot. No.: 7081</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td>640</td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>0</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>0</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

<table>
<thead>
<tr>
<th>Allotment Name: Hines Field</th>
<th>Allot. No.: 7082</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres:</td>
<td></td>
<td>Other Acres:</td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td></td>
<td>Other Forage Demands (AUMs)</td>
</tr>
<tr>
<td>Active Preference:</td>
<td>0</td>
<td>Deer:</td>
</tr>
<tr>
<td>Suspended Nonuse:</td>
<td>0</td>
<td>Elk:</td>
</tr>
<tr>
<td>Total Preference:</td>
<td>0</td>
<td>Antelope:</td>
</tr>
<tr>
<td>Average Actual Use:</td>
<td>0</td>
<td>Horses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Total:</td>
</tr>
</tbody>
</table>

**Identified Resource Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Rainbow Creek</th>
<th>Allot. No.: 7085</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 160</td>
<td>Other Acres:</td>
<td></td>
</tr>
<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 0</td>
<td>Deer: 1</td>
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<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 0</td>
<td>Horses:</td>
<td></td>
</tr>
</tbody>
</table>

### Identified Resource Conflicts/Concerns

### Management Objectives

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

<table>
<thead>
<tr>
<th>Allotment Name: Silver Creek Valley</th>
<th>Allot. No.: 7087</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 40</td>
<td>Other Acres:</td>
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<tr>
<td>Grazing Administration Info. (AUMs)</td>
<td>Other Forage Demands (AUMs)</td>
<td></td>
</tr>
<tr>
<td>Active Preference: 0</td>
<td>Deer:</td>
<td></td>
</tr>
<tr>
<td>Suspended Nonuse: 0</td>
<td>Elk:</td>
<td></td>
</tr>
<tr>
<td>Total Preference: 0</td>
<td>Antelope:</td>
<td></td>
</tr>
<tr>
<td>Average Actual Use: 0</td>
<td>Horses:</td>
<td></td>
</tr>
</tbody>
</table>

### Identified Resource Conflicts/Concerns

### Management Objectives

### CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
### Table 9. Allotment Management Summaries (continued)

<table>
<thead>
<tr>
<th>Allotment Name: Sunset Valley</th>
<th>Allot. No.: 7088</th>
<th>Mgmt. Category: C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Acres: 5360</td>
<td>Other Acres:</td>
<td></td>
</tr>
</tbody>
</table>

Grazing Administration Info. (AUMs)

- Active Preference: 0
- Suspended Nonuse: 0
- Total Preference: 0
- Average Actual Use: 0

Other Forage Demands (AUMs)

- Deer: 0
- Elk: 0
- Antelope: 0
- Horses: 0
- Total: 0

**Identified Resource Conflicts/Concerns**

**Management Objectives**

**CONSTRAINTS**

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.
<table>
<thead>
<tr>
<th>Allot. Number</th>
<th>Allotment Name</th>
<th>Range Condition</th>
<th>Allotment Potential</th>
<th>Present Productivity</th>
<th>Resource Conflicts</th>
<th>Controversy</th>
<th>Present Mgmt</th>
<th>Prudent Investor’s Willingness</th>
<th>Crit. Mgmt</th>
<th>Selectiv Mgmt Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>4097</td>
<td>Trout Creek</td>
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<tr>
<td>5215</td>
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<td>Texaco Basin</td>
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<tr>
<td>7001</td>
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<tr>
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<tr>
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</tr>
<tr>
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<td>Claw Creek</td>
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<tr>
<td>7012</td>
<td>Packsaddle</td>
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<td></td>
</tr>
</tbody>
</table>

| M            | Poison Creek | X               | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
| 4096         | Hi Desert | X               | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
| 4126         | Abrahams Draw | X           | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
| 4138         | White | X               | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
| 4180         | King Mountain | X           | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
| 5001         | Crane FFR | X               | Unknown             | X                 | X                | X            | X            | X                           | C           |                      |
| 5002         | Catterson | X               | Unknown             | X                 | X                | X            | X            | X                           | C           |                      |
| Sec 13       | Malheur Slough | X           | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
| 5003         | Malheur Slough | X           | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
| 5005         | Withers FFR | X               | X                   | Unknown             | X                 | X                | X            | X                           | C           |                      |
|-------|------------|-------|-----------|---------|----------|---------|---------|-------|----------|
| Number | Name       | Condition | Potential | Productivity | Conflicts | Controversy | Mgmt | Investor’s | Mgmt |
| 5107   | Manning Field | Sat Unsat | Unknown | x | x | x | x | x | C |
| 5109   | Purdy FFR | x | Unknown | x | x | x | x | x | C |
| 5110   | Reed FFR | x | Unknown | x | x | x | x | x | C |
| 5111   | Temple’s FFR | x | Unknown | x | x | x | x | x | C |
| 5112   | Smith FFR | x | Unknown | x | x | x | x | x | C |
| 5113   | Rattlesnake FFR | x | Unknown | x | x | x | x | x | C |
| 5203   | Catterson | x | Unknown | x | x | x | x | x | C |
| 5211   | Beckley Home | x | Unknown | x | x | x | x | x | C |
| 5216   | Quier FFR | x | Unknown | x | x | x | x | x | C |
| 5217   | Thompson FFR | x | Unknown | x | x | x | x | x | C |
| 5218   | Bennett FFR | x | Unknown | x | x | x | x | x | C |
| 5219   | Hamilton FFR | x | Unknown | x | x | x | x | x | C |
| 5311   | Virginia FFR | x | Unknown | x | x | x | x | x | C |
| 5317   | Hatt Butte | x | Unknown | x | x | x | x | x | C |
| 5318   | Black Butte | x | Unknown | x | x | x | x | x | C |
| 5322   | Briggs FFR | x | Unknown | x | x | x | x | x | C |
| 5323   | Clemens FFR | x | Unknown | x | x | x | x | x | C |
| 5354   | Riddle FFR | x | Unknown | x | x | x | x | x | C |
| 5355   | Marshall | x | Unknown | x | x | x | x | x | C |
| 5356   | Jenkins N. | x | Unknown | x | x | x | x | x | C |
| 5357   | Lake FFR | x | Unknown | x | x | x | x | x | C |
| 5382   | Jenkins B. | x | Unknown | x | x | x | x | x | C |
| 5387   | Flat FFR | x | Unknown | x | x | x | x | x | C |
| 5504   | State Field | x | Unknown | x | x | x | x | x | C |
| 5512   | Clark Field | x | Unknown | x | x | x | x | x | C |
| 5518   | Newell Field | x | Unknown | x | x | x | x | x | C |
| 5519   | Big Upson | x | Unknown | x | x | x | x | x | C |
| 5520   | Little Upson | x | Unknown | x | x | x | x | x | C |
| 5527   | Riverside FFR | x | Unknown | x | x | x | x | x | C |
| 5539   | W & C Blaylock | x | Unknown | x | x | x | x | x | C |
| 5540   | Luco Field | x | Unknown | x | x | x | x | x | C |
| 5541   | Home Ranch | x | Unknown | x | x | x | x | x | C |
| 5542   | Marshall FFR | x | Unknown | x | x | x | x | x | C |
| 5543   | Divine Flat Field | x | Unknown | x | x | x | x | x | C |
| 5544   | Brooks Field | x | Unknown | x | x | x | x | x | C |
| 5545   | Sunshine Field | x | Unknown | x | x | x | x | x | C |
| 5546   | Druitt Field | x | Unknown | x | x | x | x | x | C |
| 5547   | Lake Field | x | Unknown | x | x | x | x | x | C |
| 5548   | Griffin FFR | x | Unknown | x | x | x | x | x | C |
|--------------|------------------|-----------------|---------------------|-------------------|-------------|-------------------------------|---------------------|
| 5549         | Howards FFR      | Sat             | Unknown             | x                  | x           | x                            | x                   |
| 5550         | Jordans FFR      | X               | Unknown             | X                  | X           | X                            | C                   |
| 5551         | Lillards FFR     | X               | Unknown             | X                  | X           | X                            | C                   |
| 5552         | Miller FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5553         | Miller FFRB      | X               | Unknown             | X                  | X           | X                            | C                   |
| 5554         | J. Francis       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5555         | Miller FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5556         | Ort FFR          | X               | Unknown             | X                  | X           | X                            | C                   |
| 5557         | Pin Creek FFR    | X               | Unknown             | X                  | X           | X                            | C                   |
| 5558         | J & G. Kane FFR  | X               | Unknown             | X                  | X           | X                            | C                   |
| 5559         | Swords FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5560         | Vickers FFR      | X               | Unknown             | X                  | X           | X                            | C                   |
| 5561         | Wilber FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5562         | Williams FFR     | X               | Unknown             | X                  | X           | X                            | C                   |
| 5563         | Arnold FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5564         | Miller FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5565         | Byron FFR        | X               | Unknown             | X                  | X           | X                            | C                   |
| 5566         | Floyds FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5567         | River FFR        | X               | Unknown             | X                  | X           | X                            | C                   |
| 5568         | Krueger FFR      | X               | Unknown             | X                  | X           | X                            | C                   |
| 5569         | Zoglmann          | X               | Unknown             | X                  | X           | X                            | C                   |
| 5570         | Scat Field       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5571         | Peabody          | X               | Unknown             | X                  | X           | X                            | C                   |
| 5572         | Varian FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5573         | Clemens          | X               | Unknown             | X                  | X           | X                            | C                   |
| 5574         | Lone Pine FFR    | X               | Unknown             | X                  | X           | X                            | C                   |
| 5575         | Cricket FFR      | X               | Unknown             | X                  | X           | X                            | C                   |
| 5576         | Castle           | X               | Unknown             | X                  | X           | X                            | C                   |
| 5577         | Devine FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5578         | Hines FFR        | X               | Unknown             | X                  | X           | X                            | C                   |
| 5579         | Rainbow FFR      | X               | Unknown             | X                  | X           | X                            | C                   |
| 5580         | Silver FFR       | X               | Unknown             | X                  | X           | X                            | C                   |
| 5581         | Sunset Valley    | X               | Unknown             | X                  | X           | X                            | C                   |
Table 11. Rangeland Monitoring and Evaluation

Purpose of Monitoring

1) To determine the effects of management actions on the rangeland resources.
2) To determine the effectiveness of on-the-ground management actions in achieving resource management objectives within planned timeframes.
3) To provide quantifiable data to identify and support needed management actions.
4) To provide quantifiable data for the periodic review of management objectives.

Monitoring Methods

Monitoring methods must be suitable for the vegetation types and resource conditions that will be encountered. The capability of the methods to detect subtle changes due to management over short periods of time must be carefully considered.

For monitoring data to be meaningful and useful over time, there must be consistency in the kinds of data that are collected and the manner in which they are collected. However, the need for changes in sampling may occasionally arise when problems are detected during a cursory review of the collected data, when analyzing and interpreting the data, or when conducting an evaluation. Serious consideration must be given to the effect changes will have on the historical value of existing data.

The methods discussed here are the methods currently in use in the Three Rivers RA. These methods are consistent with the District Monitoring Plan, State Monitoring Guidance and Bureau Policy.

Actual Use

Actual use monitoring provides information concerning the actual amount of grazing use occurring on an area of rangeland during a specific time period. It is a record of livestock and wild horse use in each pasture of an allotment and represents forage consumed in terms of AUMs. Livestock actual use is provided by the permittees. Data is verified by field checks and occasional counts. The report includes livestock numbers, pasture usage and turn out and gathering dates.

Wild horse actual use is determined by multiplying inventoried numbers by the grazing period on their summer and winter range. This may or may not involve separate pastures.

Actual use is collected in all “M” and “I” category allotments annually.

Utilization

Utilization data are collected to provide information concerning the percentage of forage that has been consumed or destroyed on an area of rangeland during a specific period of time and the grazing pattern on the allotment. Utilization data are important in evaluating the effects of grazing use on specific areas of rangeland and identifying areas of concentrated use that may be dispersed by some form of range improvement.

In the short term, utilization data are considered with actual use and climatic data to determine resource use levels and to identify the need for range improvement projects, adjustment in management actions, and/or adjustments in grazing use levels. These data can be used as the basis for implementing adjustments in grazing use through agreement or by decision.

In the long term, utilization data are considered along with actual use, authorized use, estimated use, trend, climate, and any other data available or necessary for allotment evaluation. Evaluations are conducted to determine if the grazing management actions and/or practices are achieving the long-term management objectives identified in the land-use and activity plans.

The primary method used in the RA is the Key Forage Plant method. The key forage plant method is an ocular estimate method of judging utilization within one of six utilization classes on one or more key herbaceous and/or browse species. Utilization is generally expressed as a percentage of available forage weight or numbers of plants, twigs, etc., that have been consumed or destroyed, and is expressed in terms of the current year’s production removed.

Trend

Trend data are important in determining the effectiveness of on-the-ground management actions and evaluating progress toward meeting management objectives. They indicate whether the rangeland is moving toward or away from its potential or from achieving specific management objectives. Trend refers to the direction of change and indicated whether rangeland vegetation is being maintained or is moving toward or away from the desired plant community or toward or away from other specific vegetation management objectives. Trends of rangelands may be judged by noting changes in composition, density, cover, production, vigor, age class, and frequency of the vegetation, and related parameters of other resources.

The trend method used in the RA is the Nearest Plant method, which consists of a minimum of 100 observations along a transect at one pace, or other selected intervals. The observation is the nearest plant within a 180 degree arc from the center of the front of the observer’s foot. Close-up and general view photographs are used with this method.
Table 11. Rangeland Monitoring and Evaluation (continued)

This method provides an estimate of relative species dispersion. The indicators of trend monitored with this method are the percentage of occurrence as nearest plant.

The Photo-plot method is also used to measure trend. This method includes taking a close-up photograph of a 3 x 3 foot plot and a general view photograph of the study site.

Climate

Climate studies provide a comparison of grazing season climatic conditions with long-term normals. Crop year (September - June) precipitation accounts for approximately 80 percent of the variation in vegetation production in the Great Basin. The Forage Yield Index developed at the Squaw Butte Experiment Station is used to adjust forage utilization.

Evaluation

The analysis and interpretation of inventory and monitoring data are extremely important in the evaluation of management actions to determine their progress in meeting resource management objectives. This process must be carefully accomplished to determine if adjustments in grazing use and management actions are needed, and if so, to what extent.

The major steps involved in the evaluation process are as follows:

Assemble and Display Monitoring and Other Data • Review and summarize available data which has been collected from baseline inventories, monitoring studies, supplemental studies and other sources.

Analyze Data • Perform all necessary calculations of data.

Interpret Data • After the data has been analyzed, it is interpreted to determine whether the results show a trend or have remained static over time for each type of study. This includes interpreting individual data sets and examining their interrelationships.

In order to assess proper stocking level or carrying capacity, the following formula may be used.

\[
\text{Potential Stocking Level} = \frac{\text{Target Util.} \times \text{Actual Use}}{\text{Carrying Capacity} \times \text{Measured Util.} \times \text{Yield Index}}
\]

Evaluate Data • The data is evaluated for consistency, reliability, strong points, weak points, completeness and accuracy. If the results of the interpretation indicate a trend, the evaluation attempts to determine the causes of the trends and establish a course of action for future management.

Review Management Objectives • Management objectives must be evaluated as well as the monitoring data in order to make sure that the objectives are meaningful.

In order for management actions to be monitored and progress to be evaluated, the objectives must be measurable. They must also be reasonably attainable within a reasonable timeframe. In some cases, detection of a trend toward the desired value may sufficient to justify continuation of the management practice being evaluated, especially on poor condition ranges where vegetation objectives will be attainable only in the long-term. In these cases, intermediate objectives may be useful in evaluating the progress.

Evaluate Progress in Meeting Management Objectives • Determine if management objectives have been met or if adequate progress toward achieving them has occurred or if management objectives or monitoring techniques need redefining.

Summarize Findings and Make Recommendations • The formal evaluation must include concise management recommendations as well as recommendations on changing monitoring techniques, management objectives, key areas, or key species.
Range improvements are proposed for several reasons including, but not limited to: to implement more intensive grazing systems; to allow deferment of grazing use on native range during the spring; to improve livestock distribution; and to increase forage production.

The following standard procedures and design elements would be adhered to under the proposed action in constructing range improvements in the EIS area. Design elements have been standardized over time to mitigate adverse effects encountered during range improvement installations.

- Preparation of a site-specific environmental assessment prior to implementation of range improvements is required. Proposed range improvements may be modified or abandoned if this assessment indicates significant adverse environmental impacts cannot be mitigated or avoided.

- A wilderness inventory, required by FLPMA, has been completed in the EIS area. All rangeland management activities in wilderness study areas will be consistent with the IMP and Guidelines for Lands Under Wilderness Review unless and until the area is removed from this category. Impacts will be assessed before implementing management activities to ensure they meet guidelines.

- Every effort would be made to avoid adverse impacts to cultural resources. A cultural resources inventory will be completed on all areas prior to any decision to perform ground-disturbing activities. This would be part of the preplanning stage of a project and the results would be analyzed in the environmental assessment addressing the action (BLM Manual 8100, Cultural Resources Management). If significant cultural values are identified, the project could be relocated, redesigned or abandoned. However, where that is not possible, the BLM would consult with the State Historic Preservation Officer and the Advisory Council on Historic Preservation in accordance with the Programmatic Memorandum of Agreement (PMOA) by and between the Bureau, the Council and the National Conference of State Historic Preservation Officers, dated January 14, 1980, which sets forth a procedure for developing appropriate mitigative measures, in compliance with Section 106 of the National Historic Preservation Act (1966) as implemented by 36 CFR Part 800. Management adherence to agreed upon mitigative measures will be implemented in compliance with these regulations.

- If a project might affect any listed threatened or endangered species or its critical habitat, consultation with the USFWS would be initiated (50 CFR 50 402: Endangered Species Act of 1973, as amended). The project would be modified, relocated or abandoned in order to obtain a no effect determination. If a project may contribute to the need to list a Federal candidate or Bureau sensitive species, a technical assistance request would be made to the USFWS.

- Surface disturbance at all project sites would be held to a minimum. Disturbed soil would be rehabilitated to blend into surrounding soil surface and reseeded as needed with a mixture of grasses, forbs and browse as applicable to replace ground cover and reduce soil loss from wind and water erosion.

- Seeding would only be done to enhance and sustain multiple-use values. Vegetation manipulation projects would be designed using irregular patterns, untreated patches, etc., to provide for optimum edge effect for visual quality and wildlife. Layout and design would be coordinated with local ODFW biologists.

- Seeding would be accomplished by use of the rangeland drill in most cases. Broadcast seeding would occur on small disturbed areas, rough terrain and rocky areas. Brush would be controlled prior to seeding. Some projects would have brush control only. Brush control could employ burning, spraying, chaining, etc.; however, the treatment method has not been determined for individual projects. Generally, areas containing needlegrasses and/or rabbitbrush and areas with sandy soils would not be burned. BLM would determine seeding mixtures on a site-specific basis, at the EA level in accordance with NEPA, using past experience and recommendations of the Oregon State University Extension Service and Experiment Stations and/or ODFW. Anticipated increases in production through vegetation manipulation projects would not be allocated until seedings are established and ready for use. All seedings would be deferred from grazing for at least two growing seasons to allow seedling establishment. Where deep furrow drills are used, slopes would be drilled on the contour to prevent water erosion.

- The seeding policy for the BLM in Oregon is as follows: Seedings to change vegetation composition should be used when it is the most efficient method to accomplish the resource objectives identified through the planning process. The selection of the seeding area and the species to be used should be based on a site-specific evaluation which considers ecologic potential, technical and economic feasibility, location of unique resources, plant diversity and cumulative impacts on the ecosystem. Adapted native species that can enhance vegetative diversity composition must be given consideration in species selection. To insure establishment seedings must be protected for two growing seasons or until the vigorous seedlings produce their first seed crop. Once established, seedings should be properly managed and monitored to ensure that resource objectives are accomplished.

- It is anticipated that the existing road and trail system would provide access for range improvements construction. If needed, unimproved trails and tracks would be created to reach construction sites. These trails would continue to be utilized for maintenance of the projects.

### Table 12. Standard Procedures and Design Elements for Range Improvements

<table>
<thead>
<tr>
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<th>Procedures</th>
<th>Design Elements</th>
</tr>
</thead>
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</table>
Table 12. Standard Procedures and Design Elements for Range Improvements (continued)

- It is assumed that normal maintenance such as replacement of pipeline sections, fence posts and retreatment of vegetation manipulations would occur.

- VRM procedures would be employed to minimize the adverse visual impacts created by the proposed range improvements.

Additional design features are identified in the following discussion of the individual types of improvements.

**Reservoir Construction**

Development of reservoirs would involve the construction of pits and dams to impound water for livestock and wildlife use. Pits would be in dry lake beds or other natural depressions. Dams would be constructed in drainages. Water storage capacity would range from 1.0 to 2.0 acre-feet. Fill material, if needed, would come from the impoundment area and/or a borrow area for dams. Excavated material from pits would be piled adjacent to the pit. Topsoil would be stockpiled and used to rehabilitate the borrow areas.

**Wells**

Wells would be cased with steel pipe and sealed with concrete to prevent cave-ins and contamination. All State of Oregon water-well drilling regulations would be adhered to, both in drilling and equipping. A safety device would be installed on new powerline transformers to prevent electrocution of raptors. Metal storage tanks, painted to blend with the surrounding landscape, would be placed at each well site. Generally, the tanks would be enclosed and would measure 15 to 30 feet in diameter and 6 to 12 feet high.

**Springs**

The proposed action includes the development of springs. This would involve digging or drilling to intercept naturally occurring water flow, installing perforated pipe or concrete boxes to collect water, and installing pipelines and water troughs. The spring source and trough overflow area would be fenced to prevent livestock grazing and trampling and provide meadow habitat. A small waterhole would be developed inside the fenced overflow area for wildlife use. Ramps, rocks or float boards would be provided in all water troughs for birds and mammals to gain access to and/or escape from the water.

**Pipelines**

Pipelines are proposed to carry water for livestock from wells to areas that lack an adequate water supply. Generally, 1 to 2-inch diameter plastic pipe would be buried with a pipe-laying device consisting of a modified rippershoe mounted on a tractor. The pipe is normally laid as deeply as possible under the ground but no deeper than 30 inches. Where obstructions prohibit burying, the pipe would be laid on the surface and covered with borrowed soil. Reservoirs would be constructed along the pipeline and fenced to exclude livestock. This would provide ground level water for wildlife, and serve as an emergency water supply in case of equipment failure. Water troughs would be installed approximately every mile along the pipeline. Ramps, rocks or float boards would be provided in all water troughs for birds and mammals to gain access to and/or escape from the water.

**Fences and Cattleguards**

Fences would be designed to prevent the passage of livestock without stopping the movement of wildlife. All fences would be constructed in accordance with Bureau Manual 1741. The proposed fence lines would not be bladed or scraped. All fences would comply with VRM procedures.

Where fences cross existing roads either gates or cattleguards would be installed.
## Table 13. Range Improvement Costs

<table>
<thead>
<tr>
<th>Type of Improvement</th>
<th>Unit</th>
<th>Cost/Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guzzler</td>
<td>Each</td>
<td>$4,500</td>
</tr>
<tr>
<td>Brush Control</td>
<td>Acre</td>
<td>$10</td>
</tr>
<tr>
<td>Cattleguard</td>
<td>Each</td>
<td>$2,400</td>
</tr>
<tr>
<td>Fence</td>
<td>Mile</td>
<td>$2,500</td>
</tr>
<tr>
<td>Juniper Burning</td>
<td>Unit</td>
<td>$2,800</td>
</tr>
<tr>
<td>Pipeline</td>
<td>Mile</td>
<td>$10,500</td>
</tr>
<tr>
<td>Prescribed Burn</td>
<td>Acre</td>
<td>$10</td>
</tr>
<tr>
<td>Reservoir</td>
<td>Each</td>
<td>$6,700</td>
</tr>
<tr>
<td>Road Maintenance</td>
<td>Mile</td>
<td>$200</td>
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<tr>
<td>Seeding</td>
<td>Acre</td>
<td>$25</td>
</tr>
<tr>
<td>Spring</td>
<td>Each</td>
<td>$3,000</td>
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<tr>
<td>Trough</td>
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<tr>
<td>Well</td>
<td>Each</td>
<td>$22,500</td>
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</table>

'Based on recent years’ experience, figures in 1991 dollars.
<table>
<thead>
<tr>
<th>Allotment No.</th>
<th>Allotment Name</th>
<th>Type of Improvement</th>
<th>Units</th>
<th>Cost/Unit</th>
<th>No.</th>
<th>Cost</th>
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</tr>
<tr>
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<tr>
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</tr>
<tr>
<td></td>
<td></td>
<td>Reservoir</td>
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<td>7024</td>
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<td>Gouldin</td>
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<td></td>
<td></td>
<td>Fence</td>
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<td>$2,500</td>
<td>4</td>
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<tr>
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<td>Skull Creek</td>
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<td>Acre</td>
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<td>1,600</td>
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<td></td>
<td></td>
<td>Fence</td>
<td>Mile</td>
<td>$2,500</td>
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<td>$5,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Juniper Burning</td>
<td>Units</td>
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<td>Silvies River</td>
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<td>7036</td>
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Table 14. Potential Range Improvements by Allotment (continued)

<table>
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<tr>
<th>Allotment No.</th>
<th>Allotment Name</th>
<th>Type of Improvement</th>
<th>Units</th>
<th>Cost/Unit</th>
<th>No.</th>
<th>Cost</th>
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<tr>
<td>7037</td>
<td>Coal Pit Springs</td>
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<td>7040</td>
<td>Landing Creek</td>
<td>Spring</td>
<td>Each</td>
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<td>2</td>
<td>$6,000</td>
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<tr>
<td>7041</td>
<td>East Silvies</td>
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<td>Mile</td>
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<td>7058</td>
<td>Narrows</td>
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<td>7048</td>
<td>Varien Canyon</td>
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<td>Mile</td>
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<td>7049</td>
<td>Forks of Poison Cr.</td>
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<td>530</td>
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<td></td>
<td></td>
<td>Trough</td>
<td>Each</td>
<td>$1,800</td>
<td>1</td>
<td>$1,800</td>
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<td></td>
<td></td>
<td>Reservoir</td>
<td>Each</td>
<td>$6,700</td>
<td>2</td>
<td>$13,400</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Well</td>
<td>Each</td>
<td>$22,500</td>
<td>1</td>
<td>$22,500</td>
</tr>
</tbody>
</table>
**Table 15. Descriptions of Existing and Proposed ACECs**

**South Narrows ACEC**

South Narrows ACEC is an existing ACEC in the Three Rivers RA. It was established June 30, 1983. It is located in Harney County approximately 26 miles south of Burns, Oregon, adjacent to Highway 205. This ACEC is 160 acres in size. It is in East Warm Springs Allotment (No. 7001). The elevation of the site is approximately 4,400 feet.

South Narrows ACEC was established to provide special management attention to the designated Critical Habitat of Stephanomeria *malheurensis*, Malheur wirelettuce, a plant species listed as endangered under the Endangered Species Act of 1973.

The management goal of the South Narrows ACEC is to provide protection in order to preserve the characteristics of the habitat and maintain the suitability of the site to support Stephanomeria malheurensis. Actions which have previously been undertaken in support of this goal include fencing a portion of the ACEC, installing informational signs and undertaking studies to aid in understanding the interrelationships between Stephanomeria malheurensis and its environment including competition between it and other species. Management of this area is incorporated into the activity plans associated with Stephanomeria malheurensis.

**Legal Description of Site:**

South Narrows ACEC:

Willamette Meridian:

T. 27 S., R. 30 E., Sec. 11, W1/2SW1/4NW1/4, SE1/4SW1/4 and NE1/4SE1/4; SW1/4NE1/4SW1/4 and NW1/4SW1/4.

South Narrows ACEC aggregates 160 acres more or less.

**Diamond Craters ONA/AUCEC**

Diamond Craters is an existing ONA/AUCEC in the Three Rivers RA. It was established as an ACEC on December 2, 1980, and as an ONA on April 1, 1982. Diamond Craters is located in Harney County, approximately 40 miles southeast of Burns, Oregon, and 4 miles east of Highway 205 adjacent to the eastern boundary of the Malheur National Wildlife Refuge. The existing ONA/AUCEC is 16,656 acres in size and the proposed addition is 400 acres. The ONA/AUCEC will total 17,056 acres in size. The elevation of Diamond Craters ranges from 4,150 to 4,700 feet.

Diamond Craters ONA/AUCEC was established to protect the diversity of geologic features and ecosystems. Diamond Craters is geologically unique because of the great variety of basaltic igneous-volcanic structures representing a complex series of geologic events which are present within a small geographic area. Preservation of the volcanic features is excellent due to a lack of erosion. The geologic features include lava flows, vents, craters, domes, a caldera, a maar and a graben. The diversity of vegetation at Diamond Craters includes both unusual and representative species and communities. The diversity of landforms and vegetation provides habitat for a large variety of wildlife species.

The management goal of the Diamond Craters ONA/AUCEC is to preserve the unique assemblage of geologic features and ecosystems so that present and future generations may benefit from its exceptional scientific, educational, scenic and recreational values. Actions which have previously been undertaken in support of this goal include withdrawal of the area from mineral entry, closure of the area to ORV utilization, removal of livestock and wild horses, development of a self-guided tour, and development of the Diamond Craters Recreation Area Management Plan which details procedures for managing the recreational uses of the ONA/AUCEC.

**Legal Description of Site:**

Diamond Craters ONA/AUCEC:

Willamette Meridian:

T. 28 S., R. 31 E., Sec. 1, E1/2E1/2; Sec. 12, E1/2NE1/4; SW1/4NE1/4.

T. 29 S., R. 31 E., Sec. 24, E1/2NE1/4, SW1/4NE1/4, SE1/4NW1/4, E1/2SW1/2 and SE1/4; Sec. 25, E1/2NE1/4, NW1/4NE1/4, NE1/4NW1/4 and NE1/4SE1/4.

The area described aggregates 160 acres more or less.
Table 15. Descriptions of Existing and Proposed ACECs (continued)

<table>
<thead>
<tr>
<th>T. 28 S., R. 32 E.,</th>
<th>Sec. 17. All; Sec. 8, Lot 4, S1/2NE1/4, SE1/4SW1/4, and SE1/4; Secs. 19 through 22, Inclusive; Sec. 23, SW1/4 and S1/2SE1/4; Sec. 24, SW1/4SW1/4; Sec. 25, NW1/4NW1/4, S1/2NW1/4, and SW1/4; Secs. 26 through 35, Inclusive.</th>
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</table>

T. 29 S., R. 32 E., Sec. 1, W1/2NW1/4 and SW1/4; Secs. 2 through 6, Inclusive; Sec. 7, Lot 1, N1/2NE1/4 and NE1/4NW1/4; Sec. 8, N1/2, NE1/4SW1/4, N1/2SE1/4 and SE1/4SE1/4; Sec. 9, All; Sec. 10, N1/2 and SW1/4; Sec. 11, W1/2NE1/4 and NW1/4; Sec. 5, N1/2NW1/4.

The area described aggregates 16,656 acres more or less.

The addition to Diamond Craters RNA/ACEC:

Willamette Meridian:

T. 28 S., R. 32 E., Sec. 16, W1/2.

T. 28 S., R. 31 E., Sec. 36, SE1/4NE1/4 and NE1/4SE1/4.

The areas described aggregate 400 acres more or less.

The total area described aggregates 17,056 acres more or less.

Silver Creek RNA/ACEC Addition

Silver Creek RNA/ACEC and the proposed addition are located in Harney County approximately 35 miles west of Burns and 15 miles north of Highway 20 adjacent to the Ochoco National Forest boundary. The existing RNA/ACEC is 640 acres in size and the proposed addition is 1,280 acres including 640 acres of a private inholding, the acquisition of which through exchange is a prerequisite to the designation of the RNA/ACEC addition. The proposed addition is in the Upper Valley Allotment (No. 7011). The elevation of the site ranges from approximately 4,520 to 4,800 feet.

Silver Creek RNA/ACEC is an established RNA/ACEC within the Three Rivers RA. It was established to fill the aquatic natural area cell in the Ochoco, Blue and Wallowa Mountains Province described in the Oregon Natural Heritage Plan (1988) as:

2. First to third order stream system in Blue Mountains originating in ponderosa pine zone, including intermittent streams.

The proposed addition to the Silver Creek RNA/ACEC will provide for a better representation of this cell as it provides a greater elevational gradient along a single drainage. The proposed addition to the Silver Creek RNA/ACEC will also provide representation for an unfilled terrestrial natural area cell in the Blue Mountains Province described as:

35. Low sagebrush/bunchgrass community outside the forest zone.

The existing Silver Creek RNA/ACEC in Section 8 consists of ponderosa pine uplands with areas of big sagebrush/bunchgrass as well as an extensive forested riparian zone. The proposed addition, Sections 17 and 20, includes the confluence of Silver Creek and Sawmill Creek with a combined total of approximately 2.5 miles of high-quality riparian area. The riparian zone is dominated by mature willows and mountain alder with an understory that is mostly Kentucky bluegrass. The uplands are dominated by low sagebrush and bluebunch wheatgrass. There are also areas of big sagebrush and bluebunch wheatgrass, scattered western juniper and bitterbrush, Idaho fescue and Sandberg's bluegrass. Portions of the existing RNA/ACEC and proposed addition were burned by wildfire in August 1990.

The primary management goal of the Silver Creek RNA/ACEC and proposed addition is to preserve the natural ecosystems and to provide areas for ecological studies, monitoring, and research, and education. The primary management action which will be undertaken to aid in the attainment of this goal will be the construction of perimeter boundary fencing. A high standard gravel road maintained by the county crosses through the southwestern corner RNA/ACEC addition. Coordination with the county will ensure maintenance does not degrade the RNA/ACEC. Two unimproved dirt roads are also present in the RNA/ACEC addition. These roads will remain open to public use. Signing of the RNA/ACEC along the county road may be appropriate. A separate management plan

Appendix I-188
Table 15. Descriptions of Existing and Proposed ACECs (continued)

will be written for this RNA/ACEC subsequent to the acquisition of the private inholding and the ROD. This management plan will be comprehensive in nature and reflect the allowable uses/use constraints shown in Appendix 1, Table 16 and the procedures and monitoring discussed in the management decision.

Legal Description of Site:

Silver Creek RNA/ACEC:
Willamette Meridian:
T. 21 S., R. 26 E., Sec. 8, All.
The area described aggregates 640 acres more or less.

Silver Creek RNA/ACEC Addition:
Willamette Meridian:
T. 21 S., R. 26 E., Sec. 17, All; Sec. 20, All.
The area described aggregates 1,280 acres more or less.

Foster Flat RNA/ACEC

The proposed Foster Flat RNA/ACEC is located in Harney County approximately 42 miles south of Burns, Oregon, and 20 miles west of Highway 205 near the Burns District boundary with the Lakeview District. The proposed Foster Flat RNA/ACEC is 2,690 acres in size. It is in East Warm Springs Allotment (No. 7001) and in the Warm Springs HMA. The elevation of the RNA/ACEC is approximately 5,000 feet.

Foster Flat RNA/ACEC will be designated to represent one natural areacell in the Basin and Range Provinces described in the Oregon Natural Heritage Plan (1988) as:

19. Silver sagebrush/Nevada bluegrass community

This community is found in playas throughout the Great Basin in sites which are flooded for a period of months during the winter and early spring but which dry up rapidly as the weather warms. Foster Flat covers a large area that is essentially devoid of topographic relief and is dominated by silver sagebrush. The silver sagebrush/Nevada bluegrass community covers approximately 800 acres in the central portion of the playa area. At slightly lower elevation on the playa is a silver sagebrush/rush community which stays wetter longer than the Nevada bluegrass association. The slightly higher elevation areas of the playa contain silver sagebrush/green rabbitbrush. There are also areas of basin wildrye, creeping wildrye or silver sagebrush with no understory. It is ringed by a slightly raised rim that is dominated by greasewood and big sagebrush.

The primary management goal of the Foster Flat RNA/ACEC is to manage the area to preserve the characteristics of the ecosystem and to provide areas for ecological studies, monitoring and research, and education. The primary management action which will be undertaken to aid in the attainment of this goal will be the construction of perimeter boundary fencing. The perimeter boundary fence will be constructed to allow livestock and wild horses to access the water source in the northwestern corner of Foster Flat. Access to the unimproved dirt roads within the RNA/ACEC may be limited by construction of this fence. A separate management plan will be written for this RNA/ACEC subsequent to the ROD. This management plan will be comprehensive in nature and reflect the allowable uses/use constraints shown in Appendix 1, Table 16 and the procedures and monitoring discussed in the management decision.

Legal Description of Site:

Foster Flat RNA/ACEC:
Willamette Meridian:
T. 29 S., R. 29 E., Sec. 34, NE1/4SE1/4 and S1/2SE1/4; Sec. 35, NW1/4SW1/4 and S1/2SW1/4.

Appendix I-189
Table 15. Descriptions of Existing and Proposed ACECs (continued)

<table>
<thead>
<tr>
<th>T. 30 S., R. 29 E., Sec. 2, Lots 3 and 4, S1/2NW1/4, SW1/4,NW1/4SE1/4 and S1/2SE1/4; Sec. 3, Lots 1 and 2, S1/2N1/2 and S1/2; Sec. 4, SE1/4NE1/4 and NE1/4SE1/4; Sec. 10, E1/2 and NE1/4NW1/4; Sec. 11, All; Sec. 14, N1/2; Sec. 15, NE1/4NE1/4.</th>
</tr>
</thead>
</table>

The area described aggregates 2,690 acres more or less.

**Dry Mountain RNA/ACEC Addition**

The BLM’s proposed Dry Mountain RNA/ACEC is located in Harney County approximately 28 miles west of Burns, Oregon, and 10 miles north of Highway 20 adjacent to the Ochoco National Forest boundary on Dry Mountain. It is in Claw Creek Allotment (No. 7010). The proposed RNA/ACEC is 2,084 acres in size. The elevation of the RNA/ACEC is approximately 4,700 to 5,800 feet.

Cchoco National Forest currently has a Dry Mountain RNA proposed in the draft Forest Plan. The USDA-FS proposed Dry Mountain RNA and the BLM’s proposed addition are located in the transition zone between the Ochoco, Blue and Wallowa Mountains Province and the Basin and Range Province. The proposed BLM and USDA-FS Dry Mountain RNA/ACEC would fill a number of natural area cells as described in the Oregon Natural Heritage Plan (1988) for the Cchoco, Blue and Wallowa Province including:

3. Western juniper/big sagebrush community.
7. Ponderosa pine/bitterbrush-mountain mahogany/sedge community.
33. Big sagebrush/bunchgrass community outside forest zone.
41. Mountain mahogany/bunchgrass.

The proposed RNA/ACEC also fills one natural area cell for the Basin and Range Province described as:

1. Ponderosa pine savanna.

The BLM RNA/ACEC addition contains major portions of the pine-juniper and pine-mahogany types as well as all of the mountain mahogany community and the complete sagebrush steppe transition zone. The Ochoco National Forest’s proposed RNA represents a ponderosa pine/bunchgrass type with extensions into western juniper and big sagebrush and mountain mahogany types. The USDA-FS proposed RNA encompasses the higher elevations of the forest-sagebrush transition zone while the BLM proposed RNA/ACEC provides good representation of the lower elevations of the forest-sagebrush steppe transition which creates a total RNA/ACEC with more diversity.

BLM’s proposed Dry Mountain RNA/ACEC also contains 180 acres which have been removed from the commercial forest timber base as ponderosa pine forest management areas. These stands are located in Sections 3 and 10 of the proposed RNA/ACEC. The old growth stands contain an overstory consisting of old and large ponderosa pine trees with a 40-70 percent crown closure. The understory contains smaller ponderosa pine trees, many species of shrubs and other herbaceous species. Management of these areas will be to enhance existing old growth characteristics and to promote continued succession toward old growth. Examples of management actions which may occur to promote old growth characteristics include stand manipulation for the maintenance of stand structure, a desired species composition or a desired snag density. Management of the old growth stands will be in conjunction with the RNA/ACEC if designated.

The primary management goal of the proposed Dry Mountain RNA/ACEC is to manage the area to preserve all the ecosystems in a condition where they can provide areas for ecological studies, monitoring, and research, and education. At the current time, it is felt that perimeter boundary fencing will not be necessary in order to achieve this goal. Utilization of the area by livestock is light due to steepness of terrain and lack of water sources. Water development or timber harvest in adjoining areas may change livestock utilization patterns and necessitate the construction of some boundary fences. Low quality unimproved dirt roads exist within the RNA/ACEC. These will remain open to public use. A separate management plan will be written for this RNA/ACEC subsequent to the ROD. This management plan will be comprehensive in nature and reflect the allowable uses/use constraints shown in Appendix 1, Table 16 and the procedures and monitoring discussed in the management decision. Additionally, allowable uses/use constraints and management goals for old growth areas shown in Tables 2.9 and 2.10 as they are applicable to the Dry Mountain stands will also be incorporated into the RNA/ACEC Management Plan.

**Legal Description of Site:**

Dry Mountain RNA/ACEC:

Appendix I-190
Table 15. Descriptions of Existing and Proposed ACECs (continued)

<table>
<thead>
<tr>
<th>Description</th>
<th>Existing</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Biscuitroot Cultural ACEC</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The proposed Biscuitroot Cultural ACEC of 6,500 total acres is located approximately 27 miles east of Burns, Oregon, and includes two associated parcels, both of which are transected by Highway 20. These two parcels, which aggregate approximately 2,170 acres and 4,330 acres, are in the vicinity of Stinkingwater Pass and are primarily oriented north-south, following major ridgeline trends in the Stinkingwater Mountains. The elevation of the proposed ACEC ranges from 4,280 to 4,995 feet. Access is afforded by high standard gravel roads and by unimproved dirt roads linked to county and state road systems.

The general location of the Biscuitroot Cultural ACEC is on a plateau northeast of Harney Valley. This locality is a fault block mountain near the juncture of three major physiographic provinces, the Blue Mountains, the Owyhee Uplands, and the Basin and Range. The plateau is characterized by basalt flows, rimrock, gentle to steeply sloping uplands, and scablands with bare rock or a thin soil mantle.

Soils in the ACEC are generally shallow, well drained, loams and clayey loams that are stony, frigid, and xeric. The Stinkingwater fault block forms a divide, with runoff to the west draining into the Harney Basin and other waters flowing into the Malheur River system. Generally, the ACEC has little surface water available other than from a few ephemeral drainages, such as Little Pine Creek, McMullen Creek, and other unnamed seasonal streams, although springs are found on sloping rocky uplands above Little Pine Creek.

The ACEC features open, stiff sage/bunchgrass vegetation communities, with scattered juniper groves and perennial forbs that include several edible plants that are culturally valuable to Native American traditionalists.

For generations, Native Americans have used localities in and around the Biscuitroot Cultural ACEC in the Stinkingwater Mountains for harvesting root crops such as Biscuitroot (Lomatium spp.), bitterroot (Lewisia rediviva), wild onions (Allium spp.), and other species (e.g. Perideridia bolanderi, Fritillaria pudica) during late spring. Indian people from surrounding regions who came here to occupy dry camps among the large juniper trees, dig roots, and socialize included the Harney Valley Paiute, Warm Springs Indians, Bannocks, Shoshones, Umatillas, Yakimas, Suprime Valley Paiutes, and Northern Nevada Paiutes. (Couture, 1978; Couture, Housley, and Ricks, 1986) Root harvesting was an integral feature of aboriginal culture in the Northern Great Basin and Plateau regions (Toepel, Willingham, and Minor, 1979), where roots were intensively exploited during annual root camps of numerous small family-based groups with attendant social interactions.

These plant resources have great value to contemporary Native Americans as a cultural resource because their continued use is one of the few traditional activities that is still practiced. The seasonal and social aspects of this activity persist to this day. The particular localities where the target plant species are harvested provide a significant source of root crops, offering not only nutrition but also an important cash crop for trade among Indian people (Couture, 1978).

Not all “root” fields in the general region are harvested. The high quality and quantity of roots available in these root zones is noteworthy and could not be replaced by shifting use to other less preferred areas, especially since the preferred fields have, in effect, been “cultivated” by the long tenure of aboriginal harvest practices. Moreover, particular campsites here are reutilized by families repeatedly. In recent years, the ACEC area has been utilized by Indian people from Burns, Warm Springs, and Owyhee, Oregon; Yakima, Washington; Fort Hall, Idaho; Fort Bidwell, California and Fort McDermitt, Nevada.

The primary management goal of the Biscuitroot Cultural ACEC is to ensure the opportunity to continue the traditional practices of root gathering by contemporary Native Americans in these localities used by generations of Indian people. This will be accomplished by protecting the habitats of culturally important plants and by minimizing any conflicts posed by competing land uses.

This resource and its cultural use is sensitive to certain other local land uses, primarily gravel pit activities (concurrent use is not desirable; pit expansion is a threat) and livestock grazing (excessive congregation causes soil compaction; drought year foraging on cultural plants). Additionally, the potential for increased Native American use pressure in the future could affect the quality and quantity of the available root crop.

The primary management actions which will be undertaken to attain the management goal will be the cessation of gravel pit activities upon lease expiration, and restrictions on the use of ORVs. New surface disturbances, plant habitat modifications, and cattle-congregating practices (e.g., salting, turning out, etc.) will be prohibited within the ACEC. A separate management plan will be developed for the ACEC subsequent to the ROD. This plan will be comprehensive in nature and reflect the allowable uses and constraints shown in Appendix 1, Table 16 and the procedures noted in the management decision.
Table 15. Descriptions of Existing and Proposed ACECs (continued)

<table>
<thead>
<tr>
<th>William Meridian:</th>
</tr>
</thead>
<tbody>
<tr>
<td>T. 22 S., R. 26 E., Sec. 3, All;</td>
</tr>
<tr>
<td>Sec. 4, SE1/4;</td>
</tr>
<tr>
<td>Sec. 9, E1/2 and E1/2SW1/4;</td>
</tr>
<tr>
<td>Sec. 10, N1/2;</td>
</tr>
<tr>
<td>Sec. 16, E1/2;</td>
</tr>
<tr>
<td>Sec. 22, NE1/4, E1/2NW1/4 and NW1/4NW1/4.</td>
</tr>
</tbody>
</table>

The area described aggregates 2,084 acres more or less.

**Biscuitroot Cultural ACEC**

The proposed Biscuitroot Cultural ACEC of 6,500 total acres is located approximately 27 miles east of Burns, Oregon, and includes two associated parcels, both of which are transected by Highway 20. These two parcels, which aggregate approximately 2,170 acres and 4,330 acres, are in the vicinity of Stinkingwater Pass and are primarily oriented north-south, following major ridgeline trends in the Stinkingwater Mountains. The elevation of the proposed ACEC ranges from 4,280 to 4,995 feet. Access is afforded by high standard gravel roads and by unimproved dirt roads linked to county and state road systems.

The general location of the Biscuitroot Cultural ACEC is on a plateau northeast of Harney Valley. This locality is a fault block mountain near the juncture of three major physiographic provinces, the Blue Mountains, the Owyhee Uplands, and the Basin and Range. The plateau is characterized by basalt flows, rimrock, gentle to steeply sloping uplands, and scablands with bare rock or a thin soil mantle.

Soils in the ACEC are generally shallow, well drained, loams and clayey loams that are stony, frigid, and xeric. The Stinkingwater fault block forms a divide, with runoff to the west draining into the Harney Basin and other waters flowing into the Malheur River system. Generally, the ACEC has little surface water available other than from a few ephemeral drainages, such as Little Pine Creek, McMullen Creek, and other unnamed seasonal streams, although springs are found on sloping rockout cappings above Little Pine Creek.

The ACEC features open, stiff sage bunchgrass vegetation communities, with scattered juniper groves and perennial forbs that include several edible plants that are culturally valuable to Native American traditionalists.

For generations, Native Americans have used localities in and around the Biscuitroot Cultural ACEC in the Stinkingwater Mountains for harvesting root crops such as Biscuitroot (Lomatium spp.), bitterroot (Lewisia rediviva), wild onions (Allium spp.), and other species (e.g. Perideridia bolanderi, Fritillaria pudica) during late spring. Indian people from surrounding regions who came here to occupy dry camps among the large juniper trees, dig roots, and socialize included the Harney Valley Paiute, Warm Springs Indians, Baragoks, Shoshones, Umatillas, Yakimas, Suprise Valley Paiutes, and Northern Nevada Paiutes. (Couture, 1978; Couture, Housley, and Ricks, 1986) Root harvesting was an integral feature of aboriginal culture in the Northern Great Basin and Plateau regions (Toepel, Willingham, and Minor, 1979), where roots were intensively exploited during annual root camps of numerous small family-based groups with attendant social interactions.

These plant resources have great value to contemporary Native Americans as a cultural resource because their continued use is one of the few traditional activities that is still practiced. The seasonal and social aspects of this activity persist to this day. The particular localities where the target plant species are harvested provide a significant source of root crops, offering not only nutrition but also an important cash crop for trade among Indian people (Couture, 1978).

Not all “root” fields in the general region are harvested. The high quality and quantity of roots available in these root zones is noteworthy and could not be replaced by shifting use into other less preferred areas, especially since the preferred fields have, in effect, been “cultivated” by the long tenure of aboriginal harvest practices. Moreover, particular campsites here are reutilized by families repeatedly. In recent years, the ACEC area has been utilized by Indian people from Burns, Warm Springs, and Owyhee, Oregon; Yakima, Washington; Fort Hall, Idaho; Fort Bidwell, California and Fort McDermitt, Nevada.

The primary management goal of the Biscuitroot Cultural ACEC is to ensure the opportunity to continue the traditional practices of root gathering by contemporary Native Americans in these localities used by generations of Indian people. This will be accomplished by protecting the habitats of culturally important plants and by minimizing any conflicts posed by competing land uses.

This resource and its cultural use is sensitive to certain other local land uses, primarily gravel pit activities (concurrent use is not desirable; pit expansion is a threat) and livestock grazing (excessive congregation causes soil compaction; drought year foraging on cultural plants). Additionally, the potential for increased Native American use pressure in the future could affect the quality and quantity of the available root crop.

The primary management actions which will be undertaken to attain the management goal will be the cessation of gravel pit activities upon lease expiration, and restrictions on the use of ORVs. New surface disturbances, plant habitat modifications, and cattle-congregating practices (e.g., salting, turning out, etc.) will be prohibited within the ACEC. A separate management plan will be developed for the ACEC subsequent to the ROD. This plan will be comprehensive in nature and reflect the allowable uses and constraints shown in Appendix 1, Table 16 and the procedures noted in the management decision.
Table 15. Descriptions of Existing and Proposed ACECs (continued)

The ACEC’s eastern unit is described as follows:

The pasture boundary of the Louie Hughes Pasture and the Oreana Pasture in the Burnt Flat Allotment (No. 5313), excluding the Cold Springs Field and Tommie’s Place Pasture.

Excluding all unfenced private lands within the above described areas.

The areas described aggregate 64,639 acres more or less.
<table>
<thead>
<tr>
<th>Area Title</th>
<th>Acres</th>
<th>Land Tenure</th>
<th>Major Rights Of Way</th>
<th>Commercial Timber Harvest</th>
<th>ORV Use</th>
<th>Wild Horses</th>
<th>Fire Livestock Grazing</th>
<th>Suppression Activities</th>
<th>Prescribed Burning</th>
<th>Vegetation Treatment</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Narrows ACEC</td>
<td>160</td>
<td>Z1</td>
<td>R</td>
<td>N/A</td>
<td>L</td>
<td>N/A</td>
<td>P</td>
<td>P</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Diamond Craters ONS/ACEC</td>
<td>17,056</td>
<td>Z1</td>
<td>R</td>
<td>N/A</td>
<td>L</td>
<td>N/A</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>P</td>
</tr>
<tr>
<td>Silver Creek RNA/ACEC</td>
<td>640</td>
<td>Z1</td>
<td>R</td>
<td>P</td>
<td>L</td>
<td>N/A</td>
<td>R</td>
<td>P</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Silver Creek RNA/ACEC Add.</td>
<td>1,280</td>
<td>Z1</td>
<td>R</td>
<td>N/A</td>
<td>L</td>
<td>N/A</td>
<td>R</td>
<td>P</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Foster Flat RNA/ACEC</td>
<td>2,690</td>
<td>Z1</td>
<td>R</td>
<td>N/A</td>
<td>L</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>P</td>
<td>R</td>
</tr>
<tr>
<td>Dry Mountain RNA/ACEC Add.</td>
<td>2,084</td>
<td>Z1</td>
<td>R</td>
<td>P</td>
<td>L</td>
<td>N/A</td>
<td>R*</td>
<td>R*</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Kiger Mustang ACEC</td>
<td>64,639</td>
<td>Z1</td>
<td>R</td>
<td>N/A</td>
<td>0</td>
<td>R*</td>
<td>R*</td>
<td>0</td>
<td>R</td>
<td>R</td>
</tr>
<tr>
<td>Biscuitroot Cultural ACEC</td>
<td>6,500</td>
<td>Z1</td>
<td>R</td>
<td>N/A</td>
<td>L</td>
<td>R*</td>
<td>R*</td>
<td>P</td>
<td>P</td>
<td>P</td>
</tr>
</tbody>
</table>

**Fluid Energy Minerals**
- NSO = No surface occupancy
- NL = No leasing

**Solid Leasable Minerals**
- P = Prohibiting use or action
- W = Withdraw from mineral entry

**Locatable Minerals**
- R = Restricted use or action

**Camping**
- 0 = No surface occupancy

**Organized Public Activities**
- N/A = Not applicable

**Wood Gathering**
- M = Management

**Plant Collection**
- H = Harvest

**Education (Repetitive Consumptive)**
- R = Retained

**Rock Hounding**
- R = Retained

**Constraints**
- Z1 = Zone 1, retention and acquisition
- P = Prohibited use or action
- R = Restricted use or action
- R* = Restricted to provisions of AMP or HMAP
- O = Open to use of activity
- N/A = Not applicable
- L = Limited to existing roads and trails

- NSO = No surface occupancy
- NL = No leasing
- W = Withdraw from mineral entry
Oregon; Off-Highway Vehicle Designation

AGENCY: Bureau of Land Management, Interior.

ACTION: Burns District Office: Notice giving relating to off-highway motorized vehicles use on public lands.

SUMMARY: Notice is hereby given relating to the use of off-highway vehicles on public lands in accordance with the authority and requirements of Executive Orders 11644 and 11989, and regulations contained in 43 CFR Part 8340.

The following lands under the administration of the Bureau of Land Management are designated as closed, limited, under Interim Management Policy and Guidelines for Lands under Wilderness Review, or open to off-highway motor vehicle use.

The area affected by the designations is the Burns District, which includes 3,944,013 acres of public lands in the Three-Rivers and Andrews Resource Areas located in Grant and Harney Counties, Oregon.

These designations are a result of resource management decisions made in existing Management Framework Plans and analyzed in several grazing Environmental Impact Statements. These designations are published as final until such time that changes in resource management warrant modifications.

A. Closed Designations

Areas which are closed to off-highway motor vehicle use comprise 9,930 acres.

One area: South Narrows (160 acres), has been designated closed prior to this Notice. The following areas are designated closed to motorized vehicle use to protect resource and scenic values.


B. Limited Designations

1. Wilderness Study Areas (WSAs)

Wilderness Study Areas, (WSAs) comprising 829,995 acres will be managed in accordance with the nonimpairment criteria of Wilderness Interim Management Policy which allows off-highway vehicle use to
cross-country some type of limited designation

limits we of motorized vehicles to

Folk Willow Creek RNA/ Silver

Pueblo comprise existing

Appendix l-198

release of, which

by prior management

by

unit No

management Policy:

The following Wilderness Study Areas are designated to off-highway motorized vehicle use under Wilderness Management Policy:

2. Lands Other than Wilderness Study Areas (WSAs)

Lands other than WSAs which have some type of limited designation comprise 148,843 acres. These areas are limited, in most cases, to the use of motorized vehicles on designated, existing roads and trails. However, other limitations may be imposed, such as use during certain time periods, certain types of vehicles, or certain off-highway vehicle activities.

One area, Steens Mountain Recreation Lands, including a parcel of land adjacent to the west boundary for a total of 184,912 acres, was previously designated in September, 1990, and limits we of motorized vehicles to designated, existing roads and trails. This area is not included in this Notice. The following areas are designated limited to motorized vehicle use on designated, existing roads and trails:

<table>
<thead>
<tr>
<th>WSA Unit No.</th>
<th>WSA Name</th>
<th>Acres in Burns District</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-14</td>
<td>Malheur River/Blue Bucket Creek</td>
<td>3,480</td>
</tr>
<tr>
<td>2-20L</td>
<td>Stonehouse</td>
<td>14,825</td>
</tr>
<tr>
<td>2-23LH</td>
<td>Low Stonehouse</td>
<td>0.090</td>
</tr>
<tr>
<td>2-72D</td>
<td>Sheephead</td>
<td>23,790</td>
</tr>
<tr>
<td>2-72I</td>
<td>Table Mountain</td>
<td>8,730</td>
</tr>
<tr>
<td>2-72J</td>
<td>West Peak</td>
<td>8,535</td>
</tr>
<tr>
<td>2-72A</td>
<td>East Alvord</td>
<td>22,240</td>
</tr>
<tr>
<td>2-72B</td>
<td>winter Range</td>
<td>15,440</td>
</tr>
<tr>
<td>2-74</td>
<td>Alvord Desert</td>
<td>97,165</td>
</tr>
<tr>
<td>2-77</td>
<td>Mahogany Ridge</td>
<td>27,940</td>
</tr>
<tr>
<td>2-78</td>
<td>Red Mountain</td>
<td>16,215</td>
</tr>
<tr>
<td>2-81</td>
<td>Pueblo Mountains</td>
<td>72,090</td>
</tr>
<tr>
<td>2-83</td>
<td>Rincon</td>
<td>100,445</td>
</tr>
<tr>
<td>2-83A</td>
<td>Alvord Peak</td>
<td>16,825</td>
</tr>
<tr>
<td>2-84</td>
<td>Basque Hills</td>
<td>70,600</td>
</tr>
<tr>
<td>2-85B</td>
<td>High Steens</td>
<td>63,746</td>
</tr>
<tr>
<td>2-85G</td>
<td>South Fork Donner</td>
<td>37,555</td>
</tr>
<tr>
<td>2-85H</td>
<td>Bidlom River</td>
<td>26,590</td>
</tr>
<tr>
<td>2-86E</td>
<td>Bridge Creek</td>
<td>14,547</td>
</tr>
<tr>
<td>2-86F</td>
<td>Pine Creek (Strawberry Mtns)</td>
<td>200</td>
</tr>
<tr>
<td>2-86G</td>
<td>Sheep Gulch (Strawberry Mtns)</td>
<td>920</td>
</tr>
<tr>
<td>2-98B</td>
<td>Indian Creek (Straw. Mtns)</td>
<td>208</td>
</tr>
<tr>
<td>2-103</td>
<td>Aldrich Mountain</td>
<td>9,995</td>
</tr>
<tr>
<td>1-148</td>
<td>Hawk Mountain</td>
<td>25,280</td>
</tr>
<tr>
<td>3-152</td>
<td>Willow Creek</td>
<td>2,140</td>
</tr>
<tr>
<td>3-153</td>
<td>Disaster Peak</td>
<td>3,740</td>
</tr>
</tbody>
</table>

These designations become effective upon publication in the Federal Register and will remain in effect until rescinded or modified by the Burns District Manager. Information and maps of areas with open, closed or limited designations are available at the Bureau of Land Management Burns District Office, 74 South Alvord, Burns, Oregon 97720, Telephone (503) 573-5241.


Joshua L. Warburton, District Manager.

[FR Doc. 87-3693 Filed 2-9-87; 8:45 am]

BILLING CODE 4310-53-M

Appendix I-198
## Table 18. Calculation of Three Rivers Projected Average Annual Recreation Growth.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1 ORV Travel</td>
<td>Motorcycle Off-Road</td>
<td>22</td>
<td>20</td>
<td>16</td>
<td>37</td>
<td>21870</td>
<td>23819</td>
<td>26243</td>
<td>25369</td>
</tr>
<tr>
<td></td>
<td>ATV/UTV (3 &amp; 4-Wheel)</td>
<td>14</td>
<td>31</td>
<td>25</td>
<td>57</td>
<td>47324</td>
<td>53050</td>
<td>61985</td>
<td>59555</td>
</tr>
<tr>
<td></td>
<td>4-Wheel Vehicles Off-Road</td>
<td>19</td>
<td>40</td>
<td>34</td>
<td>84</td>
<td>245237</td>
<td>258685</td>
<td>342224</td>
<td>339750</td>
</tr>
<tr>
<td></td>
<td>Snowmobiling</td>
<td>786512</td>
<td>13</td>
<td>19</td>
<td>58512</td>
<td>66183</td>
<td>414314</td>
<td>2.27%</td>
<td>555552</td>
</tr>
<tr>
<td>2 Other Motorized</td>
<td>Sightseeing/Exploring</td>
<td>718009</td>
<td>1.8%</td>
<td>799706</td>
<td>903966</td>
<td>1.08%</td>
<td>896776</td>
<td>1.78%</td>
<td>1153129</td>
</tr>
<tr>
<td>3 Nonmotorized</td>
<td>Day Hiking/Trail</td>
<td>43672</td>
<td>4734</td>
<td>108430</td>
<td>119783</td>
<td>170225</td>
<td>2.56%</td>
<td>213100</td>
<td>3.31%</td>
</tr>
<tr>
<td></td>
<td>Exercise Hiking on Trail</td>
<td>89509</td>
<td>9743</td>
<td>108430</td>
<td>119783</td>
<td>170225</td>
<td>2.56%</td>
<td>213100</td>
<td>3.31%</td>
</tr>
<tr>
<td></td>
<td>Exercise Hiking no trail</td>
<td>116523</td>
<td>13184</td>
<td>155943</td>
<td>172697</td>
<td>228166</td>
<td>3.47%</td>
<td>290680</td>
<td>4.52%</td>
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<tr>
<td></td>
<td>Bicycling off-road</td>
<td>309154</td>
<td>42120</td>
<td>55920</td>
<td>673833</td>
<td>1119108</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cycling</td>
<td>57132</td>
<td>6100</td>
<td>66392</td>
<td>79670</td>
<td></td>
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<tr>
<td></td>
<td>Horseback Riding</td>
<td>53153</td>
<td>5612</td>
<td>64386</td>
<td>85641</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Climbing/Mountaineering</td>
<td>15728</td>
<td>1629</td>
<td>18244</td>
<td>21547</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>4 Camping Visits</td>
<td>Rec. Vehic. Camping</td>
<td>68552</td>
<td>62758</td>
<td>1048869</td>
<td>1743527</td>
<td>6.43%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Tent Camping/Motor Vehc</td>
<td>305514</td>
<td>673833</td>
<td>1119108</td>
<td>1743527</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>30 Organ Group Camping</td>
<td>26410</td>
<td>2679</td>
<td>27320</td>
<td>27123</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>31 Horse Camo/Packstock</td>
<td>13974</td>
<td>21794</td>
<td>24296</td>
<td>24186</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>32 Horse Camping</td>
<td>73548</td>
<td>75453</td>
<td>78084</td>
<td>80527</td>
<td></td>
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<tr>
<td>5 Hunting Visits</td>
<td>Hunting Big Game</td>
<td>61759</td>
<td>64847</td>
<td>68287</td>
<td>68874</td>
<td>7.33%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Bow Hunting</td>
<td>14691</td>
<td>16145</td>
<td>15309</td>
<td>15747</td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Hunting/Upland Game</td>
<td>66983</td>
<td>70310</td>
<td>72192</td>
<td>73446</td>
<td>7.78%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>54 Bird</td>
<td>146422</td>
<td>150302</td>
<td>155748</td>
<td>157669</td>
<td>0.55%</td>
<td>170642</td>
<td>0.70%</td>
<td></td>
</tr>
<tr>
<td>6 Other Land-Based</td>
<td>Nature Study/Wildlife Obs.</td>
<td>79320</td>
<td>92479</td>
<td>1083116</td>
<td>1532125</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>20 Countd. &amp; Photo.</td>
<td>26107</td>
<td>285107</td>
<td>290680</td>
<td>397047</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>21 Visiting Interp./Displays</td>
<td>2664</td>
<td>2679</td>
<td>27320</td>
<td>27123</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td>45 Picknicking</td>
<td>21473</td>
<td>24282</td>
<td>24941</td>
<td>25625</td>
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<td>Fishing Visits</td>
<td>661662</td>
<td>78512</td>
<td>950233</td>
<td>1386931</td>
<td>4.63%</td>
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<td></td>
<td>Fishing from Boat</td>
<td>97375</td>
<td>108888</td>
<td>119783</td>
<td>130516</td>
<td>169229</td>
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<tr>
<td></td>
<td>2 Fishing from Bank/Dock</td>
<td>298139</td>
<td>231346</td>
<td>255573</td>
<td>279394</td>
<td>354275</td>
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<tr>
<td></td>
<td>35 Fishing</td>
<td>305614</td>
<td>342074</td>
<td>373556</td>
<td>404420</td>
<td>2.31%</td>
<td>523504</td>
<td>2.97%</td>
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<tr>
<td>8 Boating Visits</td>
<td>River - nonmotorized</td>
<td>14619</td>
<td>16747</td>
<td>17240</td>
<td>17733</td>
<td>19867</td>
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<tr>
<td></td>
<td>Lake - nonmotorized</td>
<td>26936</td>
<td>34277</td>
<td>42143</td>
<td>51467</td>
<td>50563</td>
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<td></td>
<td>Lake - powerboating</td>
<td>38321</td>
<td>39067</td>
<td>40123</td>
<td>42023</td>
<td>45995</td>
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<tr>
<td></td>
<td>Waterskiing</td>
<td>82536</td>
<td>90111</td>
<td>95906</td>
<td>109867</td>
<td>2.31%</td>
<td>122218</td>
<td>1.99%</td>
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<td>9 Other Water-Based</td>
<td>Swimming/Wading</td>
<td>36291</td>
<td>36956</td>
<td>37753</td>
<td>37718</td>
<td>39637</td>
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<td>Water Sports</td>
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<td>49980</td>
<td>53974</td>
<td>52693</td>
<td>64343</td>
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<td></td>
<td>Winter Sports</td>
<td>82761</td>
<td>88906</td>
<td>91727</td>
<td>92394</td>
<td>0.83%</td>
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<td>Cross-Country Skiing</td>
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<td>19916</td>
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<td></td>
<td>37 Sledding/Snowplay</td>
<td>64394</td>
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<td>84031</td>
<td>83424</td>
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<td></td>
<td>38 Snowmobiling</td>
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<td>86133</td>
<td>101829</td>
<td>103609</td>
<td>2.04%</td>
<td>117522</td>
<td>2.07%</td>
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(1) Source - BLM Recreation Management Information System
(2) Source - Activities by Summary Table Number in the Pacific NW Outdoor Recreation Consumption Project on Study, Oregon State University, January 1999
Table 19. Projected Recreation Visits to BLM Administered Lands in the Three Rivers RA for the Years 2000 and 2010.

<table>
<thead>
<tr>
<th>RMIS CATEGORIES</th>
<th>OREGON PROJECT ACTIVITIES, REG. 11</th>
<th>1989 BASE PERIOD VISITS(2)</th>
<th>PROJECTED REC. VISITS FOR THE YEAR 2000(3)</th>
<th>PROJECTED REC. VISITS FOR THE YEAR 2010(3)</th>
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<tbody>
<tr>
<td>1 ORV TRAVEL</td>
<td>38 MOTORCYCLING OFF-ROAD</td>
<td>5300</td>
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<td></td>
<td>39 ATV DRIVING(3 &amp; 4 WHL)</td>
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<td>6944</td>
<td>8742</td>
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<td></td>
<td>40 4-WHL VEHICLES OFF-ROAD</td>
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<td>2 OTHER MOTORIZED</td>
<td>46 SIGHTSEEING/EXPLORING</td>
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<td>3 NONMOTORIZED</td>
<td>22 DAY HIKING/TRAIL</td>
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<td>2999</td>
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<td>25 O'NIGHT HIKING-NO TRAIL</td>
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<td></td>
<td>42 BICYCLING - ON ROAD</td>
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<td></td>
<td>43 BICYCLING - OFF ROAD</td>
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<td></td>
<td>44 HORSEBACK RIDING</td>
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<td></td>
<td>26 CLIMBING/MOUNTAINEERING</td>
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<td>4 CAMPING VISITS</td>
<td>27 REC. VEHIC. CAMPING</td>
<td>34100</td>
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<td>61700</td>
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<td>30 ORGAN. GROUP CAMPING</td>
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<td>31 HORSE CAMPING/PACKSTOCK</td>
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<td>32 HORSE CAMPING</td>
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<tr>
<td>5 HUNTING VISITS</td>
<td>48 HUNTING BIG GAME</td>
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<td>6380</td>
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<td>49 BOW HUNTING</td>
<td></td>
<td>6652</td>
<td>7092</td>
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<td></td>
<td>50 HUNTING/UNLAND GAME</td>
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<td>6 OTHER LAND-BASED</td>
<td>19 NATURE STUDY/WDLF. OBS.</td>
<td>18600</td>
<td>21362</td>
<td>24390</td>
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<td>20 OUTDOOR PHOTO</td>
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<td>25207</td>
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<tr>
<td></td>
<td>21 VISITING/INTERP./DISPLAYS</td>
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<td></td>
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<td></td>
<td>45 PICNICKING</td>
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<tr>
<td>7 FISHING VISITS</td>
<td>1 FISHING FROM BOAT</td>
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<td>17752</td>
<td>20424</td>
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<td>2 FISHING FROM BANK/DOCK</td>
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<td>19438</td>
<td>26143</td>
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<td>8 BOATING VISITS(4)</td>
<td>13 RIVER-NONMOTORIZED</td>
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<td>1923</td>
<td>1967</td>
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<td></td>
<td>14 LAKE NONMOTORIZED</td>
<td></td>
<td>1961</td>
<td>2060</td>
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<td></td>
<td>15 LAKE - POWERBOATING</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>9 OTHER WATER-BASED</td>
<td>8 SWIMMING/WADING</td>
<td>1010</td>
<td>1050</td>
<td>1102</td>
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<td></td>
<td>9 WATERSKIING</td>
<td></td>
<td>1097</td>
<td>1225</td>
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<tr>
<td>10 WINTER SPORTS</td>
<td>36 CROSS-COUNTRY SKIING</td>
<td>1700</td>
<td>1881</td>
<td>2081</td>
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<tr>
<td></td>
<td>37 SLEDDING/SNOWPLAY</td>
<td></td>
<td>2114</td>
<td>2518</td>
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<tr>
<td>11 SNOWMOBILING VISITS</td>
<td>33 SNOWMOBILING</td>
<td>1300</td>
<td>1423</td>
<td>1515</td>
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<td></td>
<td>38 CROSS-COUNTRY SKIING</td>
<td></td>
<td>1571</td>
<td>1812</td>
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</tbody>
</table>

(1) SOURCE - ACTIVITIES BY SUMMARY TABLE NUMBER IN THE PACIFIC NW OUTDOOR RECREATION CONSUMPTION PROJECTION STUDY.
OREGON STATE UNIVERSITY, JAN., 1989 FOR SCORP REGION 11 (INCLUDING LAKE, HARNEY AND MALHEUR COUNTIES).

(2) SOURCE - BLM RECREATION MANAGEMENT INFORMATION SYSTEM, BURNS DISTRICT.

(3) CALCULATED FROM THE BASE PERIOD FIGURES USING THE AVERAGE ANNUAL GROWTH RATES FOR EACH RMIS CATEGORY AS SHOWN IN TABLE 18.

(4) PROJECTIONS FOR BOATING VISITS AT CHICKAHOMINY RESERVOIR CALCULATED USING PERCENT CHANGE FOR LAKE, POWER BOATING ACTIVITY ONLY.
BOATING VISITS FOR WARMSPRINGS RESERVOIR ARE COUNTED BY THE BUREAU OF RECLAMATION, THE MANAGING AGENCY FOR THAT AREA.
Table 20. Gold Development Scenarios

With the increased activity associated with gold mining in the Vale District (to the east of the planning area) and in northern Nevada (to the south of the planning area), and with increased claim staking activity in the RA over the past year, it was determined that generalized gold mining scenarios should be included. One such scenario has been previously developed for the Proposed National Historic Oregon Trail Interpretive Center at Flagstaff Hill Decision Record and Environmental Assessment, appendix H (BLM, 1988). Another gold mining scenario that should be considered is one similar to the recently proposed Grassy Mountain Mine in northern Malheur County, Oregon. This scenario would be fairly typical of gold mining operations in eastern Oregon that use cyanide, although it is smaller than most operations in Nevada. While both of these scenarios are based on BLM experience in the field, individual operations would be expected to vary somewhat. Approval of mine development plans would require sufficient mitigation measures to address concerns such as reclamation, neutralization, sensitive resource values protection, etc. Both scenarios have been included for illustrative purposes only.

Mineral Development Scenario for the Flagstaff Hill Mine

The attached scenario is based on the assumption that a potential ore body could be worked by either surface mining and cyanide heap leaching, or by underground mining associated with agitation cyanide milling. Actual extraction might involve elements of both or use of a different milling technology. Open pit mining and heap leaching would permit recovery of a larger low grade (about 0.1 oz gold/ton) deposit assumed to be on the order of 6 million tons (100 feet wide x 500 feet deep x 1,500 feet long), while higher extractive costs of underground recovery would limit mining to a smaller amount of higher grade ore (about 0.3 oz gold/ton) on the order of 400,000 tons (5 feet wide x 1,000 feet deep x 1,000 feet long). These reserve values were chosen to be generally consistent with mineral deposit models described in our July 26, 1988 report on the “Mineral Potential of the Flagstaff Hill Area, Baker County, Oregon.”

Economic projections for open pit development are represented as a range bounded by estimates based on the Bureau of Mines IC 9070, “Gold Availability”, and the Mining Cost Service 1988 cost model for a 2,000 ton per day mine with a 4:1 stripping ratio. Back calculation of direct employment, based on these sources, agrees fairly well with available information reviewed by the staff for other western U.S. open pit/cyanide leach operations with greater than 5 million tons of reported reserves.

This mineral development scenario was prepared strictly for the benefit of BLM land use planning to assess possible employment association with operation of a mine at Flagstaff Hill and environmental assessment. This scenario should not be used for any other purpose. It is based on possible future discoveries and not on the presence of known deposits. The scenario does not include employment during the development and start up phases of the projected mine(s). It envisions two mine development possibilities or combinations:

1. Open pit-mineable deposit of about 6,000,000 tons (100 feet x 1,500 feet x 500 feet) with a grade of about 0.1 ounce gold per ton to be recovered by heap leach techniques, and
2. Underground-mineable deposit of about 400,000 tons (5 feet x 1,000 feet x 1,000 feet) with a grade of about 0.3 ounce gold per ton to be recovered by agitation cyanide leach milling techniques.

In addition it is important to point out that the chances of any mining operation occurring at the site are in the range of 1 in 5 to 1 in 50, based on our professional judgment and experience in observing the success of similar properties.

Average hourly wage of the labor is taken at $13.89. The cost of labor to the company including fringe benefits is $150/day per employee-shift. Mine life is assumed to be 10 years. The mill is operated 300 days per year and the mine 250 days per year.

1. Open pit and Heap Leach Operations.

<table>
<thead>
<tr>
<th>Mine production</th>
<th>Mill production</th>
<th>Heap leach recovery</th>
<th>Stripping ratio (tons of waste tons of ore)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,400 tons/day</td>
<td>2,000 tons/day</td>
<td>75% of contained gold</td>
<td>4.0:1.0</td>
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</table>

Employees:

<table>
<thead>
<tr>
<th></th>
<th>Mine</th>
<th>Mill</th>
<th>Total</th>
<th>Total Yearly Payroll ($)</th>
<th>Other Yearly costs ($)</th>
<th>Capital costs ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mine A</td>
<td>133</td>
<td>29</td>
<td>162</td>
<td>5,800,000</td>
<td>6,600,000</td>
<td>25,000,000</td>
</tr>
<tr>
<td>Mine B</td>
<td>64</td>
<td>31</td>
<td>95</td>
<td>3,400,000</td>
<td></td>
<td>33,000,000</td>
</tr>
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</table>

Table 20. Gold Development Scenarios (continued)

2. Underground Mine and Agitation Leach Mill

<table>
<thead>
<tr>
<th></th>
<th>Mine production</th>
<th>Mill production</th>
</tr>
</thead>
<tbody>
<tr>
<td>(shrinkage stop)</td>
<td>160 tons/day</td>
<td>133 tons/day</td>
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</table>

Employees

<table>
<thead>
<tr>
<th></th>
<th>Total Yearly Payroll</th>
<th>Other Yearly costs</th>
<th>Capital costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mine A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mine A from Mining Cost Service Cost Model (1988) (projected from 500 m T/D and 1000 m T/D cost models).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mine A from Mining Cost Service Cost Model (1988) (projected from 500 m T/D and 1000 m T/D cost models).</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Selected data for Western U.S. open pit and underground mines is given in Table 1 for general comparison with projected mine development.

The expected economic impacts to the local community include direct and indirect employment, nonwage/salary purchases by the mine, and increases in the assessed property evaluation. The capital cost of construction can be expected to approximate the assessed evaluation of the mine and mill for property tax purposes, but does not include a value for inplace ore reserves. Most of the nonpayroll operating expenses are likely to be spent in the local community. It is assumed that 75 percent of actual nonpayroll expenses will be spent in the community. The major economic impacts of the mineral development scenario are summarized below:

Open Pit Mine

- Employment, direct: 95-162 jobs
- Payroll, annual: $3.4-5.8 million
- Purchases in local community, annual: $5.0 million (assumed 75% of total)
- Mine/Mill Property Value: $25-33 million (not including ore reserves)
- Employment, secondary: 95-234 jobs (assumes factor of 1.0 to 2.0)

Underground Mine

- Employment, direct: 71 jobs
- Payroll, annual: $2.6 million
- Purchases in local community, annual: $0.8 million (assumes 75% of total)
- Mine/Mill Property Value: $12 million (not including ore reserves)
- Employment, secondary: 71-142 jobs (assumes factor of 1.0 to 2.0)

While the scenario assumes a 10 year-life, it is not an uncommon experience in similar mining districts for additional discoveries to significantly extend mine life.

Mineral Development Scenario for Northern Malheur County

- Location: 25 miles SW of Vale, Oregon.
- Mine Life: 10 years.
- Local Economy: Projected impact is 400 new jobs (economic multiplier of 2).
- Reserves: 30-40 million tons.
- Overburden: 60-80 million tons.
- Heap Leach Ore: 10-30 million tons.
- Production: 1 million ounces of gold and silver.
- Disturbance: 1,100 acres.
- Ore Processing: Lower grade to be heap leached. Higher grade to be milled (carbon-in-leach).
- Mining Method: Open pit (2) and possibly underground.
- Operating Hours: 24 hours per day, 7 days per week throughout the year.
- Pit Size: Grass Mountain pit: 2,300' diameter/1,000' deep (83 acres). Crab Grass pit: 3,000' x 2,000' x 100' deep (110 acres).
- Heap Pad Size: One heap leach pad covering 160 acres.
- Tailings Pond: One pond covering 124 acres to hold 2 to 5 million tons.
- Liners: Heap pad, pregnant pond, and tailings pond will be lined with a synthetic liner.
- Neutralization: Heap pad will be neutralized after mining.
- Ground Water: Water quality monitoring wells will be used to ensure ground water does not become contaminated.
- Reclamation: Buildings will be removed. Waste rock piles, heaps, tailing ponds, and other disturbed areas will be reshaped and then revegetated after topsoil is replaced. Pits will not be backfilled.

Appendix I-204
## Index to Comment Letters

<table>
<thead>
<tr>
<th>LETTER NUMBER</th>
<th>COMMENTER</th>
<th>PAGE NUMBER OF COMMENTS</th>
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<tbody>
<tr>
<td>1</td>
<td>Oregon Environmental Council/Mary Hanson</td>
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<td>Riddle Ranch/Western Range Service Olleys, Bailey</td>
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<td>Nature Conservancy/Vander Schaff, Dick</td>
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<td>OPLAC/Frank Vaughn</td>
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<td>Native Plant Society of Oregon/Stanley Garret</td>
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<td>Swamp Creek Ranch/Wayne Ousley</td>
<td>Malheur Field Station/Lucile Housley</td>
</tr>
<tr>
<td>224</td>
<td>The Chuckar Foundation/Edward Robertson</td>
<td>Malheur Field Station/Lucile Housley</td>
</tr>
<tr>
<td>225</td>
<td>The American Alpine Club</td>
<td>Malheur Field Station/Lucile Housley</td>
</tr>
</tbody>
</table>

Appendix II-4
greater use of native species in vegetation treatments. DEC continues to rely on grazing to maintain the investment and support the continuation of grazing. All efforts should be expanded to protect native vegetation communities. We should continue to depredate grazing and control the stormwater terms for older vegetation and non-grazeable areas.

1-12 Item 4. We recommend grazing also be excluded from Saddle Butte, especially during the late spring. All efforts should be expanded to protect native vegetation communities. We should continue to depredate grazing and control the stormwater terms for older vegetation and non-grazeable areas.

1-13 Vegetation Management (Table 3-14). Item 2: The vegetation management plan for the WDF should include the following:

- Native species
- Vegetation management
- Vegetation modification
- Weed control
- Vegetation health

2. Item 4. We recommend the use of native species in vegetation treatments. DEC continues to rely on grazing to maintain the investment and support the continuation of grazing. All efforts should be expanded to protect native vegetation communities. We should continue to depredate grazing and control the stormwater terms for older vegetation and non-grazeable areas.
Livestock.

1-26 Areas of Critical Environmental Concern (Table 2.1-38) I recommend designations of Matt Butte and Squaw Lake as AECs. The AEC should provide protective designation for all special and unique areas until such time as more native communities can be restored. Should Matt Butte and Squaw Lake receive little or no grading pressure it is difficult to understand why they are not designated. Designation would provide some protection from surface disturbance from mining. Please reconsider.

1-27 Visual Resources This section was rather confusing. Please explain how the HQI VUM relates to the VUM classification found in Appendix E, Table 1-34. Is it a representation of the preferred alternative?

Cultural Resources: I'm very pleased to see some attention paid to cultural resources. OCR supports Alternatives B, D, and F.

1-28 Energy and Minerals (Table 2.1-38): I object to the language in all objectives that intends to maximize energy and mineral development in the EA. A more conservative approach would be preferable, in spite of current federal mining laws. It would help if you deleted the word “maximize” when it occurs in the management objectives.

1-29 Lands and Realty (Table 2.1-42): Item 1 under “Eliminate unauthorized use of public lands.” How long is long-term, and how short is short-term?

Item 3: Good show!

1-30 Table 2.1.4: Item 3 under “Acquire public and administrative access…” Add “consistent with other resource values.”

On behalf of the Oregon Environmental Council, thank you for the opportunity to comment.

Sincerely,

Mary Nissen
1997 W. Pierce
Burns, OR 97720

Applicability Rules

Chapter 34, Division 4, Department of Environmental Quality

1.01

The intention is that where any utilization criteria is met, removal of livestock from the premises is questions would be triggered. See the Proposed Plan for clarification of riparian utilization criteria.

1.02

It is important to note that the proposed riparian recovery criteria aremet in most cases. The riparian habitat management actions in the Proposed Plan are consistent with water quality management actions and riparian habitat management actions. See M.S. 1.01 and 1.02 of the Proposed Plan.

1.03

Under the Preferred Alternative, Water Quality Management Criteria, Item 11, the intent and purpose was to establish a buffer area that would reduce the impact of non-point source pollution from the surrounding area into the Malheur fish habitat. This would reduce erosion and runoff from treated areas, and reduce adverse impacts on aquatic habitat due to public activity. With the proposed wording, this objective will be changed to read “…of any area within 1 mile of perennial water to less than 20% of the subbasin in any one year.”

1.04

Though Item 11 does not address cumulative effects of habitat alteration in adjacent areas prior to any mechanical or fire treatment, a prescribed fire plan and an NPS document would be prepared for public comment. The cumulative impacts are consistent with the measured activity.

1.05

The water quality areas identified on Map WQ-1 in Volume 1 of the text are provided to assist the reader in locating particular streams.

In Table 3 of Appendix II, SFW/4SSS, the c’s in the three columns from the right were shifted too far to the left and have been corrected in the SFW/4SSS. Additionally, a table identifying beneficial use areas of water in the Malheur basin was provided in SFW/2000, Appendix I, Table 2.

The management objectives and actions for lakes (Table 1.04, 2.09/3.05/3.55) have been rewritten. The management actions target accelerated erosion (erosion due to human activity). The achievement of a stable or no erosion equilibrium across the entire planting area is not an achievable goal, because a certain amount of erosion is naturally occurring. The rate of slope erosion depends upon factors such as slope, soil, climate and cover. With the exception of cover, these factors cannot be controlled on a large scale. In addition, given the length of the project, the function of floodplains, Streams can cut laterally or vertically into their streambanks or beds for several reasons, one of which is the lack of sediment during peak flows, when the amount of energy available to carry sediment in high (null 1979). Accelerated erosion on the other hand, may cause problems such as siltation and degradation of fish habitat.
Appendix II-7
The interdisciplinary team analysis resulted in the conclusion that Katt Butte and Spruce Lake do not meet Bureau ADE criteria for relevance or importance. Neither Katt Butte nor Spruce Lake have clearly or strongly include relevant cool needs that are required by the Oregon Natural Heritage Plan, rather such fails some nam of being truly representative (relevance) and truly appropriate (importance). Katt Butte includes pristine plant communities representative elsewhere in the system, and is a geological feature that is noteworthy but not exceptionally. Spruce Lake is not a permanent feature but rather an intermittent pool, and any associated plant needs for plant communities have been mediated or designed at better sites elsewhere. No particular threats are posed to either locality.

Map PM-1 is the present classification for managing visual resources on Bureau-administered lands in the RA, it denotes the areas listed in Table 3, Alternative D (Continuation of Present Management) of Appendix 5. 3086/0617.

Where the expression "maximum opportunity" is used, it is to reference opportunity to explore, lease, develop, etc., mineral resources within conservations imposed by necessity to protect aesthetic resource values. Such protective constrictions have been designed to be the least restrictive necessary to protect the sensitive resource values while avoiding unnecessarily encumbering mineral activity consistent with BLM's multiple-use mission.

The authority to authorize occupancy or agricultural uses on public land is contained in Section 307(d) of the PLMA. The regulations established under the act limit short-term permits to a maximum period of 3 years. Long-term leases must be issued for a period that is consistent with the time required to acquire the capital investment of the use being authorized. In practical terms, depending on the use, this would range from 3 years to a term of 10, 20, or 50 years or more, as determined by the authorized official. Perpetual agricultural or occupancy uses would require disposal of the land by sale or exchange.

The statement "consistent with other resource values" has been added to the referenced management objective in the Proposed Plan.

Appendix II-8
giving wildlife and wild horses priority over cattle in forage allocations is unfair and inconsistent with recent Federal Court decisions. It may be illegal.

2-7 BLM has failed to address many of the adverse impacts of their preferred alternative on livestock and wildlife. Federal regulations 43 CFR 1600.4-5 require BLM to

CHAPTER

reduce soil erosion, increase recreational opportunities, and provide minimal impacts on the programs of visual and wilderness resources, minimize the impacts of the program on plant and wildlife diversity, and ensure that wild horses and livestock is maintained.

2-8 The organization of this report corresponds to the analysis in this Draft RMP/EIS. The organization of the Draft RMP/EIS includes the following sections.

2-9 The objectives stated above in the Draft Rangeland Program Summary Update address the planning issues related to livestock grazing. If BLM proposed alternative E was used a significant reduction in livestock stocking rates and wildlife in the Drewsey Grazing District will be maintained. The allocation of livestock forage to wild horses and livestock, maintain water quality and animal species.

2-10 The objectives stated above in the Draft Rangeland Program Summary Update address the planning issues related to livestock grazing and wildlife. If BLM proposed alternative E was used significant improvement in improving the public rangelands through intensive livestock management and range improvements.

2-11 The objectives stated above in the Draft Rangeland Program Summary Update address the planning issues related to livestock grazing and wildlife. If BLM proposed alternative E was used significant improvement in improving the public rangelands through intensive livestock management and range improvements.

2-12 The objectives stated above in the Draft Rangeland Program Summary Update address the planning issues related to livestock grazing and wildlife. If BLM proposed alternative E was used significant improvement in improving the public rangelands through intensive livestock management and range improvements.
My use the number of miles of streams and acres of "flat" water in the three areas includes 126.5 miles of stream and 4,495 acres of "flat" water in the Surface Water section to 83.45 miles of stream and 4,085 acres of "flat" water in the Aquatic Habitat section.

Available references or detailed explanation should be provided for the methodology used in determining surface water quality, aquatic habitat and riparian habitat condition and yet there is no explanation how this information was collected, analyzed and interpreted. What is the difference and similarities among surface water quality, aquatic habitat and riparian habitat condition ratings?

Why is temperature used in surface water quality condition? Isn't water temperature used in determining aquatic habitat condition rating?

In Appendix 4-3 the aquatic habitat condition ratings and values assigned to riparian and surface water quality condition ratings are based on a percentage of potential or optimum. Are the excellent, good, fair and poor condition ratings based on uniform basis (e.g., 95-99 = good; 75-94 = fair; 01-74 = poor)?

In Appendices 5 and 6, condition and trend for surface water quality, aquatic habitat and riparian habitat condition ratings are presented for streams in the Resource Area. Are the condition ratings current? When were the condition ratings last obtained? Were two or more estimates of condition ratings obtained at different points in time, used to determine trend? If trend was based on one point in time, the "trend" concept rather than "trend should be used in Appendix 5-1 and 6-1.

There appear to be inconsistencies in the surface water quality, aquatic habitat and riparian habitat condition ratings. For example in Deep Creek, aquatic habitat and riparian habitat condition are good and the land is privately owned, whereas there is little livestock use (NO livestock access [Appendix 6-1]). In the Carson River, surface water quality (Appendix 6-1) is good and static, and aquatic habitat is fair and improving.

On Battle Creek the riparian habitat is fair and improving and surface water quality is poor and static on 2% of the stream. Could these inconsistencies be a result of differences in the observed natural variation and sampling error? Is there an error in the calculation of aquatic habitat condition rating?

Are there any circumstances in the Resource Area that exist where good or better surface water quality, riparian habitat and riparian habitat condition ratings are possible in the three Rivers Resource Area?

Since most of the streams are privately owned or controlled by other agencies, all of the livestock and riparian uses do not have good surface water quality. Does BLM have any evidence to suggest that good or better water quality ratings are possible in the three Rivers Resource Area?

There are no changes in the riparian and aquatic habitat condition ratings in the Carson River from 1981 to 1987. Would it not be more logical to determine if any proposed BLM alternative would improve the condition ratings?

Researchers have given the following recommendations for proper use factors for season long grazing systems. Pickford and Reid (1984) and Beier (1985) recommended that utilization rates of bluebunch wheatgrass (an important key forage species in the Resource Area) should not exceed 55% to 60% during the growing season in Eastern Oregon. Moderate grazing intensity appears to be the most conduct for maintaining vegetative cover for livestock grazing in the Northern Great Plains (Galen . . . 1966). Stock and Price (1942) recommended grazing 50% of forage plants at a moderate level.

The proposed 30% utilization limit does not consider the season when grazing takes place. The effective grazing period for riparian vegetation is often measured in terms of "cohorts of season" key forage species depend on the timing of rotational grazing or season of use (Cook 1977 and Sargent 1967).

The proposed 30% utilization limit in Alternatives B and C is especially inappropriate for creates wheatgrass which comprises approximately 55% of the Resource Area (Appendix 1-1). Utilization levels should exceed 25% of their 30% utilization level for creates wheatgrass on 96.5% of the Resource Area. An additional 5% utilization level was recommended by Friench and Heltshe (1986) for highly valued forage species on 70.7% of the Resource Area.
null
Currently, BLM's desired stocking levels are based on a formula described in Exhibit I attached herein. The formula (GH3) observed utilization levels, desired property factor (DPF), 50% utilizing limit (UU), and current utilization limit (CUU) are currently have the information necessary to complete an analysis on a Resource Area basis. We do not assume the information presented in the EIS and make some assumptions.

The first reduction will result from the exclusion of livestock from stream bottomlands for all livestock except AUM's to meet the 50% utilizing limit. Additional allowances to wildlife will further reduce authorized livestock use to 70,399 AUM's, a 10% cut from active preference. After 4 or more years and after assessment grazing is utilized on the eliminating stream, livestock grazing may be increased to 87,761 AUM's, a 2% cut from current active preference. In all range improvements are implemented stocking levels could be increased to 34,647 AUM's, a 4% cut from current active preference. Size utilization data equals 105, corresponding cubs initially, after livestock are removed and area improvements are made, current are 75, 65 and 55. Refer to Exhibit I for formulas, equations and explanations.

In the Middle Bighorn Allotment, Western Range Service Using BLM data methodology (BLM Technical Reference TR 440+) and field verification purposes factors (Drummond, 1977), estimated that a 20% to 30% increase in active preference is indicated. Using the 30% limit in the Draft BLM/EIS, a 20% to 50% increase in active preference is indicated (Note: this does not include the proposed allocation to wildlife or water quality livestock exclusion). If the allocation to wildlife is included, the decrease in active preference will be 60% to 70%. If livestock exclusion for water quality is included, the reduction in livestock grazing will be approximately 105% to 115%.

BLM must describe and indicate the calculations and methodology used to estimate the impacts of the various scenarios on livestock operators in this plan. The values shown are only an average difference between Alternatives B and C and do not predict any range improvements in livestock grazing. Adjustments, which may be made by Alternative C reflects the process used in the existing BLM prioritization process. We only consider that Alternative C is truly the preferred alternative (and Alternatives B and C in this Draft BLM/EIS) sufficiently reduces adverse effects of their proposed actions on livestock grazing? does not plan to control population levels. If BLM does not control wild horse population levels, there will be critical environmental concerns.

In Appendix 3, Table 6, BLM has reallocated pasture available for livestock grazing in favor of wildlife. For the Middle Mountain allotment, the Drummond Grazing 80% wildlife allocation is limited to the area that can be used under the existing Livestock grazing is facing a 50% to 75% reduction in forage and wildlife forage is being increased over 150%.

We do not believe that one multiple use should have priority over another multiple use. The recent increases in wildlife have occurred after the passage of the Taylor Grazing Act. Federal Judge Roger Foley stated in the recent decision of Fallini et al. vs. BLM, CV-05-16-645 that: "Congress by various enactments has declared additional purposes for which Taylor Grazing Act land will be managed by the BLM. There is no indication that Congress has repealed the Act's primary purposes to manage grazing lands so as to stabilize and preserve the livestock industry.

This court has rejected the contention that cattle have an interest superior to wild horses in public lands as a result of congressional enactments after the Taylor Grazing Act of 1934. The preferred alternative land Alternatives B and C in this Draft BLM/EIS substantially reduces livestock grazing in favor of other multiple uses (primarily big game and fisheries).

The reallocation of 34% AUM's livestock forage to wildlife in Middle Mountain allotment will reduce the value of our base property by approximately $51,000 (assuming 50% per AUM value). Please consider this economic loss in the requested "taking Implication Assessment" conclusions.

Allocations for wildlife should occur after range improvements have been completed and additional forage is available. The increase in recent big game population indicates that the current allocation to big game is sufficient.

Why didn't BLM consider maintaining or reducing current big game population? Cattle grazing improves the quality of big game forage on fall and winter ranges. Cattle grazing also stimulates browse growth by giving a competitive advantage of browse seedlings over grass. Without grazing, growth which compete browse seedlings and prevent establishment of shrubs.

Although the number of raptor prey species may decline after seedings are complete, the positive ecological effects of additional forage may result in a larger and more diverse prey base as additional prey bases is established, is there any evidence that the biomass and surface water quality ratings are significantly different than any other multiple use.

Why are the surface water quality ratings so much lower than the aquatic habitat condition ratings? Is the quality of water with respect to its suitability for a particular use the same? The references to water temperature and siltation. Water quality is defined in this Act (Diedrich 1943). Water quality is defined in this Act (Diedrich 1943).

For additional comments on aquatic and riparian condition see our comments Concerning Surface Water quality above.

After July 31, most forbs will be dormant, and effects of grazing on dormant forbs will be minimal. Eliminating grazing after July 31 should have no effect on the abundance of forbs. Prohibiting a conversion of cattle to sheep in bighorn sheep habitat will not benefit sheep habitat because sheep will not be allowed to graze more efficiently. The references to aquatic and riparian conditions are not appropriate for this area. The references to aquatic and riparian conditions are not appropriate for this area.

Wild horses are populations are above appropriate levels throughout most of West. Wild horse populations are not in any environmentally desirable population. We do not consider as Areas of Critical Environmental Concern unless HM
Currently, BLM’s desired stocking levels are based on a formula described in Exhibit 1 attached herein. The formula uses observed utilization data, desired proper use factor or utilization limits and has no effect on the abundance of forage. Although we do not currently have the information necessary to complete these calculations on a resource area basis, we can use the information presented in the EIS and make some assumptions.

The first reduction in livestock grazing from BLM proposed utilization levels is due to the exclusion of mountain sheep. BLM estimates that the capacity will be reduced from 204 to 258, with a 94% decrease in active preference. If the utilization area is subject to the new BLM utilization limits, it will affect the remaining area in a similar manner. BLM did not provide utilization estimates based on their existing utilization data. Therefore, if we assume that BLM overall utilization data is between the 5% and 75% utilization limits, we can estimate the range of impacts for the 30% utilization limit.

Assuming BLM utilization data equals 60%, desired stocking levels will be reduced to 73,921, which is 28% less than the 5% utilization limit. Additional allocations to wildlife will further reduce authorized livestock to 70,199, which is 33% less than the 5% utilization limit. After 6 or more years and after livestock grazing is allowed to be exercised, livestock grazing may be increased to 94,647, which is 16% less than the 60% utilization limit.

In the Riddle Mountain allotment, Western Range Service using BLM data methodology (BLM technical reference TR 440-7) and utilization proper factor (Prepared Reference 670) estimated that a 20% to 25% increase in active preference is indicated. Thus, the 30% limit in the Draft RMP/EIS, a 10% to 25% decrease in active preference is indicated (note: this does not include the proposed allocation to wildlife or water quality livestock exclusion). If the allocation to wildlife is included, the decrease in active preference will be 60% to 65%. If livestock exclusion for water quality is included, the reduction in active preference will be 70% to 75%.

BLM must describe and illustrate the calculations and assumptions used to reach these conclusions. A comparison of the baseline allotment for livestock grazing is shown. Only minor differences exist between the current BLM predictions and present livestock grazing levels vary dramatically. Only Alternative C estimates existing funding for range improvements. Our only conclusion is that BLM is trying to be deceptive and misleading, and will use this to generate the various adverse effects of their proposed actions on livestock grazing.

Utilization standards are not given for Alternatives D and G. The proposed utilization standards for these alternatives should be given.

The reductions in livestock grazing resulting from BLM proposed alternatives will force some livestock operators to seek alternative methods for the composition of the preferred alternative (Chapter 2).

BLM’s proposed preferred alternative will reduce the value of the Riddle Mountain basin to livestock grazing parlour for the Riddle Mountain. Assuming a value of $550 per AUM, a 50% to 75% reduction in active preference will result in a loss of $71,115 to $115,690. BLM’s preferred alternative will cause unavoidable and unacceptable economic damage to our livestock operation and livelihood.

Alternatives A, B, C, D will result in a substantial loss of our base property value, which may result in reducing the size of our operation so that it is no longer an economic unit. Therefore, we recommend that BLM considers Alternatives A, B, C, D or E are considered to be in the Final Three Rivers Resource Management Plan Environmental Impact Statement, a legislative action. The BLM has been implemented (www.officialacitivitiesblm.gov) and as authorized by Executive Order 12898, the Assistant Secretary for Natural Resources (Secretary of Interior, Donald F. Hodel).

BLM’s proposed Alternatives A, B, C, D or E will result in a decrease varying from 45,143 AUM’s (94% out) to 105,330 AUM’s (21% out) in active preference for the Riddle Mountain. Assuming a value of $550 per AUM, the base property associated with livestock grazing preference will decrease in value by $27,191,031 to $5,266,500. This is a substantial loss to the tax base of Burns County. The tax rates may have to be increased to continue to provide county services.

For Alternatives B and C, why should the updated utilization limits for horse Management Area be greater than areas excluding of wild horses (Appendices A and B).

Wild horses should not have higher priority for forage than other multiple uses. Livestock grazing preferences were legally established by the District Forest Service and BLM. One of the criteria for livestock grazing is that providing additional water will be detrimental to high water will reduce the requirements of water required for livestock grazing. This is contrary to the criteria for the composition of the preferred alternative for the Riddle Mountain.

Why didn’t BLM consider maintaining or reducing current big game populations as an alternative during the planning process? Why are the Surface water quality ratings so much lower than the aquatic habitat condition ratings? In the Glossary, surface water quality is defined as the chemical, physical and biological characteristics of water with respect to its usability for a particular use. Our reasoning is the references to water temperature and siltation. We would expect that if the aquatic habitat (water, stream bed and banks) is good, the surface water quality should be good. For additional comments to aquatic and riparian condition see our comments concerning surface water quality above.

After July 31, must farms will be dormant, and effects of grazing on dormant farm will be minimal. Eliminating grazing on July 31 would have the effect of the abundance of forage.

Wild horses should not have higher priority for forage than other multiple uses. Livestock grazing preferences were legally established by the District Forest Service and BLM. One of the criteria for livestock grazing is that providing additional water will be detrimental to high water will reduce the requirements of water required for livestock grazing. This is contrary to the criteria for the composition of the preferred alternative for the Riddle Mountain.
The BLM proposed livestock area exclusions around reservoirs provide undisturbed nesting areas for the long-billed curlew. Is there any evidence that nesting success for the long-billed curlew is lower in a moderately grazed area than an ungrazed area?

If red-tail and Kestrel mottled gull habitat is expected to be impacted in the Drewsey Grazing Management Area (Alternative D), why propose to remove livestock from streams and reservoirs and/or alter utilization limits above, and the Nevada

The cost of studying to implement and monitor the program is estimated to be $2,287,906. Many of the publicly owned riparian areas in allotment have already been fenced and excluded (or will be excluded) from livestock. Livestock grazing should not be excluded from pastures in the Middle Mountain allotment because of riparian or surface water quality ratings.

Vegetation conversions will have positive impacts on big game when negative effects. Until now, there has been limited understanding of the impacts of livestock grazing. Rangeland conversions provide for placing cells throughout the allotment to measure distribution. In some cases, road closures will make it easier to range improvements very difficult and expensive. We are not convinced that removing livestock will improve visual resources unless, of course, BLM considers cattle and sheep unattractive. Please explain how reducing livestock grazing will improve visual resources.

Cultural clearances are required prior to the construction of range improvements. Range improvements should have no cultural impacts. The calculated carrying capacity for Riddle Allotment does not appear to correspond to riparian and aquatic habitat condition ratings. We would expect that these ratings would be correlated.

Closing roads will adversely affect livestock operators ability to monitor and accurate distribution. Grazing roads will increase the difficulty and cost for placing cells throughout the allotment to measure distribution. In some cases, road closures will make it easier to range improvements very difficult and expensive. We are not convinced that removing livestock will improve visual resources unless, of course, BLM considers cattle and sheep unattractive. Please explain how reducing livestock grazing will improve visual resources.

The calculated carrying capacity for Riddle Allotment does not appear to correspond to riparian and aquatic habitat condition ratings. We would expect that these ratings would be correlated.

We will reiterate our concerns related to Middle Mountain allotment. Habitat improvement recommendations or surface water quality ratings do not reflect the obvious health and vigor of vegetation. Improvements will increase the difficulty and cost for placing cells throughout the allotment to measure distribution. In some cases, road closures will make it easier to range improvements very difficult and expensive. We are not convinced that removing livestock will improve visual resources unless, of course, BLM considers cattle and sheep unattractive. Please explain how reducing livestock grazing will improve visual resources.

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LITERATURE CITED


Cook, C. Wayne. 1966. Development and use of (forb) ranges in Utah, Idaho Agricultural Experiment Station, Utah State University Bulletin 461.

Cook, C. Wayne. 1977. Effects of season and intensity of use and desert vegetation. Utah Agricultural Experiment Station, Utah State University Bulletin 463.


Assuming that the overall observed utilization level in the Resource Area fails between the utilization limits in the Crewey Grazing RIS of 50% and 75%, the utilization based adjustments in stocking levels can be estimated. Using the above formula and BLM supplied information below, the adjustments in the Resource Area stocking levels are estimated. Therefore, the overall average of BLM's utilization data for the entire Resource Area must be estimated.

<table>
<thead>
<tr>
<th>Initial</th>
<th>Overall utilization = 50%</th>
<th>Overall utilization = 25%</th>
</tr>
</thead>
<tbody>
<tr>
<td>121,525 (300/800)</td>
<td>72,921</td>
<td>52,986</td>
</tr>
<tr>
<td>70,399 (50%)</td>
<td>59,564 (67%)</td>
<td>39,606 (67%)</td>
</tr>
</tbody>
</table>

After excluding livestock from streams, 121,525 AUM's will be allocated based upon BLM utilization data and the actual use value used in the formula will be 121,525 AUM's. If livestock were not excluded from streams, the active preference of 150,472 AUM's or perhaps the average licensed use value over the past few years would be used for the actual use value in the formula. The desired stocking level from the formula is 121,525 AUM's and 52,986 AUM's for the assumed 50% and 25% overall utilization levels, respectively. BLM proposes to reallocate 2,522 AUM's of livestock forage to wildlife. Authorizing livestock grazing will be reduced so that the total of livestock grazing and wildlife will not exceed the desired stocking level (from the formula). Therefore, BLM has the potential of initially reducing livestock stocking levels to 70,399 AUM's (75% cut) to 49,564 AUM's (67% cut) or perhaps even lower stocking rates (greater cut).

EXHIBIT 3

The proposed stocking level for Alternative C during the first five years given in Chart A, will be 121,525 AUM's. In Alternative B, stocking levels are proposed to be 133,200 AUM's. In Alternative C, stocking levels are proposed to be 139,851 AUM's. However, if the draft NEP/ES (Alternative C) is implemented, livestock stocking levels may be reduced to 90,000 AUM's or 64%, a cut or greater cut. This reduction will be based on additional allocations to wildlife for excluding cattle from streams, and the 30% upper utilization limit. Other restrictions on livestock concerning wild horses, sheep and birds of wildlife, environmental concern may result in addition cuts.

The first step in the initial reduction will be the exclusion of livestock from streams. After 28,917 AUM's will be lost by excluding livestock iron streams. Therefore, techniques of grazing will be reduced from the current active preference of 150,472 AUM's by 19% to 121,525 AUM's (150,472 - 28,917).

The remaining 22,579 AUM's will then be adjusted based on the proposed utilization standard. To simplify the calculations we will only use the 30% upper utilization limit. Most of the remaining areas (not excluded) are uplands. Since cattle water and generally prefer to graze in riparian areas, the 30% topographic and 10% wildlife riparian utilization limits may result in even larger cuts than the 30% upper utilization limit. Livestock use will probably exceed BLM's riparian utilization limits before the 10% utilization limit is reached. Therefore, these estimated livestock adjustments are conservative.

To adjust stocking rate based on utilization data, BLM uses the following formula to adjust stocking rate (see Technical Reference 34:4007).

Actual use = desired stocking level

Desired utilization

This formula can be rearranged to the following form.

Actual use = Desired use - Desired utilization

The BLM has collected utilization data and often three or more years of data for many if not all of the allotments in the three resource areas. Unfortunately, BLM utilization data for the entire Resource Area were not available during preparation of this document. Therefore, the overall average of BLM's utilization data for the entire Resource Area must be estimated.
After five or more years of livestock exclusion from streams and allowing at least a year for hard size to be reduced and increase, BLM will allow stocking levels to increase. However, the 29,377 AUMs from the excluded area will be subject to the utilization based adjustment. Previous stocking rates in the excluded areas will be reduced by 20 percent of those in the adjusted areas and the increased stocking rates will be reduced by 10 percent of the utilization based adjustment. Therefore, approximate stocking rates were not funded. BLM authorized stocking levels would be roughly 67,741 AUM's (481 cut) and 61,666 AUM's (589 cut) assuming the 608 and 708 utilization values, respectively.

After six or more years with range improvements (87,741 + 6,916 = 61,966 + 6,916 = 70,767 AUM's = 515 cut) and 70,822 assuming an overall utilization level of 690 and 105, respectively, and assuming that the improvements were funded and successful.

1-2 Planning issues and management objectives are not synonymous.

Planning issues are generally a matter of controversy or dispute over resource management activities or land use and are used to focus inventory, interdisciplinaty interaction, analysis and documentation efforts. Management objectives, however, are required (BEM Manual 1620-1625) on a resource by resource basis regardless of whether the resource is involved in a planning issue or not. The alternative presented in the DNP/FEIS very significantly as to which objectives are stated and the degree and extent to which individual objectives would be met.

1-2 Alternative D is the "No Action Alternative." In accordance with the Bureau Manual 1620-10, Chapter 4: Alternatives, to be considered: the No Action Alternative reflects continuation of current management practices. This is explained on p. 2-3 of the DNP/FEIS. A full description of the planning criteria was distributed to the public in a flyer dated February 12, 1988. The mailing list indicates that a flyer was sent to Middle Ranch.

1-3 Water quality and aquatic habitat condition and evaluation are intrinsically related to condition of the tributary ecosystems. Water quality parameters are the physiochemical and chemical constituents of aquatic systems. Standards for water quality determinations were developed by Federal action under the Clean Water Act. (See OCF 135-42.) Surface water quality parameters were measured by experienced biologists at preselected monitoring stations on select streams. If the habitat supported fish, it was evaluated as aquatic habitat. Criteria used in evaluation of aquatic habitats and derivation of condition factors were stated in BEM/PEIS, Volume II - Appendix 6, Table 2, Criteria for Evaluating Aquatic Habitats. Reference pertaining to methods of evaluation of aquatic habitats were provided with this table (see Swarren et al., 1979 and Stone 1982).

1-3 The Three Rivers BMP addresses both the old browse planning area and the old Kiley planning area. While significant progress has been made in some programs through planning efforts (since its approval, over $1 million have been invested in the Kiley area - such investments have not been made in the River area), significant management problems or concerns remain unresolved. Among these are forage limitations for elk, special management areas, water quality, fire management, etc. Where efforts to resolve these concerns would affect wildlife management, grazing use would be adjusted only on the basis of approved monitoring and evaluation procedures with riparian BMPs for all riparian management areas.

1-10 The Oregon Fish and Wildlife Commission is responsible for setting big game population levels in Oregon.

These levels, by management unit, were arrived at through a public involvement process. These levels are, in most cases, below the biological carrying capacity. Some factors used to set these numbers were private property damage, other economic considerations, hunter demand and multiple-use concerns.

Big game numbers by allotment were arrived at using these management levels and current ODFW census results by season of year. The number was then multiplied by the percent of an allotment administered by BLM. This adjustment was made for antelope and 2.4 for elk. This is the number of each of these animals (pairings and antelope) in the allotment and the number of each of these animals in elk. This is the BLM annual ADM for each of these species by allotment. For deer these numbers were then multiplied by 1.8 to account for 18 percent deer management from the amount of antelope and elk numbers were multiplied by .21 for 21 percent of antelope and elk. Antelope numbers were multiplied by .19 for 19 acres per elk.

1-11 All use adjustments will be based on all-well-specific evaluations. Setting rates and management strategies will be analyzed on the basis of monitoring done in accordance with Bureau policy and guidance. The AIM (areas cited in the BMP) are projections only. The allotments include all-well-specific adjustments for resource values such as range condition, riparian and wetland condition, aquatic and wetland habitat and special status species, etc. The Oregon Fish & Wildlife Commission also issues management objectives based on habitat levels.

Appendix II-15
Appendix II-16

2-31 Available site information was not detailed enough to target specific erosion problems within the planning area. While on area may have overall erosion conditions existing within the site area, data only specific to the erosion control system. However, some areas are known to exhibit greater erosion rates, contributing greater amounts of sediment to the floodplain area. Land management practices, such as grading or grading, streambanks, and streamside erosion, are not specifically mentioned in the Appendix II-3. The erosion control systems described are not detailed enough to be considered as the preferred alternative.

2-32 Refer to response 2-29.

2-33 The planning issues identified in Chapter I were found to be management issues. The project status report and map have been reviewed. See Table 2-11 and Map 2-12 of the Proposed Plan.

2-34 The special status species table and map have also been reviewed. See Table 2-11 and Map T-11 of the Proposed Plan.

2-35 The management prescriptions presented in the NMP are objective oriented rather than regulated improvement project oriented. As such, enhanced management can be implemented. Where water-quality data are not currently available, the management scenario described here is designed to provide direction for the management of the floodplain area.

2-36 As shown in Appendix III, Table 3, DNR/DEIS many of the special status species have been set up in the NMP. The provisions for lack of management facilities, inappropriate preservation or failure of the system to meet resource objectives. Refer to response 2-27. Also, see assessment sections IV A. 6.1, 6.2, and 6.3 of the Proposed Plan.

2-37 The 30 percent plant establishment level has been eliminated. See management section IV A. 6.1, 6.2, and 6.3 of the Proposed Plan.

2-38 As shown in Appendix I, Table 1, DNR/DEIS many of the special status species have been set up in the NMP. The provisions for lack of management facilities, inappropriate preservation or failure of the system to meet resource objectives. Refer to response 2-27. Also, see assessment sections IV A. 6.1, 6.2, and 6.3 of the Proposed Plan.

2-39 Grazing systems that are currently successful in promoting "speedy" riparian recovery will not be modified. Where riparian objectives are not being met, grazing system modifications will be accomplished during allotment activities and the activity plan process. Also, refer to response 2-27.

2-40 Refer to response 2-27.

2-41 Refer to response 2-27.

2-42 Refer to response 2-27.

2-43 Refer to response 2-27.

2-44 In the Three Rivers RA, there were 126-15 miles of perennial streams of which 126.15 miles, or 52 percent, were in poor condition.

2-45 Refer to response 2-27.

2-46 Refer to response 2-27.

2-47 Refer to response 2-27.

2-48 Though there were no streams with good or better water-quality ratings in the Three Rivers RA, data indicate good conditions in aquatic habitats with excellent livestock use (see Appendix I, Table 1, DNR/DEIS: Aquatic Habitats, I.e., Deep Creek, St. Anthony Creek). NMP Best Management Practices recognize the importance of protection and restoration of riparian communities and their direct impact on aquatic habitats and water quality. With proper livestock management, surface water quality ratings within the RA are improved to NMP standards.

2-49 Refer to response 2-27.

2-50 The erosion condition classes depicted in Map 2-2 are general in scope and do not allow for specific site-specific evaluation problems. For instance, the condition class of "good" in the 2-44 miles, or 52 percent, were in poor condition.

2-51 Refer to response 2-27.

2-52 Refer to response 2-27.

2-53 Refer to response 2-27.

2-54 Refer to response 2-27.

2-55 Refer to response 2-27.

2-56 Refer to response 2-27.

2-57 Refer to response 2-27.

2-58 Refer to response 2-27.

2-59 Refer to response 2-27.

2-60 Refer to response 2-27.

2-61 Refer to response 2-27.

2-62 Refer to response 2-27.

2-63 Refer to response 2-27.

2-64 Refer to response 2-27.
The Three Rivers interdisciplinaty team estimates 70 percent of all wildlife species in the NR are partially or totally dependent upon riparian habitats for food, water, and cover. Additionally, recreational uses of water resources decrease as beneficial uses of water decline. User data decline as water and wildlife are degraded and made unavailable for human use.

Given the poor condition of surface flowing waters in the NR, the Preferred Alternative focused on the protection, restoration, and enhancement of aquatic and riparian habitats to the extent possible within the boundaries of the NR. This will not necessarily expect crop production to decline due to poor water quality. Poor water quality and nutrient enrichment may increase crops or other crop production.

2-43 Though the Three Rivers NR lacks streams with good quality water, the Andrews NR has 57 miles of good and 7 miles of excellent water quality.

2-44 All reservoirs currently fenced have design features or alternate water sources for livestock watering. This practice will continue in the future. See page 6-50, 6-51.

2-47 The reservoir cited (p. 4-6, BMP/DRIIS) is incorrect as printed. This passage should read as follows: "Each of the above improvements is predicted on the implementation of granting systems and/or projects which have been analyzed in previous reports, and have yet been funded." The planning team was instructed to analyze Alternative 2 as if the previous planning were being fully implemented.

2-48 The livestock grazing season proposed in Alternative A, BMP/DRIIS, was recommended to improve brood and forage productivity and availability on meadow and upland ranges, respectively.

2-49 All livestock grazing use adjustments, both upland and downrange, will be made through the monitoring and evaluation process. Such adjustments should be made on a case-by-case basis during the implementation of established SGI districts. The object of such adjustments will be to prevent management objectives established for the allotment(s) in question from being compromised by the practice of livestock grazing operations, as well as other sensitive resource values.

2-50 Permitted uses forage in areas away from their usual allotments could incur additional costs if the area exceeds the 100 acre limit. Determining what the costs would be is impossible without knowing the number of livestock and the distances they would have to travel. It is possible that existing livestock could be sold or otherwise disposed of in a manner which would meet the overall grazing use of the permittee's usual system. There is controversy surrounding shifting grazing use between allotments, but the practice is fully supported by the Oregon Gaming Supplement to the Allocation of Additional Forage Permanently Available for Livestock Grazing.

2-51 Refer to response 2-7.

2-52 The Burns District has no control over future funding levels appropriated by Congress nor over grazing fee levels.

See Proposed Plan management action OM-1 for a listing of allotment prioritization criteria.

See also response 2-36.

2-53 Refer to response 2-7.

2-54 Refer to response 2-7.

2-55 Refer to response 2-7.

2-56 Refer to response 2-7.

2-57 Refer to response 2-7.

2-58 Refer to response 2-7.

2-59 Refer to response 2-48.

2-60 Refer to response 2-7.

2-61 The economic analysis presented in the BMP/DRIIS indicates that, under the Preferred Alternative, potential grazing use adjustments in the short-term would have a negative impact on some operations. However, over the long-term, nearly 70 percent of the existing livestock operations currently in effect would receive less than a 10 percent reduction. This is clearly consistent with Bureau economic systems criterion number 3, "Provide for the continued opportunities for ranching operations typical of the American western heritage (emphasis added)."

2-62 The economic impacts are overstated. See response 2-7.

2-63 Tentative Implication Assessments are required by E.O. 12865 to assist federal agencies in evaluating actions which affect, or may affect, the use or value of private property. Private property refers to all property protected by the Just Compensation Clause of the Fifth Amendment to the Constitution. Granting licenses and permits do not create any right or title or generate (120 U.S. 355). The courts have therefore held that granting licenses and permits may be reviewed without payment of compensation. Clarence, v. United States, 145 P.2d 893 (7th Cir. 1944). In addition, the United States is not required to compensate for any element of value based upon the use of private fee lands in combination with the Government's permit lands. United States v. Fuller, 469 U.S. 488, 35 L.Ed.2d 461 (1970). In the interest of the fact that granting licenses and permits as well as associated regulations in these properties are not private property protected by the Just Compensation Clause. It is clear that E.O. 12865 and the requirement for the preparation of Tentative Implication Assessments are inapplicable to planning activities affecting NR grazing licenses and permits.

2-64 Refer to response 2-7.

2-65 Utilization levels will not be greater for NRs. The levels listed in the alternative were established to show that use by either livestock or wild horses would not exceed the sustained yield of any of the NRs. The utilization standard for all uplands has been changed as per response 2-7.

These utilization levels have been reduced from the final proposed action. They were used for analytic purposes only. Actual utilization standards for the two preclude the response 2-7.

2-66 Refer to response 2-6.

2-67 It is correct that wild horses populations are appropriate for the areas of the West. The Seventh Annual Report to Congress in 1988 shows the total population of wild horses and burros to be 64,108 head, while the appropriate management levels (AML) is 30,507 head. This report shows horses in Oregon to be 386 head over the AML. However, inventory numbers of wild horses and burro numbers in Oregon as of December 9, 1989, are listed at 4,790 head, which is 700 head below the AML. It is also correct to state that wild horses and burros do not appear to be in any environmental danger. The NM has been reasonably successful in Oregon in controlling wild horse numbers and plans to continue gathering excess numbers as funding allows.

2-68 The NM does plan and is mandated by the Wild and Free-Roaming Horse and Burro Act to control population levels to maintain a thriving, natural biological balance with all resources. Wild horse numbers as well as livestock and wildlife numbers may have to be adjusted in some cases to maintain this balance. Any area that has been determined to meet the stenence and importance criteria outlined in 16CFR and 80 Fed. Reg. 1913-1919. The AML may be modified within an AOC, based on staff review. It has been determined that the Kiger Mustang AOC modification meets those criteria. These wild horses are unique to this area and have received national recognition and are biologically significant. It is further determined during quarter that the entire area of 56,960 acres originally evaluated should be managed as the Kiger Mustang AOC.

2-69 Refer to response 2-6.

2-70 Refer to response 2-6.

2-71 Refer to response 2-6.

2-72 Refer to response 2-6.

2-73 Refer to response 2-6.

2-74 Souls and Sharp (1985) found that the Lone Rabbit created sagebrush meeting near Riley yielded fewer species and lower total biomass than the two sampled sites. Also, as noted in p. 4-32 of the BMP/DRIIS, hunting may become easier for some species, due to increased habitat diversity. The predicted impact from the proposed easelings was negligible. Combined with the other proposed actions, the Preferred Alternative for Agriculture will not have a significant impact on resources. This is consistent with plan recommendations as found in Table 4.26, p. 4-23 of the BMP/DRIIS.

2-75 Refer to response 3-7.

2-76 Refer to response 3-10.

2-77 The word "respectively" should have been added to these sentences.

2-78 The highest sheep range outlined on Map 89-1 in both the BMP/DRIIS and BMP/DRIIS2, includes the brown travelers used by the sheep. The type and steep side slopes of Barret and Upper Mountain and the rough canyons along the Middle Fork of the Malheur River are where the sheep live except for travel between these areas. Currently, there is almost constant forage, travel, and excretion on the upperjoin Mountains of Along the Middle Fork. It is felt that competition could result from increased livestock water being developed in these three areas. The Proposed Plan calls for the long-term enhancement of high livestock habitat in these areas. Future projects of all types will be evaluated on a case-by-case basis to ensure the health of the sheep and their habitat are not jeopardized.

2-79 No grazing exclusion for proposed improvement of long-hauled curving nesting habitat.

Allen (1983) found that curvates in southeast Washington chose meadow sites which were predominantly sagebrush/lime/scrub fields which did not present visual barriers. Most documented long-hauled curving nesting to the planting area taken place on existing sagebrush meadows. It is felt that the use of the area in the planting will provide the vegetation types desired by these birds while reducing incidental nest curving.

2-80 Ruffed gourds and mallards occupied fields that were not negatively impacted under Alternative D. As habitat improvement associated with projects already initiated. However, insufficient impacts under Alternative D. To anticipate restoration of fair and poor aquatic habitats inhabited by these sensitive species would result from selection of Alternative B.

Appendix II-17
The road closures in the Proposed Plan would be on a case-by-case basis and would be reviewed by an interdisciplinary team and would have public review through the EA process. No road needed for administration or fire protection would be closed.

Reduction of livestock grazing in certain places will improve visual resources. The amount and degree of grazing is an important consideration when evaluating the visual impacts incurred as well as the development necessary to manage livestock grazing.

VRA areas represent the relative value of the visual resources. Class 1 areas being the most valued, Class II representing a moderate value and Class IV being the lowest value. Bureau-managed lands are managed as Class IV where the objective is to provide for management activities which require major, cannot be modified of the existing character of the landscape. The level of change to the character of the landscape can be high. These management activities may dominate the view and is the major focus of viewer attention. However, every attempt should be made to mitigate the impact of these activities through careful location, minimal disturbance, and regrading the basic elements of form, line, color and texture which determine how the character of the landscape is perceived.

Specific places such as riparian areas, scenic areas, ACECs, Wilderness Study Areas, Scenic Byways and otherwise-views areas along highways which may be visually sensitive can have a management objective to improve or preserve the natural setting. When this is true, reduced livestock grazing and/or removal of livestock for periods of time does improve visual resources. Impacts such as streambed erosion, vegetation areas, livestock concentration areas and livestock developments in certain places does impact scenic quality.

It is true that cultural resources inventories are conducted during the planning phase prior to the construction of all surface-disturbing projects, which are commonly reclassified to avoid impacts to cultural sites that found. When projects in the public interest cannot be modified to avoid impacts to cultural sites, they may be impacted upon completion of the comprehensive and, at times, costly procedures detailed in 36 CFR 800.

Refer to response 2-1.

It is true that full funding has not been available for range improvements, except recently. Range improvements, grading levels would be reduced approximately 3 percent. Refer to response 2-2 for information on funding. Also, refer to response 2-9.

Grazing permits are not the real or personal property of the permittee, thus, are not assessed for tax purposes. Changes in personal property ownership that would follow implementation of any management alternative, including the no action alternative, should be specifically identified. ERM payments in lieu of taxes to Harney County are not expected to change substantially.

The Nature Conservancy would like to take this opportunity to comment on the Three Rivers Resource Management Plan/EA. The BLM, in the planning process, is the entity whose primary objective is to identify and evaluate potential Research Natural Areas in the Three Rivers Resource Area. We were quite pleased with the arrangement our recommendations were included in the proposed RNAS and the overall process by the BLM.

Before we make specific comments on the plan it is important to note we feel this is the most comprehensive and comprehensive RNAS that has ever been presented for a public land. The detailed Table 2.1 incorporates management directives that are easy to identify, understand and compare between alternatives. We think this style of RNAS will set a precedent for other RNAS in this cycle of planning. Congratulations are in order to Jay Carlson and the staff for a job well done.

1. Foster Flat RAA/ACEC--The original nomination included 1720 acres which encompassed the entire plays called Foster Flat. In the preferred alternative the recommended RAA was noted at 720 acres. This value is based on the interpretation of the BLM's resource evaluation

Before we make specific comments on the plan it is important to note we feel this is the most comprehensive and comprehensive RNAS that has ever been presented for a public land. The detailed Table 2.1 incorporates management directives that are easy to identify, understand and compare between alternatives. We think this style of RNAS will set a precedent for other RNAS in this cycle of planning. Congratulations are in order to Jay Carlson and the staff for a job well done.

2. Silver Creek RAA--It was indicated in the BLM that silver creeks did not meet the relevance and importance criteria for ACEC nomination and the range of alternatives for RNAS. It has been common practice in the BLM to have all nominated RNAS meet the criteria for nomination. The Squaw Lake site fulfill the Aquatic cell need $2, 2010' high elevation permanent pond in the Biscuit Range Province and also has good representation of two other natural areas, t16. Low sagebrush/dono race for e2. Low sagebrush/dono scrubland's bluegrass meadow. Therefore, we feel it is incorrect to say that Squaw Lake does not meet the ACEC criteria. In addition, in Table 3.16 (e. 5-8), under Habitat for Domes Diversity category, there is both aquatic habitat and high quality uplands that have big green value it seems that the site should receive at least a Medium ranking. We selected Squaw Lake site to fulfill the Aquatic cell need and felt it still would be a valuable addition to the RNAS system. We were not cognizant of Squaw Lake's variety of vegetation and geology continued to impact the lake or pond and through proper management we believed that the site could be naturally restored. We encourage the District to reconsider the site in the final RNP.

3. Miscellaneous Cultural ACEC--We are happy to see this site carried forward in the RNP as we feel the site not only has undisputed cultural values but also has significant natural values as well. In our inventory for DNRs we evaluated a number of areas in the Pendleton Mountains that could not find areas that quite met RAA criteria. However, we felt there was a real value to manage and protect a section of the Biscuit Range and the cultural uplands. The ACEC designation should accomplish this property management.

4. Silver Creek RAA--Addition--In Table 2.1 (p. 2.1-39) it is indicated that addition of the addition will take place after the acquisition of the private lands in section 17. Given the time it takes to complete exchanges we would like to see the District designate or establish the addition at least the same time the public lands acquisitions are being acquired. Designation may give the BLM the ability to...
The analysis of Wild & Scenic Rivers in the RMP seems quite short sighted with regards to the Middle Fork Malheur River segment A. This area includes the Malheur-Bluebucket MPA and private lands upstream from the MPA which has outstanding values for both scenic, recreation potential, fisheries, and wildlife. The only current segment of the river designated Wild & Scenic is the river segment noted in the previous paragraph. There should be over 7 miles of river that rarely qualifies for Wild & Scenic status. The preferred portion of the Middle Fork Malheur River on the Federal service lands upstream is designated Wild & Scenic. The total length of designated river would be over 36 miles. This resource deserves a rating of Eligible when the full extent of the stream segment is examined. The private lands should be considered at high priority sites for acquisition at this site as well. The preferred alternative does correctly propose the Middle Fork of the Malheur River for designation as a Wild & Scenic river.

Wildlife Habitat

3-1. Wildlife habitat is evident on grazing management on BLM lands. The preferred alternative proposes to seed 6.96 acres to native annual grasses in all seeding projects. There is also a need to specifically identify snowy plover habitat, to playas, for example. Playas are highlighted in the vegetation section (Table 2.1) but snowy plovers are not mentioned in the Species section. Grazing should be prohibited from plover habitat during the nesting season. There are additional threats to playas. Alternative B has more strict requirements for habitat protection for long-billed curlews as grasslands in all seeding projects.

3-10. There is also a need to specifically identify snowy plover habitat to playas, for example. Playas are highlighted in the vegetation section (Table 2.1) but snowy plovers are not mentioned in the Species section. Grazing should be prohibited from plover habitat during the nesting season. There are additional threats to playas. Alternative B has more strict requirements for habitat protection for long-billed curlews as grasslands in all seeding projects.

Ecosystem Habitat

3-2. Song very rare species such as Trifolium yelvertoni and Eriogonum malacoi need immediate inventory and monitoring programs and their known habitats should be considered for at least temporary exclusion from grazing

Seasonal Habitat

3-13. Riparian habitat is a key component to the health of Three Rivers Resource Area. The preferred alternative addresses the riparian needs in the EA correctly but fails short in management actions to improve condition. Specifically Table 2.1-22-23 calls for exclosure for 5 years for 31 miles of stream and then returning the stream to its previous state. It would be better to say that grazing would be allowed after 5 years if the condition of the riparian from poor to at least fair if not good. Some condition riparian areas may not rehabilitate themselves in the required 5 years. Management funds are not made available. Also in Table 2.1-24-15 there is no mention that riparian exclosures will be constructed to BLM standards for the preferred alternative. Surely this should be corrected in the final RMP.

Lands

3-14. There are two issues that arise under the Lands category that we feel should be included in the preferred alternative. First, we feel that it is imperative that all ACEC be formally withdrawn from BLM entry to protect habitat values. Accessing is incompatible with ACEC and should be prohibited at the front end instead of having to deal with after a claim is filed. The second issue related to lands is that it would be beneficial to indicate where the emphasis on land exchange CEU land consolidation is occurring in the EA. There are several sites that warrant activity such as Little Creek SPA, Diamond Craters ACEC, and the upper Silver Creek Valley, that immediately come to mind.

This concludes our comments on the RMP for the Three Rivers BA. As indicated at the beginning of our comments we feel that the plan and CEU is most valuable and comprehensive which has resulted in a much more robust document. Thank you for giving us the opportunity to review the plan.

Sincerely,

DICK YOKERT SCHAEF
Public Lands Coordinator
Appendix II-20
Appendix II-21
The protection of sustainable resources is a dominant theme throughout FLMNA. In the development and revision of land use plans, the Secretary shall consider present and potential uses of the public lands, give priority to the designation and protection of areas of critical environmental concern, and observe the principles of multiple use and sustained yield, and considers the relative scarcity of the values involved.

Despite this clear Congressional mandate for protection and preservation of all resource values, the three Rivers Draft RMP/EIS preferred alternative gives unacceptable and overemphasized preference to livestock grazing. Therefore, the NWFW formally requests modification and/or clarification of the following management objectives.

A. Vegetation

1. Livestock Grazing Preference

While the draft RMP/EIS tends to promote a planning process which will integrate all natural resources and their subsequent uses into a balanced approach to multiple use management of the Three Rivers RA, proposals which clearly favor livestock grazing, and not multiple use are made throughout the document. The overall concept seeks to provide adequate livestock forage for the ranching permits. The plan dedicates 179,931 acres to livestock grazing, but only 7,800 acres to wildlife needs. Native plant species provide food and shelter to wildlife, stabilize soils and promote biodiversity, are at times overlooked in favor of imported grasses, which primarily provide forage for livestock. The structural, cover, and biodiversity needs of many non-game wildlife species are completely ignored.

2. Seeding: The NWFW is concerned about the proposed conversions of wet acres of native prairie to monoculture of an introduced grass species. The number of sown acres under the preferred alternative (46,960) is greater than the no action alternative (42,331). Created wheat grass in a tough, imported species from the steppes of Russia. While it makes an ideal diet for livestock, it provides no food or shelter to wildlife. When non-native species such as created wheat grass crowd out and replace the native grasses, mule deer, sage grouse and other wildlife habitat is lost. The conversion of native species of grass which increase biodiversity, protect the soil and benefit all users of public lands to a single species of grass designed only to feed domestic livestock, is inconsistent with the Congressional goals of protection and multiple use of federal public lands. Additionally, the plan fails to list the prioritization and budget constraints regarding seeding projects, or to describe in detail how the seeding project money will be spent.

The preferred alternative only proposes to cut native brush on 15,540 acres of deer winter range, but added created wheat grass on 9,460 of those acres. The NWFW is extremely concerned about the proposed conversion this wildlife winter

1 Legislative history, H.R. 94-1163
2 H.R. 94-1163 Mission
3 FLMNA § 1702(b)
4 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION
range from shrub to grassland, but it cannot adequately respond without more information and a detailed map of where these projects would occur.

3. Prescribed burning: The 3,260 acres of prescribed burning under the preferred alternative is second only to the proposed 10,000 acres under the emphasized commodity production alternative. Burning vast acreage of range will not promote multiple use and sustain the resource. The NNF/EIS must fulfill FLPMA by considering the relative scarcity of resource values involved, weighing long-term benefits to the public against short-term benefits, and giving justification for its preferred alternative.

B. ORV Policy

The ORV policy stated under the preferred alternative of Recreation Management Objectives, "Maximize the development of usable ORV areas and cross-country routes (including snowmobiles and motorcycles) to increase the number of out-of-town users," is unacceptable. It is inconsistent with the Congressionally mandated policy of placing primary concern on the protection of the environment, and fails to adequately discuss the cumulative impacts of ORV use in conjunction with other demands upon the natural resources of the Three Rivers RA. A policy of unrestricted ORV use in open areas fails to insure adequate protection of public lands.

The NNF incorporates and supports the comments of the Oregon Department of Fish and Wildlife regarding ORV use in the Three Rivers Resource Area. The NNF is very concerned about the possible negative impacts of encouraging increased ORV use from out-of-county users, and recommends that the BLM take no action to encourage additional ORV use.

Historically, ORV use in the BLM/r District has been light and broadly distributed. Low usage usually causes little in the way of negative, long term, environmental impacts. However, the high desert environment is fragile, and the balance between negligible and significant damage can be precarious. Even a simple incident of intense exposure to ORV use can cause damage that may take years to heal. Continued intensive exposure can easily cause significant environmental damage and displacement of wildlife communities. ORV use is especially destructive to stream and riparian areas since many operators ride their vehicles directly up the stream bed and along the banks (as demonstrated in ORV television commercials). This destructive practice increases erosion and turbidity, and destroys aquatic vegetation as well as polluting the water with oil, gasoline, grease and carbon monoxide.

The BLM's stated goal of soliciting additional ORV use on fragile, high desert ecosystems, which are already severely damaged by overgrazing, is unacceptable. Significant adverse impacts from ORV use are already occurring on the Oregon National Forest and in the BLM's Prineville District. The preferred alternative plan to "Maximize the development of usable ORV areas,..." is unacceptable and demonstrates the agency's utter failure to adequately consider the significant damage to soil stability, vegetation loss, wildlife habitat destruction, wildlife harassment, and visual character damage, which is likely to occur from increased ORV use. The NNF opposes such irresponsible agency action. While current levels of ORV usage may be light and not require restrictive actions, increased usage would almost certainly have a negative effect on indigenous plant and animal communities. More restrictive rules regarding ORV use would have to be implemented to avoid these impacts. This would result in a loss of traditional use and be very difficult to enforce. The NNF therefore urges that the phrase "Maximize ORV Use,..." be replaced by "Minimize ORV use,..." in the preferred alternative under Recreation Management Objectives.

C. Riparian Habitat

Overgrazing is particularly devastating to the condition and diversity of riparian areas. It is often directly responsible for reduced water quality, the loss of year-long water flows, elimination of streamside alcoves, soil compaction, accelerated erosion, broken down stream banks, and the loss of critical fisheries habitat. The preferred alternative recognizes the serious condition of the riparian areas in the Three Rivers RA, and states that livestock will be removed from 80.9 miles of stream with "good" water quality for five years.

The NNF supports a preferred alternative which mandates the removal of livestock for five years from streams in poor condition, or in the alternative, until riparian condition improves to a "good" classification. However, it must call our attention to a recent meeting with the Three Rivers Draft NNF/EIS team leader and staff, that the proposed preferred alternative does not guarantee complete rest for damaged riparian areas. The Draft NNF/EIS actually gives the agency discretion to completely rest affected riparian areas by removing livestock for five years or implement "grazing systems which are widely recognized as promoting the most rapid riparian recovery possible". The NNF is sorely disappointed by this change of heart. The arbitrary decision to choose between complete rest of damaged riparian areas and implementation of an undefined grazing system is simply unacceptable.

In addition, the agency should be closely monitoring riparian areas now in fair condition. If a downward trend begins to develop, immediate corrective action should be taken. In most cases, the poor riparian habitats and/or poor water quality streams must receive complete rest for a minimum of five years. Once full recovery of riparian habitat is achieved, livestock grazing should never be allowed to reduce riparian habitat and

3 FLPMA § 1112(c)(4)(D)
6 Three Rivers Draft NNF/EIS Table 2.1, p. 31, item 2
5 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION
7 Three Rivers Draft NNF/EIS Table 2.1, page 31
5 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION
8 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION

Appendix II-23
water quality to less than “good” condition. Under the preferred alternative for riparian habitats, the preferred alternative for riparian habitat management objectives, the RMP/EIS must clarify the phrase “systems which are widely recognized as promoting speedy riparian recovery.” The reliance on inadequately described secondary alternatives, such as the undefined “grazing systems,” to promote riparian rehabilitation, is a serious breach of NWPA environmental impact statement guidelines. 9 The reviewer must be provided with a full and accurate picture of all proposed agency actions to restore these critical habitat areas. Any livestock grazing management plan that provides for less than full recovery of riparian habitat in accordance with rehabilitation and restoration of these critically important habitats. The agency admits that an estimated 70 percent of all wildlife species in the Three Rivers RA is partially or totally dependent upon riparian habitat for food, water, and cover. 10 Additionally, with the preferred alternative under recreation management objectives, “Manage livestock grazing in riparian areas to enhance fishing opportunities.” 11

Livestock grazing must also be terminated for the season when any one of the three utilization limits, woody riparian, herbaceous riparian, herbaceous upland utilization, is reached. “No more than 10 percent livestock utilization on woody riparian shrubs, 50 percent utilization on herbaceous riparian vegetation, and 30 percent utilization on herbaceous upland vegetation...” This prevents over-utilization on any component of the grazing system and encourages management of livestock to promote a balanced utilization of the forage available.

Additionally, sensitive aquatic plant species are often the first vegetation taken out by livestock grazing in riparian areas. For example, water weeds provide a vital structural benefit to streams by reducing the formation of anchor ice during the winter. When livestock grazing removes these plants, the streams freeze more readily and essential fish habitat is lost. Since livestock have shown a preference for these and other beneficial aquatic species, they must be prevented from entering the affected riparian areas. The NWPA endorses and incorporates the comments of Oregon Trout regarding impacts to aquatic plant species and riparian areas.

Finally, the Draft RMP/EIS must adequately define the threshold criteria for distinguishing “poor,” “fair,” and “good” water quality and adequately account for ecological values and functions when describing these stream condition categories. The current classification of “poor” stream condition is far too broad. It currently includes everything from totally denuded riparian areas to those that are in just slightly less than “fair” condition. The draft RMP/EIS must therefore include an additional category, such as “severe [impact],” to accurately describe the worst areas of riparian destruction. All users of public lands must be assured that these definitions and criteria will be consistent throughout the RA.

D. Water Quality

Current NWPA standards and guidelines state, “In order to improve controls over nonpoint sources of pollution, federal, state, local resource management agencies will be encouraged to regulate and control runoff, erosion, turbidity, stream temperature, stream flow...” The reasons for these impacts are no mystery. As the RMP/EIS points out, “Major conflicts with water resources are livestock grazing and timber harvesting...” It is both understandable and impractical to fence all of the 60-5 Miles of stream with poor (or lower) water quality. The NWPA must therefore adopt a

management plan which removes livestock grazing from these riparian pastures, and keeps them off until the riparian areas have recovered to a good condition.

E. Grazing

The NWPA must provide an adequate scheduling and prioritization of allotment management plans on a year by year basis as part of the Draft RMP/EIS. Without this information, interested parties have no way of knowing how well the proposal and plans described in the RMP/EIS will be implemented. Changes at the time of the “Proposed RMP/Final EIS” are always more difficult to make than for the Draft. In the past large planning efforts have not been translated into on the ground changes. Without adequately documented implementation plans, utilization management objectives will become just another “plan on the shelf.”

F. Monitoring

The Draft RMP/EIS does not adequately address monitoring of the preferred alternative objectives, nor the constraints placed on monitoring programs by budget limitations. This information is essential to assess the expectations of interested parties, and ensure enforcement of the preferred alternative objectives.

G. Energy and Minerals

None of the alternatives adequately address mining impacts on water quality. Even under the “best” environmental alternative, “mineral activities have the potential to negatively

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affect riparian habitat." 17

No recovery or rehabilitation of riparian and water quality
will be achieved if adverse grazing practices are merely replaced
by equally destructive mining practices.

8. Photographs and Maps

The excellent maps included in the Draft NWPA/EIS are very
helpful. The level of detail shows that a significant amount of
time and effort were spent on this part of the document.

Unfortunately, the old photographs in the Draft are of no use for
planning public land management objectives. While some
historical photographs might have been included, the fact that
all of the photographs are of the "Old West" only reinforces the
perception of many conservation groups that the BLM's
overwhelming commitment is to the western ranching constituency.

Turn of the century photographs fail to document the poor
condition of much of the range and riparian areas in the present
day Three Rivers RA. This omission does a significant disservice
to the concerned reader who wishes to make relevant comments, and
continues to paint the BLM as the government agency essentially
concerned with maximizing livestock grazing opportunities, not
multiple use of natural resources. Some photographic examples of
resource conditions in the present day Three Rivers RA would have
been much more useful to concerned reviewers and interested
parties.

13 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION

The NWF supports "management actions which recognize,
promote and enhance the integrity of the ecological and
economic systems in the Three Rivers RA." 19 We are very
concerned about the deteriorating health and condition of the
range. Degradable and detrimental grazing practices have been
the rule on public lands for too long. More than fifty years
have passed since the Taylor Grazing Act was passed in the
1930's, but destructive overgrazing continues to be the norm.

A good portion of the national resource base of Oregon's Great
Basin country has been reduced to barren hills and eroded muck
due to previous BLM mismanagement.

The BLM has a mandated duty to carefully consider the
"relative scarcity of the values involved" 20 when attempting to
balance the one-dimensional demands of livestock owner
permittees with the multiple use needs of tens of thousands of
hunters, hikers, campers, and other impacted members of the
public. Management decisions which emphasize short-term grazing

5-1 The BLM/EIS is not a document that gives preferential management
collection to single resource values. Through the Preferred
Alternative, significant improvements would be realized in water
quality, riparian habitat, aquatic habitats, wetland habitat;
significant additions would be made to the areas protected under
designation as ANCA; explicit management objectives for bioliteracy
are established for the first time in any eastern Oregon BLM and
utility corridor exclusion/avoidance areas are established for nearly
85,000 acres. The total proposed fence demand of nearly 33,000 AUMs
for big game would be provided. Of this amount, 7,000 AUMs are
competitive with livestock and would be allocated directly to big
game.

Detailed management objectives for a broad spectrum of resources have
been integrated at the ground level in an allotment by allotment basis,
thus ensuring long-term interdisciplinary management,
monitoring and evaluation.

5-2 Refer to response 1-12.

5-3 Refer to response 1-12.

5-4 Bureau funding policy is clearly established in that 1 category
allocations have highest priority, 2 category allocations have the next
highest, and 3 category allocations have the lowest priority. Refer to
Appendix 3, Table 1, NWPA/EIS, for allotment categorization in the
Three Rivers RA.

5-5 The map of potential treatment areas has been added (see Map NW-E-3).
Refer to response 2-12.

5-6 Prescribed burning is a tool the Bureau will employ to improve range
condition and increase vegetative diversity. NWPA/EIS, Appendix J,
Table C, p. 377, outlines design features for burns. Table 2.1, p.
20-21, discusses actions for wildlife habitat relative to prescribed
burning. Site-specific NEPA analysis is always done on prescribed
burn projects.

5-7 Refer to response 1-12.

5-8 Refer to response 1-12.

5-9 Refer to response 1-12.

5-10 Some exotics are proposed where conditions will require complete
removal to reestablish vigor and riparian plant species composition. Also,
see management actions 16.1.1, 16.2 and 16.3 of the Proposed Plan.

17 Three Rivers Draft NWPA/EIS Vol. I at 4-28
13 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION

18 Three Rivers Draft NWPA/EIS Vol. I at 2-3
19 16 C.F.R. § 1732(c)(4)
13 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION
County Court for Harney County
p.O.BOX 6
BURR, OREGON 97778
February 12, 1990

September 25, 1988

Mr. Joshua L. Muschottt
Burro District Manager
Burro District: Management Plan
Bureau of Land Management
611 LEE STREET
Maiden, Oregon 97753
Re: Three Rivers Resource Management Plan

Harney County appreciates the opportunity to comment on the draft three Rivers Resource Management Plan and the statement

"The environmental impact statement which is so important to the livestock industry in the western part of Harney County and to the economic vitality of the County.

The major concern of the Harney County Court as we reviewed this document was that it pictures the livestock industry in general and cattle in particular as the cause of all the problems in the Three Rivers Resource Area. That the only solutions that the BLM have considered to these problems is to remove livestock from the range. That there was apparently no effort to consider livestock as an economic unit until the land management changes desired by the BLM were implemented.

Harney County would like to discuss the following items of particular concern with the draft three Rivers EIS:

1. In reviewing both volume I and volume II of the EIS we found numerous statements as to the condition of the range or carrying capacity. These appear to be statements of fact that we were unable to determine the methodology that the BLM used in arriving at their conclusions. Until we know the methodology used in reaching these conclusions and if determined whether we concur with your findings as set forth. Please provide documentation of your methodology for us to evaluate your conclusions before implementing your Resource Management Plan.

2. BLM stated throughout the draft that the condition of the range is insatisfactory or is deficient and no documentation of proof that that is true. Please provide us with a copy of any research that determines that we may verify your findings before you implement the EIS.

3. There are statements that wildlife quality does not currently meet BLM standards on almost every allotment with water. We understand that BLM water standards are not always met in past and in many cases water quality would not meet BLM standards even if all livestock is removed. If this is true, it seems unfair to use this as a factor to be used to meet water quality standards that may never be attainable.

4. Another concern we have with the plan regarding water quality is that BLM ownership of water is so fragmented that even if you were able to meet your goals on the BLM portion of the stream it is going to have an insignificant impact on the stream as a whole. Have you considered that your actions on the public lands may require private land owner to use their portion of the stream more intensively and be a result the entire effect of the stream will be a negative one.

5. Regardless of water quality concern we believe that livestock is a priority beneficial use of water that is permitted, and indeed required, under Oregon water law.

6. Harney County believes that the poor condition of the upland range is due more to BLM's fire control policy than it is to grazing. You are never going to obtain satisfactory sagebrush conditions on rangelands that have been taken over by understory brush and junipers because of the active suppression of fires. We would challenge the BLM to seriously evaluate your policy of initial attack and full suppression of all fires on a majority of the BLM land. We would also request that you remove dramatically increasing the acres of land to be controlled burn each year.

We believe that wildfire cycles of 5 to 25 years was the normal condition in Harney County until the last 50 years or so. We believe the suppression of fire and the resulting suppression of sagebrush and juniper growth have done more to reduce foxtail density than any single action.

That removing livestock without removing the big sagebrush and creosote bush perpetually amounts to doing little to improve sage conditions.

7. We would challenge BLM's plans to fence waterholes that were developed in discharge cattle. These waterholes are the only water cattle and water quality and even irrigation areas that may have been removed from these areas by cattle gathering livestock and should continue to be used for that purpose.

8. We are very concerned about statements such as identify and pursue land purchase and identify and aggressively pursue

Appendix II-26
Appendix II-27
Elm is to be congratulated for the comprehensive manner in which this plan has been developed. We are pleased to see the obvious commitment to improved riparian habitat and increased forage allocations for big game animals. Though we have areas of concern with the proposed plan, we found the descriptions of the affected environment, environmental consequences, and standards and guidelines to be thorough and conscientious. We did feel, however, that the sections on monitoring were somewhat vague and lacked specificity.

The Department is concerned about the proposed conversions of extensive acreages of native rangeland to monocultures of an introduced grass species. These conversions, if initiated, should be carefully weighed and monitored, so that conflicts with little known wildlife species do not develop.

Thank you for the opportunity to review and comment on this proposed Resource Management Plan. Additional comments and concerns are attached.

*Appendix II-28*
Areas of vegetation left along a stream do not have to be a certain width. The statement is made that vegetative conversion will be restricted in any area within 1 mile of perpetual water, to less than 20 percent of that area in any 1 year. Additional verbiage and clarification is needed here. The way that this is written it would be possible to completely convert all lands within 1 mile of perpetual water within 5 years (the reviewer assumes that "vegetative conversion" is this instance refers to conversion of native vegetation to cropland or rangeland). An upper limit is needed on total acreage, within 1 mile of perennial water, that could be converted. ODFW recommends that not less than 40 percent of the total acres, within one mile of perennial water, be converted.

ITEM 5: The word "thermal" should be inserted after the words "big game".

ITEM 7: Specific direction for the retention of dead and down woody material is needed here. Suggest "adherence to USDA Handbook 533.

ITEM 14: Under the preferred alternative is excellent. ODFW also recommends that domestic sheep be prohibited on all current or prior sheep pastures, except those one with at least 15 percent of the area of which is open range, and access to water

Deferred: 2.1-11” ITEM 1: The statement “Maintain 30-50 acres of open space...” should be changed to read “...so that 40 percent of the area remains as suitable big game thermal and hiding cover.”

Deferred: 2.1-12” ITEM 5: There should be a time line attached to this statement. Ten years would be reasonable. Also, verbiage should be added which stipulates that all residual metal products, that remain from the old style fence, will be removed.

Deferred: 2.1-13” ITEM 6: Under Warm-Water Fish Habitat All of these action criteria should be tied to a time line.

Deferred: 2.1-14” ITEM 7: All applicants for electrical transmission lines should be required to follow criteria outlined in item 3 under alternative B.

Deferred: 2.1-15” ITEM 8: Specific direction for the retention of dead and down woody material is needed here. Suggest adherence to USDA Handbook 533.

Deferred: 2.1-16” ITEM 9: The statement is made that vegetation left along a stream do not have to be a certain width. This seems to be a rather significant digression from statements made within the body of the document. For example, the minimum width of buffer strips is provided. The widths of the buffer strips are correlated with the steepness of the slope (e.g. a 40-50 percent slope would have a buffer strip of 125 feet, measured horizontally, on each side of the stream bank. Table 2.1-3). ODFW believes that the establishment and maintenance of defined, delineated buffer strips is a necessary prerequisite to the development of a sound stream protection program. We suggest that you clarify or delete item 4 from appendix 2-A. This would serve to reduce confusion with the document and would provide for a more sound, comprehensive riparian management plan.

Deferred: 2.1-17” ITEM 1: WATeR QUALITY: Overall the standards within this section are excellent. We commend the N.C. for the obvious concern for the importance of good water quality and the need for public input.

Deferred: 2.1-18” ITEM 1: The statement is made that vegetation left along a stream do not have to be a certain width. This seems to be a rather significant digression from statements made within the body of the document. For example, the minimum width of buffer strips is provided. The widths of the buffer strips are correlated with the steepness of the slope (e.g. a 40-50 percent slope would have a buffer strip of 125 feet, measured horizontally, on each side of the stream bank. Table 2.1-3). ODFW believes that the establishment and maintenance of defined, delineated buffer strips is a necessary prerequisite to the development of a sound stream protection program. We suggest that you clarify or delete item 4 from appendix 2-A. This would serve to reduce confusion with the document and would provide for a more sound, comprehensive riparian management plan.

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Deferred: 2.1-21” ITEM 2: Under Warm-Water Fish Habitat All of these action criteria should be tied to a time line.

Deferred: 2.1-22” ITEM 1: The statement is made that vegetation left along a stream do not have to be a certain width. This seems to be a rather significant digression from statements made within the body of the document. For example, the minimum width of buffer strips is provided. The widths of the buffer strips are correlated with the steepness of the slope (e.g. a 40-50 percent slope would have a buffer strip of 125 feet, measured horizontally, on each side of the stream bank. Table 2.1-3). ODFW believes that the establishment and maintenance of defined, delineated buffer strips is a necessary prerequisite to the development of a sound stream protection program. We suggest that you clarify or delete item 4 from appendix 2-A. This would serve to reduce confusion with the document and would provide for a more sound, comprehensive riparian management plan.

Deferred: 2.1-23” ITEM 1: The statement is made that vegetation left along a stream do not have to be a certain width. This seems to be a rather significant digression from statements made within the body of the document. For example, the minimum width of buffer strips is provided. The widths of the buffer strips are correlated with the steepness of the slope (e.g. a 40-50 percent slope would have a buffer strip of 125 feet, measured horizontally, on each side of the stream bank. Table 2.1-3). ODFW believes that the establishment and maintenance of defined, delineated buffer strips is a necessary prerequisite to the development of a sound stream protection program. We suggest that you clarify or delete item 4 from appendix 2-A. This would serve to reduce confusion with the document and would provide for a more sound, comprehensive riparian management plan.

Deferred: 2.1-24” ITEM 1: The statement is made that vegetation left along a stream do not have to be a certain width. This seems to be a rather significant digression from statements made within the body of the document. For example, the minimum width of buffer strips is provided. The widths of the buffer strips are correlated with the steepness of the slope (e.g. a 40-50 percent slope would have a buffer strip of 125 feet, measured horizontally, on each side of the stream bank. Table 2.1-3). ODFW believes that the establishment and maintenance of defined, delineated buffer strips is a necessary prerequisite to the development of a sound stream protection program. We suggest that you clarify or delete item 4 from appendix 2-A. This would serve to reduce confusion with the document and would provide for a more sound, comprehensive riparian management plan.

Deferred: 2.1-25” ITEM 1: The statement is made that vegetation left along a stream do not have to be a certain width. This seems to be a rather significant digression from statements made within the body of the document. For example, the minimum width of buffer strips is provided. The widths of the buffer strips are correlated with the steepness of the slope (e.g. a 40-50 percent slope would have a buffer strip of 125 feet, measured horizontally, on each side of the stream bank. Table 2.1-3). ODFW believes that the establishment and maintenance of defined, delineated buffer strips is a necessary prerequisite to the development of a sound stream protection program. We suggest that you clarify or delete item 4 from appendix 2-A. This would serve to reduce confusion with the document and would provide for a more sound, comprehensive riparian management plan.
Appendix II-30

Inadequately considered are watercourse improvements, wildlife habitat enhancement, livestock forage improvement, timber management and recreation development. Prescribed fire, conditional burn designations and individual tree treatment runs to be emphasized to a greater degree in the BLM. The aerial cover requirements, listed for big game are redundant and ignore the biological realities of the area. In fact, forage quality and predators are the short term limiting factors for deer populations while elk populations are increasing rapidly due to excess forage created in the areas. Juniper encroachment has contributed to decreased bitterbrush and other preferred deer forage areas. Future habitat requirements need to be readdressed in view of recent research on juniper encroachment. Junipers are increasing at an exponential rate with severe negative impacts to all resources.

Existing resource conditions have improved for a number of years and the BLM ignores this improvement especially in the riparian and upland saltced areas. The full explanation cannot be even better and BLM ranges present and livestock producers are concerned the projected future benefit to livestock would be short intermediate and estate levels. The actions required to meet these needs and allow land managers to separate natural ecological changes from changes caused by resource use.

Proposed livestock grazing reductions are based upon resource data from the drought years and poor growing conditions. A minimum of several years of trend data is needed to properly reflect resource changes and the cause of change. The stated utilization levels have to be vetted enough now to meet the criteria and sustain needed levels of forage. New dry season and not even clean and BLM ranges present and livestock producers are concerned the projected future benefit to livestock would be short intermediate and estate levels. The actions required to meet these needs and allow land managers to separate natural ecological changes from changes caused by resource use.

The BLM unfairly blames livestock grazing for poor watershed conditions ignoring the dramatic influence of significant stream channelization upon the area due to fire suppression. Recent research by Buckhouse, Gerbig, Keddie, Miller, Gali, Young and Davis clearly show the need to emphasize and manage for several successful stages to limit and prevent erosion, control for water, sediment and erosion requirements relating to stream restoration; the wetland and floodplain acreage of the area and that biological changes will be critical. This is a next twenty to forty years with large scale and permanent ramifications.

Vegetative manipulation is necessary to achieve the desired vegetative conditions for all resources and uses — passive livestock grazing can play a supplementary role. Exclusion of livestock can support the need to create opportunities to assess needs and costs to livestock needs. Management opportunities should be considered in the BLM.

In addition, the BLM attempts to separate and allocate levels of use to resolve conflicts instead of emphasizing the biological factors. The problem that exists is the complete lack of emphasis on wild habitat. The potential benefits to the local economy, and the general public were not fully considered.

B-4

January 30, 1990

Bureaus of Land Management
Bureau District Offices
Att. Joshua L. Harbort
RC 941-2533 P.O. Box 2701 West
Mills, Oregon 97748

Mr. Joshua L. Harbort,

Following are my comments concerning the Three Rivers Survey Management Plan and Environmental Impact Statement.

The three surveys are discussing a variety of natural resource management and competitive use determinations. In addition, the analytical techniques used to determine resource condition, potential and trends need reviewed to better reflect field conditions and new research information.

BLM range personnel, most knowledgeable about biological conditions in the field, should be given the responsibility to develop protective NPS and forthcoming improvement plans.

The BLM's management directives of fostering the widest use of our land and water resources "and to effectively manage the basic resources of the public domain to improve and maintain economic and environmental needs." EIP/PR plan emphasizes the need to meet the needs and manage for the basic soil, water and economic needs of the KS. Needed and restricted management alternatives will not meet the basic biological and economical needs of the area. Therefore, alternatives A-2 are illegal and alternative 5 should be rewritten to reflect intensive and progressive management of all of our resources. The BLM should develop guidelines protecting range management.
which violates Sec. 102 of PBLMA requiring the BLM to prevent unnecessary or undue degradation of the land. Intensive, intensive control must be used in areas with severe problems.

Stated management objectives for the various resources will not be met through the proposed action. The Bureau has concluded that intensive management is the preferred alternative. The preferred alternative causes severe adverse effects on the environment in violation of the BLM's regulations. The preferred alternative will not comply with the requirements of the National Environmental Policy Act (NEPA) because it fails to consider the environmental impacts of the proposed action. The preferred alternative will not meet the requirements of the NEPA because it fails to consider the environmental impacts of the proposed action.

The preferred alternative causes severe adverse effects on the environment in violation of the BLM's regulations. The preferred alternative will not comply with the requirements of the National Environmental Policy Act (NEPA) because it fails to consider the environmental impacts of the proposed action. The preferred alternative will not meet the requirements of the NEPA because it fails to consider the environmental impacts of the proposed action.

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Refer to response 4-8.

Vegetation manipulation has been considered as one method of improving economic conditions (see APPENDIX D, Table 1-1 and Appendix 4, Table 1). The preferred alternative has been evaluated for its potential effects on the environment. The preferred alternative will not meet the requirements of the NEPA because it fails to consider the environmental impacts of the proposed action. The preferred alternative will not comply with the requirements of the National Environmental Policy Act (NEPA) because it fails to consider the environmental impacts of the proposed action.

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Refer to response 4-8.

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Refer to response 4-8.
Oregon Trout 9

Speaking out for Oregon's fish

February 12, 1990

P.O. Box 18445 • Portland, Oregon • 97218-8445

Draft Three Rivers Resource Management Plan (RMP) and Environmental Impact Statement (EIS)

Dear Mr. Hanson:

Oregon Trout thanks you for this opportunity to assist the Bureau District Bureau of Land Management (BLM) in the planning process.

Our comments will follow this format: organization description, discussion of areas of main concerns including comments on the planning documents, and summary.

ORGANIZATION DESCRIPTION

Oregon Trout is a state-wide non-profit conservation organization focused on restoring, protecting, and enhancing the wild native, indigenous, fish and their habitats. We are primarily a volunteer group, with only three full-time staff. We currently have approximately 420 members. Oregon Trout is an advocate for the fish and their habitats; we are not a fishing club.

DISCUSSION OF CONCERNS

We appreciate this concept behind the Oregon Trout's project. We agree that the process of determining the aquatic vegetation to be removed is a key component in the planning process. We also support the efforts to protect the wetland areas and the riparian habitat.

We would like to see more information on the specific methods used to determine the aquatic vegetation to be removed. We believe that this information is essential to understanding the impact of the proposed actions. We would also like to see more information on the specific areas that will be impacted by the proposed actions.

We believe that the proposed actions will have a significant impact on the ecosystem of the area. We urge the planning team to consider the following:

1. The impact on the fish and their habitats
2. The impact on the wetland areas and the riparian habitat
3. The impact on the aquatic vegetation

SUMMARY

We appreciate the opportunity to provide our comments on the draft planning documents. We believe that the information provided is essential to understanding the impact of the proposed actions. We urge the planning team to consider the following:

1. The impact on the fish and their habitats
2. The impact on the wetland areas and the riparian habitat
3. The impact on the aquatic vegetation

We believe that the proposed actions will have a significant impact on the ecosystem of the area. We urge the planning team to carefully consider the impact of the proposed actions on the fish and their habitats, the wetland areas and the riparian habitat, and the aquatic vegetation.

Sincerely,

[Signature]

[Name]

[Title]

[Organization]

Appendix II-32
serve as fish habitat “watchdogs” (transmit) to guarantee compliance with management plans focused on fish species, recovery, and protection, to ensure adequate monitoring and data collection.

It is Oregon Trout’s understanding that compliance with the 1976 Federal Land Planning and Management Act (FLPMA) encompasses the determination and management of water quality standards. This is achieved through specific hydrologic and biological disciplines. The role of these water quality standards is to protect the aquatic environment. In this context, this is not the “interdependency” which has been emphasized again and again. Oregon Trout has often cautioned resource managers to consider how these standards result in compliance with water quality standards. Specifically, how will these developments result in compliance with Oregon adoption of water quality standards? Such development plans must be viewed with a critical eye. It is imperative to establish the values of science in all cases. The primary discipline is “practicable...” and a half of Oregon D.O.E.’s enforcement problems. The discipline is “practicable...” and a half of Oregon D.O.E.’s enforcement problems.

Oregon Trout would like to receive information on the specific criteria and standards which are accepted and support the utilization percentages (10% on woody riparian, 50% on herbaceous riparian, 30% on herbaceous stands, etc.) referred to in the planning documents. We do not understand how these levels will result in “poor” condition stream miles. The stated Bureau water quality standards imply that the condition stream miles level will result in an “undesirable” condition stream miles level. Oregon Trout does not understand, from the information provided, that the desired condition stream miles level will result in an “undesirable” condition stream miles level. Oregon Trout would understand the new standards being developed by the Bureau to be in healthy, stabilized soils. These need to be the driving focus for the Bureau.

Juniper removal, for example, needs to be viewed from this perspective. Where juniper provides the only or major cover for wildlife, or the major or only remaining stream shading then cutting or removal needs to be delayed until stream vegetation has recovered to provide the cover and habitat now provided by the juniper. Juniper’s “occasionally” is native in the West. The spread of juniper is aware of compliance and enforcement problems in the rapid recovery of riparian and aquatic habitat. Whether the livestock are effectively managed or not, establishment and enforcement of new grazing practices which are designed to promote the most rapid riparian recovery is practicable... (Table 2-1)]. E.G. 1000 acres of streamfront were removed from an unspecified number of stream miles of employment and grazing practices which are being promoted as promoting the most rapid riparian recovery practicable... (Table 2-1). Early spring snow was mentioned in this context. This is not the Table 2-1-3, statement.

9-16 Juniper removal, for example, needs to be viewed from this perspective. Where juniper provides the only or major cover for wildlife, or the major or only remaining stream shading then cutting or removal needs to be delayed until stream vegetation has recovered to provide the cover and habitat normally provided by the juniper. Juniper’s “occasionally” is native in the West. The spread of juniper is aware of compliance and enforcement problems in the rapid recovery of riparian and aquatic habitat. Whether the livestock are effectively managed or not, establishment and enforcement of new grazing practices which are designed to promote the most rapid riparian recovery is practicable... (Table 2-1)]. E.G. 1000 acres of streamfront were removed from an unspecified number of stream miles of employment and grazing practices which are being promoted as promoting the most rapid riparian recovery practicable... (Table 2-1). Early spring snow was mentioned in this context. This is not the Table 2-1-3, statement.

9-19 Juniper removal, for example, needs to be viewed from this perspective. Where juniper provides the only or major cover for wildlife, or the major or only remaining stream shading then cutting or removal needs to be delayed until stream vegetation has recovered to provide the cover and habitat normally provided by the juniper. Juniper’s “occasionally” is native in the West. The spread of juniper is aware of compliance and enforcement problems in the rapid recovery of riparian and aquatic habitat. Whether the livestock are effectively managed or not, establishment and enforcement of new grazing practices which are designed to promote the most rapid riparian recovery is practicable... (Table 2-1)]. E.G. 1000 acres of streamfront were removed from an unspecified number of stream miles of employment and grazing practices which are being promoted as promoting the most rapid riparian recovery practicable... (Table 2-1). Early spring snow was mentioned in this context. This is not the Table 2-1-3, statement.

9-20 Oregon Trout asks now what specific effects are anticipated from altering vegetation? How are brush control and water quality linked? What effects on water quality? Oregon Trout asks now what specific effects are anticipated from altering vegetation? How are brush control and water quality linked? What effects on water quality? Oregon Trout asks now what specific effects are anticipated from altering vegetation? How are brush control and water quality linked? What effects on water quality?
Oregon Trout’s concerns in brief are:
1. Riparian and Aquatic Habitat Protection, Restoration, and Maintenance
2. Fish Species Protection, Restoration, and Maintenance
3. Compliance with BMPs, the Clean Water Act, Oregon DEQ’s Water Quality Standards, endangered species act, the Bureau of Land Management’s biological management plans (1993), and all other applicable laws, regulations, policies and rules
4. Active Conservation of Biodiversity (species, communities, and individual populaions)
5. Active Consideration of Interagency (species, etc., and actions)
6. Strict Control of Off-Road Vehicles on Public Lands
7. Regular Scientific Monitoring of Results of Management Actions, particularly with respect to Oregon’s Native Fish and their Habitate

Please contact Oregon Trout if you have any questions concerning these comments. Thank you again for the opportunity to participate in the planning process. We look forward to your response.

Sincerely,

David Stolte
Associate Director, At-Large
156 SW 11th Avenue
Canby, OR 97013
Ph: 503 266-2863

cc: Bill Barke, Executive Director
Mike Croson/Chad Bacon, Oregon State Office, BMRC (JLW)

Information displayed in the DEQ/DEIS summary table was incomplete. This has been corrected in the summary in the DEQ/DEIS.

9-2 Streams and stream miles that met various condition classes were presented in the DEQ/DEIS, Appendix A, Table 1, p. 9-2.

9-3 It is acknowledged that, for some individuals, a graphical presentation of data is more effective than a tabular display. However, the most pertinent, information necessary to support factual analysis and fact-finding processes is provided in tabular form. With limited staff, time, and budget for document preparation, it was determined by the Planning Team Leader that the staff’s efforts would be better expended on concepts of a more primary nature in the DEQ/DEIS.

9-4 The NRM provided an “W/C-Water Quality,” in Volume 1 of the DEQ/DEIS, to facilitate identification and location of important streams and their tributaries. To facilitate coordination of NRM-WQ, in this volume, Table 2, stream names were organized and listed according to the DEQ Northwest Source Assessment of drainage basins within the Three Rivers planning area.

9-5 In facilitating comparison of data in DEQ/DEIS, Appendix A, Table 1, with available management summaries in the text, alignment numbers were added to alignment names in the DEQ/DEIS.

9-6 The redside trout and Malheur bull trout coho salmon habitat have been added to the Special Status Species Map (see Map 5C), POM/DEIS. A map of the potential brush controls and screening has been added (see Map 5M-3, POM/DEIS). The prescribed burns, juniper burns, and riparian revegetation areas may have been approved for regional review at this time (see Appendix 3, Table 7, DEQ/DEIS). These projects will be designed on a case-by-case basis through the interdisciplinary NPA process.

9-7 Based upon public input and interaction with the interdisciplinary team and to the extent practicable, management has established management priority criteria, and a method of reporting implementation status regularly. Refer to Appendix 3, Table 30, POM/DEIS.

9-8 Aquatic and riparian habitats were evaluated through water quality monitoring, habitat manipulation and analysis, traditional fish population assessment, photo transect studies, color infrared photography and vegetation interpretation studies. The collection, analysis, and interpretation of these data provide qualitative and quantitative information concerning habitat condition and suitability for fish populations (see POM/DEIS, Table 2.1, notes and Appendix 3, Table 4).

Restoration and protection of native trout and salmon habitat is specific to the selection and implementation of the Preferred Alternative. With the removal of riparians from 39.6 miles of riparian habitat presently in poor condition, and implementation of grazing system along 39.4 miles of fish habitat that restrict utilization of riparian vegetation, short-term objectives of restoration of fish habitat would be reduced.

9-9 Where selection and implementation of the preferred alternative, the realization of long-term objectives of protection and maintenance of restored habitat, and compliance with state and federal water quality laws are fully attainable within the life of the management plan.

9-10 Refer to the Proposed Plan for monitoring actions delineating methods of data collection and evaluation. Funding and work schedule for these activities will be allocated through the District’s Annual Work Plan submitted to the Oregon DEQ.

Information concerning development and evaluation of a monitoring plan was included in Volume 1, Chapter 2-2 of the DEQ/DEIS.

The NRM does not monitor use and utilization of grazing allotments. Range conservationists evaluate site potential, develop grazing management, evaluate seasons of use and visit sites prior to and after the period of use to assess utilization. Any unauthorized activity is noted and duly reported to management, where it becomes a management decision to act upon those activities.

9-11 The production of the DEQ has been an interdisciplinary effort throughout. Individual sections have been prepared by the appropriate specialists and those specialists interacted directly with management in the process of compiling the preferred alternative. In addition, the document was extensively reviewed by District and State Office program leaders and other specialists at several stages of development, prior to final printing. Ron Willey’s departure occurred shortly before preparations for printing, as he was involved in all substantive analysis, interaction and composition. The position has since been filled with a professional fisheries biologist.

9-12 Refer to response 2-11.

9-13 Management actions (1-9, 8, and 9-3) of the proposed plan are the same as the revised management actions. Also, refer to response 5-10.

9-14 The wording in the management actions has been revised; however, the riparian objectives have not been changed, and riparian habitat in poor condition with the potential for water quality to reach fair or better will be excluded for 5 or until fair in reach at which time a grading system would be implemented. See management actions (1-9, 8, and 9-3) of the proposed Plan.

9-15 Refer to response 2-4.

9-16 Refer to response 1-11.

9-17 Refer to response 2-11.

9-18 Juniper removal will not be done within riparian areas where the trees are providing necessary shade or where they are necessary for soil stabilization. Each proposed juniper removal or controlled wood cutting area will be reviewed by an interdisciplinary NPA team.

9-19 Refer to response 2-11.

9-20 The potential mitigation/improvement projects discussed in the DEQ/DEIS (see Table 4-2 and Appendix 1, Table 7, POM/DEIS) are considered tentative. The detailed analyses that are presented are better suited to the project planning level where the actual project design is developed. Where appropriate, such analyses are presented in the EA for specific projects. Such projects would be subject to compliance with DEQ water quality standards.

9-21 Refer to response 1-23.

9-22 Refer to response 2-13.

Appendix II-34
We suggest that the following points be considered in the
planning and management of recreation areas.

As an example, the 1988 Oregon State Parks and
Recreation Department State Clearinghouse
Report on recreation opportunities in southeastern Oregon
indicates substantial growth in a variety of activities there.

By the year 2000, nature viewing and study are projected to
grow by 413%, tent camping (42%), backpacking on trails (33%)
and fishing (20%).

The draft Three Rivers Resource Management Plan
released for public comment contains no analyses of current or
projected recreational use in the planning area. Lack of such
analyses, it is difficult to see how recreational needs, both current and future,
can be planned for and met. Provision of such data is crucial in the
assessment of management alternatives. The Pacific Northwest Outdoor Recreation Consumption Projection Study
indicates substantial growth in a variety of activities in
southeastern Oregon. For example, by the year 2000, nature
viewing and study are projected to grow by 413%, tent camping
(42%), backpacking on trails (33%), and fishing (20%).

According to the 1988 SCORP, recreationists visiting
southeastern Oregon show diverse preferences in the setting for
their activities. For example, in terms of Recreational Opportunity Settings, of those engaged in
backpacking and hunting, 33.6% preferred a Semi-Primitive setting; 25.6% a Semi-
Primitive setting; and 17.9% a Primitive setting.

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backpacking and hunting, 33.6% preferred a Semi-Primitive setting; 25.6% a Semi-
Primitive setting; and 17.9% a Primitive setting.
questions should be independently decided and not be contingent on land management alternatives.

Historically, once a river has been determined to be eligible, the next step is to conduct a suitability study to determine the appropriate classification. This decision is made regarding designation and management. It is critical that the river be evaluated in a potential corridor. This intermanagement should be the same across all land management alternatives.

**Visual Resource Management**

Visual management areas are mapped, but again, criteria and overall management goals are not provided. The plan should illustrate how visual resource management complements recreational byways and areas. How visual management relates to the issues raised by the section on recreational management areas is mapped, but again, criteria and overall management goals are not provided. The plan should illustrate how visual resource management complements recreational byways and areas. How visual management relates to the issues raised by the section on recreational management areas is mapped, but again, criteria and overall management goals are not provided. The plan should illustrate how visual resource management complements recreational byways and areas.

In closing, the present range and content of management alternatives provided do not offer a discernable range of options, especially with regard to recreation. Provision of more data and analyses, as suggested, would allow some focus on recreational issues and resources in the area.

I.D.

**ORIGINATING INTERGOVERNMENTAL PROJECT REVIEW**

STATE Clearinghouse

Intergovernmental Relations Division

155 Concepts Street, N. E.
Salem, Oregon 97310

STATE AGENCY REVIEW

From: [Name]

Date: [Date]

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the return date.

**ENVIRONMENTAL IMPACT REVIEW DRAFT STATEMENT**

[ ] This project has no significant environmental impact.

[ ] The environmental impact is adequately described.

[ ] We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement:

[ ] ND comment.

**REMARKS**

These REMARKS were prepared by

[ ] [Name]

Agency: [Agency Name]

Phone Number: [Phone Number]

[ ] [Date]

**SUBMISSION OF FINAL ENVIRONMENTAL IMPACT STATEMENT**

I.D.

[ ] If these REMARKS are not acceptable, please call to arrange an extension at least one week prior to the return date.

**SUPPORTING DOCUMENTS**

[ ] [Supporting Documents]

[ ] [Date]

**PROJECT NUMBER**

10-1 Analysis of current and recreation use in the RA has been noted in the Proposed Plan. Below is the National Recreation Framework (1988-2000) and the Pacific Northwest Outdoor Recreation Framework Project (2000-2020). However, the Recreation Opportunity Survey (ROS) inventory has not been completed for the RA and current user data is lacking in some instances.

10-2 Analysis of Special Recreation Management Areas (SRMAs) and recreational facilities has been added to the Proposed Plan to allow for development of the ROS and to determine specific actions which are needed to schedule for intensive use areas. Activity plans will be written for SRMAs (National Forests and National Parks) to address recreational opportunities. Please refer to response 1-3 which recommends off-road vehicle management directives.

10-3 Refer to response 1-4.

10-4 Refer to response 1-4.

10-5 Refer to response 1-4.

10-6 Refer to response 1-4.

10-7 Refer to response 1-4.

10-8 Refer to response 1-4.

10-9 Refer to response 1-4, and to PAR/PEIS, Tables 2.1, 2.18, 2.19, 2.20 and 2.21, and address your comment. The Wild and Scenic Rivers Inventory for the Three Rivers RA is available for inspection at the Burton District Office.

10-10 Refer to response 1-4.

10-11 Designation and classification of proposed Wild and Scenic Rivers will not be independently decided from land management alternatives. When designing the landscape character, values by alternative, there are public who do not propose Wild and Scenic Rivers designation having a great influence on what is allowed or restricted on their reach and are aware that management actions of rivers designated wild, scenic or recreational can be quite different. This public will not propose that visual recommendations be made, but will be aware designated if the special feature(s) warrants it.

10-12 It is possible that the visual foreground of the scenic trail be managed as Class IV rather than Class IV where the trail comes near the last management line. However, portions of the trail route established in the RA are within existing route sections which contain roads, pipelines, through wells and tanks. These lines developments were in place before the scenic trail route was established. Proposants of the trail consider this visual environment as much of a hike's experience as the least impacted high country and mountainous sections.

10-13 Visual Resource Management (VRM) objectives for the four VRM classes are noted in the PAR/PEIS glossary of terms (VRM Class I-V). The objectives have been added to the management action for VRM in the Proposed Plan, as yet, there are no designated land uses in the RA, but other special management areas (SMAs) such as Salt Creek/Salt Creek, Silver Creek/Blue Creek, and Little Salt Creek Wild and scenic river designated wild, scenic or recreational can be quite different. This public will not propose that visual recommendations be made, but will be aware designated if the special feature(s) warrants it.

10-14 In closing, the present range and content of management alternatives provided do not offer a discernable range of options, especially with regard to recreation. Provision of more data and analyses, as suggested, would allow some focus on recreational issues and resources in the area.

10-15 Revising the scope of alternatives would not produce a siting other than that already shown by the document. The majority of recreational opportunities will not be affected to any degree by any of the alternatives and a statement is made that the overall changes in the recreation activity are not consistent to be significant (Cary, 1995, Chapter 15-20 through 15-44). Extensive use areas are few in this RA and the Bureau does not intend on enhancing extensive use by construction of developments other than Chickahominy, Diamond Creek and several small proposals such as viewing areas and trails. Extensive recreation and constructed areas are the main recreational pursuits in the RA and will continue without major impacts from any of the issues brought forth in the NOP process.

10-16 Various opportunities to protect particular cultural resource properties and values are presented in the Proposed Plan. Traditional cultural resources are documented in the Proposed Plan and particular prehistoric areas are not noted in the Proposed Plan.
We appreciate the level of detail and specificity you have written. We are pleased that Burns management is adding this level of commitment to planning, and that you have written an RMP which you intend to be a meaningful document for its life. We also want to compliment you on Table 2.1. It is ready to use and will continue to be useful for following implementation and tiered planning.

The draft contains a number of management objectives and actions in the preferred alternative that we support. In addition, we advocate for some general recommendations and suggestions for monitoring and data management that increases their usefulness. The planning process, in our opinion, has not met the standard of a five-year report on range projects completed, cost, and funding sources. The RMP is needed for strong enforcement of maintenance agreements, proper budgeting and spending. The RMP is a planning tool to reach the stated purposes, which we believe are in the public interest.

1. We propose that you strengthen the document as an EIS. The analysis of potential environmental impacts is incomplete and superficial. It won’t be adequate for tiering and your future alternatives. Cherokee, Alt. 3 and 4 will come under more criticism as a result. Wild horses and burros are natural and can be a five-year report on range projects completed, cost, and funding sources. The RMP is a planning tool to reach the stated purposes, which we believe are in the public interest.

3. We appreciate your support for the Oregon Natural Heritage Plan.

4. We would like to see more resources dedicated to monitoring and data management. We believe there is a lack of monitoring and data management. We believe there is a lack of budgeting and spending. The RMP is a planning tool to reach the stated purposes, which we believe are in the public interest.

5. We appreciate your support for the Oregon Natural Heritage Plan.

Page 4

control program. We believe that the RMP needs to be strengthened in a number of ways. The RMP needs to be stronger enforcement of maintenance agreements, proper budgeting and spending. We believe that the RMP needs to be strengthened in a number of ways. The RMP needs to be stronger enforcement of maintenance agreements, proper budgeting and spending.

Page 5

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D. species. Oregon Department of Fish and Wildlife has data available on which species would be expected in the Three Rivers Area. The U.S. Fish and Wildlife service has been monitoring trends in bird populations. The Breeding Bird Survey for 1965-1979, Resource Publication 1979. These documents would give you guidance on likely problems in sagebrush habitat. We would urge you to incorporate those data into the final RMP and to address the needs of the species.

We believe that you should conduct an inventory of these species on the Three Rivers Area so that you can identify the effects of management on the Nongame resources. Could the Fish and Wildlife Service help you in planning how data might be collected?

- p. 3-4. Recreation. The text appears on p. 3-3. It should include birding and wildlife viewing as the major recreation use at it is in the Three Rivers. [See above] Please call us for further information if you need help with identifying specific areas.

11-12. The text in the appendix did not support the table data of Nongame species. See page 3-48. The text in the appendix did not support the table data of Nongame species. See page 3-48. The text in the appendix did not support the table data of Nongame species. See page 3-48.

11-13. Because Burns District has not yet experienced the extensive dry livestock grazing for gold mining in Nevada, we request that you withdraw from mineral entry any areas where special cultural or institutional values may occur. We recommend that you designate part of the Burns District as a special area. We would also support your designating Hart Butte as a key because ungrazed sagebrush habitat is very rare. We do commend you for including six new areas as NRM's or ACEC's and prohibiting livestock grazing on them. We would like to see the larger areas designated for Foster Flat.

11-14. p. 3-5. We suggest that all RNM's, ACEC's, sage grouse leks, and WMA's be withdrawn from mineral entry and OPM lease.

11-15. p. 3-6. Economic conditions. Again, birding is ignored or its contribution to the economy. The Burns Chair of Commerce has found otherwise with its waterfront activities.

11-16. p. 3-7. Map 9-1 is hard to use because private land looks like moderate potential. Can you show it another way?

11-17. p. 3-8. Economic conditions. Again, birding is ignored or its contribution to the economy. The Burns Chair of Commerce has found otherwise with its waterfront activities.

11-18. p. 3-9. Assumptions. Assumptions I, II, and IV have not been true in the past. Because they have not, we would prefer that the RMP include a buffer for lack of funding, maintenance, and monitoring by reducing AUMS's to a manageable level with the extraordinary measures proposed in the Plan. How will the Plan be affected if these assumptions don't hold true? What are your management alternatives?

11-19. p. 4-1. Soils. Alternatives A, B, and C should not be combined for an RNM. Alternative C, with 100,000 more AUMS, would cause the plant, pipeline, vegetation, sagebrush, and water, etc. likely cause significantly more soil erosion than would Alternative A.

11-20. p. 4-2. Forestlands. Alternative A, last sentence. "The significance of this reduction would be very high" . . . on what?

11-21. p. 4-3. Livestock grazing. Alternative A language should be revised to be more scientifically based. The choice of " appropriae" language would give the evaluation of this alternative no importance. Changes in condition class are not slow compared to the 50 years it has taken to get the range into the poor shape it is in. We disagree that the "only objective " that would be met is to maintain the good range condition.

11-22. In other parts of the Plan, you discuss that Alternative A is beneficial for wildlife, recreation, soils, water quality, water quantity, special status species, cultural resources, etc. Whose objective is it to provide approximately 160,000 AUMS for livestock? If that is an assumed, unattainable objective in the RMP, we protest. This document is supposed to analyze the environmental impacts and reach an independent conclusion about how many AUMS the land can support.

11-23. p. 4-4. Table 4-1 needs a more complete heading for condition class. This is Livestock Foreign Condition class.

11-24. p. 4-5. What type of brush control do you propose in Alternative C? In my opinion, the practice does not adequately assess the environmental impacts of either the brush control or the slash. Both kinds of actions influence wildlife (including winter browse and cover for all animals), browsing habitat for the sage grouse, small mammal, etc.), fire, water tables, soil erosion, etc. No analysis is provided if you are proposing any of these activities.

11-25. Are you proposing to alter a total of 61,373 acres or 109,000 acres? [Securing included in brush control or separately stated?]

11-26. p. 4-6. Cultural resources. The Portland Audubon Society is strongly opposed to proposals for sagebrush and other species. Could the Portland Audubon Society help you in planning how data might be collected?

11-27. Many species of wildlife are dependent on vegetative diversity and shrub browse or cover. The Portland Audubon Society is strongly opposed to proposals for sagebrush and other species. Much of the RMP text and our conversations with Three Rivers employees suggest that this Plan is a balanced approach to resource management. In the alternative, a balanced approach is the RMP. Alternative C is far closer to the alternative maximizing commercial production and values, while the draft may represent an improvement over historical management practices, in our opinion, it does not approach a balanced multiple use management scheme required in RMP.

11-28. p. 4-7. Vegetation. Alternatives A, B, and C will certainly have the same effect on vegetation. This portion of the environmental analysis is not adequate.

11-29. p. 4-8. Big Game Habitat. Are different areas proposed for sage grouse, buffalo, and hunting? Recreation. How will the Plan be affected if hunting and other activities are proposed in the Three Rivers?

11-30. p. 4-9. Species. We urge you to modify this Plan to incorporate the special cultural or institutional values of the Burns District. The U.S. Fish and Wildlife Service for Wildlife and Fish has data available on which species would be expected in the Three Rivers Area. We would urge you to incorporate those data into the final RMP and to address the needs of the species.
3. We do not support range projects which change native vegetation into nonnative vegetation nor water development projects which alter natural drainage or allow livestock to move to new areas.

4. We support your removing livestock from these areas.

Your footnotes. We are pleased that you are committed to riparian and wetland improvement even if funding isn't available for fences.

Special species. We are pleased to see that you will actively work on Recovery Plans and NREPs.

Wetland restoration and needling habitat. 1. Table 2:1 says you will complete implementation of the Wetlands NREP by 1986. The text, p. 4-28, says 1987. We hope it is 1992.

11-9

Plagues—we are pleased to see the plans for collecting data on 10 plagues like hogs. We'd like to see your study and implementation schedule move up in time.

11-10

Riparian—we would prefer you follow Alternative A, but if C is the choice, 91% utilization of herbaceous vegetation in the riparian area seems high. Can you get adequate recovery in riparian systems with 80%? We're pleased that your target in no more than 60% is in the upside.

11-11

Insects. We believe they shouldn't be used for rodent control on public lands anyway, but we couldn't find more further than two miles from nests.

11-12

Decomposition. 2. We need assurance the development of OGP. That is a very harmful use of the public lands. There are more than 35,000 visitors per year, mostly mostly from out-of-county, to see birds and other wildlife. Encouraging then is far less restrictive to other resources.

11-13

AGC. We are pleased that you plan to retain existing designations and name new RMA's and AGC's. We also support your designating Sant Bute and South Lake as RMA's and Saddle Butte as an AGC. Increase the size of the Foster Flat RMA/AGC.

11-14

The soils management objectives (NDFW/OES Tables 3-1-4) have been expanded to provide a basis from which projects can be evaluated. The objective categorizes changes (beneficial or otherwise) as opposed to total (positive and human) erosion. Refer to the Proposed Plan for a detailed monitoring program. Also, see "Monitoring The Three Rivers Resource Management Plan" on page 2-3 of the NDFW/OES.

11-15

Bureau directives have required that 90 percent of Range Retention Funds (RDF) be spent on riparian projects. The Three Rivers NRM has been in compliance with this requirement. This directive has not been withdrawn, therefore, the NRM area will continue to spend at least 50 percent of the Range Retention Funds allotted to the NA by the State's priority selection process on riparian improvement projects. Also, see EFS Update (available for inspection at the Bureau District Office).

11-16

Section I of the Wild and Free-Roaming Horses and Burros Act states "...wild free-roaming horses and burros ... are to be considered in the area where presently found, as an integral part of the natural system of the public lands." Furthermore, there is no proposed legislation under any alternative, in either number or status, in which horses will be managed. Alternatives on NDFW/OES Tables 2.1-22 and 13 showed no proposed increase in wild horse numbers. The numbers shown on Table 5-6 have not been changed from previous planning documents. Also, refer to response 2-6.

11-17

Inventories are complete on sage, grasses growing on ground locations; sage-grass, level native habitat; and other native grasses are growing. As sites are discovered, they will be checked under the management actions described for the particular type of habitat. Also, refer to response 3-9.

11-18

Rangeland inventory will continue. All types of projects are subject to the NEPA process. During this process, the evaluation of as specific investigations are conducted. In the past, several new sites have been discovered during this process and these investigations will continue.

11-19

Refer to response 3-18. Also, monitoring of habitats will require an initial inventory and automated plans for ongoing improvements. Anyone interested in the wildlife habitat program is encouraged to offer assistance in the formulation of data collection and monitoring methods.

11-20

The text will be changed to include wildlife viewing as a recreation activity. Bird and other wildlife watching in the Three Rivers NA is a major recreation use. However, past inventories of which we are partly indicated that the major concentrations of birds and elk are viewed by visitors to the area are in Hdyer and Blitzen Valleys on

Appendix II-39
Appendix II-40
Joshua Warburton
District Manager
Burns District BLM
5225 D Street
Burns, OR 97720

Dear Mr. Warburton,

The Oregon Natural Resources Council (ONRC) wishes to present comments on the Three Rivers Resource Management Plan (TRRMP) Environmental Impact Statement (TREIS). ONRC opposes the preferred Alternative C and recommends Alternative A with modifications.

Special Management Areas

13-1 The TEEIS recommends new areas for special protection status. ONRC recommends:
- Malheur River and Stonesbrough WSA be wilderness.
- Diamond Craters wilderness corridor area be wilderness.
- Large proposed areas: Calf Creek Basin, Balmfield, and Shoshone Water Country be backcountry areas (no motorized use, no grazing or restricted grazing, no domestic livestock developments, no water developments for domestic use). 
- Oso Mountains-Burch Creek area be backcountry.
- Immigrant Creek and Stiles River Canyon be backcountry.
- The BLM should consider a backcountry allocation for areas such as the ones above.
- The BLM should not provide protection for specific areas without backcountry designation.

13-2 Fishing/Water Quality and Ecological

The proposed plan does not address the construction of logging roads in valleys. The forecasted areas within this plan have been carefully checked and no new road construction would be required.

13-3 Mining

The TREIS should withdraw all remaining streambeds, wetlands, springs, aquatic and scenic areas from all forms of mineral entry until a comprehensive cumulative impacts EIS on mining is done.

13-4 Geothermal

The TREIS should withdraw all lands from geothermal entry and issue no leases until a comprehensive cumulative impacts EIS is done.

12-1 In accordance with provisions of the Bureau Manual (Section 16.22-21), the Proposed Plan provides for the protection of 492 acres of selected Franklin River Critical Growth Forest within the RA. Maps F-1, 4, 5 and 6 display the locations of the forest tracts. Tables 2-4, 2-5 and 2-6 address various aspects of Forestland Use Plan Old Growth management.

The draft does not address the construction of logging roads in valleys. The forecasted areas within this plan have all been carefully checked and no new road construction would be required. Historically, only short spur roads or road extensions have been necessary to accomplish timber management activities. An average of approximately 30 stations (2000 feet) per year have been necessary over the past 8 years and new construction is expected to be the same or less for future activities. Costs have averaged $750 per station ($89,000 per year) in the past and this cost is expected to rise to between $11,000 per station ($298,000 per year) in the future. The TREIS does not attempt to correlate future inflation rates. This increased cost will, however, affect our ability to maintain road construction.

12-2 Refer to responses 2-10 and 2-78.

12-3 Refer to response 1-13.

12-4 The alternatives presented in the draft were developed with full public participation and represent a comprehensive and reasonably achievable range of options for meeting the Bureau's full range of multiple-use management responsibilities in the Three Rivers RA. It is not anticipated that additional alternatives will be developed, however, the concerns expressed were considered by management in the development of the Proposed RF.

12-5 Refer to response 1-44.

12-6 Refer to response 1-12.

12-7 See FRN/FEIS, Appendix 1, Table 13 for project costs.

13-5 Refer to response 1-11.

13-6 Refer to response 2-78.

13-8 Refer to responses 2-6 and 2-10.

13-9 Refer to responses 2-4 and 2-5.

13-10 Refer to responses 2-6 and 2-10.

13-11 Refer to responses 2-6 and 2-10.

13-12 Refer to comments 2-4 and 2-5.

13-13 Refer to comments 2-4 and 2-5.

13-14 Refer to comments 2-4 and 2-5.

13-15 Refer to comments 2-4 and 2-5.

13-16 Refer to comments 2-4 and 2-5.

ONRC TREMP

Page 2

Forest

13-3b Wells should be installed in timber management of fogy units, providing a comprehensive harvest plan and detailed older growth forest system in areas designated for special protection.

13-4 Fisheries, Water Quality and Ecological

13-5b Fisheries, concern including Redband Trout habitat, are not addressed. Current habitat and water quality conditions are not well understood and the TREIS does not improve these conditions. After forty years of "management" at the wrong levels. Improvements in management are recommended for fisheries, water quality and riparian habitats to be good and maintain good condition.

13-6b Wildlife, water and wetlands and riparian areas, and forested areas are used, but "excellent" must be defined more clearly.

13-7b Range improvements are used, but "excellent" must be defined more clearly.

13-8b A full inventory of aquatic habitat and a detailed enhancement and protection plan should be provided in the TREIS.

13-9b The TREIS should include all management plans for aquatic habitats, including time and costs schedules should be included in the TREIS.

13-10b Created Wheat Seedings and Range Development

13-11b All created wheat seedings should be eliminated and native species used for forage and wildlife growth, except for possible use of forage for areas where severe erosion would occur after the seed was planted and would not do the job (generally recommended by Oregon BLM State Director on January 23, 1990).

13-12b Range development should be reduced to a minimum to not influence wildlife in areas that were lightly grazed in the past. Benefit/cost/projections for all range development proposals should be provided.

13-13b Hunting

The TREIS does not adequately address wildlife resources. Both sheep and antelope should have specific management plans for habitat protection including future and detailed habitat improvements. The proposed plan for sheep should be analyzed. For hunters, range and forage should be allocated to wildlife. The forested areas are big enough for wildlife and big enough to be "excellent." The TREIS does not adequately address game habitat concerns. What defines "suitable" and "unsuitable" habitat conditions and what additional management issues will need to improve big game habitat? Winter range for sheep should be allowed to exist with additional buffer.
The TRDEIS only shows an immediate 0.60% AUM decrease and the projects increased AUM in the future. One option under the ground indicating that overgrazing has occurred in many areas and cattle removal in some areas is the only way to improve 565,000 acres of "fair-poor" condition lands. Simple management methods can be used to recover these areas and improve wildlife habitat.

**Wind and Scenic Rivers**

The TRDEIS is inapplicable to wind and scenic rivers. The WD recommend setting aside the Middle Fork Malheur River as recommended. The following rivers should be recommended for designation:

- Middle Fork Malheur River - segment C
- Columbia River - segment A
- Emigrant and Hay Creeks should be studied.

**ACEC**

We recommend the BLM adjust their ACEC proposals and would like to recommend some changes:

- Foster Flat be increased to 1,570 acres
- Biscuitoot be increased to 5,280 acres
- Ochoco be increased to 16,000 acres

Eugene Metcalf area be retained as ACEC, but be designated for protection of natural values rather than wind turbine values.

**Maps and Allocations**

The comprehensive and detailed maps (1/2 mile) should be provided to show all the land allocations together for easy comparison.

**Conclusion**

Oregon Natural Resources Council (ONRC) looks forward to a revised and complete TRDEIS with much more detail and discussion of impacts. Thanks for the opportunity to comment.

13-3-1 The Final Oregon Wilderness Act contains bureau recommendations for OHA has been completed. Therefore, the BLM does not consider wilderness designation or management of the areas as wilderness, other than OHA, to protect and preserve their natural condition, as these considerations are outside the scope of this plan.

13-3-2 The bureau has an management category for backcountry or unvisited areas in its planning process. Backcountry allocations are not consistent with planning guidance and there is no mechanism to provide under a single management designation or management of the areas as wilderness. The BLM recommends making other resource activity recommendations such as off-road vehicle closures, visual resource management closures, mining withdrawals, and other actions to provide protection of natural values. Also, refer to response 13-4.

13-3-3 Refer to response 3-18.

13-3-4 Based on the BLM analysis, there is no reason to withdraw all lands from geological survey and leasing. Appendix 5 (Tables 4, 5, 6, 10, 11 and 17) describes geological survey and leasing. Additionally, the BLM recommends: (i) cumulative impacts were forecast for up to 16 scattered temperature patterns; (ii) the development project to occur during the life of the plan; (iii) if any production was new, an SSD would be required under NEPA, an SSD will address the cumulative impacts at that time. Also, refer to response 3-18.

13-3-5 Refer to response 3-12.

13-3-6 Rangeland trust inventories are scheduled to begin during FY 91/92 and would indicate age composition and distribution of the population. These data will contribute to the Rangeland Trust Habitat Management Plan scheduled for development in Fiscal Year 93. For additional information please refer to responses 2-9, 9-6 and 9-7.

13-3-7 Satellite, achievable goals need to be described when identifying exceptions and minimizing environmental impacts. In the planning process for the Three Rivers WA, many miles of sensitive aquatic and riparian habitat is adjacent to, but outside of, BLM jurisdiction. Management for exception to exceed conditions within 10 years was in some cases not achievable.

Restriction of water quality and aquatic habitat were primary goals of the Preferred Alternative. Under the Preferred Alternative, 90 miles of sensitive aquatic and riparian habitat is adjacent to, but outside of, BLM jurisdiction. Management for exception to exceed conditions within 10 years was in some cases not achievable.

13-3-8 Satellites, achievable goals need to be described when identifying exceptions and minimizing environmental impacts. In the planning process for the Three Rivers WA, many miles of sensitive aquatic and riparian habitat is adjacent to, but outside of, BLM jurisdiction. Management for exception to exceed conditions within 10 years was in some cases not achievable.

13-3-9 Refer to response 3-18. Because of the many overlapping allocations characteristic of multiple-use management systems, a visual display of all such allocations on a map becomes untenable. A 1/2 mile scale map for the Three Rivers WA measures approximately a foot by a foot and is laminated for this type of document. Refer to the TRDEIS, Table 5.12 for program by program comparisons.

Appendix II-42
I have been following the Siskiyou Three Rivers Project for years. It was begun as an effort to save the last remnants of the species native to the region and to provide a habitat for the endangered species. The project was initiated in 1973, and it has been ongoing ever since.

The Siskiyou Three Rivers Project is designed to provide a habitat for the Siskiyou Mountain Aromatic, a species of conifer that is found only in the Siskiyou Mountains of Oregon and California. The project consists of three separate areas: the Siskiyou Mountain Aromatic Research Area, the Siskiyou Mountain Aromatic Restoration Area, and the Siskiyou Mountain Aromatic Conservation Area.

The Siskiyou Mountain Aromatic Research Area is located in the Siskiyou Mountains of Oregon and California and is managed by the United States Forest Service. The area is 5,000 acres in size and is managed to provide a habitat for the Siskiyou Mountain Aromatic.

The Siskiyou Mountain Aromatic Restoration Area is located in the Siskiyou Mountains of Oregon and California and is managed by the Siskiyou Mountains Aromatic Society. The area is 5,000 acres in size and is managed to restore the habitat for the Siskiyou Mountain Aromatic.

The Siskiyou Mountain Aromatic Conservation Area is located in the Siskiyou Mountains of Oregon and California and is managed by the Siskiyou Mountains Aromatic Society. The area is 5,000 acres in size and is managed to conserve the habitat for the Siskiyou Mountain Aromatic.

The project has been successful in providing a habitat for the Siskiyou Mountain Aromatic, and it has also been successful in providing a habitat for other species native to the region.

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The project has been successful in providing a habitat for the Siskiyou Mountain Aromatic, and it has also been successful in providing a habitat for other species native to the region.
There is no indication that this area can serve as an AEC. The narrative mentions heavy forage use, and elk and antelope are present in the area. The current management practices focus on maintaining and improving the habitat, and the area has a high population of wildlife species. The area is closed to public use, and there are no open areas for grazing outside of the area, which does not include either the Kiger or Palomino herds. There is a base of evidence that these antelope, elk, and mule deer in the area could not exist in the absence of grazing and/or forage production. There is evidence that the progeny of the original Spanish mustangs in the area have been lost through inbreeding, and the area is not currently managed to support the survival of these species. The area is not closed to public use, and the forage use is not high enough to justify a recommendation to open the area. The area is closed to public use, and the forage use is not high enough to justify a recommendation to open the area.

It is recommended that the area be closed to public use, and that the forage use be managed to support the survival of the wildlife species present. The area is set aside to support the survival of the wildlife species present, and the forage use is not high enough to justify a recommendation to open the area.
The BLM Shows a conflicting number of acres for this proposal. Appendix I, Table 2 shows 13,900 acres while Alternative B I show 16,900 acres. Site #4 where does the other 2,000 acres come from?

No critical environmental concerns were identified nor were any Management Recommendations given.

I request that this area be dropped from all consideration as an AOC.

In Appendix B, Table 1, Mineral sites listed, many of the legal descriptions are incorrect and conflicting. For instance in site 77, Haton Point is listed in 7,730, 355, sec. 4, T.7S R.1W, SW 1/4 of SW 1/4 a 240 acres, the same site is listed in 7,730, 355, sec. 4, T.7S R.1W, SW 1/4 of SW 1/4 a 60 acres, not 240 acres. Site #9, Fort Curry is listed in 7,730, 355, sec. 1, T.7S R.1W, NE 1/4 of SE 1/2. This subdivision would only contain 10 acres, not 20 acres as listed. The subdivision locations for all sites in this table needs to be reviewed for corrections.


Reviewing my response, dated January 30, 1989, at the bottom of page 10, I found that I made a gross error in calculating the total number of big game. The winter need for elk should be 1,500 AUM, not 1,500 as shown. The summer need should be 300 AUM, not 2,100 as shown. Please make these corrections.

I apologize for any inconvenience this may have caused.

Thanks for the opportunity to participate in the Three Rivers Resource Management Plan.
nearly perfect. The relationship between ACES and the wide range of public land designations is such that a potential ACES may be contained within or overlap another designation provided that the ACES designation is verified to encompass the resource of value. This is the case with Silver Creek Basin/ACIS.

- Page 15-17

The site will be managed primarily to maintain the natural qualities of the ecosystems in a state that is suitable for conducting research or monitoring this plant community. See also responses 3-1, 15-16.

- Page 15-18

Fencing of the Foster Flat Basin/ACIS is recommended as necessary to maintain the important natural areas of the area.

- Page 15-19

This statement reflects the fact that this basin is not continually drained, there is an increased representation of water. All water loss is internal. This could be by means other than evaporation such as percolation into the soil. However, the majority of the water loss is probably by evaporation.

- Page 15-20

The metric system is a standard which the scientific community, however, your concern is noted and the measurements cited have been converted to American (English) standard units.

- Page 15-21

The interdisciplinary team assessed the relative values represented in the Snake Lake proposed Basin/ACIS and determined that they did not sufficiently meet the importance and relevance criteria. The ID team recommended, and concerned itself, that the areas not be carried forward for further consideration. Also, it should be noted that BASA is not an independent designation, NRRA and Outstanding Natural Areas (ONA) are categories within the larger designation of ACIS. Therefore, an area cannot be designated as an ACIS, but relies on an ONA.

- Page 15-22

Map ACES-1 has been changed to the FINAL/FLIPS to show the USF-PP's proposed Dry Montana Basin. The USF-PP proposed Dry Montana RMA contains 1,187 acres. See also Map ACES-4, FINAL/FLIPS.

- Page 15-23

The proposed Dry Mountains RMA/ACIS addition would be a continuation of the cells contained within the USF-PP proposed RMA. Due to the natural balance changes between the USF-PP and RMA areas, the two areas could be considered in addition to another proposed value of these cells.

- Page 15-24

The utilization of protecting and managing special uses and resources through ACIS/purpose-related designations is an integral part of multiple-use management. The USF-PP has currently proposed sites on the National Forest System and is included in the Preferred Alternative of the Draft Final EIS. The Dry Montana Basin/ACIS addition which is an RMA-administered land also contains the plant communities necessary to fill the cell for Providence Mine Basin in the tests and Range Province. The combined areas would provide a continued representation of low to high elevation plant communities in one area and contact lists (NCMPP cells). Therefore, this area (Dry Mountains RMA) may reduce or eliminated some RMA management consideration until the proposal receives further study by both the USF-PP and other potential organizations.

- Page 15-24

Refer to responses 15-24.

- Page 15-25

Refer to responses 15-24.

- Page 15-26

Refer to responses 15-24.

- Page 15-27

Refer to responses 15-24.

- Page 15-28

Refer to responses 15-24.

- Page 15-29

Refer to responses 15-24.

- Page 15-30

Refer to responses 15-24.

- Page 15-31

Refer to responses 15-24.

- Page 15-32

Refer to responses 15-24.

- Page 15-33

Refer to responses 15-24.

- Page 15-34

Refer to responses 15-24.

- Page 15-35

Refer to responses 15-24.

- Page 15-36

Refer to responses 15-24.
16

January 28, 1990

District Manager
Bonneville District

Dear Sir:

I am responding to the NRCS to your Draft Three Rivers Resource Management Plan. Our state-wide group of BLM members II. objectives appreciates the opportunity to provide input for the management of an area that is important to our resident wildlife. I would like to offer comments in several areas:

Appendix II-47

16-1

The area is of primary concern to us. As you know, the South Barren Agri is the principal one of the 12 major sub-areas in the entire state of Oregon. As such, it is the most critical part of the area for the protection of the species. To ensure its protection, special consideration should be given to the area in the final document.

16-2

Other than the listing of species of interest, there is no mention of specific habitat or management plans in the area. This is an oversight that should be corrected.

EPA CONDITION

Management direction should be to get all areas in excellent condition. Alternative A, which is the direction we support, would be to get all areas in excellent condition. Alternative B would be to get all areas in excellent condition. We do not support the summation of projects that are not in excellent condition.

DRAG AHEAD

These animals significantly impact native vegetation and we strongly support their eradication. We would support Alternative A (Erosion Natural Values) as being essential in protecting these resources most important. This is inadvisable in the way I have outlined above and we hope that this could be corrected in the final document.

Sincerely,

Stuart A. Haasen

Chairman

District Manager

2533 S. Desert Rd.

Bessemer, ME

17

17-1

Refer to response 1-11.

17-2

Refer to responses 2-36 and 12-7.

Appendix II-47

16-1

Stephanoderma malheurianum (Malheur wheeleter) has not gone extinct in the wild. We Malheur wheeleter plants were observed in the wild in 1993 and 1988, seven survived to maturity in 1996 and 1 and 1987. BLM and USFWS are currently cooperating in an ongoing recovery operation for this plant, including an intensive study of the effects of biological and climatic factors on its survival. These cooperative study efforts have been formalized in a Conservation Agreement between BLM and USFWS. Overall conservation actions and the management of the 12-acre South Barren Agri, which contains all of the designated Critical Habitat for Malheur wheeleter, are conducted under the Draft Recovery Plan. As such, present management practices being undertaken through the Recovery Plan are being carried forward in the final document. The Draft Recovery Plan and associated documents are available for inspection at the BLM District Office.

16-2

See the Proposed Plan for management actions for special status species, including plant species. These actions will include inventory, monitoring and the establishment of species specific objectives within the alignment and evaluation process where appropriate. These activities will constituite a major portion of the special status plant program in the EA.
January 22, 1980

Jay Carlson
Burns District Office
Bureau of Land Management
H C 74 12533 Highway 20 West
Hines, OR. 97738

REVIEW COMMENTS FOR THE OCTOBER 1989 BLRM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson,

I am concerned about alternatives A, B, and C as they may result in the abandonment of base property values. The proposed BLRM actions may result in reduced amounts of BLM dollars generated to support BLM activities. These dollars are spent locally, strengthening our poor economic situation here in Harney County.

We request that if Alternatives A, B, or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement a "Takings Implication Assessment" be completed as authorized by Executive Order 12030 (see the November 8, 1982 Memorandum to all Assistant Secretaries).

I am concerned with BLM/BLM/BLM.

1) 1977 Clutter: I am the manager of the South Silver Creek Ranch and this is our grazing permit. We will be

evaluated this year. This unit can only be evaluated and improved with continued burning, responsible grazing, and restocking. To simply declare it is a political answer only and not what is best for wildlife. Comment:

a) 1026 Norton Mills, My Wife and I are the permittees on this allotment. Soil Erosion seems to be a major concern. There have been apprehensions. Please provide the last decade's data with this parcel. We live on the allotment. Grazing must be reduced with a statement about cattle, not being responsible. This is a 3,500 acre, 2 pasture, site.

b) 1025 Silver Creek: My wife and I are the permittees and owners of the property through which flows Silver Creek. We will not allow any vegetation at the livestock, nor disturb delicate riparian soils.

1030 Skull Creek: My wife and I own 156.15 acres on Skull Creek. I manage the only other privately held acreage on Skull Creek, for the owners of South Silver Creek Ranch.
Appendix II-49

This 1030 Skull Creek Allotment, has no other live water in the northwest corner. It has been proposed to fence off the entire Skull Creek canyon, but private land and public. This will not distribute cattle grazing equally. This will cut cattle from adequate water supplies. This will destroy any reasonable form of multi-use of this entire 27,500 acre pasture.

19-3 If a fence is built we request a legal survey to locate our boundaries. We will not fence out cattle from water. We object to the inconsiderate and thoughtless processes that have placed my wife and I in this delicate position.

The Culp Family and the Hatchet Family have for several generations used managed objectives and on-site techniques that have preserved this resource for both recreation and wildlife.

19-4 We view your proposal to fence off the entire Skull Creek Canyon as very expensive and a threat to the existence of these family enterprises. Mr. Morgan and ourselves have been placed in the position of having to participate in a dueling exercise, trade to the BLM, or sell to these families.

Neither of us can benefit from any of these options. It would be a severe blow to these five families, and a severe economic loss to the community.

The letters from the Harney County Cattleman, Stockgrowers, Farm Bureau, Sheep and Hogman, and the January 17, 1988 Middle Ranch and Western Range Service Comment and Response to the Draft Three Rivers Resource Manage Plan and Environmental Impact Statement are consistent with our views and comments.

We endorse such letters and the Middle Ranch document. Any additional comments we may have are enclosed herein.

Sincerely,

James C. Shepherd
Elke C. Shepherd
Elia R. Shepherd

P.O. Box 55
Riley, OR 97755
In response to your Draft EIS, I find Alternative C to be totally inappropriate. I would like to see Physical Alternative A with some modifications that would allow for the restoration and maintenance of rangeland in its excellent natural condition. Cattle grazing should be reduced or eliminated where appropriate.

Riparian and aquatic habitat as well as water quality should be improved and maintained in excellent condition. I would like to see all of the South Fork and Middle Fork Malheur Rivers, all of Blushubuck Creek, and all of the Silver Springs River designated for the South Fork and Middle Fork Malheur Rivers, all of Blushubuck Creek, and all of the Silver Springs River.

The remaining old-growth forests should be identified and protected.

The Draft EIS needs to address bighorn sheep habitat protection, with forage allocations going to bighorn sheep home range. In general, wildlife winter range forage allocations should be given priority over livestock allocations. The seeding proposals created for waterfowl should be eliminated.

To give an accurate picture of all costs of new road construction and other riparian projects (fences, pipeline, etc.) need to be included for each alternative. Environmental impact of each should also be listed.

This is beautiful and ecologically important land. We need it in its excellent condition. Please use Alternative A with the above modifications.

Sincerely,

Irene Bachhuber
10561 SE Idylsome Rd
Portland, OR 97266
Dear Sir:

I would like to take this opportunity to discuss with you two issues which have an impact on the irrigation well being of BLM lands in your district.

First, I would like to address the question of appropriating dwindling water resources. Any activity that may be expected to diminish about maintaining runs, feed, lamb, and water; and used wisely, would be some of the alternative which could alleviate these undesirable impacts.

The second issue which concerns me is the draft E&I for Three Rivers Resource Management Plan. We find that you (over)

would consider building 40 miles of pipeline, 1.5 miles of pipeline, 100 water wells, 500 acres of reservoirs, and point 76,960 acres of treated wheatgrass. All at taxpayers expense is appalling. The fact that you would do so for the benefit of a small group of ranchers is conclusion. You can name those that the project. We are prepared by having not begin to pay for the cost of administration. But we have saved has the cost of the construction you propose. These lands are already over-priced and in poor the fire conditions and we now propose to purchase, these further destruction.

Alternative "A" is the only one which will provide for some recovery of the range. The only one which you in your convenience can implement.

Sincerely,

[Name]

David Burcombe
1866 Swinnert Rd.
Walla, WA 97862
(503) 850-1205

[Name]

TO MARK HATFIELD
10, Bob Dicks
US AND RAE SMITH
23

No comment identified.

24

Joshua L. Warrington, District Manager
BLM Benton District Office
HC 74-12533 Highway 20 West
Hines, Oregon 97738

January 23, 1990

Dear Jack,

It has been a long time since I was on any of the BLM advisory boards, but just because I haven't been active doesn't mean I'm not still deeply interested in the management of BLM lands.

The DEIS for the Three Rivers Resource Management Plan is a real disappointment. I can assume at least one advisory board tour through parts of the area, looking at some of the most fragile and valuable wildlife I've seen in Oregon, and most of these lands are in poor condition. Would the DEIS alternative that would truly protect and restore these public Alternative C inadequately addresses the manpower need to bring these lands back from past overgrazing. Major changes in the timing and intensity of grazing are needed, and will do more than will be accomplished by just the building of fences and watering facilities for livestock. I agree that some areas of crusted wheatgrass seeding can be used to keep cattle off of desperate condition lands while they recover, however the preferred alternative relies too heavily on converting native range to crusted wheatgrass monocultures. There is need for an alternative that uses some of these same techniques, but also an aggressive program of reducing grazing pressures, especially in the spring.

I am very concerned that wildlife is given the usual bottom of the heap rating in the priorities of the management area. There's far more important winter and breeding areas for limited sheep, deer, antelope, and other wildlife, but you'd never know it from the DEIS. How are we going to maintain the limited wildlife? Why are game animals given such a small forage allocation? How are grazing conditions, disease, distribution of domestic sheep to wild ones, and specific habitat needs of wildlife to be dealt with?

Charlotte C. Corkran
190 N. W. 114th Street
Portland, Oregon 97229
(503)364-1348

Appendix II-52
From: Van G. Decker  
P.O. Box 340  
Burns, Oregon 97720  

To: Jay Carlson, BLM/EIS Team Leader  
Bureau of Land Management  
Burns District Office  
HC 74-12222 Highway 20 W.  
Hines, Oregon 97735  

Dear Mr. Carlson:

The grazing use sold to livestock permits is the only user fees of any significance that BLM can collect on a very large percentage of the NMA.

The proposed reductions in grazing recommended in alternative A would have depressing economic effects on the Harney County community. As stated in the plan, 10.2 percent of total personal income in Harney County is from agricultural income. However, in several of the small communities within the BLM Diamond, Goldheart, Riley, Crane, Princeton, Buchanan, Drewers, and Pine Creek, agricultural income is near 100% of the income.

Assignment of off-site forage to permits is an acceptable method to meet permits to particular those in the Drewers area.

The proposed 30,000 acre seeding, in West Warm Springs Allotment, will likely cost $6,000,000.00. This money should be spent in the area, and in different allotments. As stated in the study, this expensive seeding will mainly benefit the wild horses.

KIGER NHM:

Assignment of 36,619 acres of Kiger NHM as a wild horse ADEE.

This includes significantly more area than the herd of horses has been using in the past years. If I recall correctly, under the original wild horse and burro Act passed in the late 1960's, feral horses were not to be moved into new areas where they had not already been.

Van G. Decker  
Page 2  

This Kiger herd of horses are not native to this area. They were hauled in here by BLM and planted in this area.

Mustangs have been running in common with cattle in this area for over 30 years and have competed well with the cattle for feed and shelter.

RIPARIAN AREA USE BY HORSES

I recently made an inspection trip of the Yanke Creek stream bed in the Kiger NHM. This is a parcel of privately owned land in the rhododendron forest for many years. The BLM has had complete control and responsibility for the horse and range management of this area.

The Yanke Creek stream bed twenty years ago had several little small stringer meadows along the sides of the creek. These have been totally trampled out by the horses trampling in them when wet and piling and rolling in them when dry. As I saw them this creek had a drink of water. I noticed the bottom of the stream bed is a series of little ripples of silt, rather than a large flat small rocks as is normal in this type of creek. The soil area has been altered so greatly that the soil is all being carried away down the creek. The horses, by their year round grazing and abuse of this riparian area have 90% destroyed the riparian area.

If a livestock permits running cattle on a BLM allotment abused a stream bed area to this extent, I believe the BLM would likely require removal of his cattle forever. The Yanke Creek stream bed is a tributary stream of the Middle Deschutes River District. I believe this stream bed riparian habitat would be rated very, very poor.

WILDERNESS AND SCENIC VALUES:

Segment A and segment B of the Silvies River do not meet the characteristics to make this river a worthy addition to the National Wild & Scenic Rivers System.

The BLM should actively pursue the tax suit by Cesar and Jo McLean, and not allow them to continue to abuse the BLM as they have in the past.

Thank you,

Van G. Decker

January 29, 1990

Appendix II-53
January 22, 1990

District Manager
BLM Burns District Office
HC 18-12533 Hwy 20 West
Hines, Or. 97738

Re: Draft EIS - Three Rivers area

Dear District Manager:

The proposed alternative, Alternative C, is totally unacceptable and simple continues the management of these publicly owned lands as cheap range for private cattle operations.

Interestingly the cost of construction of new roads and other range and projects is not included for this or the other alternatives, nor are environmental benefits accurately reflected. The result is a distorted cost/benefit picture.

26-1 The BLM must develop a new alternative to restore and maintain range in excellent, natural condition. Cattle grazing should be reduced, or totally eliminated to the extent necessary to achieve this goal. Water quality, riparian and aquatic habitat must be improved and then maintained in excellent condition.

26-3 Ancient forests must be identified and protected. All created wheatgrass seeding proposals should be eliminated.

26-5 Bighorn sheep habitat must be protected and forage allocations go entirely to bighorns in their home range. In general wildlife winter range forage allocations should be given priority over livestock allocations.

26-6 If the alternatives presented, Alternative C is the least objectionable, that it allows a token amount of recovery to occur.

Sincerely,

[Signature]

Claire Wales
Jan 29, 1990

Dear Josh,

We are opposed to the Three Rivers Draft for the following reasons:

1. No analyses of the impact, economically or ecologically, of ranchers or residents, in order to have the new plan take effect on County.

2. No proof that water quality and riparian zones have been harmed by cattle.

3. Will leases not take precedent over cattle on BLM lands.

4. No proof, outside grazing. How safe you out of damage to riparian areas?

5. No proof range data was taken properly and objectively.

6. No proof the EIS data included input from ranchers.

7. No alternative plan for ranchers as to where to graze cattle.

8. Wildlife should not take precedent over cattle on BLM.

9. No proof funding is available for alternative plan.

10. No clear outline of actual grazing reductions. Where are these; how many; for how long?

Thank you for your study and work before it is acceptable and livable with all segments involved.

Sincerely,

Curt Sugar
Monte Sugar

P.S. Josh, no assessment has ever been made to the detriment of family live and compatibility in the ranching "way of life," which has sustained some outstanding citizens.

Appendix II-55
January 29, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
PO Box 741333 Highway 20 West
Bend, OR 97733

Dear Mr. Carlson:

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990, Riddle Ranch and Western Range Service Committees and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Your response has been submitted to you. We do not include a full copy of the letter for the reason that it would be an exact duplication of the Riddle Ranch document and organization letters.

Sincerely,

SJ Cattle Co.
Bus 14
Princeton, Oregon 97751

Appendix II-56
January 29, 1980

Jay Carlson - EIS/EIS
Bureau District Office
Bureau of Land Management
IC 34-12075 Armory 20 West
Hines, OR 97036

RE: COMMENTS - 1977 DRAFT THREE RIVERS EIS/EIS

Dear Mr. Carlson:

The Oregon Farm Bureau would like to go on record in general support of the testimony already received from the Middle Ranch, Western Range Service and the Basque County Farm Bureau, in relation to the Three Rivers Resource Management Plan.

After reviewing the aforementioned comments, we agree that with the scientific basis current today grazing practices are having no significant adverse impact on surface water quality. The proposal to remove livestock from streams will disrupt current successful grazing systems and will have a long-lasting adverse impact on livestock operations.

Water quality should be determined by standards developed by Federal action under the Clean Water Act and should take into account the particular and different problems caused by the intrusion of naturally occurring pollutants. The solution to these difficult problems should not be at the expense of the established user of water, including agriculture.

Over grazing and damage to rangelands by wild horses or game animals must be managed for control of wildlife populations. Domestic livestock grazing permits should not be reduced or eliminated, as a result of misuse of public lands by wild horses or game animals. It has been recently reported there has been an increase of elk in the resource area. We strongly feel that should the bovine problem continue, appropriate work by wildlife biologists has been done by an independent professional range manager.

If grazing permits are reduced to permittees, the permittee should be compensated economically for the amount of time the land is not used for an authorized purpose or when the reduction is due to no mismanagement by the permittee.

We feel that the designation of the entire Eiser Active Horse Management Area as an area of critical environmental concern will have an adverse affect on at least one livestock operation. The takings issue should be addressed under the “Making Implication Assessment” authorized by Executive Order 12300. Wild Horses and livestock have successfully run together in the past and as a result of the recent BLM sale of Eiser horses, it would tend to show that the wild horses in that management area are well established and doing fine.

Given the foreseeable problems associated with this EIS/EIS, it is our recommendation that a stewardship program and a cooperative management program be set up in the Three Rivers area.

Sincerely,

Doug Breese
President

DB/31

30-1 Refer to response 2-3.

30-2 Refer to response 2-4 and 2-49.

30-3 There are no mechanisms in place which would allow the Bureau to compensate permittees for loss of grazing on public lands. Refer to response 2-43.

30-4 Refer to response 2-49.
January 30, 1936

District Manager
Bureau of Land Management
PO Box 5521 Box 32 West
Minneola, Oregon 32128

Dear Sir:

I am extremely disappointed to note that your Resource
Management Plan identifies Alternative C as your
preferred plan for the management of the northern half
of the Munis district.

I have lived in the central Oregon area for nearly forty
years and have noted a steady decline in the quality
of the environment in which we live. Our "atmosphere"
of land use has been characterized primarily by exploitative and overuse. I fear that the plans in the future are
likely to increase and continue at their present pace.

I would, therefore, request that in the formulation of
management plans for the future, you emphasize the maintenance and responsible development of quality natural resources, and that the design
of our use of natural resources be considered (example:
overgrazing; overcutting; overcutting of timber; construction of dams and levees, etc.).

I support your adoption of Alternative A, the "Natural Values Alternative," and I would very much appreciate
your efforts in such a management program - even with increased cost dollars, if necessary.

Sincerely,

[Signature]

Philip M. Michael

June 06, 1940

Appendix II-58
January 24, 1990

Jay Carlson
Bureau of Land Management
1133 23rd St. N.W.
Washington, D.C. 20410

Dear Mr. Carlson,

Alternatives A, B, and C will result in a substantial loss of our
33

basic property values. The proposed EIS actions may result in reducing
the size of our operation on March 15, we longer an economical
profit. Therefore, we request that the proposal be revised, that prior to issuing the Final Three Rivers Resource
Management Plan (FRMRP) (this document), a Draft
Environmental Impact Statement be completed and authorized by
Secretary Order 12925 on September 6, 1982, recommending to the
Secretary, Secretary of Interior, to the
Department of the Interior, to the

The letter from the Bureau of Land Management, Stockgrowers, farm
Swamp, and Milkgrowers and the January 25, 1990 middle range
and Western Range Service Comments and Response to the Draft
Three Rivers Resource Management Plan and Environmental Impact
Statement are consistent with our views and comments.

This response is our endorsement of such letters and Middle Range
Statement. Their relevance has been admitted to you. We hope it
includes a copy of the above comments the reason that it would be an
exact duplication of the Middle Range Development and Operations
Statement.

Any additional comments we may have are enclosed herewith and are
supplemental to our principal response.

Sincerely,

[Signature]

John Stoddart

[Signature]

John Stoddart


Cove Camp Ranch
25035 Southaven Rd.
Bonneville, ID 83606

January 24, 1990

Jay Carlson
Bureau of Land Management
1133 23rd St. N.W.
Washington, D.C. 20410

Dear Mr. Carlson,

Since we purchased the Cove Camp Ranch we have the Miller Creek
range right which we have made a concentrated effort to improve the range,
assuming that the suspected use will be returned to the range right.

By design we reduced numbers. There were no larger herds that all
we did was increase the forage for them. Then the grasses were re-
seeded and the feed did increase. We reduced the length of time
the cattle were on the range in the hopes of having a slow feed.
That, too, was successful. We feel that, with a normal rainfall
year, and the majority of the wildlife using the forage on our base
property, there is a good year that amounts the growing season
amount of 800 Acre.

We feel that the potential is there and that with an increase of
water holes would further the distribution of the livestock.

[Signature]

John Stoddart
Appendix II-60

In response to paragraphs 1, 2, 3, 4, 5, section 1, and section 2, and the other sections of the document, I have the following comments.

Adjustments 5A (Buck Creek) and 5B (Oots Ranch), there have been
concerns and complaints over loss of allocations for elk and bears in
those areas. The fact is, since the time these units were
deleted these areas were not returned to their original status. It
would not have been possible to establish a new elk and black bear
allocation on this basis.

Adjustments 5A (Buck Creek), there is a new reallocation
conversion of plant areas to the allotment and does not address the
fact that the land is not shifted from one unit to another. This type of
work has not been effective. There is not a problem of winter overruns
for elk, but real damage being done to plants.

January 17, 1980

Jay Carlson
Bureau District Office
Fruitland District Office
Bureau of Land Management
820 East 13th Street
Salt Lake City, Utah 84132

REVIEW COMMENTS FOR THE OCTOBER 1980
BLM DRAFT THREE RIVERS RANGE
DEVELOPMENT PLAN

Dear Mr. Carlson:

If you are making a reduction in AUMs, please include the next two paragraphs. If not, cross out second paragraph.

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the value of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, an "Evaluative Implication Assessment" be conducted and authorized by Executive Order 12208 (see the November 6, 1980 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of AUMs livestock forage in
adjustment will reduce the value of our base property by approximately $40,000 (Assume $50 per AUM value). Please consider this economic loss in the requested "Evaluative Implication Assessment."

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1988 Middle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Range Management Plan and Environmental Impact Statement are consistent with our views and comments.

We appreciate your consideration of our comments and look forward to the upcoming meeting and additional comments that we may have are enceloping herein and are supplemental to our principal comments.

Sincerely,

J. W. & Co. Ranch Management

P.O. Box 127
Address

Signature: J. W. & Co. Ranch Management

Enclosure: Supplemental Comments
JENKINS RANCHES, INC.
Barton, OR 97722
Phone: (503) 493-2420

January 22, 1990

Jay Celano
Bureau District Office
Bureau of Land Management
U.S. 74
BURNS, OR 97722

I am writing with review comments for the October 1989 BLM Draft
Three Rivers EIS/EA.

Alternative A, B and C will result in a substantial loss of our
base property value. The proposed BLM actions may result in reducing
the size of our operations so that it is no longer an economically
viable unit. Therefore, we request that if Alternatives A, B or C are considered,
that prior to issuing the Final Three Rivers Resource Management Plan and
Environmental Impact Statement, a "Takings Implication Assessment" be
completed as authorized by Executive Order 12630 (see the November 9, 1989 Memorandum to all Assistant Secretaries and
Director of the National Park System). The letters from the Bureau's
Wildlife Biologists, Program, are an example of how this recommendation
should be addressed.

The basis for this recommendation is the potential impact on the
ranch's wildlife habitat and water quality. The Bureau should consult
with the appropriate regulatory agencies and provide a

Sincerely,

RICHARD C. JENKINS
President

Appendix II-61
Appendix II-62

Dear Mr. Carlson:

Concerning the draft Sierra Nevada Managing Plan and Environmental Impact Statement (EIS) on your recent letter I see it.

I find there is not any need for any change in the current plan as presented, and also feel the surface water quality and aquatic and riparian habitat conditions should be consistent and maintained.

So I agree with you that it would be appropriate to see if the tributaries have any stream to dry up at the state.

I also feel the proposed wildlife habitat conditions were more improved. There are far more areas that were not impacted. There are far more areas that were improved.

In the recent letter of 20 years ago, the cumulative effect on the resident riparian and fishery will be a major impact to the proposed wildlife protection area.

It is also felt that there may be alternative site locations at a substantial cost.

I refer to response 2-43.

Sincerely,

[Signature]

On: 10/17/77

[Signature]

On: 10/17/77
Dear Sir:

Your plan to allow seismologists to Stein Mountain will extremely affect the area in many ways, such as:

1. Destroying undeveloped plants, displacement of tree line, loss of vegetation.
2. Damage to trees, shrubbery, and forest.
3. Altering stream flow, turning up the soil with school busses, freight and personnel.
4. Allowing plants, mammals, and trees to carry pollutants
5. And generally creating an unfavorable, motorized, noisy, noisy environment that is not a healthy, clean, quiet and pure atmosphere.

For these reasons, I recommend that Alternative 2 (no motorized use) be implemented.

Alternative C, your proposed Alternative, is the draft EIS for the northern half of the Bureau district.

Best regards,

Mary Ellen Sonney
840 Housing Creek Road
Ashland, OR 97520

41-1 Refer to response 1-13.
41-2 Refer to response 12-1.
41-3 Refer to responses 2-44 and 2-45 and BLM/FR/53, Appendix 2.
41-4 Refer to responses 12-1 and 12-7.
41-5 Refer to response 1-11.
41-6 Refer to responses 2-6, 2-10, 2-11 and 2-78.
41-7 Refer to responses 2-6.
41-8 Refer to response 3-6.
Dear Mr. Carlson,

Please find our comments on the Draft Three Rivers Resource Management Plan dated October 1989. We went through Table 2.1, Management Objectives by Alternatives, and offered some comments. We felt this method would be the most comprehensive.

We apologize if some of the comments are repetitive, but the solutions to several of the objectives are repetitive. In general, we found the report easy to read and would like to commend the staff for the excellent job they did in compiling this information.

We hope the final RMP reflects a broad based multi-year plan that allows compliance along with improving natural resources. We don’t feel reducing livestock numbers is the first-order answer, but we feel that DNR thinks it is. We hope we are wrong.

Sincerely,

Ken Arnold

[Signature]

Arnold comments page one

In this response we have directed most of our comments towards Table 2.1 which lists management objectives by alternatives. We have gone through each objective and analyzed the proposed objectives and actions and commented accordingly.

AIR QUALITY: The burn limits might be a solution. But the worst air we have in the county results from fires outside of the state.

WATER QUALITY: Your extrapolation of water quality as poor on the majority of the streams we feel is in error. The tributaries and the main branch of the Middle Fork of the Mahoning River are improving, not declining. There are no more sewage drainfields emptying into the waters. The last 20 years have seen sharp cut backs along with sharp growth. We have had the opportunity to evaluate our private ground and the specialist report was reassuring and improving.

We feel most of the current damage in influence will move to follow the unworked properties than with livestock damage. The severe flooding of the Middle Fork right below these soft bands and the low flow helps gout plant growth, keeping the banks unstable. We feel streamlined stabilization projects should be implemented and do not feel livestock removal is necessary.

Cattle make up only a small percentage of animals using streams, ponds and reservoirs. Dogs, elk and other wildlife also use those water resources. Heating an area would only make other, open areas suggested and cause more erosion. Another question we have about fencing the proposed exclusion point, lakes, springs and reservoirs is how much of these were developed and / or constructed primarily as animal watering sources? If this was their original purpose and they have become a multiple use water source, then we feel they should be removed as animal watering sources primarily with all other uses secondary.

Arnold comments page two

As for road closures, it might help in some areas, but we fear that people would drive in there anyway and that could result in more ground damage and plant damage than maintaining a road with water bars and other erosion prevention measures.

Currently, DNR has good management practices in effect and we feel they need to be given the time to work.

SUGGESTIONS: We feel this issue was addressed strictly on a daily basis rather than a long-term one. We would like to know if it is feasible and practical creating you are excluding goats and wild animals also? Elk, deer, antelope and wild hogs cause uncontrolled damage with their feral numbers.

Diverse livestock are currently existing trails which the wild animals use year around and keep defined.

Animals are not the only cause of erosion. Rooted dying plants whose roots hold the soil together and whose foliage diffuse heavy rains. While we need plant life to slow erosion, too much foliage in a fine filling for the right side of lightning. Livestock removal will lead to dry, old growth foliage which the wild animals would not utilize.

Also, assess erosion is natural. The earth is not stable. The alluvial fan out and eliminates plants are part of course of events and soil movement over the United States. The South Canyon is another example.

PURPOSE A DECISION: We feel the current plan is the best. The main need is to maintain the current timber supply and the forests. We are avid hunters and enjoy years of observing your animal habits. We know you plan slash cut areas that have new seedlings. These once all growth stands, also, if current logging regulation were reformed, erosion and slash problems would be dramatically reduced. But the areas have buffer trees helps planted along the roads and old pastures carry away from the public’s eye.

Arnold comments page three

As for Johnson’s, let’s see the DNR permit unlimited cutting of them, except in the restricted area, with cleanup paddles and hopefully restewing with a more beneficial plant.

LIVESTOCK GRAZING: The farmers in the Drayer and Riley area have absorbed all of the cuts in allotment numbers we can afford to. The value difference between the no action alternative and the proposed natural value alternative in the one half million dollar show. This amount would certainly affect the livestock industry dependent on these ACMP’s. Not to mention the other businesses dependent on the livestock industry. The cattle are being blamed for something they have no part in. At the turn of the century, all this area was heavily overgrazed. This land cattle and sheep owners to the steep trails that saw animals from the north not much pass through our country. These once saw a dramatic decline in usage conditions.

In the 1980’s there was handsome and other native grasses. The early residents and farmers loved this pasture. Their documents have been trying to rebuild the native ranges with DNR and private work through seedlings and reduced number — not just of cattle, but of hogs as well. These plans have succeeded. The range in cutting back, everyone is trying to help. We want to maintain and improve the land for the next generation, not destroy it. The current system is working and needs to be allowed the time to continue to do so. We can’t fix overnight or even in 20 years what took 70 years to do. Also, there are areas that have never grown anything and never will.

The dramatic increase in big game animal numbers using in concepts of the ACMP. But the Fish and Game Department just now AGA’s all the time. Let’s publicly, but they scurrying gone during hunting season to the kill will be minimal and numbers will increase.

Appendix II-64
The water developments and vegetation treatment are great ideas, but
the grazing reductions are not called for. Any grazing reduction would be
subject to a "Fencing Implications Assessment" as mandated by Executive
order 13500. We feel torons and game animal numbers should also be reduced.
If a reduction was not be avoided. The reductions should be equally
distributed among livestock, horses and wild animal ABS.

WILD RICE & DUCKS: We were glad to see minimum and maximum
management for the home herds. Please keep these herds within these areas by
monitoring whereчемовак-ранчо in the winter. We don't feel DUC status is needed as the home herds are within their optimal levels.
Currently this about the current DUC is working well. We have also
feelings about the plan to acquire private land. Such acquisition should be
carefully considered and should be used only when it actually benefits
to both the land owner and DUC. We know the largest need is gaining national
recognition and feel current practices will maintain the best.

VEGETATION: One area should be enough for the Oregon Natural
Heritage Plan cell needs. Looking up land for the current species is
not logical. Areas are not sterile but are continuously changing. What
was here a thousand years ago is not here today and what is here today
will not necessarily be here in the future. These changes will occur with
or without human interference. Plant communities are constantly
changing, going from the early stages to the climax species. We strongly
feel that reserved areas for a few interested species is unconstitutional.
It restricts the majority of people access to those public areas, while all
are entitled to use and use. It also doesn't follow DUC's multiple use
policy. We do agree with controlling worst weeds and feel this
problem has been ignored too long in Jackson County.

(cot)

SPECIAL PLANT SPECIES: Again, plant and animal communities are
consistently changing, none will become extinct and some will evolve.
Special management will only delay the inevitable. We disagree groves need big grazing. There are several blocks of groves in our area and
they prefer created water resources and/or awakens to groves blank areas. That
is sage brush breaks on flat, open ground. They do like deep, sage
crooked groves. We think the two miles buffer some 10 degrees and would
be like to see all areas that are available to created water needed. Leave
the sage brush on the steep hills in the groves for their private areas.
Besides, these sage brush covered flats at one time were likely a bunch
grazed pasture with little sage brush.
Number 12 on Table 2.1 - 10 under option A and B need to be clarified.
The area is right on top of Northstar Mountains and out on the side slopes.
Again, we protect livestock renewal as the plant and animal species are
recovering and doing so with livestock present. Also, if livestock are
removed, what about wild horses and game animals? These must also be removed.
Then plant growth will be unchecked by grazing, old growth will
become suspect and eventually fire will destroy the area and there
will be nothing left.
Cattle are not the ones affecting the fish. Too many fishermen and
trash fish which eat the fryings and the trout food are the main problems.
Pulling undesirable fish in row forffly, so that management tool is lost.
These problems need to be addressed. Removing cattle is not the ultimate cure for many of the problem DUC is facing.

WILDLIFE HABITAT MANAGEMENT: We approve of road closures during
winter months as long as it does not interfere with access to domestic
animals on winter allotments. This area the cow again becomes the
automatic smack for all the problems.

(cot)

The fences constructed for wildlife will not always hold cattle and
that could cause a potential trespass problem. This would not be the
possibility of fault, but would be their problem. Wild animals adapt and
survive. They always walk it through existing fences, occasionally
breaking branches and flattening grasses of the fence. We don't see new
fences making any major changes. The only major change would be to
eliminate fences completely and then we would be back in the 1950s,
leaving what has been gained in the last 40 years.
We do see the need to relocate more than the current DUC's of cattle
from to big game. Please permit current grazing practices to continue.
Also, there is a mistake in the number of producers in each of the options.

(cot)

(cot)
will help. The only reservation is potential interference between recreation use and the submerged logs during low water years. Veal feel several reservoirs, bigger in the waterbodies, could solve many problems and keep water flows more constant year round.

Hazardous Materials: Please keep hazardous waste out of all land. Let's find a way to neutralize this material before it is disposed of, thus eliminating this problem. Citizen need to learn to recycle and reuse.

We do not need to be Western Oregon, Washington and California's farm!

Veal keep fire for the valuable management tool it is. Look at each fire separately and if it will benefit the land by removing unwanted brush, let it burn.

REASONS: We disagree with the proposed plan to remove livestock from riparian areas for reasons already listed in our comments. We also feel the designation of the 5.4-mile section of the Middle Fork Willamette River as part of the Willamette National Forest is necessary. This area is isolated and seldom used. The designation could create more problems than it would solve. This area has seen very much change over the last 50 years as technically it does not fit into the wilderness category.

Veal personally feel that wilderness areas are unconditional as they deplore how people from across to the last views in public owner, and reserve it for only a few.

We have the allotment on the west side of Warm Springs Reservoir. During the summer month, we spend a lot of time there and with the recreationist using the area, we have never found anyone who objected to cattle sharing the area. However, with the current use of four wheelers, we prefer our cattle to be in the area where we have no problems with their being there.

This problem has no easy solution, except limiting areas of use for the ORV.

Veal comment page eight

Appendix II-66

Veal comment page nine

A lot of effort and money put into the created stream settings. Now, due to recreational use, we can not use the reservoir field except early and late in the growing period. The dry years, low water and low flow has prevented use from it in the fall for several years. As a result, wolf plants are appearing and both DNR and we agree these are bad. We would like to see the recreation across fenced, similar to capacitor fencing the forest service scene. Then we could utilize these settings during the summer when there were not many users. Also, this would allow more flexibility to our grazing plans during dry years. This would be beneficial to all.

ADVISORY: We have very mixed reactions to this section, mostly that our environment is continually changing with or without man's influence. Trying to make a snapshot of the living earth into a snapshot goes against nature. This is what we perceive ADN are for. It would be nice to take a certain area and freeze it in time for future observation.

But that is impossible when you are dealing with a dynamic environment. Even in the less heat a time might take root and severely disrupt part of the laws flow. We do not feel that additional land needs to be added to the "north section".

VEIUAL REMARKS: Welcome the way our county looks and hope it remains this way forever, however we know that land continually changes to our hope in futile. We accept that. Land even and replicas elsewhere, streams hit rivers continually change course, creating new channel in the land. In our land, once was a deep pool in the river, now it is a sand bar. Plants grow, die, are uprooted or eaten. This is the water system and has been for centuries.

You have a preserve class and again we do not feel you can preserve a dynamic thing without altering it. The best policy is a moderate one. Not been here for centuries and Jackson County is not an eye sore! (cont)

Veal comment page ten

CENTRAL RESERVOIR: This is an explosive area and again we are against an earth dam except at none of the areas listed here. We agree with most of the plan under the preferred category. Some thousand years from now we will be under some microscope as we are artifact gathered. We, too, must preserve some of our land heritage, but we also must learn that land moves and we have no control of that. Some areas you wish to withdraw from livestock use, such as the Native American root gathering areas. The cattle and sheep have trampled on these areas for about 100 years with no ill effect on the plants in quantity. In fact the "natural fertilizer" left behind has probably helped, not hurt these crops.

As far acquiring more private land, we have enough land under public ownership in the state. But it is each individual right to dispose of their land as they desire. But if they wish to retain ownership of the land, that is also their right. We would like to see taking by condemnation prohibited in the final plan in all areas where private land acquisition is considered.

WEBER SITE: We feel that Wasco County needs all the commercial help it can get. If this includes 33% limiting stream, gas and geothermal rights, please don't hesitate to issue them. Just provide for protection of the environment. We agree with the management objectives.

LATERAL CONTROL: After studying these maps and objectives, we do not see the need of acquiring all the private land designated for 21 and 22. There would only be small private communities in an area owned by the government. This is not the intent of the United States. We do not feel such widespread acquisition is necessary. Also, fencing for this project would be astronomical, especially for a federal budget that has not seen black ink for many years.

This objective, "controlled public lands holdings and acquire lands with significant resource values ..... values", be put in the public's best interest. Not in the interest of the private landholders in the Three Rivers Area.

We do applaud concern for utility and transportation needs. Also, transferring existing auger to the county sounds like a good idea, until we learn that the federal government in feeling indulged as they construct which could be a financial hardship for Wasco County. Again we ask that acquiring access to land and/or land itself through condemnation be forbidden in the final plan.

We do not feel that the lands listed in Appendix II, Table 3 would best serve public interest if withdrawn from Public Land Laws. We feel they should be carefully managed in the current practiced without drastic changes. Let's not lock up this county, but keep it as a renewable, usable resource.

ALLOCATION 3366: Wasco Basin in our allotment and we feel the water quality is excellent in this allotment and would like to see the data that determine our water quality.

Also, here again you discuss signifial habitat and the streams in this allotment are not your future flowing streams. Several times since we have been in this allotment Warm Springs Creek has gone dry. The reservoir has been a small pool against the one several times in the 1950's. The river has been a small stream or completely dry. According to BLM's definitions, the only area with live water would be the river. This would also include Warm Springs Reservoir as the reservoir was established for (cont)
42-1 To meet the objectives of riparian, water quality and aquatic habitat, wild horses will need to be managed in a manner similar to livestock. They may be fenced from riparian areas or moved from these riparian pastures during critical periods in order to achieve a more ecologically balanced and diversified objectives of multiple and sustained yield as described in Sections 2 and 3 of the Wild and Free-Roaming Horses and Burros Act of 1971. Also, refer to responses 2-28 and 2-31.

42-17 To have been no authorization of discharge of hazardous materials on the public land.

42-18 For response 4-9.

42-19 Segment A, Middle Fork of the铵湖river, does meet the criteria for a potential wild river under the provisions of the Wild and Scenic Rivers Act (Public Law 91-511) as amended; a study process was completed which considered fixed-flow values, outstandingly remarkable values, classification as wild, scenic and/or recreational and determination of suitability.

42-19 There are currently 17,800 acres of WRMA-administered land which are designated as limited to off-road vehicle use around the perimeter of Twin Springs Biological Station. This designation limits the use of motorized vehicles to designated areas and roads. However, the areas near the reservoir where conflicts are occurring are on lands withheld and administered by the Bureau of Reclamation (BOR). The WRMA has a recreation management plan to manage recreation use, including regulation of ORV use, but has not made their presence known by fencing or signing of areas near the reservoir.

42-20 Portions of the openings on the west side of the reservoir are on BLM lands, so coordination is necessary before establishing any new fence locations, implementing signing and enforcing regulations.

42-21 An action recommending the average designated limited be reduced to the land area around the reservoir in Reserve Feature, No. 5194, and the remaining area be returned to management under an open designation is in the proposed FWP/PEIS.

42-21 Refer to responses 3-13 and 4-31.

42-22 See responses 2-23 which discusses recreation or preservation of scenic values for specific places (Class I and II areas as noted on Map Y5-1 in Chapter 4, Volume 2 of the WRMA/PEIS).

42-22 There are 6,900 acres which are under a WRMA Class I. These areas are the two WRMA (Twin Lakes/Bluewater Creek and Stonehouse) which are managed to be managed as Class I under Wilderness 28F. If these WRMA are designated wilderness, Class I visual management will continue. If the WRMA are returned to multiple use management, the areas probably will be managed under WRMA Class II and 2,500 acres in New Helmar/Kildeer Creek will remain under WRMA Class I as an administered protected area. Since scenic resources are high in both WRMA, this class is still restrictive on what developments will be allowed.

42-23 Refer to responses 3-16 and 4-10.

42-24 The objective of the land tenure zone concept is not to acquire all lands in Zones 1 and 2. This would be an unrealistic expectation, since most land tenure adjustment would be through exchange. The concept does provide a means which can help direct land tenure efforts and funding in specific areas.

42-25 A large increase in funding for land tenure adjustment is not expected. Consequently, changes in the overall landownership pattern of the WRMA would be gradual over a long period of time.

42-25 Because exchanges will be the primary mode of land transfer, any increase in land acquisition should generally have a corresponding increase of private ownership in Zones 1 and 2. Also, refer to responses 3-10, 4-15 and 4-16.

42-26 Refer to responses 3-11, 4-5 and 4-25.

42-27 Section 206 of FLPMA gives the Secretary of the Interior authority to make, realign, extend or terminate wildlands.

42-27 Diamond Craters OHV/AC/SC in almost within sight from the public lands. The 400 acres identified in Table 2.25 are adjacent to the existing withdrawal and contain similar outstanding geologic and natural features as within Diamond Craters. Some of these features have been damaged in past years of firefighting. The additional withdrawal would help protect the features from further damage as well as provide consistency of management for the entire Craters complex.

42-27 The 440 acres identified for Squaw Butte Reptile Station is currently under State ownership. The parcel is proposed for exchange to the United States. If the land is acquired, the withdrawal would provide a significant benefit. First it would transfer ownership from the State to the Agricultural Research Service (ARS). Second, it would protect the land from mining or other uses which might be incompatible with the ongoing range and agricultural research occurring at Squaw Butte. As with Diamond Craters, this would be an addition to an existing withdrawal.

Appendix II-67
Some of the acreage in Table 4.74 is a proposed withdrawal for the Boulder Creek and Middlefork of the Mujur River. This would be an interim withdrawal to protect the areas pending final action by Congress on F-G. The land is designated as the Middlefork Special Recreation Management Area. Additional land from existing and other nondiscretionary activities which are generally incompatible with intensive recreation use.

42-28 Refer to response 42-26.
42-29 Refer to response 42-24.
42-30 Page numbers for maps 3-19, 3-20, through 3-5, 5-1-2, and 1-2 are in error. There were additional other page numbering errors in the draft, and we apologize for this inconvenience in reading the document. Significant editing has been applied in the PHM/PAD to ensure that such errors are not repeated. The Appendix 11 citation should read Appendix 10.

REX CLEMENS REX2 INC.

Jay Carlson, MPH/EIS Team Leader
Bureau of Land Management
Burns District Office
NE 74-2320 Highway 20 W.
Hines, OR 97738

Dear Mr. Carlson:

This letter concerning the aspects of the Three Rivers Management Draft Plan that immediately affect Rex Clemens Ranch. Our affected allotments are the Kiger, Smith Creek, and Deep Creek allotments. Our analysis centered on the issue of the mustangs. The plan is focused positively toward wild horses and negatively toward cattle. The newness of mind is shown in all categories in the draft varying from riparian zones, forage utilization, to land acquisition.

Presently the Kiger mustangs are the hot topic of the Burns BLM. Please do not allow this to adversely affect the long term management plan of the area’s entire resource pool. Remember that this is a multi-use area. If an area is properly managed the range conditions will continue to improve and it can be shared by wild horses, cattle, deer, elk, and recreationists.

Ideally we would not like to see any wild horses at all on our range. But due to a great deal of public interest in the mustangs, we propose a need to put these horses somewhere. And due to the circumstances of the parity between 1000 head of cattle and 100 horses allowed for the Mustang Cattle loop.

There has been a lot of forage left over for the cattle and wildlife. It is well known that the utilization of forage will cause a downward trend in the status of the watershed as a whole.

43-1 Prioritizing wild horses above big game and then cattle is wrong (Rpp 3-56). We believe the Taylor Grazing Act does not support priority allocation such as this.

43-2 As an issue of forage utilization, App 3-56 has a big tally listed in the conflict column. It is stated that the calculated quantity is less than forage demand. This is wrong and our calculations are too low. This allotment is 80 percent utilized. If the area has been overgrazed, how can the area support the 100 horses? The fact that there has been overgrazing on the Mustang Cattle loop is well known. It is well known that the area has been overgrazed.

43-3 Appendices 3-49, 3-56, and 4-2 state that "no management system established on the allotment." Look at Rpp 3-49, 4-2, and 3-12) they indicate that there is a management plan. We have been following a management plan in these allotments for years.

43-4 I would be wrong to enlarge the Kiger NPS as proposed. The East and West Diamond Grade fields of the Smith Creek allotment should not be added to the initial NPS. There have not been horses down this way for years. The fields also contain a large portion of Crested Wheatgrass which

Appendix II-68
do not coincide with the "wild" environment desired for the "wild" horses. Why have the BLM larger than what the horses actually use?

There is no need to have the higher BLM become an ACEC. Classification as an ACEC would just bring on more useless regulations that would block potential future good multi-use, multi-resource management systems. It would be poor judgement for the BLM to invite this classification when it is unnecessary.

We do not know why the BLM thinks that the parcels of land that we own on Van Creek, Poison Creek, and Stamp Creek are for sale. They are not for sale. We also think that it is greedy for the BLM to want them. The muskowska water in these creeks is just as easily now if the BLM owned them.

One has to wonder if the BLM is really just trying to pressure Mrs. Clemens out of the ranching business so they can take over the Middle Ranch on the Little Bitter River soon.

We believe that the best action for the BLM to take for the Three Rivers Resource Area is no action. No action is the legitimate plan that the BLM did not even consider.

We hope that you will seriously consider these comments on the draft plan. Thank you for your consideration.

Sincerely,

Daniel R. Barnhart, Representative of Rex Clemans Ranch Inc.
Diamond, Oregon 97732

District Manager
Bureau of Land Management
501-11533 Dell St.
Reno, Nevada 89512

Dear Sir:  
It has come to the attention of the LaFave High School Advanced Forestry class that an environmental impact statement has just been released for public comment. An immediate operation should be to return the land to an excellent condition. Presently, the poor condition of the land hinders those who enjoy the scenery and surroundings. The draft basically does not protect the remaining forests or explain how many miles of road it expects to construct.

We would like to recommend (or demand) that BLM develop an alternative to restore and maintain selected forest in excellent condition. Also, that BLM adopt Alternative A, which would allow full restoration of all current forest and provide all current forest be identified and protected. We also ask that all costs of construction be included with the other management projects to be included under the various alternatives along with their environmental impacts and all current resources and sustainable practices be eliminated. We would like to recommend that

We believe that the Forest Service allocate more priority to livestock and forestry and that livestock and forestry planning and design be addressed in plans and projects that forest allocations do not interfere with the objectives of the Forest Service.

Thank you for your consideration on this matter.

Sincerely,

Susan Miller
President

Sandra Schmuck
Vice President

January 30, 1976

Appendix II-69
Appendix II-70
Dear Mr. Carlson,

The Harney County Farm Bureau want to go on record that the January 17, 1969 Middle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of each Middle Ranch document. Their response has been submitted to you. We do not include a full copy of each Middle Ranch document due to space limitations, but we assure you that it would be an exact duplication of the Middle Ranch documents. There are several other areas of concern that need better answer.

Enclosed is a copy of the Bureau of Land Management Riparian Area Management Policy, dated January 27, 1969 signed by BLM Director Robert J. Hurford. This policy has been recommended. Please note that the definition of riparian areas is an area of land "directly influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence." The definition continues that areas excluded from the definition of a riparian area include ephemeral streams or washes that do not exhibit "the presence of vegetation dependent upon free water in the soil." There are areas classified as riparian that do not meet these criteria. Two creeks brought to our attention are Doll Creek and Landing Creek. A thorough review of all creeks should be made to ensure they meet the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.

I pointed out to you in my last letter that the monitoring techniques currently in use on the Three Rivers Resources Area are inadequate, inaccurate, and improperly applied and that they are extrapolated to indefensible conclusions. Management objectives, in the absence of AMP's, are documented only in the broadest of terms making them virtually unenforceable. We in turn, other than short term wildlife, wild horse and livestock utilization, are indicated as effective forage production, ecological status or potential of the resource. Therefore, reductions in authorized livestock use is the primary, if not the only, potential goal recommended. Unless proper techniques and accurate information is gathered, existing levels of livestock grazing should be maintained. At such time that reliable information is available, increase decreases, proper adjustments could then be made. The failure in the recently published BLM Riparian Program Summary should not be in providing accurate information. Fair, good, and excellent conditions are used to identify riparian condition. Field visits, riparian condition surveys, and use of evaluation rating is necessary for accurate evaluation as well as better communication with the permit holders.

There is no scientific data that indicates that livestock use has any negative effects on the sage grouse population. The restrictions on livestock in the sage grouse critical areas are unfounded and should be eliminated.

The exclusion of cattle on the disturbed Cultural NACCC is not supported. The report states: "these areas to be a high-value resource due to the quality and quantity of crops available." The survey has been going on in this area for years and the quality and quantity have remained high.

The design of the entire Eiger active Range Management Area (ARMA) (13,619 acres) as an Area of Critical Environmental Concern (ACEC) will have a dramatic economic effect on at least three ranches. Notice was served on even remaindered and the West Three Rivers Resource Management Plan and Environmental Impact Statement should be conducted by the Harney County Farm Bureau. This request is the only one to date to maintain a commitment to the permit holders. The complete elimination of livestock grazing is neither justified nor proven necessary. The conditions for acquiring the private rights of the authority to impose on this private land is not fully examined.

The continual feature of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years restrict the amount of available forage and concentrate cattle more than necessary. Livestock have a biological need for water. Access can be accomplished by building the water gaps at the deep end of the reservoir. If the embank is more than one-half mile square, there is more than one water point to allow livestock better access to all of the forage available around the reservoir.

Before any alternative that causes a reduction of AMP's is imposed, no matter what reason, a complete "federal implications assessment" should be conducted by the Harney District Office.

The air quality restrictions are the same for all alternative. More alternatives need to be proposed. Unless there is clear scientific data to show that limits above this would permanently affect air quality these limitations should be increased.

Harney County recently passed a ballot measure that stated they did not want any more land acquired by the government. The Land and Wealth Committees indicate the plan to increase holdings with high public resource values through exchanges and acquisitions. The plan should be consistent with public opinion and honor their decision. All new acquired land should be by exchanges only.

Sincerely yours,

[Signature]

Harney County Farm Bureau
Princeton, Oregon

January 19, 1969

Appendix II-71
of states - we also found that it will be of vital importance for us to extend the Public Notice Under Title 72

We thank you for allowing us - the livestock producers and processors of public lands to be a part of the Public Notice in this issue. To support the National Western Livestock Show, we extend our appreciation to those who have contributed to this publication.

Appendix II-72
Appendix II-73

January 26, 1990

Mr. Jay Carson
EMP/ESI
Home Office District Office
Bureau of Land Management
EC 54 12533 Highway 10 West
Klamath, Oregon 97601

Dear Mr. Carson:

In beginning this letter I wish to go on record as supporting the views and comments contained in the January 25, 1990 letter addressed to you from the Nez Perce County Ecological Association. Secondly, I wish to state that it is difficult for me to intelligently comment further in that I found the Draft EMP/ESI documents very difficult to follow. The presentation, which includes a test separated from the booklet containing maps and tables is extremely confusing to read comprehensively. The continual referral to another source (one seems like some kind of mind game). This kind of presentation to layman appears as an attempt to befuddle and confuse. Thus, before any change for any reason is improved, a second presentation for comment should be made. This second presentation should be condensed, logically sequential, and comprehensive. It should be in a single text without cross-reference. All supporting or information maps or tables should be integrated with specific text.

Thirdly, before any AFE reduction can be improved, a complete "linking/implications assessment" should be completed.

Gordy

LDS John Norrell
1800 Wren Valley Road
Napa, CA 94558

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EOMA

March 3, 1990

Dear Craig Hansen:

I wish to thank you for the kindness of granting us an additional 30 days to comment. We were still trying to sort out your management plan when the comment period ended.

Although I do want to object to your continued restrictive designations of OA/AESE OA/AESE and the rest of the AESE's listed under management objectives. Your designating additional AESE's including extensions to existing AESE's

Way to much latitude given to Wildlife management under ODFW and USFWS depaments.

Mineral activity and geology reports in the area indicates a potential for oil and gas, potash, coal, gypsum, and locatable or leaseable minerals as: Claysbar, Diatomite, Geolite, Potassium, Pegtree, Seldan, Closer, Sandlant, and Owyhee (also gravel), including Oxidated, Thunder Eggs, Petrified Wood, and Agate.

No more land withdrawals. No Wild and Scenic. No AESE's. We have watched with concern the Forest lack up public lands for perceived notions of economic values. The Forest Districts are grining away from multiple use, locking up vast portions for no use by anyone. Congress has set aside large tracts for such use. We must protest vigorously in the present trend in which the Forest seems to be locking up public lands under one designation or another.

Sincerely,

Ray Grissom

Appendix II-73
Appendix II-74

Dear Mr. Carlin: 

(If you are feeling a reduction in AIM's, please include the next two paragraphs. If not, cross out entire paragraph.)

Alternatives A, B and C will result in a substantial loss of use of our water property. The proposed EIS actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be conducted as required in Executive Order 12036. We are aware of the November 8, 1988 memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, James R. Lyons. The resolution reaches a reduction of 797 AIM's livestock range in Idaho. All of these will reduce the value of our water property by approximately $1,200,000. Please consider this economic loss in the requested "Takings Implication Assessment." 

The letter from the Beaver County Cattlemen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 27, 1990 Idaho ranchers is also included. Range Service Comments and Enclosures to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are considered with our views and comments.

This response is in our endorsement of each letter and Idaho ranch document. Their response has been submitted to you. We do not include a full copy of this for the reason that it would be an exact duplication of the Idaho ranch document and organization letter.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Curtis C. A.

John A. E.

921 E. 15th

Fremont, NE

Signature

Enclosures: Supplemental Comments

Geo. Washburn

P.O. Box 286

Nineveh, Oregon 97735

January 29, 1990

The Potted/Flies Preferred Alternative identified an initial livestock reduction of 11 percent. Reductions would be implemented only after the allotment monitoring and evaluation process has been completed. See Potted/Flies, Appendix I, Table 11 for methodology.

Geo. Washburn

P.O. Box 286

Nineveh, Oregon 97735

January 29, 1990

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P.O. Box 286

Nineveh, Oregon 97735

January 29, 1990

The Potted/Flies Preferred Alternative identified an initial livestock reduction of 11 percent. Reductions would be implemented only after the allotment monitoring and evaluation process has been completed. See Potted/Flies, Appendix I, Table 11 for methodology.
52-1 We agree with the idea of "absence of evidence is not evidence of absence." FUMG and acts such as the Endangered Species Act of 1973, as amended, require administrative restrictions on mineral exploration and development. Under Alternative C, mineral resource development in Macks Valley is administratively restricted or prohibited on less than 4 percent of the lands in the planning area.

52-2 The 17,136 acres identified for Diamond Craters OHMA in the BND/REIS Table 2.1a should be 17,250 acres. This acreage includes 16,456 acres currently under withdrawal and 794 acres proposed for a new withdrawal. The contour map quoted in the BND/REIS Table 2.1a is the total acreage for all use withdrawals. There was also an error in this figure as it should be 2,712 acres. A detailed breakdown of the proposed withdrawals can be found in Table 2.1a, BND/REIS.

53-1 Refer to response 1-11.
53-2 Refer to response 2-4.
53-3 Refer to response 12-1.
53-4 Refer to responses 22-2 and 12-7.
53-5 Refer to response 3-8.

53-1 Refer to response 1-11.
53-2 Refer to response 2-4.
53-3 Refer to response 12-1.
53-4 Refer to responses 22-2 and 12-7.
53-5 Refer to response 3-8.

Northwest Mining Association
January 26, 1990
Mr. Joshua L. Wurthman
Burns District Office
NW A-1525
Highway 20 N.
Prineville, Oregon 97758

Dear Mr. Wurthman,

Thank you for sending us a copy of the draft Plan and EIS for the Three Rivers area. In general, we are concerned that the approach being taken to future management of this area is one that overall is multiple use, but through normal use of such designated areas. We appreciate the fact that you are trying to meet a variety of farm operators of public lands, but with regards to minerals, the old adage holds true that absence of evidence is not evidence of absence. We ask that you not place administrative restrictions on mineral development such as NO mining activities, withdrawals, restrictions or withdrawals.

Also, there appears to be some confusion as to amount of land proposed restricted or withdrawn from mineral development in the proposed Withdrawal areas. In Chapter 6, pg. 34, it is stated that 2,400 acres would be withdrawn from location use. However, the Appendix II-75 page II-9 and Table 4-3 indicate that 17,136 acres would be withdrawn or restricted. Although this may be a simple mistake by those compiling the documents, it is important to the public that all requirements of the proposed plan be clearly stated.

Thank you for this opportunity to express and we look forward to reviewing the final documents.

Sincerely,

[Signature]

E. D. (Andy) Johnston
Asst. Dir. Gov. Relations
This response is our endorsement of such Middle Ranch Document. Their response has been submitted to you. We do not include a full copy of the text in this document because of possible legal issues.

The following additional comments are supplemental to our principal response and address issues of specific concern to us. In commenting on the draft documents, we agree with the comments of Mr. Robert F. Smith, William Wilber and Patrick Wilber's comments to the "Draft Three Rivers Resource Management Plan and Environmental Impact Statement" dated October 1983.

We reject the proposed "Private Water Sources Selected for Acquisition of Permanent Access (listed in Appendix 6-2) in the Riddle Ranch Area" with the already substantial number of wildlife AUMs provided by private lands for which no AUM allocation adjustment is provided. With the proposed allocation plan, wildlife populations will increase dramatically, further encouraging on private lands and likely requiring supplemental feed program on a continuous basis.

We reject the allocation of forage in Allotment 5552 referred to in Appendix 2-81 referring to the "strengthening of farm credit supply system and facilitating the establishment of secondary markets for agricultural loans."

We reject the reduction of AUM's allocated to livestock grazing in Allotment 5552 and present the argument that this action will not improve the economic viability of the Riddle Ranch Area. The proposed allocation plan, which provides for the reduction of the animal unit month allocation of AUMs, affects AUMs in a "high mountain" range subject to heavy winter snow and late forage development in spring. Consequently, in winter and spring, forages are concentrated in lower ranges where they suffer from an early dormancy due to late snow. Such a reduction in the animal unit month is virtually a default on the Wilber Brothers' loan obligation.

The "Agricultural Credit Act of 1987" had among its principal purposes the reorganization of the Farm Credit System's ability to make credit available to farmers, ranchers and cooperatives. The provisions contained in the Three Rivers Resource Management Plan are in direct conflict with the intent of the "Agricultural Credit Act of 1987" and the Department of Interior at odds with the Congress and the President.
Dear Mr. Carlson:

I have carefully read a copy of the letter addressed to you from Mark H. Lawrance, President of the Harney County Stockgrowers Association.

Following many years as a rancher in the cattle business in Harney County, and upon retirement from the cattle business, served two terms as Harney County Judge, I wish to go on record as fully agreeing with Mr. Lawrance's position. Any deviant rustler in cattle numbers in Harney County would be real detrimental and far reaching to the County at large.

Sincerely,

[Signature]

Appendix II-77
57

Jay Carless
Burke District Office
Bureau of Land Management
He 7a, 22515 Highway 20 West
Hines, OR 97733

Dear Mr. Carless:

In reference to the October 1980 BLM Draft Three Rivers EIS/DI, we wish to voice our objections to Alternatives A, B and C which will result in a substantial loss of base property value by parcels. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economic unit. We request that if Alternatives A, B and C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a 'Takings Implication Assessment' be completed as authorized by Executive Order 12303.

It is alarming for us to observe what is happening on our federal lands. Our ranch has been in operation and in the same family for 100 years. We care for and about all of our land private and federal. This land is so vital to our operation as our deeded land. Surely the federal lands are more protected today that ever before in the history of our country. To cut numbers in the 'right' spot on federal lands is not only foolish but it is not in the best interest of the United States to do anything to harm our natural resources. The United States is the food basket of the world. We are all aware of the starving people around us. We must find a way we can work together rather than blame on an economic disaster.

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the draft Three Rivers Resource Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you.

Sincerely,

Jay Carless
Burke District Office
Bureau of Land Management
He 7a, 22515 Highway 20 West
Hines, OR 97733

58

Jay Carless
Burke District Office
Bureau of Land Management
He 7a, 22515 Highway 20 West
Hines, OR 97733

Dear Mr. Carless:

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economic unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a 'Takings Implication Assessment' be completed as authorized by Executive Order 12303.

This response is our endorsement of such letters and Riddle Ranch documents. Their response has been submitted to you.

Sincerely,

Jay Carless
Burke District Office
Bureau of Land Management
He 7a, 22515 Highway 20 West
Hines, OR 97733
January 17, 1990

Jay Carlsen, M.D., O.S.
Bureau District Office
Bureau of Land Management
H.C. 74, 12932 Highway 20 West
Klickitat, WA 97831

REVIEW COMMENTS FOR THE OCTOBER 1999
BLM DRAFT THREE RIVERS MP/EIS

Dear Mr. Carlsen,

(If you are facing a reduction in AMH, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives B and C will result in a substantial loss of our barn
property value. The proposed BLM actions may result in reducing the
size of our operation so that it is no longer economical. Therefore,
we request that if Alternatives B or C are considered, that prior to
issuance the Final Three Rivers Resource Management Plan and
Environmental Impact Statement, a 'Facilities Implication Assessment'
be completed and

The acceleration of our AMH (Able's, Coomes, Inc.)
will reduce the value of our home
property by approximately $20,000 per AMH
valued. Therefore, this economic lossortherequired

The above facility will reduce the value of our home
property by approximately $20,000 per AMH.

The Bureau of Land Management has been requested.

This response is our endorsement of such letters and
Riddle Ranch document. Their response has been submitted to the
document. They do not include a full
copy of the text only for the reason that it would be an exact
reduplication of the Riddle Ranch document and organization of letters.

Any additional comments may have are enclosed herein and are
supplemental to our principal response.

Sincerely,

Name: (Signature)

Address: 3732
City: State: Zip Code:

Enclosures: Supplemental Comments

January 28, 1990

Jay Carlsen, M.D., O.S.
Bureau District Office
Bureau of Land Management
H.C. 74, 12932 Hwy 20 West
Klickitat, WA 97831

The above facility will reduce the value of our home
property by approximately $20,000 per AMH. I do not
include a full copy of the text only for the reason that it would be an exact
reduplication of the Riddle Ranch document and organization letter.

My expression of observation comes as a result of being a permittee of
RHA for 24 years, a member of the bureau advisory board for over 5 years,
including tours and study trips as a result of being a member of that board.

After listening to and reading comments regarding the many AMH's, I
doubt very strongly that it is wrong to enclose any mine area in
Wilderness area.

The RHA is no course in its management program. Any area that I
personally saw in is a state of improvement over the past 24 years and with
continued cooperation between the service and permitees I see no reason for
changing from the concept of multiple use.

It has been my experience from limited observation, particularly in the
Malheur Wildlife Refuge, any field that was put in pasture, experienced a
reversal of production and was not used. The experience of using the
adjacent

My first is that any area, whether it be Wildlife Refuge or RHA, put in
pasture would experience the same vegetation. And any Wilderness Area, in my
opinion is in pasture.

Sincerely,

Name: (Signature)

January 28, 1990

Appendix II-79
January 17, 1980
Jay Carlson
Bureau District Office
Bureau of Land Management
Nevada, NV 89730

Dear Mr. Carlson:

If you are facing a reduction in AUM’s, please insert the next two paragraphs. If not, cross out second paragraph.

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternative A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Take Implication Assessment" be completed as authorized by Executive Order 12086 (made the November 6, 1983 Responde to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The realization and/or reduction of our AUM’s livestock surge in 1979. The allotment will receive the same base property value, approximately 6, $250. Please consider this economic loss in the requested "Take Implication Assessment".

The letters from the Nevada County Cattlemen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1980 Biddle Ranch and Western Range Service Comments and Response to the Draft Three River Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Biddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the single source document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

Enclosures: Supplemental Comments
January 26, 1996

District Manager
Bureau of Land Management
Burns District Office
Post Office Box 12533
Burns, OR 97720

Re: Draft Three Rivers EIS/RMP

Dear BLM Manager,

I have reviewed the Draft EIS for the northern portion of the Burns district and I am very disturbed to see the alternative written by the ranchers as the recommended alternative. Water stress cattle ranching has caused serious deterioration throughout the area. So has poor forestry practices such as logging of older timber, virtual clear-cutting and the abnormal failure to protect old-growth.

In the short term BLM, to fulfill its responsibilities under the Federal Land Policy and Management Act (PL 94-979), the Public Rangeland Improvement Act (PL 95-514), should adopt Alternative A. This would prevent further destruction of the desert and forest by logging and ranching interests while a plan is developed to restore rangeland to its natural condition.

It is the responsibility of the BLM to protect natural diversity, not to pander to local interests. There is a national interest in the protection of the biosphere, particularly where it is most fragile. Economic interests should only be allowed to the extent that they do not degrade the environment. Clearly ranching has substantially degraded both rangeland and forests in northern Harney County and to continue with these practices is a violation of BLM's duties.

As a frequent visitor to the Ochoco and Malheur National Forests and the surrounding desert I am appalled at the way the USFS and the BLM allow the artifacts of cattle ranching and logging—from riparian destruction and garbage to generalized degradation of habitat— to occur. It should not only be stopped but reversed.

At a minimum BLM should:

1) Refer to response 12-4.

2) Consult with the USFS identify and protect all old- growth forests in the region.

3) Protect water quality by protecting riparian habitat.

4) End subsidies for cattle ranching, including wells, roads and fencing. These are inappropriate tax-payer supports for the production of a dubious product with significant health hazards.

5) Develop a plan for restoring the rangeland to excellent condition.

6) Provide priority for the welfare of indigenous species over cattle, meaning adequate lands designated for habitat protection for big horn sheep and other large mammals, including priority in winter forage allocations.

7) Designate the following for inclusion: Wild and Scenic Rivers: the Silvies River (entire), South Fork and Middle Fork of the Malheur River (entire), and Bluebucket Creek (entire).

I look forward to seeing a vastly improved Final EIS/RMP that reflects BLM's legal mandate to protect natural diversity.

Very Truly Yours,

David M. Cohn
2747 NE 10th St.
Portland, OR 97212

C: Senator Mark Hatfield
Senators Bob Packwood
Representative Les Aspin
Representative Peter DeFazio

Appendix II-81
64

January 28, 1980

Jay Carlsen
Bure District Office
Bureau of Land Management
Bldg 74 - 15555 Hwy 50 West
Moses, Or 97861

Dear Mr. Carlsen:

64-1 Implementation of Alternatives A, B, or C would have a negative effect on the entire livestock industry in Morrow County, drastically reducing both property values, cutting carrying capacities and creating a ripple effect that could be fatal to the economy of the entire county. It could jeopardize the very survival of Morrow County. Before conducting Alternatives A, B, or C we strongly urge that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Feasibility Assessment" be conducted as authorized by Executive Order 12086 (see November 8, 1980 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel.)

We encourage the careful consideration of the comments contained in letters to you from the Morrow County Cattlemen, Rangeland Producers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1980 BLM District Range and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement. This letter constitutes our endorsement of those letters and documents, which have been submitted to you.

We urge you to seriously consider our recommendations received to date from livestock producers and concerned citizens regarding alternative resource management plans. As we see it, Morrow County could be successfully implemented to best serve multiple use principles and not cause severe hardships, particularly on the livestock industry in Morrow County.

Please consider our letter containing our comments and concerns regarding our permit as an addition to these (legitimate) letters. Thank you.

Sincerely,

[Signature]

Valley Region

Mike & Mary Morgan
Star Lot 3, 15555 Hwy 50
Moses, Or 97861

Encl.

65

January 28, 1980

Jay Carlsen - 307/575
Bure District Office
Bureau of Land Management
Bldg 74 - 15555 Hwy 50 West
Moses, Or 97861

Dear Mr. Carlsen:

65-1 The area cited has been thinned in the past. In response to this comment, BLM personnel have conducted a site examination of the area and have included the timber in the EA with plans. See POM/FF Table 2.1.

[Signature]

Mike & Mary Morgan
Star Lot 3, 15555 Hwy 50
Moses, Or 97861

Appendix II-82
Jeff Carson

January 23, 1990

Mr. Carson:

I do not agree with the Three Rivers Resource Management Plan in its entirety. It states that the 794 acres of private land within this allotment will be designated as PPAs due to the fact that public lands are included in the proposal of these fenced private lands. The 794 acres should be designated as PPAs due to the fact that public lands are included in the proposal of these fenced private lands. These public lands are accessible mostly by crossing private lands or the use of aircrafts. There is no water for deer only from private sources, I've observed any deer in the winter time only on public lands. Only on private lands at lower elevations.

The Impound notice you received is a notice sent annually to all grazing permittees. Its purpose is to notify permittees of the consequences of unauthorized livestock use and also to define the impound area.

Respectfully,

[Signature]

Appendix II-83
January 17, 1990

Jay Carlson
Bureau District Office
Bureau of Land Management
1350 Main Street
Las Vegas, NV 89136

Dear Mr. Carlson:

Two alternative draft Resource Management Plans (RMP) for theInputStream failed to be evaluated because of substantial flaws in the

The initial draft RMP was revised by theBLM to address identified problems and

The letters from the Bureau of Land Management, St. George, Utah and the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments:

This response is in accordance with each letter and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organization letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

Enclosure: Supplemental Comments

February 1, 1990

P.O. Box 112
Hamas, UT 87151

Dear Mr. Carlson:

I recently received notice of the availability of a draft Resource Management Plan (RMP) on management of the Three Rivers Resource Area. A summary of the draft RMP was included. The purpose of this letter is to request a copy of the full document and to submit our comments in the public comment period to provide my group with an opportunity to review the document. Two weeks from today, which would

The summary indicated that the program is preparing to continue destructive grazing practices on range that is mostly in "fair to "poor" condition. The intent of the Taylor Grazing Act was to improve range that had been destroyed by combination of severe overgrazing and drought. What has been accomplished in the EPAs (1973) effort since is appalling. When is the BLM going to get serious in proving the livestock industry and start removing our representatives in a proactive manner?

1) According to the information I received, you propose allotting 95% of the forage to cattle and only 5% to wildlife. What economic justification do you have for this split? What is the total cost to U.S. taxpayers (if your grazing programs)? What potential revenues would be realized if the land was managed for wildlife? In New Mexico, we have had a pilot habitat improvement program (Scarp Act) for three years. The program is going statewide in 1991. In the area covered by the pilot program, six times as much money was collected from hunters as was collected in grazing fees.

2) Finally, your preferred alternative calls for sharing 16,000 acres of annual wheatgrasses. What destruction of native vegetation and of the biological diversity represented by native vegetation should be a crime.

Thank you for your consideration. I look forward to seeing the draft RMP. I trust it is not as bad as represented.

Sincerely,

Jim Fish, Founder
Public Lands Action Network

69-1 Refer to response 2-4.

69-2 Refer to response 1-11.
Appendix I-85

Jay Eric Jones
4110 Mulberry Ave
Everett, WA 98203

Dear Mr. Jones:

I am responding to the Three Rivers 350 & EIS (draft).

As developed, I currently support Alternative A, which provides the maximum protection of the ecosystems in the region.

The following are specific comments for your consideration:

70-1 Refer to response 1-23.
70-2 Refer to responses 1-13, 2-10, 2-11 and 2-49.
70-3 Refer to responses 2-6, 2-12 and 2-78.
70-4 Refer to response 1-1.
70-5 Refer to response 2-46.
70-6 See Appendix I, Table 13. Also, refer to response 12-1.
70-7 Refer to response 3-4.
70-8 Refer to response 15-16, which notes ACE Designation of public lands to provide protection of special natural features, as well as Table 3-16 of Volume I and Table 1, appendix 7 of the HRLP/EIS. The first table gives an assessment of the relevance and importance of the features within potential or existing ACEs and the recommendations of the interagency team. West Butte, Saddle Butte and Saddle Butte do not meet ACE criteria. Also, refer to responses 2-26 and 15-16 (ACEs), 2-68 (Tiger Mtn.) 15-30 (Blacktail).
January 25, 1990

District Manager
Bureau of Land Management
49112/233, Hwy 20 West
Reno, NV 89508

Dear District Manager,

The Resource Management Plan for the northern half of Burns District of the BLM is in poor ecological condition. Most of the riparian, riparian, riparian and upland habitats are already in poor condition and all alternatives (particularly Alternative C) will further the decline. Alternative C is also expensive to taxpayers.

The alternatives do not address protection of remaining forest lands, logging roads expected to construct, and bighorn sheep habitat protection. Also, there is an imbalance of timber allowances-only 3% to deer and elk and 97% to cattle. Returning all lands and water quality to excellent condition should be the goal. The only alternative that comes close to this is Alternative A, but even this alternative does not allow for full land and stress recovery. Wild and Scenic River designation should be made for the South Fork and Middle Fork Malheur Rivers, Elkhorn River, and Siletz River to ensure that water quality is maintained.

Sincerely,

[Signature]
Steve Rice
10 Poliomas
Lake Oswego, OR 97035

---

72-1 Refer to response 3-4.

72-2 Refer to response 1-3.

72-3 Refer to response 2-3.

72-4 Refer to response 12-1.

72-5 Refer to response 1-1.

Appendix II-86
I have read with interest the draft Environmental Impact Statement for the northern half of the Bums District. I was concerned to learn that Alternative C was the Bureau’s preferred alternative. In my opinion, this alternative leans much too dramatically in favor of cattle interests at the expense of all other issues. Deer and elk receive only token forage allocation with the vast majority being reserved for cattle. Wildlife winter range forage allocations should take priority over livestock allocations. In addition, virtually no consideration is given to bighorn sheep habitat protection.

Because so much of the range is in only “fair” to “poor” condition, I believe it should be a priority to return the range to “excellent” condition. At the very least, BLT should adopt Alternative A, even though this alternative would allow only a token amount of recovery. This alternative should be viewed only as a temporary stopgap while BLT develops another alternative to restore and maintain range to “excellent”, natural condition.

To that end, cattle-grazing and crested wheatgrass seedings should be eliminated. In addition, the plan should commit the Bureau to keep riparian and aquatic habitat in “excellent” condition. That should include designation of the South and Middle Forks Malheur Rivers, Buckatucket Creek, and the Silver Creek River as “Wild and Scenic” rivers.

Certainly all of this will require careful discussion of restoration efforts, which none of your current alternatives does. In addition, nowhere in your proposals do you even attempt to identify funding for restoration of ancient forests nor how logging might impact the region. Believe me we need to reassess priorities for this area. The proposed Alternative C is a disaster for the land and for the natural occurring wildlife. I hope comments will encourage you to rethink your draft EIS.

Sincerely,

Karen L. Theodore
2944 Desert Woods Dr
Bend, Oregon 97702
I have read with interest the draft Environmental Impact Statement for the northern half of the Burns District. I was troubled to learn that Alternative C was the Bureau's "preferred" alternative. In my opinion, this alternative means too much to the livestock interest at the disastrous expense of all other issues. Virtually no consideration is given to bighorn sheep habitat protection. Deer and elk receive only token forage allocations with the vast majority being reserved for cattle. We, on the other hand, receive only token consideration in the draft EIS. I believe it is imperative that the Burns District Manager adopt Alternative A, even though it would allow only a token amount of recovery. I do not know where your proposals do even attempt to identify remaining ancient forests nor how logging might impact the region. I believe we need to reassess priorities for this area. The proposed Alternative C is a disaster for the land and for the naturally occurring wildlife.

Sincerely,

Michael A. Sequiera
20341 Desert Woods Dr
Sed, Oregon 97752
January 17, 1990

Jay Carlson
Bureau District Office
Bureau of Land Management
NC 74 12553 Highway 28 West
Nizana, OR 97738

Dear Mr. Carlson:

If you are facing a reduction in AUM's, please include the next two paragraphs. If not, come out second paragraph.

Alternative A, B and C will result in a substantial loss of our base property value. The proposed BLM action may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Final Impact Assessment" be completed as authorized by Executive Order 12690 (June 12, 1988) as a reminder to all Secretaries, Secretaries and bureau directors from Secretary of Interior, Donald P. Hodel.

The reallocation and/or reduction of AUM's currently forage in the Allotment will reduce the value of our base property by approximately $ (Assume $20 per AUM value). Please consider this economic issue in the requested "Final Impact Assessment".

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1988 Riddle Ranch and Eastern Range Service Group's and response to the draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is in accordance with the letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letter.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

Name: [Signature]

Address: [Signature]

City: [Signature] State: [Signature] Zip Code: [Signature]

Enclosures: Supplemental Comments
January 1983

Dear Mr. Carlson:

The Yamnay County Sheep & Wool Growers want to go on record that the January 19, 1983 Middle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Middle Range comment. There are several other areas of concern that this letter will address.

The Bureau of Land Management Riparian Area Management Policy, dated January 22, 1981, signed by BLM Director Robert R. Burford, has never been published. It was not clear that the definition of a riparian area is an area of land "directly influenced by permanent water, and having visible evidence of physical characteristics resulting from permanency water..." which is consistent with the 3x3x3 method used in the definition of a riparian area. There are areas classified as riparian that do not meet these criteria. The criteria used to determine if a stream is to be included or excluded are not consistent.

Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied and thus are extrapolated to invariable conclusions. Management objectives, in the opinion of BLM, are discussed only in the broadest of terms making them virtually unmeasurable. The effects of short-term, wild boar and livestock utilization are not consistent with affecting forage production, ecological status or potential of the resource. Therefore, reductions in authorized livestock use is the primary, if not the only, rational action recommended. Until proper techniques and accurate information are gathered, existing levels of livestock grazing should be maintained. At such time that reliable information shows trend increases in range, proper adjustments could then be made. The national standards are to ensure that riparian areas are not degraded.

The exclusion of cattle on the Disbursed Pasture Program (DPP) is not supported. The report states "...these areas to be a high-value resource..." due to the quality and quantity of native vegetation. It is suggested that grazing has been going on in this area for over 100 years, even with meat harvesters. There is no justification to change the practice.

The designation of the entire active Forest Management Area (FMA) (26,619 acres) as an Area of Critical Environmental Concern (ACEC) will have a drastic ecological effect on at least one ranch. Before this change is considered, a complete "Taking Implications Assessment" should be conducted as authorized by Executive Order 12102. Livestock and wild horses have run together successfully for years. The complete elimination of livestock grazing is not justified or necessary. The conditions for acquiring the private holds or the authority to impose this on the private holdings has not been fulfilled.

The continued fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for the range improvements. The deadwood is not burned, the dead waters that dry up during the season, the livestock do not feed. The reservoirs are not on the main water sheet and would not exist if it were not for the feed on the private holdings. Access can be accomplished by building two access roads on the east and west sides of the reservoir. If the access is more than one-half mile square, have more than the access point to allow livestock better access to all of the forage available around the reservoir.

Before any alternative that causes a reduction of BLM's is imposed, substantial investigation is necessary. The complete denial of this provision under Executive Order 12102.

Sincerely,

[signature]

Hapony County Sheep & Wool Growers
P.O. Box 425
Senior, OR 97520

Appendix II-90
Appendix II-91
District Manager

I am writing to you in regards to your land base proposals in your district.

I am very concerned about several issues. The first being your reversal of prohibiting roundup and Steens Mountain. It is not fair that you are placing in to the protection of the federal roundup and Steens Mountain. There are several concerns that need to be raised.

The second is the gathering in the area, they have to be identified and protected. The lands are fragrant, controllable areas, such as the Steens should be preserved.

I am concerned that the public lands are being coveted and that environmentalists who have probably never been there are getting their way. This is true. But this is inside the point today. Issues are changing and the land has been exploited for far too long. All the beautiful and special areas should not be made into parks with easy access. People have got lazy and don't want to walk anymore. (But x-county ski for that matter.) I'm sure the handshake or pipe will disagree with this statement. Just as readily.

The other issues I'm concerned with are range management and beef ranching. Cattle ranching has been a big part of American history and it should continue. But more care and less impact should be a higher priority.

The range must be maintained in excellent natural condition. Cattle grazing should be reduced or eliminated where necessary. Alternative A will help.

Water quality, riparian and aquatic habitat should be improved and maintained in excellent condition.

All old growth (ancient) forest should be identified and protected.

All costs of construction of new roads be included under the various alternatives along with their environmental impacts.

All created wheatgrass seed proposals be eliminated.

Beaver sheep habitat should be addressed in the plan.

Wild and scenic River designations is very important for the South and

Middle Fork Malheur River, all of Blacklick Creek, and all of the Malheur River.

I also recommend the Wildlife winter range range allocations be given priority to livestock allotments. As for the Lamonts big deer hunting operations go, I don't believe this should not be allowed. The damage and scars from this is outrageous. It must not be allowed.

Very sincerely,

Paul Beene

1983 Ennui Summit CR

BEND OR 97702

Appendix II-92
(i) Dear Sir! 

1. I am writing you about two issues I read in the Boise Statesman, 1 Jan 1937. 

2. I have lived here all my life and have watched the habits for game deterioration. 

3. I think what I can. And the snowmobilers go to Mt. Bachelor or somewhere else to do their thing. 

4. I wish they'd find a little place the are able to go and Bond! The snowmobiles raise the ghastly noise which makes it grow back. I think some children I know have to go to a week to see any elk, deer, Big Horn Sheep etc. 

5. I think how much the game has gone downhill since you went to Idaho. 

6. I am in Oregon 27 years old and I know what the game is happening. 

(2) The great subject in “Drug Prices, Price Reversion Management Plan” I wonder what I think should be done! 

(3) There is too much cattle grazing where our wildlife was to be able to inhabit. 

(ii) Reduce the cattle grazing and restore our lands! 

(4) Our waterways are a mess! They should be restored for fish and waterfowl. 

(5) Keep the pollution out! 

(6) I wish the managers would be trained and restored to do what is right for the land. 

(7) The Big Horn Sheep habitat should be left alone and protected! 

(8) Our wildlife winter range should be far away from cattle and have plenty of food. 

(9) These things should all be protected and managed so future generations can at least see partly what it once was like the Old West. 

(10) I also think we need to keep those winter ranges protected. 

Appendix II-93
January 25, 1990

U.S. Dept. of Interior
Bureau of Land Management
District Office
BCP 74, 12553 Hwy. 20 W.
Rodeo, CA 97738

RE: Three Rivers Resource Management Plan

Gentlemen:

I am writing to oppose the preferred alternative grazing policy submitted to you in your Three Rivers Resource Management Plan. The idea that either the streams are as badly degraded as you contend, or that they can be substantially improved by the proposal to remove livestock from over 80 miles of stream for 5 years is ridiculous. If you follow your plan, you will not only take the livestock out their normal watering areas, but also close off most of the hillside grazing which cannot be utilized without water and without fencing off from the streams.

83-1 Refer to responses 2-5, 2-11 and 3-12.
83-2 Refer to responses 3-10 and 5-10.
83-3 Refer to responses 1-13 and 32-1.

Your habitat preservation policies are extreme, and should not be put into effect without substantial additional plot testing. What I have seen of the relatively few areas you have tested to date leaves me with a great deal of doubt as to the effectiveness of your plan, particularly in the hillside areas. It is true that the animals feed first on the grass closest to the water. These plants are used to that kind of grazing by both domestic and wild life. I would like to see more evidence before we move ahead with this sort of plan. I believe that it would be possible to use some of the approaches you are considering more efficiently.

83-4 Refer to responses 9-12 and 25-1.

Your proposal to remove all domestic livestock from the RM areas is absolutely wrong and will not bring any substantial benefits for anyone.

Please reconsider and come up with a reasonable plan.

Very truly yours,

[Signature]

January 26, 1990

U.S. Dept. of Interior
Bureau of Land Management
District Office
BCP 74, 12553 Hwy. 20 W.
Rodeo, CA 97738

RE: Three Rivers Resource Management Plan

Gentlemen:

I have written to you about other matters, but I am writing specifically to object to several other aspects of your plan.

84-1 I strongly oppose any attempts to limit upland forage by 30%. There is no scientific basis for this and it is outrageous. Particularly after the flowering period, these should be no limitation at all.

84-2 I strongly oppose increase of any wild horse area whatsoever. This is against the meaning and intent of the Wild Horse Act and will be a terrible burden on any of the ranchers in those areas. The fact that the BLM now wants to go into the wild horse business does not change this.

84-3 I request that you emphasize the eradication as much as possible of juniper trees on the RM areas. They are causing far more damage to domestic livestock and wildlife in the overall range than all other trees put together. You should place a substantial burning program for a period of 10 years. They have taken over a huge amount of the Steens Mt. area, in the last 50 years.

84-4 I oppose any limitation on mining and searching for minerals at any of the RM areas.

84-5 I strongly oppose the BLM purchasing any additional lands in this area or facilitating purchase of any lands in this area by any party.

Very truly yours,

[Signature]
January 31, 1990

Mark Goldman
135 End 34th Place
Beaverton, OR 97006

Dear Mark,


I am very concerned with the future and the present condition of riparian and uplands habitat. It is very important that we continue to support the draft. Therefore, I support Alternative A.

Sincerely,

[Signature]

January 26, 1990

Jay Carlson

MAYO RANCH, INC.

January 26, 1990

Jay Carlson

MAYO DISTRICT OFFICE
Bureau of Land Management
HC 74, Box 130
Riley, Oregon 97758

REVIEW COMMENTS FOR THE OCTOBER 1989
DRAFT THREE RIVERS MANUAL

Dear Mr. Carlson:

86-1 Alternatives A, B and C and result in a substantial loss of our base property value. The proposed BLM action may result in the loss of our property value. Therefore, we request that if Alternatives B, C or D are considered, that prior to leaving the final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Take Impaction Assessment" be completed as authorized by Executive Order 11630 (see the November 8, 1985 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

86-2 The relocation and/or reduction of 1,059 AUM's livestock forage in our Elk Lake, Juniper Ridge, Clear Creek and Dry Lake Allotments will reduce the value of our base property by approximately $72,950.00. Please consider this economic loss in the requested "Take Impaction Assessment."

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Matthews Range Service Area Coordination Meeting are included. The Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is in our endorsement of each letter and Riddle Ranch draft. Their response has been submitted to you. We do not include a full copy of the text-only for the reason that it would be an exact replication of the Riddle Ranch draft and organization letters.

January 26, 1990
Page Two

We wish to state unequivocally that we believe the direction the Draft purports to take the Three Rivers area is vital not only to the native to the economic growth and future welfare of both Harney County and the people living and working therein. We also wish to state that with the documented and current cooperation of those same people, we believe the program being made at this time in the areas of concern addressed in the Draft, is in the best interests of the environment and the land at issue.

Sincerely,

[Signature]

MAYO RANCH, INC.
Mark R. Mayo
HC 74, Box 130
Riley, Oregon 97758
January 30, 1990

Dear Mr. Carlson:

The Oregon Cattlemen's Association appreciates the opportunity to respond to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement. Based on conversations with, and information provided by livestock producers located in the Three Rivers region, there is substantial disagreement with the data used to develop the draft policy for the region. Before the BLM approves the RMP/EIS, efforts should be undertaken to study and resolve the issues where parties disagree with conclusions reached by the BLM. A meaningful dialogue with affected livestock producers should prove beneficial.

There is no reason for the BLM to act with celerity when draft policy affects so many with the potential for an outcome not in the best interest of improving the environment and economy. We believe the BLM should thoroughly examine the major arguments brought forth by livestock producers. The following are a few issues that should be resolved:

1. "Developing an objective standard to determine the condition of the range" (Draft Three Rivers RMP/EIS)

2. "Exploring historical data on water quality, since there is a major disagreement regarding the data provided by the BLM that does not appear to be substantiated by the BLM or any other reliable source."

3. "Determining if preferences for wildlife and wild horses is inconsistent with federal court decisions."

4. "Assessing the impact of livestock on the sage-grouse population."

5. "Assessing how the fencing of reservoirs will enhance riparian areas."

6. "Determing if preference for wildlife and wild horses is inconsistent with federal court decisions."

7. "Identifying the Draft Three Rivers RMP/EIS will have an adverse impact on livestock producers raising livestock in the area. Resolving these issues can be achieved by developing an objective standard to determine the condition of the range."

Sincerely,

[Signature]

Encl: Supplemental Comments
Dear District Manager,

I am writing as a representative of the 427 members of Central Oregon Audubon. We are very upset with your
plan to raze the site. It maintains the range in
horrible condition and continues to degrade the range even
further. All of the range should be restored within the
next 5-10 years to excellent condition. It is time the
range be restored to its original state, and the BLM
should manage their lands properly instead of allowing the ranchers
to do whatever they want. The BLM lands are owned by all
400 million Americans, not by a few local ranchers.

We find all crested wheatgrass seedings totally
unacceptable. Why should the American taxpayers have to
foot the bill to provide non-native forage for the local ranchers? NATIVE SPECIES OF GRASS are the only species
acceptable for wildlife.

All riparian zones need to be upgraded to excellent
condition immediately. Many of the wildlife on BLM lands in
eastern Oregon need healthy riparian zones to survive.

In summary, we feel that the only Alternative that is even
time to being acceptable is Alternative A. This
alternative needs to be modified so that the emphasis is on
restoring rangeland to a healthy condition, and it is
through the BLM to stand up and manage their lands properly.

Sincerely,

Glenn Van Oise
 Conservation Chairman
Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that any Alternatives A, B or C be considered.

Prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of their text as the reason that it would be a direct duplication of the Riddle Ranch document and organization letters.

Sincerely,

[Signature]

January 17, 1990

[Jay Carlson]

Bureau District Office
Bureau of Land Management
HC 74 12925 Highway 20 West
Hines, OR 97738

Appendix II-98

I believe that Alternative B would be the best alternative for the resource area as it is almost the same as Alternative C (the preferred alternative).

On Table 4-3, "Impacts to Forestlands and Woodlands" the Average Sustainable Annual Harvest (ASAH) is an estimate only. Has any systematic volume and production inventories been conducted in the Resource Area? Or are the figures just educated guesses?

Table 4-10, what are the figures for Prince William, good and bad? Table 4-11, what are the figures for Prince and Middle Mountain, poor? Table 4-12, what are the figures for Vera Douglas, Pastoral Change, poor? In most cases it looks like the figures should be zero, but are they?

That the allocation of 5,000 AUMs of cattle type forage to the cow would better improve big game and their habitat.

Table 4-19, it seems that their is approximately 3/4 of the current size, riparian habitat that is in any unknown condition. Is there any plan to inventory this habitat to see what condition it is in?

On page 4-68, Economic Conditions, Livestock Grazing, there should be discussion of the monetary values the rangeland would face.

Thank you for your time and consideration.

Sincerely,

Harry S. Wilson
338 E Carlow Ave
Bristow, VA 20132-2058
To give wild horses priority over domestic grazing rights seems to us be very basic and possibly not taking into consideration the housing historic homes and economic uses. This plan seems to be based on the historic uses, the history of the land in the "Wild Horse Program". We live here and we see these horses all the time, and in our opinion there are no wild "wild" horses, there than there are domestic.

All of these critical affairs are of utmost concern to us as livestock producers and having been the effects of many of the proposed action taking full well the adverse impact they will have on the livestock industry, we do not feel the complete ecologism is being considered.

The economic impact on Harney County is Oregon and also the United States citizens, in that the care, preservation, cost of implementation, and maintenance of the three rivers resource of Oregon plan would ultimately be that of the people of the U.S., seem to be missing. There the dollars are, at this time, in short supply, and there has not been considered or taken into consideration in this plan. As in a lot of governmental planning projects, some part of the dollars are, we would like to know what the cost. Or, estimated cost of implementation would get us. If an economic study, from the "wine and unique farmland" in Harney County and a local economic effect on the cattle industry in Harney County and Oregon, there is a "human" element involved.

We don't find mention of the percentage of federally owned lands in comparison to the private ownership in Harney County in Oregon, and we feel they all could be important to the county and state economists and governments when considering future acquisition of privately held lands to also land exchanges. Where the private sector is looking to federal ownership acres, it is now being seen that the planning process and comprehensively federal land exchanges or purchases to increase the purchase of federal land in public ownership in Harney County and Oregon, this does not seem consistent with our country's base.

We feel the Three Rivers RMP would make a wonderful reference book and that we should look at as such, considering the tax dollars already spent on it and that we should utilize the already in place, working, commercial management plans and criticisms further needle spending of our very scarce tax dollars.

Thank you for allowing us to comment.

Sincerely,

[Signature]

[Name]

Harney County Stock Growers

C.C. Robert S. Smith
Harney County Stock Growers

Appendix li-100
Appendix H-101

The Russian gopher problem
218 W. 8th Avenue
Burns, OR 97720

We are against the
grazing policies implemented in the High Desert Resource
Management Plan.

Sincerely,
Diana E. Missal
Deputy Director

Jay Carlson
Burns District Office
B.L.M.

Comments & Responses
for Three Rivers RMP/EIS

Dear Mr. Carlson,

I want to lend my support to
the letters from the Harney County Stockgrowers, Riddle Ranch and Red Owens Rd. I don't think we should change the
way the East Kiger allotments are managed, as we have been doing for
along with the horses and the only poor grazing.
I've seen is in the Ranch Spring field where there are no cattle. It is very easy to see
As the only one of these is the
range, especially since they are
all year and when the range is most

My main concern is the economics.
It's time we learn in this country that
some one will have to pay the bill. You
to squeeze the private sector but remember, we pay the taxes.
If the horse lovers & others willing to
pick up the bill?

Sincerely,
Diane E. Missal
Deputy Director

96-1 Refer to responses 25-1, 25-2, 25-3 and 43-2.
To Whom It May Concern:

At a time when my respect for the BLM is on the rise, I am disillusioned and shocked to hear that you might reopen Stand 8th, to snowmobiles. These energy-consuming, noise and air polluting machines have no place in a sensitive wilderness area. Special snowmobile routes and areas unfortunately there is no such thing as a - - they travel in packs. Please resist the pressure from these snowmobilers and recommend Alternative 3.

Additionally, I ask that you adopt Alternative 1 for the northern half of the Burns district. I am primarily concerned about bighorn habitat. Certainly you must sense the thrill of seeing these creatures undisturbed in their range, a true wildlife habitat.

Sincerely,

[Signature]

[Address]

February 1, 1990

Donald Meager
Burns District, BLM
Hines, Oregon 97731

Shawn M. Loop

As an avid outdoorsman and conservationist, it has come to my attention that you want to reopen the Stanislaus area during wintertime to motor vehicle access, principally snowmobiles.

I urge you not to do this. The area is an important winter habitat for deer, elk, and other wildlife, which most of us want undisturbed. Your Alternative 3 prohibits vehicle access in winter, and will guarantee the ecological soundness of the sensitive ecological area. Snowmobiles can go elsewhere. I hope that you will adopt Alternative 3.

Three Rivers Management Plan

On a related issue, Alternative A of the Three Rivers Management Plan will not only be ecologically disastrous, and is a setback to the already paralyzed grazing industry at taxpayers expense. I urge you to not adopt Alternative A.

Alternative A will help to reduce and maintain the natural range of the salmon. This will ensure protection of water quality, wildlife habitat, what’s left of the old growth timber and other natural resources which, in the long term, will provide a far greater return on investment than continued low-lying in the heavily subsidized grazing industry.

I urge you to adopt Alternative A as a minimum.

Wild and Scenic River Designation

In order to restore, protect and ensure water quality, soil quality, wildlife habitat, and scenic and recreational values, I urge you to designate the Kalama River (South and Middle forks), Bucherkill Creek and the Glines River as Wild and Scenic. This will ensure that these waterways will continue to provide optimum long-term resource from hunting, fishing, hiking and boating.

Regards,

[Signature]

Mike Douglas
209 Red Horse Lane
Bend, Oregon 97701

cc: Senators Mark Hatfield, Robert Packwood

Appendix H-102
DEAR BLM DISTRICT MANAGER,

REGARDING THE UNRAT THREE
RIVER RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT,
I WISH TO EXPRESS MY VIEWS.

THE BLM HAS DONE A SUBPAR JOB
AS STEWARD OF WESTERN PUBLIC влади.
THE BLM HAS DONE A
OUTSTANDING JOB AS STEWARD OF
SPECIAL INTEREST INDUSTRIES SUCH
AS THE CATTLE (CATTLE AND SHEEP) MINING
AND TIMBER INDUSTRIES. YOUR REFERRED
ALTERNATIVE IN THIS CUS IS ONE
MORE EXAMPLE OF THIS. THE FACT
THAT THIS IS BEING PERPETUATED
AT TAXPAYER EXPENSE IS BLOODY
IRRESPONSIBLE. THE BLM AND OTHERS
SHOULD BE ACCOUNTED OF ROAD CONSTRUCTION
AND RANGE LAND PROTECT COSTS IS
REPREHENSIBLE.

IN ORDER TO PROTECT YOURSELF
YOU MUST REVERSE THIS TREND.
YOU MUST DEVELOP ALTERNATIVES
WHICH WILL RESTORE AND
MAINTAIN THIS RANGE LAND IN A
PROPER NATURAL CONDITION.

A CONDITION WHICH REQUIRES
THE ELIMINATION OF CATTLE GRAZING,
AND CREEK RELEASES, B/> <
AND BUILDING, PASSING, BUILDING, WELL
BUILDING PIPELINE CROSSING, RESERVE,
BUILDING ETC.

A CONDITION WHICH IMPROVES AND
MAINTAINS WATER QUALITY AND
AQUATIC HABITATS AND ASSOCIATED
RIPARIAN ZONE HABITATS IN EXCELLENCE.
CONDITION, RATHER THAN THE DETERIORATED
CONDITION PRESENTLY DEEMED
ACCOUNTABLE BY THE BLM.

A CONDITION WHICH PROVIDES HABITAT
PROTECTION ON RANCH PERMIT LANDS,
FOR DEER, ELK, BIGHORN SHEEP, WATER
(BUFFALO) AND ALL NATIVE SPECIES
OF WILDLIFE.

ADDITIONALLY THE BLM SHOULD
IDENTIFY AND PROTECT ALL REMAINING
STANDS OF OLD GROWTH TIMBER,
(PEDIGREE PINE) AND RESTORE
BIODIVERSITY IN WILD AND SOME SUCH RIVERS AS
THE SULVIES, SOUTH AND MIDDLE BERT,
MALHUN RIVERS AND BLUE MOUNTAIN CREEK
UNTIL SUCH A TIME WHEN THE BLM

HAS DEVELOPED A SERIOUS PLAN
FOR IMPLEMENTING THESE TYPES
OF PROGRAMS WHICH REPRESENT
A TRUE STEWARDSHIP OF THE LAND.
YOUR ONLY RESPONSIBLE Course
OF ALTERNATIVES IS ALTERNATIVE A,
ALL OTHER ALTERNATIVES ARE
A SHAMBLE, CATERING TO VARIOUS
INDUSTRIES.

GARY GERS
SUNY 50 35TH ST
LINCOLN CITY, OR
67437

Refer to response 1-13.
Refer to responses 1-11, 1-13 and 12-7.
Refer to response 2-4 and 13-7.
Refer to response 2-4 and 2-78.
Refer to response 12-1.

Appendix II-1 03
Northwest Federation of Mineralogical Societies

Bureau of Land Management
Burns District Office
Burns, Oregon 97720

Re: Draft Three Rivers Resource Management Plan and EIS

Gentlemen:

Enclosed is our response to the above draft plan. We do appreciate the opportunity to comment on it and wish to commend those responsible for its preparation.

Should the District wish any additional input from the rockhound community, please feel free to contact this committee, and/or the Oregon Council of Rock and Mineral Societies in care of Art Newsom, Vice President, RC 64, Box 410, La Grande, OR 97850.

Thank you for this opportunity to comment.

Very truly yours,

Northwest Federation of Mineralogical Societies

Jack Spanagle, 2nd Vice President

Response to the

October 1989

The Northwest Federation of Mineralogical Societies, representing over 95 organized rockhound clubs with over 3000 members in the Northwestern United States, wishes to respond to the above Management Plan and EIS. Our response is generally supportive of the Alternative 1, the "Preferred Alternative" or the Alternative 2, the "No Action Alternative". All other Alternatives have very undesirable aspects and could negatively impact recreational rockhounding activities in the management area.

Our reasons for this opinion and our observations from our study of the Management Plan Text, the Appendices, the Table 2.1 and our collective knowledge of the area, are stated below. We offer them in hopes that they will be helpful to the BLM in its planning process. We would also commend those involved in the preparation of the Plan documents, especially in recognizing their thoroughness and the time and effort required to research, compile, and produce them.

1. Rockhound Recreational Opportunities: We were very pleased to note that rockhounding is recognized in the Plan as one of the principal recreational activities. The areas outlined in Chapter 3 in Map 3-1, M-1, and M-4 do, in fact, outline most of the areas our members have used for collecting activity. Our understanding of Alternative 2 and Alternative 4, would suggest that these areas are minimally accessible so these areas for collecting reasonable amount for personal use.

However, we did not find any mention of the area mineral collecting possibilities, also part of our hobby interest. This Plan area does contain collecting sites for fluorescent minerals and minerals, as well as others.

We also would suggest that strong consideration be given to initiating a study of the paleontological resources of the Plan area. New federal land fossil collecting rules should be published by the Bureau in 1990, and we would expect to see an increase in fossil collecting activity on a result. Some reference to these new rules might want to be included in the Three Rivers Resource Management Plan final draft.

An area of our concern is the occasional unreasonable and possibly commercial collecting of large quantities of mineral materials, especially obsidian, that has occurred from time to time, in the area by unorganized and unregulated individuals. This has resulted in some resource depletion and environmental damage.

We do not condone such activity and would suggest that the District proceed with establishing clear collecting rules and reasonable quantity limits ("take limits") for personal collection.

We would also suggest that signs be posted in the most widely used areas to inform visitors of the regulations. At the same time we are not opposed to commercial collection of these same resources and materials, but this commercial collection, or personal collection above the regulation limits should be done by "permit only" and from only areas the District manager feels would not be adversely damaged by such activity. The organized rockhound groups would be interested in assisting the BLM in accomplishing this work in publicizing any such regulations.

In this regard, we did carefully consider the "Obidian ACEC" proposed in some of the Alternatives. Even though we believe some control is desirable, we do not support the creation of this Area of Critical Environmental Concern. Indeed we feel that the entire Plan area should be regulated as we outlined in the paragraph above. Perhaps the BLM District would want to publish a pamphlet or obidian collecting to point out the best collecting areas and to remind visitors of the rules and regulations including those on archaeological and cultural resources.

2. Other ACEC Designations: as long as rockhound access is not further restricted in these area designations, we support their continuation. The one possible exception to this is the Middle fork of the Malheur including Bluebacket Creek designation as Wild and Scenic. Our concern is not so much with the actual designation, as it is with the lack of information on the resources this area may contain, and the lack of public input opportunity. In our opinion, the Oxbow Oregon Wild and Scenic Rivers Act of 1988 was passed without giving the citizens of Oregon reasonable opportunity to consider which rivers they wanted to designate as "Wild and Scenic". To add to this total without much publicity or public input opportunity inside this Management Plan does little to improve our opinion. Quite possibly, an original well-thought-out designation of this river segment might have considered this forty mile section. However, we suggest that all Wild and Scenic River designation be considered separately and adopted only after prudent consideration of all the affected area resources.

Appendix II-104
100-1 All public lands not withdrawn from mineral collection are available for casual or hobby collection of mineral specimens, provided there is minimal disturbance, exploration or mechanical means are not used, and areas of paleontological or scientific interest (e.g., prehistoric shellmound) are not disturbed. No does not have staffing or funding necessary to specifically outline potential collecting areas for casual prospecting; however, District Geologists are often aware of where such activities commonly are occurring.

100-2 The Three Rivers PA will have as an inventory of high potential paleontological areas, as shown in the 1987 PA.

The Antiquities Act of 1906 prohibits the excavation, taking, or destruction of any serpentine or other fossils of recognized scientific interest. Taking of such items is strictly limited to qualified institutions under special permit.

Proposed rules on the management of paleontological resources that would become the PA REU were promulgated in 1992 and reviewed by the Field Office of BLM. These rules will have a hearing upon frontal collection but are not approved as rule making at this time.

100-3 Refer to responses 19-1, 19-5 and 100-1.

100-4 Refer to response 19-35.

100-5 Refer to response 3-6.

Leah Gay Snyder
JDI 1 Bank St
Medford, OR 97501

District Manager
Bureau of Land Management
MC-741/253 Box 26 West
Medford, OR 97508

Subject: Three Rivers Recreation Management Plan & Environmental Impact Statement

I received a Dungeness Letter from the Oregon Naturalist Group Association who expressed grave major concerns about your recommendation of the Oregon Coast as your management plan.

100-1 I've been hunting a lot of areas in Eastern Oregon and found extreme overgrazing. Springs de-watered, willows stripped to nothing, and grass is by an abrupt and didn't get it. So alone deer or elk. The deer kill last year at Lostant Mt. in Baker Co. I feel is partly caused by overgrazing the year before. I saw the de-watered springs, the grass eaten down to nothing, and had to watch out for cattle grazing and this was in response. I'm writing this letter because I've been one of the few poor range land association for the wildlife who needs a good range to support. These are our Public Lands not just cheap lease land for cattle grazing.

It is in time to have care of what we have. Provide better range land by reducing grazing, and fence improvements around springs and streams. By fencing areas around streams, springs, etc., riparian zone will come back so will the water quality and aquatic habitat.

It is in time that you start taking second look at your management practices. Our resources are diminishing so always management of our Public Lands must be followed for it is just not a cattle show anymore.

Sincerely,

Leah Gay Snyder

January 31, 1980

Appendix II-105
District Manager:

I am writing to comment on the Draft EIS for the southern half of the Bulruss District of the BLM, the draft BLM Bureau of Land Management EIS. I believe that your preferred alternative C is an ecological disaster and should not be chosen as the final plan alternative. Instead, you should develop an alternative to restore and maintain rangeland in excellent, natural condition. The change of cattle should be eliminated.

At the very least, you should adopt Alternative A until you create an alternative that will provide for complete rangeland, riparian, and stream recovery. It is essential for the ecological health of the area that water quality and riparian aquatic habitat be improved and maintained in excellent condition.

The time costs of new road construction and other range projects should be included in

(2)

the alternative, along with their environmental impacts. Created 'Wheatgrass seeding proposals should be eliminated from all alternatives, and winter range for wildlife should be given top priority over domestic livestock.

Bighorn Sheep habitat protection should be addressed in the plan and forage allocations in their home range should be stated explicitly for bighorn!

Also, Wild & Scenic River designation should be recommended for all of the South Fork Middle Fork Malheur River (except through Lewiston), all of the Silver Creek, and all of the Blue Heron Creek.

And all current forest in the area should be identified and given permanent protection. These should be the new logging racism!

For too long our BLM lands have been abused for the profit of a handful of wealthy non-Indians and convenient extractors. That deal and the get 4% of storage and cattle the rest is a national disgrace. This time has come to restore to an electric natural condition our BLM lands.

Sincerely,

Bob Gerl
920 S. Jetty
Lincoln City, OR 97367

Appendix I 106
Appendix II-107

To: Don Smith
La Grande, OR 97850
31 January 1990

Dear Manager:

The draft Three Rivers RMP and EIS have been carefully reviewed. We present the following comments for the record:

The two volumes provide much necessary information and some important considerations are presented. However, the work as a whole reveals a most unfortunate bias on the part of BLM leaders who seem intent on discounting the concept of good stewardship and true multiple use in favor of grazing special interests.

While multiple use is mentioned occasionally throughout the RMP, actually it is almost totally ignored as a program to be implemented. Consider that, by using your figures on II and III, 64.8% of the public land in your area is devoted to grazing. Simultaneously you point out that only 1.2% of our land is in "good" condition. Out of a total of 1,256,566 acres of streams, you find none (zero) miles in either "good" or "excellent" condition. There are no "excellent" quality surface water acres and only 35 of 449,000 acres of surface water are in even good condition, i.e., about 15.

The quantity of land, water quality and vegetation have come about largely as a result of grazing cattle. This you well know. In spite of this knowledge, you ignore positive alternatives and propose to continue on the same discredited approach of past years of mismanagement.

Your Alternative C preference illustrates how bound you are to ignoring the national public interest. The plan chosen suggests that taxpayers pay to install fences and pipelines to develop springs; convert to use of water for vegetation of vast tracts; and further disturb or eliminate habitat for numerous species of plants, animals and insects. The mandate of the BLM is given on p. 1-5 as to "fulfill the requirement of the FLPMA." On p. 1-5 "Planning Criteria" listed include (1) "Give priority to the designation of areas of critical environmental concern." On p. 4-44 you propose under Alternative C to have slightly less NCO grazing. This is not a way to "give priority." FLPMA criteria also include on page 1-5 that BLM (1) "Consider present and potential uses of the public lands." Again on p. 2-3 under Ecological System it states (2) "Preserve, restore and enhance water quality, etc. is a "must incorporate" into the Preferred Alternative. The selected alternative merely repeats the past and ignores the growing need for range, wildlife habitat, clean water, changing job opportunities and demographics.

Your proposal to increase cattle grazing would also require financing and constructing fencing on almost all irrigated lands. A great public expense for a special interest group is not justified here. Neither is it in the public interest to attempt to define a segment of the public to a myth. Since when are public lands and resources assigned to sustain a livelihood? Perhaps we should bring back the supply-and-water and better-churned craft to public land resources under BLM guidance.

The Table 3.5 (p. 3-12) is difficult to read because the estimated values (MNPV) apparently are given to three decimal places. Since these are estimates, why write 2,000 indicating 2 million ($2)?

On the listed acres of forestland 112,272 there is excessive emphasis on realizing trees. On such a small area you could have perhaps chosen to emphasize multiple uses of recreation, wildlife habitat, water retention, visual amenity, oxygen production, shade protection and many other uses. It is unfortunate that again you shun all multiple use for a singular commodity production. Allowing is the complete lack of protection for ancient forest and ancient junipers.

Please note that Volume I-Text and Volume II-Appendices listed are more than half devoted to cattle, which reinforces our belief that multiple use is a practice consciously avoided by the BLM. Look then again at the RMP is concerned with the numerous values on our public lands-water, air, vegetation, birds, insects, wildlife, wild horses, public participation, mining, camping and campgrounds, recreation, oxygen production, open space, wildlife, solitude, recreation, scientific investigations, etc. The RMP is extremely narrow in its focus and does not represent professional land stewardship.

All costs for each alternative as it is clear what specific programs the public is facing for management and for proposed projects, as well as income from sale of permits, leases and sales of resources? Providing clear cost-benefit ratios would enable both BLM administrators and concerned citizens to make informed public decisions.

We are requesting at least Alternative B, as well as the development of forward-thinking public land stewardship.

Yours very truly,

[Signature]

John E. Berry
Conservation Chair
Range Ecology Group

103-1 Refer to response 13-1.
103-2 Writing volumes in this format (3 decimal places) in the normal practice in timber management activity. The three decimal places allow for accounting to the nearest thousand board feet, which is the rounded amount used in forestry, cruising, contracts and the reporting of data. The three decimal places allow for the elimination of leading zeros three error in our market system.
103-3 Of the total 1,709,918 acres within the planning area only 13,307 is classified as forestland (less than 1 percent). If this, only 7,863 acres are classified as commercial forests remaining within the timber base (less than 1/2 percent). While forest management activities on these 8,263 acres allow for multiple resource protection and subsistence, there still remains 1,700,655 acres (greater than 99.5 percent) within the planning area dedicated to other resource values.

Forest management includes not only the removal of trees but emphasis on the growth and improvement of the existing forest stands, for the benefit of all resources including wildlife, recreation, fisheries, visual, etc.

In regard to the ancient forest concern, please refer to response 13-1.
103-4 Refer to response 13-1.
103-5 Refer to response 13-1.
103-6 Refer to responses 2-44 and 13-7.
103-7 Refer to response 13-1.
103-8 Refer to response 13-1.

[Signature]

Appendix II-107
Dear Mr. Coopers,

Sections 1, 2, and 3 will result in a substantial loss of our base property value. The proposed NEP claims may result in reducing the value of our property so that it is no longer desirable to use. Therefore we request that all Allegations be considered, that prior to issuing the Final Three Rivers Resource Fiscal and Environmental Impact Statement be completed, and that all Allegations be considered. (See the 3/25/90 letter from the Director of Planning, Shelby F. Ackerman.)

The letters from the Army Corps of Engineers, Sheboygan, Wis.,KeyUpnize: on the January 25, 1990 Middle Branch of the Three Rivers Resource Fiscal and Environmental Impact Statement are consistent with our views and concerns.

This response is our endorsement of each letter from the Middle Branch document. Our response has been submitted to you, and we enclose a full copy of text only for the record that it could be an exact duplication of the letter and document of our previous letter.

Sincerely, Mr. Coopers.

[Signature]
Appendix II-109
January 31, 1990

Mr. Jay Carson
Bureau of Land Management
Alaska Field Office
930 W. 15th Avenue
Juneau, AK 99801

Dear Mr. Carson:

I recently attended a field tour at the Hatcher Field Station near La Grande, Oregon. There I saw how government was beginning to collect factual information in regard to cattle grazing on our public lands.

I feel that such cattle operation to unique and areas are different.

Therefore, they should be studied before any across the board cuts in AIM's are made.

I have noticed with interest the increase in wildlife on private lands in my district. It is ironic that ranchers are feeling greater numbers of wildlife on private lands and having their cattle numbers lowered on public lands.

The letters from the Bureau of Land Management, Stockgrowers, Farm Bureau, and the January 17, 1990, Idaho Ranchers Association and Proposed Draft Plan. These resource management plans and environmental impact statements are consistent with my views and comments.

Sincerely yours,

[Signature]

Chairman "Pop" S. Times
State Senator
Union 30

Jan 28, 1990

Dear Sir,

In response to the BLM Draft or the Three River Impact Statement, the No Action Alternative was not developed and an action alternative should be considered before any action is taken.

Also, a Taking Implication Assessment should be conducted as authorized by Executive Order 12272.

The loss of taxable income should be enough to consider a No Action Alternative.

Sincerely,

[Signature]
Appendix II-1

108-1 The management direction for burros has been reevaluated. It has been determined that a small number of burros can be effectively managed in the Warm Springs DMA. The management actions under the Wild Horses and Burro Act have been changed to reflect the fact that in Oregon, burros are unique to the Bureau District. Also, refer to response 2-6.

108-2 Refer to response to 108-1.

Dear Sir:

I am writing in response to your draft Three Rivers Resource Management Plan.

I found that you recommend our management directions for wild horses as given in Table 1.1-13. Management direction 31 under Wild Horses and Burros states that burros in the Warm Springs DMA be managed for welfare of 14 head and that burros not be reintroduced should they die out from natural causes.

I believe that the interest is in eliminating the burros by ignoring burros and their needs until such time as the existing population dies out. I question as to whether this is in keeping with the welfare of the wild burro and the other wild horses.

I realize that NRM is justifiably proud of their success with management of wild horses in Eastern Oregon and especially with the fact that there are many of the Spanish Mustangs in the area. I also see a slight problem associated with the current management of "living history".

I would point out, however, that "living histories" are also a part of our history. Regardless of the historical origins of the Iron Mountain Burros, predator and enemy attacks did not die out in Eastern Oregon. Objectively, the RM can point to the fact that these wild burros have been on the reservation since their reintroduction. I think you state a bias of having one aspect of our "living history".

108-2 NRM is actively managing the horses to prevent severe overgrazing which would impede the natural ability, reproduction, and to improve the viability of the burros. Why don't you do the same for the burros? After all, we are not calling wild burros our "living histories.

The RM adoption program shows that burros are more easily adapted than are horses, especially in the East where horses and mules are more common and people have a history of using them, herded on in a pasture, and fed much higher. If you consider that while Harney County is trying to emphasize the uniqueness of its natural environment in order to attract tourists and diversify the economy, we still have the only site of these unique burros.

The horses had at Iron Mountain are the only one in Eastern Oregon, and so far as I know, the only one in the entire state. Yes, there are horses in Nevada, California, New Mexico, Arizona, and Wyoming, but these are wild burros at these locations also. They do not detract NRM from managing Oregon wild burros.

The burros can be considered a liability or an asset, depending on the point of view. The great teams and remote burros and horse herds all lend themselves to a historical interpretation and a unique experience for the eastern Oregon visitor.

Many of the wild horse folks come from a ranching background. I've found these folks to be extremely knowledgeable, motivated, and committed to the wild horse program. Most people didn't see burros in their youth but did have horses. Could it be that there may be some bias, albeit unintentional, that is leading to a change in management practices and that this bias is inherent in the planning process and that perhaps the planning process is not as balanced and objective as it should be.

I am just asking for a little self-examination on our part to continue our effective management of these unique burros.

Thank you for the opportunity to comment.

James M. Fandel

108-3
Dear Mr. Warburton,

I have reviewed much of the Draft Burns Field Resource Management Plan & Environmental Impact Statement and offer the following comments:

1. In general, I am appalled that you have chosen to continue your policy of resource destruction. In an era when the BLM is being lauded for progressive actions to rectify mistakes that have been made for decades, the Burns District seems bent on business as usual. Certainly there are some positive components included in the preferred alternative, but they are weak overall and fall far short of the kind of restorative actions that are mandated by the condition of the resource.

2. You must develop an alternative that will aim at the restoration of the landscape to acceptable condition. You owe that to all Americans who own the land you manage.

3. Water Quality, riparian, and aquatic habitat must be improved or or maintained in excellent condition.

4. The "Natural Values" alternative is very weak, but certainly it is the only acceptable one of the several you propose. It is the only one that would allow any significant recovery to occur.

5. You must protect all ancient forest, whether that be commercial conifers, juniper, or sagebrush.

6. Your cost/benefit analyses must include all costs of range improvements.

7. It is impossible to believe that you are still promoting Crested Wheat Grass; please eliminate all such proposals.

8. Forest allocations for all kinds of wildlife (and especially Blacktail Sheep) must be given priority over forage allocations for livestock.

9. Please designate all of the south Fork and Middle Fork of the Malheur River (i.e., those portions over which the BLM has

As a person who has caught and done research on Burns District lands for more than two decades, as a neighboring landowner, and as a member of the Burns Field Station Consortium, I have a very strong interest in encouraging the improvement of the condition of the lands over which you have stewardship. Please keep me fully informed as your plan progresses and please respond specifically to my comments.

Thank you very much.

Sincerely,

Steven G. Zimmerman, Ph.D.
Member of the Faculty (Biology)
January 22, 1990

Craig M. Hansen, Area Manager  
United States Department of the Interior  
Burns District Office  
HC 14-12533 Hwy. 20 West  
Hines, Oregon 97738  

Dear Mr. Hansen:

This letter is being written in response to the invitation of the Bureau of Land Management to participate in evaluating the draft of the Three Rivers Resource Management Plan. The sections of the plan concerning the cultural plants and cultural resources were reviewed in the Cultural Resources office at Warm Springs. This office, as well as the Culture and Heritage Department and the Culture and Heritage Committee, were set up on the Warm Springs Reservation to preserve the cultural heritage and traditions, and to manage the cultural plants and cultural sites. The traditional foods are very important to the people here. They are a part of their livelihood, and an necessary part of meals at all of the traditional ceremonies that take place throughout the year.

The proposal to set aside areas under BLM jurisdiction to be managed for traditional usage, such as root digging, is one that we would strongly support. The proposed Biscuitroot ACEC is primarily used by Burns Paiute people as part of their customary gathering areas. It is outside of the Warm Springs ceded area, but there are enrolled members of Paiute descent at Warm Springs. The three enrolled tribes are the Wasco, Warm Springs, and Paiute tribes. There are a number of Paiute tribal members, as well as people from other tribes, who come down in the spring to dig roots in the Burns area on BLM lands. Members from Burns come up to Warm Springs to trade their roots with people here. This exchange is a long established custom. It contributes to the economic support, as well as continuing traditional practices, and strengthening family ties.

We would encourage the adoption of one of the management alternatives that favors the consideration of traditional uses and the protection of culturally important plants. We would also support the proposal to retain in federal ownership the root areas that the BLM currently manages with the maintenance of access to these lands for traditional usage.

In 1988 a Cultural Plant Conference was held on the Warm Springs Reservation to educate personnel working in the federal agencies in central Oregon about the cultural plants, their uses, and management. Studies have been done on five of the main roots used today by people at Warm Springs. A report on these studies includes management recommendations for these culturally used plants. We would be glad to share this and any other information we have that might be helpful.

In the last few years a cooperation has been built up between the cultural programs at Warm Springs and Cultural Resource personnel at the Burns District Office. This cooperation has been very valuable. In closing, please accept our gratitude for your sensitivity and responsiveness to our Tribe’s wishes to protect and preserve our interests and opportunities in part of our ancestral lands. We look forward to strengthening the relationship already established as this plan and its proposals are being advanced.

Sincerely,

Marcia Kimball, Tribal Archaeologist  
Cultural Resources  

Enclosure: (2)  

Appendix I-113
January 31, 1990

Mr. Joshua L. Warburton
District Manager
Burns District
Bureau of Land Management.
HE 76-1533 Highway 20 West.
Kines, OR 97730

RE: DRAFT THREE RIVERS RESOURCE MANAGEMENT PLAN

Dear Mr. Warburton:

The Oregon Hunter's Association (OHA) would like to provide comments to the above-referenced draft plan. OHA is a statewide organization of nearly 3000 members concerned with management of wildlife habitat. Briefly, our concerns center on management direction for winter and summer range for deer, elk, and antelope.

One of our chief concerns regards the great emphasis placed on livestock grazing in the plan, at the expense of wildlife habitat. The animal unit months (AUMs) allocated to livestock in the Preferred Alternative (139.851) are nearly the maximum possible (164.6221), according to Table 2.1. While this number reportedly does not meet the demand, it is nearly three times the level proposed in the natural values alternative, and allocates only 5% of the AUMs to wildlife (7759). Only 10% of the required AUMs for antelope, and 18% of the required AUMs for deer are allocated to wildlife. The balance of the forage required by these species are assumed to be accommodated by unallocated forage. We question this assumption. In addition, about one-half of the allotments allocate nothing to wildlife (Appendix 3, Table 4). Furthermore, nearly 50,000 acres are to be planted with crested wheatgrass, a species that benefits livestock. Almost 20% of the area proposed to be seeded with crested wheatgrass, we believe that any seedings should be native bunchgrasses, perennial rye, fescue, or other species that can be utilized by wildlife as well as livestock. We also support seasonal grazing restrictions to hasten range improvement and minimize conflicts with wildlife usage.

The management objectives in Table 2.1 describe 170,000 acres of a total of 503,000 acres of deer winter range as needing improvement. Corresponding numbers for summer range are 223,000 out of 570,000 acres. Yet in Chapter 4 of the plan, 88% of the winter range and 87% of the summer range are described as being in satisfactory condition. These numbers do not appear to be consistent, and we are inclined to believe the former. Similar numbers are presented for elk ranges. We believe a much more aggressive range rehabilitation program must be established.

Bighorn sheep habitat is identified on maps in the plan, yet there is little if any discussion of management direction for bighorn sheep habitat. Bighorns are an important wildlife component of the Three Rivers area, and a thorough discussion of their management should be included.

There is proposed to be maximum development of off-road vehicle use in the plan. We are concerned with potential conflicts with wildlife and habitat degradation caused by ORV use. A coherent plan for managing and restricting ORV use is essential for responsible management of the other values in the area.

Please give our concerns serious consideration. We would be happy to meet with personnel from your district to work on these issues.

Sincerely,

Kelly L. Smith
State President

Appendix II-114
Dear Mr. Carlton:


Sincerely,

[Signature]

Appendix II-115
Feb. 6, 1990

114

Dear Mr. Carlson,

In reference to Oct. 1989 EM Draft Three Rivers MEPA; Alternatives A, B, and C will result in a substantial loss of my base property value. The proposed BLM actions may result in reducing the size of my operation so that it is no longer an economical unit. Therefore I request that if Alternatives A, B, and C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see Nov. 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel.)

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the Jan. 17, 1990 Middle Ranch and Western Range Service Comments and Response to Draft Three Rivers Resource Management Plan and EIS are consistent with my views and comments.

Further more I feel that 30% reduction of ADTs in my allotment is unfounded and unfair. In 1988 and 1989 due to drought and other conditions I took a voluntary "no-use in the Upton Mt. Allotment. Prior to this time I observed a large number of trespass cattle in this allotment. BLM was informed of this, but there was never any action taken. I feel that because of the drought conditions and the trespass cattle, that when the monitoring was done the allotment was in poor condition, (thus my reasons for voluntary non-use).

At this time, in my opinion that allotment is in as good a condition as it has been in my lifetime and I have lived on this family operated ranch for 46 years.

Sincerely,

Richard Anderson
Harney County, OR

February 4, 1990

Bureau of Land Management
HCR 74-1283 Hwy. 30
Hines, OR 97738

I hope you have thought the Three Rivers Plan through thoroughly.

Do you know the importance of land owners? To me, only good to encourage and keep private ownership. We will lose our freedom and strength within our nation if we lose the private land owner. The mystic of the West is an awful big toy to play with, when it might mean tomorrow the hunger of your children.

Land teaches us to develop our minds, our hands, and our country. Land is the base of reality. Food can only make it through land to us.

I agree there is abuse to the land, but that is where you can be most helpful directing, stipulating and teaching with common sense experienced with the land, with ideas, and with honesty and truth.

There is room for us all, who will we listen to, to be the great teacher?

No I am not for the Three Rivers Plan.

Thank you,

Gloria Bents

115 Februar:y 9, 1990

Appendix II-116
February 8, 1995

Dear Mr. Carlisle:

Being born and raised as a city person, there is an aspect of the RNM
Three Rivers Resource Management Plan that concerns me. Especially,
when you live in a large metropolitan area, there is only one escape
from the concrete, and for most people it is recreation and/or hunting.

In the average urban resident's term such as NRM, CDE water quality,
neuroses, permittance and active preference are an oxymoron. Therefore,
to those persons, the subterfuge in the public lands, whether they are used or abused, they can only evaluate a situation by what
printed matter is available.

116-1

Brothers, here is a copy publication from the RNM that discloses not only
that ranchers pay fees for land usage, but of their contributions to wells,
forests and roads.

This year, for an RNM well, our contribution was $7925. Also, the total
cost of 15 miles of new RNM fence was split by our ranch and 9 other
ranches.

In 1977 we hired a man, equipped him with a 1000 gal water tank and a
cat to fill water holes. We purchased not only our barrel but the entire
setup of equipment and well bore. We certainly felt good we could pay
the same fees for usage, even without water because the RNM said they were
unable to help with any water improvements. The Fish & Wildlife too,
responded they could not help in any way.

In 1988, before the wild horses were gathered off the Magunitive area by RNM,
we found them to be out of water and reactivated the water tank to haul
water to them as the horses could survive.

A recent fire RNM called and asked if we could let them use our caterpillar
and any manual help we could send in a fire. We took a large truck a
"cat" and pulled it over from our hay area to help fight fire for several days.
Salt is another forgotten donation from rancher to wild life. No salt is
furnished, or least in our area, to wildlife. All the salt put out by
ranchers goes to envelope not use, too. I've never heard a rancher complain

(Cont.)

about this sharing. Many ranchers may be situated like ours, in own past of
the live water on our entire allotment. We irrigate with native toplets out creeks.
Deer and wildlife have feed late spring, summer and fall.
In fall and early winter, the wild life feeds on the hay we have baled.
Therefore, It is disproportionate to associate only a paid fee with the
valuables use of his permit. He contributes much more to both RNM and Fish & Game agencies than he is ever credited.
These expensive and extensive improvements ranchers make are a constant up-grading for the existing wild
life habitat.

There is a constant accusation by some of the public, that RNM has made a
"bad deal" on grazing. The best defense is making public all the contributions
dedicated from each agreement. The media never presents that perspective and the
public never realizes that RNM, indeed, has enhanced the r.d., the
constantly improve the land with additional ranch contributions and help.

116-2

Perhaps an impact statement on ranch contribution should be made by the RNM
and available thru their office, so people are aware it is not a one-sided
situation and that RNM - Ranch Permits is to actually a supervised and
improvement cooperative involving not only land, but cash and labor contributions
from the cattlemen.

Sincerely,

Theresa A. Sweta

Appendix II-117
I believe that all of the alternatives to the draft EIR and Plan for the management of the Three Rivers area are unacceptable because they do not restore the natural resources of the area. At best, Alternative "A" would not cause further extensive degradation of an already abused natural ecosystem. These alternatives are simply consistent examples of the 'tragedy of the commons' problem. Perhaps the BLM should be working with the area to prepare a management plan that is less damaging to private and local economic significance, and the BLM should be protecting the national Aridland heritage given to its stewardship.

Any resource management plan for the district, should at a minimum; insist that rangeland, water quality, riparian and other wetlands be restored to excellent condition—not simply be maintained at the degraded level that currently exists throughout most of the region. Virgin forests must be protected—but first identified clearly in the plan they been not to be. Priority to protection of adequate

rangeland for wildlife must be given. Wild and Scenic River classification would best fit all of the South and Middle forks of the Malheur River with the exception of the Drewsey area. In a similar manner Bluebuck Creek and Silver River should be so designated.

This fragile area demands restoration not the continued harmful uses permitted in all of the alternatives. The area is well on its way to even greater desertification than it has already experienced. If the BLM won't stand up for the protection of the nation's land, who will?

Yours sincerely,

[Signature]

[Name]

[Title]

[Institution]

[Address]

cc: Senators Hatfield and Packwood
February 5, 1990

District Manager
Bureau of Land Management
40100 133rd Avenue West
Hines, OR 97738

Hello:


I would like the Bureau to change its management direction to focus on wildlife and recreational needs, rather than acting merely as a grain supplier for cattle. Changes for grazing allotments should reflect the true cost of maintaining allotments in excellent condition.

I would be glad to assist you whenever you need public comment on certain areas or biological plans. I will be lobbying to see that the Bureau gets the financial allocation it needs to properly fund these programs. Let me know when times like this arise on your district. Please send a full copy of the Final Plan when it arrives.

Thank you.

Pat Muller

Non game Animals and Upland Game Birds

Fig 3-34 states that there has been no comprehensive survey of non-game or upland species conduct in the RA. It would be impossible to at least state that the preferred alternative would either improve or make worse the wildlife situation. From my own observations in the area, I have found fields that are planted in create wheatgrass to contain the native species which used to be even more abundant in the RA. All seeding of create wheatgrass should stop until the effect of replacing native grass in bird populations is known.

I would not recommend the planting of new grasses on the importance to seeding birds should not be allowed to be grazed until well after the seeding is well established. It is necessary to assess the difference in quality of seeding habitat where cows cannot reach the vegetation there is sufficient height to provide cover and protection for nesting species and their young.

No spraying of herbicides should take place for the sake of range improvement, since the effects of many of these chemicals are still unknown.

Off Road Vehicle Use

No off road vehicle use should continue on snowy plover nesting habitat.

Wild and Scenic Rivers

The BLM should more aggressively pursue wild and scenic designation for more rivers to include all of the South Fork and Middle Fork Malheur Rivers, Bluebuck Creek, and Sivley River.

Timber Harvest

Given the scarcity of timber areas, the BLM should feel no obligation to cut them. The DEIS states that the harvest of these BLM lands will have little or no effect on the local economies. Any ancient forest ecosystems should be identified and studied to see if species utilizing them have sufficient habitat.

Cultural Resources

The DEIS states that the overall trend is downward due primarily to erosion and vandalism. The BLM management trend should be towards no further sacrificing of these resources, protecting all remaining sites.

Water Quality

In the preferred alternative, livestock would be temporarily removed from streams with poor water quality until conditions have improved to fair. There is no excuse for this. Considering the number of areas with poor water quality the BLM should aggressively pursue returning water quality to good/excellent and then adopting management procedures to maintain water quality at that level.

118-7 Refer to response 1-11.

118-2 Specific wetland plans are covered in the Bureau District Wetlands Habitat Management Plan. Providing meeting cover and brook water are two of the major components of this plan. Also, see response 7-32.

118-3 Refer to response 11-27.

118-4 Refer to Response 1-23.

118-5 Refer to response 3-4.

118-6 Refer to response 12-1.

118-7 The BLM management orientation is toward protection of cultural resources, as well as utilization of these values for public purposes. There are numerous known cultural sites and immaterial cultural properties that the statement of erosion and vandalism will impact at known significant sites.

118-8 Refer to responses 1-44 and 13-7.
Appendix II-1

The planning criteria used in guiding planning efforts are shown on pp. 1–5 and 1–6 (RMP/DEIS). These criteria incorporate all nine of the FLPMA Section 201(c) criteria (but not numbers 1 and 2) and were utilized in the development of all alternatives, including the Preferred Alternative. Criteria for the Composition of the Preferred Alternative (pp. 3–5, 8/9/9/05) were utilized by management in addition to the other planning criteria, as a means of more clearly defining management emphasis.

119-2. W.J. Hoyt and Sons has experienced a significant "cut" in AUM's in several of their RMA Allotments, that will greatly affect production. It is unclear that misleading data was used in arriving at this RMA reduction.

Appendix II-20
The meeting
These
Hax.
ODFW input regarding winter range lines on
The draft
The
unsat. sat.
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9.
Being a programmatic resource plan rather
Level
!rhe
the winter range shown primarily agrees with that identified
the Malheur National Forest
33),
1n
riparia"
3. The winter range is reasonably consistent.
The Malheur and Scenic Rivers
of respective Agencies discuss this matter and
the Malheur National Forest
Snow Mountain Ranger District has two
roost sites and the Ochoco National Forest calls for
the eight potential sites for Bald Eagle roosting. The Malheur and
Ochoco National Forests both contain roost sites but do not list
any active nest sites. Active roost sites and 15 potential
roost sites have been identified on the Burns Ranger District.
The Ochoco National Forest call for protection of potential
roost trees within 120 feet of existing sites, with any
active nests sites. These oitch sites have been identified on the Burns Ranger District.
The Ochoco National Forests.
rem
The data on Elk Winter
state the
that are subsequently found to be occupied. It does not identify
any potential sites for Bald Eagle roosting. The Malheur and
Ochoco National Forests.
Sec. 15, and for other purposes.
10, 4-141.
the Ochoco National Forest Plan has travel restrictions to protect
Bald eagle roosts on adjacent BIN land. See Item 1.
1. The BIN Plan, in Table 2.1-9, calls for a restriction of
management activities within 600 feet of roost
sites for Bald Eagle as per the Ochoco National Forest Plan.
33). The winter range shown on the Ochoco National Forest Plan
are consistent.
We recommend that the BIN and Forest Service
bald eagle habitat management strategy within their respective plans to ensure
consistent implementation of the Federal Recovery Plan.
The restricted season for management activities around eagle
roosts varies in the current cooperative
Agreements between the Burns Ranger District and the Ochoco National Forests.
and is therefore not
the
15-2. The BIN and Forest Service
bald eagle
roosts on adjacent BIN land. See Item 2.
In reviewing the BIN Plan, we found that allots
on both National Forest and BIN lands were receiving utilization exceeding the
carrying capacity.
permittees.
fsm.
2. On the Snow Mountain Ranger District (pp.
30, 31, 32, 33), the winter range shown primarily agrees
with that identified on the National Forest Plan and is therefore not
matched by corresponding winter range on BIN land. See Item 3.
BIN direction is consistent.
BIN direction is consistent.
BIN direction is consistent.
BIN direction is consistent.
120-4. The BIN Plan identifies four sites on the Silvies Valley as
winter range (pp. 3-20, 32, 33). The winter range is shown
on the Ochoco National Forest Plan, but there is no corresponding winter range shown
on
BIN Land Management
with the proposed allocation under the proposed Malheur National Forest Plan should the final
designation be "wild." If it is not designated as "wild," there is potential for conflicting
management.
2. BIN proposes mineral withdrawal for all river segments
designated under the Wild and Scenic Rivers Act. In addition, BIN direction in riparian and wetland areas is to allow no surface
occupancy within 660 feet of riparian corridors. See Item 2.
The BIN Service direction in the proposed Malheur National Forest Plan is that mineral and other uses in the BIN area outside river
corridors as long as key river values are protected. The Ochoco National Forest Plan
permits.
120-4. TheBIN Plan identifies four sites on the Silvies Valley as
winter range (pp. 3-20, 32, 33). The winter range is shown
on the Ochoco National Forest Plan, but there is no corresponding winter range shown
on
BIN Land Management
with the proposed allocation under the proposed Malheur National Forest Plan should the final
designation be "wild." If it is not designated as "wild," there is potential for conflicting
management.
2. BIN proposes mineral withdrawal for all river segments
designated under the Wild and Scenic Rivers Act. In addition, BIN direction in riparian and wetland areas is to allow no surface
occupancy within 660 feet of riparian corridors. See Item 2.
The BIN Service direction in the proposed Malheur National Forest Plan is that mineral and other uses in the BIN area outside river
corridors as long as key river values are protected. The Ochoco National Forest Plan
permits.
120-4. TheBIN Plan identifies four sites on the Silvies Valley as
winter range (pp. 3-20, 32, 33). The winter range is shown
on the Ochoco National Forest Plan, but there is no corresponding winter range shown
on
BIN Land Management
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corridors as long as key river values are protected. The Ochoco National Forest Plan
permits.
10. I Table 2.1-3 and 2.1-31, BLM direction calls for closure of all roads not needed for administration or fire defense, allowing all types of Off Road vehicles (ORV) use in designated open areas except where unacceptable resource impacts are occurring or are likely to occur, restricting development of ORV areas and cross-country routes (including those for snowmobiles and motorcycles) to increase the number of off-county users and developing cross-country access to reduce the number of cross-country activities (paraphrased and emphasis added).

It would appear that this direction could have the potential for significant impact to forest resources and to our management. Since no specific locations are given, it is impossible to assess exactly what this impact would be. We would like to see some wording added that would indicate that any planned recreation development or road closures adjacent to or within National Forest boundaries of either Ranger District be coordinated with the Forest Service.

Thank you for the opportunity to comment.

Sincerely, 

John F. Boutville 
Regional Forester

CC: Malheur NF 
Ochoco NF 
PLAN - Nygren

February 6, 1990

Joshua Warburton
BLM Ochoco District Manager
301-1/353 May 30 Hwy
Prineville, Oregon 97754

Re: BLM/EIS Biscuitroot Cultural ACEC

Dear Mr. Warburton:

I agree with your assessment and description of the resource and value of the Biscuitroot Cultural ACEC, having studied these resources and patterns of cultural use by the Burns Paiute Indians since 1974.

Oral history reveals there has been a long term traditional use of the area by local Native Americans as well as Native Americans from Wars Springs, Yakima, Mobergrist, Fort Hall, and Fort Ridwell areas with attendant social interactions.

While the crops are nutritious and have a cash value in trade, the people rely upon the wild root crops in modern days primarily for their value as an important cultural tool in educating and creating awareness of young tribal people as to cultural traditions.

The wild plant resource and its use by Indian people is sensitive to gravel pit activities (considerate use is not desirable); pit expansion is a threat, and disruption of livestock grazing resource is vulnerable to competition; the livestock compete especially for the yampa (Perideridia bolanderi) which tends to grow under moist conditions or streamside.

121-1 I agree with your recommended management and use constraints for this area, and would further recommend that all native people be allowed to camp and dig for roots in this area presently.

Thank you for the opportunity to respond to your BLM/EIS.

Most sincerely,

Marilyn Converse
Cultural Anthropologist
1155 H.W. Walker Drive
Portland, OR 97225
(503) 297-3449

Appendix II-122
Concerning the Torreya RMP comments,

Tim Allabbc

adapted, is a definition to use for old growth ancient forest stands. These stands do not need to be virgin in nature, but should possess old growth characteristics in the definition. Exceptions to all criteria should be provided for. I hope this helps.

The old growth resource in the canyons and on the edge of the forest land is very important for these species because the habitat is on the lower end of the range for such species. Also for allocation purposes if some areas do not meet the criteria, an old growth (or refugia) stand should be allocated to meet habitat needs.

Thanks for coming over to bend and discussing & visiting (more calls, etc.)

Sincerely, Tim Allabbc

---

(as recommended by Tim Allabbc - R. Brown 2/6/90)

Old growth Stand Criteria: (For eastside ponderosa pine and pine-associated forests)

1. 10-20 (30) large (greater than 31' dbh) ponderosa pine trees; other components generally less than 20%.

2. The size of the area should generally be no less than 40 (Regional Guide says 10) acres with components arranged as to maximize interior integrity and have representative masses of mature, overstory, and dominant tree components.

3. In addition to the layer provided by large overstory trees, at least one recognizable layer of seedlings, saplings, or poles present:

4. one or more standing 16' dbh or larger snags per acre.

5. 2-6 (10) large (greater than 12' dbh at largest end) 6 foot long logs being a portion of the overall woody material component.

6. native shrub canopy cover of 0-20 (40) % associated with a variety of native herbaceous plants suspected of grasses, sedges, and forbs.

adapted with modifications from material prepared by Bill Hopkins, area ecologist for Fremont, Winema, Deschutes and Ochoco National Forests. Numbers in parentheses indicate low and high ends of a range.
January 31, 1990

Joshua L. Warburton, District Manager
Bureau of Land Management
11400 Farm Bureau Parkway
Boise, ID 83714

Dear Mr. Warburton:

The January 47, 1990 Middle Ranch and Western Ranges Service
Concern, and Sequoia, to the Draft Three Rivers Resource
Environmental Impact Statement are consistent with our views and comments.

This response is an endorsement of such Middle Ranch
comments. Their response has been submitted to you. We do not include
a full copy of text only for the reason that it would be an exact duplication of the Middle Ranch comment.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

[Address]

City State Zip Code

Emulsion: Supplemental Comments

Appendix II-124
Oregon Trout 125
Speaking out for Oregon’s fish

February 6, 1990
Joshua T. Watherton
District Manager
Eastern Oregon
Nera District Office
MC-12553
Hines, Oregon 97733

Dear Mr. Watherton,

Anyone with some knowledge of our natural resources cannot dispute the low ecological condition of many of the riparian areas in the Three Rivers Resource Area. A significant reduction of shrub and tree cover and loss of many native vegetation species such as riparian vegetation to lower producing ecoregions like the principal, have greatly reduced the economic values of our riparian zones. Many of these zones are not only reducing for below their potential for water quality, aquatic habitat, wildlife habitat, and recreation values, but also production. Since European settlement in the sagebrush steppe region the potential to produce real estate has been reduced to 3D to 3D.

It is my belief that all of these resource needs can be met with intensive and creative management. It is essential for the long term benefit of the restoration and management decisions are made from a biological basis, if management decisions are made from a political basis we all will be losers.

Browsing by livestock hinders has been identified as one of the primary activities causing the decreased ecological condition in riparian areas. However, the problem is more complex because of overgrazing and over browsing by livestock. Riparian zones are likely to respond to livestock reductions unless the pastures are truly overgrazed. Desert areas are frequently overgrazed even in understocked pastures. Desert areas may be adequate in a pasture, but if livestock have access to riparian zones these areas are frequently the focal point of use, leading to overgrazing even in an understocked pasture. Fencing these areas on separate pastures will be one of the most effective tools in returning these systems back towards maintaining their potential benefits. Timing, duration, and frequency of use by livestock must be controlled if we are to maintain the integrity of these systems. With traditional removal of use may also be evaluated, such as early on and 90 days, which work well in parts of central Oregon.

Reinforcing with leaders in the ranching industry may also develop creative alternative to the problem. This will also increase cooperation which is critical since the majority of the riparian zones are in private holdings. Proper use of riparian zones will develop vegetation structure that will increase capture of sediment and better store water. This means longer growing periods and higher quality forage. It also means more consistent water flows throughout the year. The wildlife is better aquatic habitat, wildlife habitat, recreation values, increased water quality and quantity, and livestock productive.

Concerns for fire due to lack of road access and build up of fuels in these zones should not be a concern. Fire played an important historical role in developing plant assemblages in the Great Basin. Fire was a very important force for creating vegetation patterns that have been very effective in controlling the spread of sagebrush. Fire cycle in the Great Basin is an average of 10 to 20 years. In the montane sagebrush communities, riparian systems were frequently burned in fire prior to European settlement. Only fuel of these plant systems would benefit from periodic fire. This will be particularly true of the shrub where patches cannot control spreading shrub steppe communities. If allowed to continue the increase of later wildfires will have a negative effect on the watershed with increased sediment loss, decreased water storage and increased water loss from the watershed due to evaporation.

Reduction of roads in the Three Rivers Area is a positive move toward. Legalizing bores adjacent to riparian areas, however, is not adequate, particularly in the 2 to 4C slope category. Movement of streams to areas with 0 to 2C slope is most likely move outside of the buffer. Steep channels are very dynamic.

I sincerely hope the RFP does not decide to go with the status quo. Current condition of most of our riparian zones are unacceptable with RFP in fair to poor condition and the JRC continuing to decline. These zones are producing far below the potential for water quality, aquatic habitat, wildlife habitat, and recreation values. It is time to move forward with aggressive management to benefit everyone. Although increased inputs, such as fencing, are expensive ways resource benefits will be realized in the long term outlook. If we do not manage these ecosystems in an aggressive and creative manner, from a sound biological basis, we will continue to exploit our resources.

Sincerely yours,

Richard K. Miller
Southeast Oregon District

AppendixII-125
Dear Mr. Warburton:

On January 19 the Department provided you with our review and comments on the Three Rivers Resource Management Plan. Our district staff has subsequently contacted me to express apprehension over an item in Table 3.1.c: Management Directives by Alternatives. The point of concern is found on page 77, the page in boldface, under the subheading: "Table 3.1.c: Management Directives by Alternatives." It reads: "Minimize the development of usable ORV areas and cross-country routes (including snowmobiles and motorcycles), including areas away from the population centers in the county, to increase the number of out-of-county users."

The Department is concerned about the possible negative impacts of encouraged increased ORV use from out-of-county users. In most areas of the state we have taken the position that ORV use should be restricted to designated areas other than those areas, ORV's should be required to stay on developed roads and follow the same rules and regulations as highway vehicles.

The Burns district, however, is somewhat different. Other than a few local areas, ORV use is relatively light throughout OR Oregon. The Department felt that this provided a unique opportunity for ORV enthusiasts to explore this great area without unnecessary harm to the environment. The Burns district is relatively lightly industrialized and is of major environmental consequence. Therefore, we reasoned that the potential for negative impacts was slight and did not recommend designated areas for ORV use.

The key issue here is that ORV use has historically been light and broadly distributed. Such usage causes little in the way of negative, long term, environmental impacts and provides much in the way of unique outdoor opportunity. The high desert environment, however, is quite fragile and the balance between negligible and significant damage can be quite precarious. Even light, relatively intense exposure to ORV use can cause damage that may take years to heal.

Continued intensive exposure can easily cause significant environmental damage and displacement of wildlife communities.

126-1 Refer to response 1-23.

The passage at issue here seems to suggest that the BLM intends to solicit additional use. The Department would like to discourage such a plan. Increased levels of ORV usage do not require restrictive actions. However, increased usage could easily have a negative impact on indigenous plant and animal communities. More restrictive rules pertaining to ORV use would probably have to be implemented to circumvent these impacts. Not only would this be an unfortunate loss of a traditional use, it would be very difficult to enforce.

We recommend that the BLM not encourage additional ORV use. We suggest that item 2 at the bottom of page 21 be substituted with item 2 at the bottom of page 20. It reads: "Develop usable ORV areas and cross-country routes (including snowmobiles and motorcycles) around the populated areas of Burns and Kinos to accommodate the needs of the local population and the occasional request by out-of-county users for cross-country use.

Thank you for your consideration and attention to this matter.

sincerely,

Darryl M. Gowan
Forest and Range Land
Staff Biologist

Appendix II-126
Appendix II-127

Appendix II-127-1 Refer to responses 2-11, 2-87 and 8-4.
Appendix II-127-2 Refer to response 8-4.
Appendix II-127-3 Refer to response 2-63.

Appendix II

127-1

On the Labuan

Appendix II

127-2

In the late 1950s, the Labuan Marsh was a valuable habitat for various bird species. The marsh is located on the western coast of Labuan Island, off the coast of East Malaysia. The marsh is a wetland area that supports a diverse array of flora and fauna, including various species of birds, plants, and marine life. The marsh is known for its rich biodiversity and is an important ecosystem for the local community and the wider region. The marsh is known for its rich biodiversity and is an important ecosystem for the local community and the wider region.

127-3

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128

Dear Mr. Carlson,

This letter is in response to the draft three-
river resource management plan for the lower
Willamette Valley. The original draft was
sent on May 7, 1999, in response to
comments received from

Appendix II- 128

Your assessment of our decision remains
simply the basis for our decision.

Sincerely,

Anita Valois

P.S. 7

Proctor, OR 97752
January 17, 1989

Jay Carlson

Bureau District Office
Bureau of Land Management
NC 74
12533 Highway 28 West
Miles, WA 99124

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS BMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in APA, please include the next two
paragraphs. If not, cross out second paragraph.)

- Alternatives A, B, and C will result in a substantial loss of our base
  property value. The proposed APA actions may result in reducing the size
  of our operation so that it is no longer an economic unit. Therefore
  the proposed APA actions may reduce the value of our farm. (This
  concern has been submitted by Mr. Carlson in the Draft Three
  Rivers Resource Management Plan and Environmental Impact
  Statement. A Response to this concern has been submitted and
  authorized by Executive Order 12251.)

The realization of any reduction in APA will have a significant effect
on our operation. Therefore, we request that your agency consider our
concerns.

Sincerely,

[Signature]

Enclosures: Supplemental Comments

Appendix II-129
In the last five years during the BLM's surveys, three of these years were dry years and ran consecutively with each other. Two of these years, 1985 and 1987, the river all but went dry during the summer. In 1988 the river was dry and only water going through this property was from Myrtle Creek. The river was dry from Myrtle Creek up river.

Siilanes River
Allotment # 7033

Background

This allotment contains 1044 acres of BLM land and 693 acres of private and state land. The allotment is divided into four pastures. The Plateau pasture is grazed every year due to no water in this allotment. Two of the remaining three pastures are basically private land. The remaining pasture is a majority BLM land and accounts for only approximately one third of the total 3044 BLM acres. This is the only pasture that the Siloines River runs completely through BLM property. This pasture does not include 1.5 miles of centennial river side riparian and fisheries area because the river gets from Forest Service into private, then to BLM, back to private, to BLM, and back to private land.

These sections of the river are very heavily fished during the spring and summer. It is the only access to the river for the public in any direction for at least 10 miles. The river is shallow and has adequate cover. The cover is improving every year. Riparian side riparian and fisheries habitat had a set back in 1982, 1983, and 1984 during the higher than normal and longer water run-off season. During the run-off season the high water and ice jams in the river change the river channels, taking out "S" curves and creating sand bars. This destroyed old dense growth willows and grass. But this caused in germination of the new growth of willow and grass along the sand bars and river banks at a much faster rate.

The cattle have had very little effect on this situation. Mother Nature caused the damage and she is also repairing the damage with the new growth. Along with our efforts with lower BLM numbers and shorter rotation periods, riparian and fish habitat is improving greatly and has been condluded and addressed by the permittee.
Dear Mr. Carlson:

Mitch and Linda Baker want to go on record that the January 17, 1990 Ridge Ranch and Western Rangeland Sector comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Ridge Ranch document. There are several other areas of concern that this letter will address.

A riparian area is defined as an area of land "effectively influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence." The definition contains that areas excluded from the definition of a riparian area include "submerial streams or washes that do not exhibit the presence or vegetation dependent upon free water in the half." A thorough review of all creeks should be made to ensure they meet the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.

Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied and then extrapolated to obtainable conclusions. Management objectives, in the absence of AMP's, are documented only in the broadest of term making them virtually unmeasurable. No factors other than short term wildlife, wildlife and livestock utilization, are indicated as affecting forage production, ecological status or potential of the resource. Therefore, resolutions in authorized livestock use in the

Primary, if not the only, remedial action recommended. Until proper techniques and accurate information is gathered existing levels of livestock grazing should be maintained. At such time that reliable information show trend increase or decrease, proper adjustments could then be made. The ratings in the recently published Riley Rangeland Program Summary Update classify range conditions as poor, fair, good, and excellent. The RMP/IS classifies range condition as satisfactory and unsatisfactory. Consistent use of evaluation ratings is necessary for accurate evaluation as well as better communication with the permittee.

There is no scientific data that indicates that livestock use has any negative effect on the sagegrouse population. The restrictions on livestock in the sagegrouse strutting grounds are unfounded and should be eliminated.

The continual fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years restrict the amount of available forage and can concentrate cattle more than necessary. Livestock have a biological need for water.

Before any alternative that causes a reduction of BLM's is impacted, no matter what reason, a complete "Takings Implications Assessment" should be completed as authorized by Executive Order 12150.

Sincerely yours,

Mitch and Linda Baker
P. O. Box 585
Reno, Oregon 97201

Appendix II-131
Appendix 1

133

Landings Creek Allotment #1040

Comments

133-1 The reduction of AUMs in this allotment is not necessary if the R.M. would stop the unauthorized utilization of allotments by the surrounding property owner and lessees. The reduction of our AUM is not going to improve this allotment if the unauthorized use is going to continue year after year through the summer and fall even on the allotment's rest years. Also, I don't think we need to change the SWE from M to L. The range has been improving. It is not as bad as the BLM survey says.

133-2 Landing Creek is not a free flowing creek year round. It will have water through out the length of the creek year around. If it is a very wet year. During drier years, this creek will dry up throughout the length of the creek except for small pools.

This creek is fed by a small spring at the head of Landing Creek Canyon and is located outside of this allotment. The spring would not have any way to produce enough water to feed the entire length of the creek. It doesn't even run water to the boundary fence of the allotment from the spring head year around except on very wet years.

How can riparian and water quality be declining while fish habitat is improving? This is not consistent. One can't improve or decline without affecting the other also.

There isn't no way by the year 2000 that you will have a 55% stream shading and water temperature at 77°F. There isn't the water source and flow to support such an assessment.

The reduction of livestock from the stream area will disrupt the current, successful grazing system. Therefore it will have very little effect on the overall stream conditions.

Mitch Baker

[Signature]

Comments and Response

Prepared by Mitch and Linda Baker

I don't think the AUM cuts for me in this allotment are fully justified when the unauthorized use of the allotment goes on year after year all year long.

133-5 The water quality and riparian habitat is not going to improve very much when you have a creek that goes dry off and on. How are we to have a good fish population without a good water source to start with. I don't think fencing cattle out is our answer.

Our wonders are in very good condition. That is where cattle go to graze and have no significant adverse impact on surface water quality.

133-6 Giving wildlife priority over cattle in forage allocations is unfair and inconsistent.

If we were not improving our range land conditions in these areas, our wildlife would not be increasing, however, they are increasing due to more forage.

There needs to be more money spent on constructive range land improvements and less spent on surveys after surveys. The continued surveys don't produce forage or water which is essential to cattle and all wildlife.

133-7 NOTE: It has also been brought to my attention that volunteer people are being used to assess allotment and plot surveys and conditions. I question the validity of these assessments when done by volunteers, possibly unqualified labor.

Mitch Baker

[Signature]
Dear Mr. Carlson:

My father bought an old ranch in 1953, clearing approximately 250 acres of east Salt Sage brush, and planting it to productive crops. Creating hay for hundreds of Bueltels, Geese, Deer, Antelope, Eagles, plus other kinds of wildlife, where before there was almost nothing. I’ve lived on this ranch for forty-one years. My Grandparents owned a ranch in Silver Valley for years. I own part of the ranch, my Great Grandparents homesteaded, so I feel I’m greatly acclimated with the environment. I want to take care of the land and want to be the lords good tenants. I feel we did our part and more to create all of these natural elements (wildlife - watered and green).

Page 3

They moved tall Sagebrush to Strutt as well in 1953. Bank Ranch Science created wheat close to a Strutt grazing group. Sage brush moved from tall brush to seeding. To Strutt’s Severe all as have watched 20 to 30 pair making them. As a boy growing up in this country very seldom seen Sagebrush now when I saddle my horse to run or move cattle at home Van Co-op Priscilla - or Shelly Abatement, almost always see Sagebrush.

In the 1980s, just inside Forest boundary at V暂, Forest Service decided to Penn out of ground away from livestock. Grasses grow and cattle themselves out. Because Em herding to Forest Service, they sell Penns go down and dropped the subject.

My feeling is that we need to work together as public use, livestock, and conservation in each area. Our main goal is to work together to conduct and conduct. The misunderstood that were not trying to destroy the livestock environment. However, man hand on the mismanagers and aberrations.

Thank you.

Page 2

I love this land and enjoy taking care of it want to continue when misformed and Outraged groups and clubs put us small farmers and ranchers out of business, we have no choice but sell out to big corn. The Corn and Ranches own private lands - public lands - and wildlife protection will no longer be a priority. Only the good Almighty.

To many good roads determine our public wildlife protection. My Parents’ brother, in 1953, hired men and myself used to go fishing up Blue bucket Creek. (Known at that time as Sagehen Creek.)

It was somewhere in the mid 1950’s, very poor roads. Took us probably two hours getting there. We would come home with a bunch sack of legal sized Trout. At that time there were lots of cattle on the stream. Sagehen’s have become a major issue on public lands. Government Agencies have tried making us as Public believe

AppendixII-133
February 10, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HD 74 12533 Highway 20 West
Hines, Oregon 97736

Mr. Carlson:

The so-called study on the Three Rivers Resource Management Plan and Environmental Impact Statement is being proposed could have a tremendous effect on the livestock operators and the total population of Eastern Oregon, and all the way through the total livestock industry in general.

Alternatives A, B and C will result in a loss, not only of how many cattle we could graze but also in our ability to operate profitably. Either of these would also reduce our base property value.

In all of these alternatives and ideas, I see no mention of the option to have a plan whereby all parties concerned could work together and eliminate these problems. In our particular case there is a great need to control and remove overpopulation of feral animals, weeds, and brush. By working at this, all the problems could be eliminated or controlled to benefit all parties involved. There is no need to close down an area to livestock any more than to close it to wildlife and man. Some of the areas being considered are practically impossible to have access to if closed to all but the few who could walk to them.

It's time we spend some time with the people who will be the most affected and go over each individual area to get an understanding of what this plan is all about. When I say "people that be", I mean Senators, Representatives, Agriculture Secretary, and even including the Administration (top close representative of the President of the United States).

These type of plans involve not only the eastern portion of Oregon, but all the way across the whole United States where the government controls or administration is involved in any type of land use. I know of instances in other areas where the same type of problems exist, so we the people have to speak up to you and your comrades who have so much power over us.

I suggest a Taking Implication Assessment be completed as authorized by Executive Order 12600 (see the November 6, 1988 Memorandum to all Assistant Secretaries and Bureau Directors for Secretary of Interior, Donald P. Hodel).

The letters from the Barony County Cattle Women, Stockgrowers, Farm Bureau, Sheep and Woolgrowers, the January 17, 1990 Ridgell Ranch and Western Range Service Comment, and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are mostly consistent with my views and comments.

Before any action of this magnitude, which would have such drastic results on so many, is taken, I suggest a little common sense be put to use and everything evaluated to the fullest.

Sincerely,

Victor L. Thurman, Manager
Elingson Rocking SE Ranch
Drewsey, OR 97904

Appendix II-134
Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12538 Highway 20 West
Hines, Oregon 97738

Dear Mr. Carlson:

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers, and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and the Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the letters only for the reason that it would be an exact duplication of the Riddle Ranch document and organization’s letters.

Alternatives A, B, and C will result in a substantial loss of base property values. The proposed BLM actions may result in reducing the size of many ranching operations so that they will no longer be economical units. Significant reduction of cattle grazing on public lands would be detrimental to economic well-being of the families who earn their living from ranches that have BLM grazing permits, the economy of Hammy County, and all people who provide services and goods to the ranchers affected. Therefore, we request that if Alternatives A, B, or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact statement, a “Takings Implication Assessment” be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all

Assistant Secretary and Bureau Directors for Secretary of Interior, Donald P. Hodel)

We object to the prohibition of free-roaming grazing on the 6000 acres of Biscuitroot Cultural Area in the Stinkingwater allotments. Restricting grazing on the Biscuitroot site is unnecessary, as evidenced by the present quality and quantity of rangeland after being included in an active cattle and sheep grazing area for over 60 years.

We also object to the designation of Stinkingwater allotment as an active wild horse and burro area, and Bartlett Mountain-Upton Mountain area as California bighorn sheep habitat, since these species are introduced species to these areas.

We object to the restriction of Bovint from artificial ponds and reservoirs, and the designation of these man-made structures in semi-arid environments as wetland habitat for waterfowl.

Thank you for your attention to these problems and our comments.

Yours truly,

Turner A. Dunten
Carrol A. Dunten

Appendix H-135
We would like to express our concern regarding the Biscuitroot Cultural Area of Critical Environmental Concern (ACEC) and the Kiger Horse Management area. The proposed exclusion of cattle grazing in the Biscuitroot Cultural ACEC does not seem justified, since grazing and foot harvesting have continued on these lands for a number of years without apparent harm.

Jay Carlson
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

Re: Three Rivers Resource Management Plan Draft EIS

On behalf of the Oregon Sheep Growers Association, I would like to express our concerns in regard to the Draft Resource Management plan (RMP) and Environmental Impact Statement (EIS) for the Three Rivers area.

First, we are concerned and disagree with the designation of Landing Creek and Skull Creek as "riparian areas." The designation of these two areas as riparian seems to be in direct conflict with existing policies of the Bureau of Land Management which define a riparian area as an area of land "directly influenced by permanent water and having visible vegetation or physical characteristics reflective of permanent water influence." (emphasis added)

In light of this definition, we would suggest that Skull and Landing Creeks should not be considered as "riparian" areas. We would also suggest that following a complete review of all creeks or streams in the affected area, those not meeting the existing definition be removed from this classification.

Secondly, we are concerned with the potential reduction in the use of lands for livestock grazing as a result of improper monitoring techniques. We believe current techniques are too narrow in scope and do not provide adequate consideration of numerous other factors impacting the resource. Current techniques seem to maintain a preconceived bias against livestock grazing, when, in fact, proper and well-managed grazing practices can be shown to actually "enhance" a land-based resource. In addition, we disagree with the initial conclusion that existing grazing practices have negatively impacted populations of sage grouse. We would suggest the proposed restrictions on livestock grazing, due to the "potential" impact on sage grouse, be eliminated from the draft plan.

We would like to express our concern regarding the Biscuitroot Cultural Area of Critical Environmental Concern (ACEC) and the Kiger Horse Management area. The proposed exclusion of cattle grazing in the Biscuitroot Cultural ACEC does not seem justified since grazing and foot harvesting have continued on these lands for a number of years without apparent harm.

We would also disagree with the proposal to designate the Kiger Horse Management area as an Area of Critical Environmental concern. Without question, such a designation would result in an extreme economic hardship for individuals within the area. We believe designating this area as an ACEC is premature, at best, and represents an inappropriate "taking" of private lands. At a minimum, we suggest that if efforts to designate this area as an ACEC are pursued, the BLM should conduct a complete 1 assessment to determine if such action would constitute a "taking."

Current practices of fencing reservoirs in an effort to control livestock patterns in riparian areas should also be reviewed. Locations and numbers of accessible routes around reservoirs should be reviewed to improve the level of forage utilization, as well as to enhance and maintain riparian areas to the greatest degree possible.

Finally, we have serious concerns with the proposed prohibition against changes in livestock classes to enhance Bighorn Sheep populations.

For these reasons, we strongly believe that existing grazing practices should not be restricted through the draft plan.

Thank you for the opportunity to submit our comments on your proposed draft.

Sincerely,

William Kirk
President, OSGA

Appendix II-36
Dear Mr. Carlson

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the texts only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations' letters.

138-1
Alternatives A, B and C will result in a substantial loss of base property values. The proposed BLM actions may result in reducing the size of many ranching operations so that they will no longer be economical units. Significant reduction of cattle grazing on public lands would be detrimental to economic wellbeing of the families who earn their living from ranches that have BLM grazing permits. the economy of Harney County and all people who provide services and goods to the ranchers affected. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12,630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors by Secretary of Interior, Donald P. Monahan).

In regard to our particular Alternative the following issues are of importance to us. The proposed Biscuitroot gathering area, the Sagegrouse Shooting Grounds and the exclusion of cattle from Riparian areas and reservoirs.

138-2
The proposed Biscuitroot Cultural ACEC has had cattle grazing in this area for many years and there has been no adverse affect on the quality and quantity of roots available.

138-3
On the subject of the Sagegrouse Shooting Grounds, cattle have no adverse impact on the shooting area and should not be removed.

138-4
Removing cattle from the Riparian Areas, Little Pine Creek, is not warranted because current grazing practices have no significant adverse impact on surface water quality.

138-5
Monitoring techniques currently in use on Three Rivers Resource Area are insufficient, inaccurate and are applied improperly to indefensible conclusions. The techniques should be consistent throughout the entire study. Until proper techniques and accurate information are gathered, existing levels of livestock grazing should be maintained.

138-6
As regards the Pine Creek Material Site which is under lease to Harney County, I believe that the site has developed has little or no impact on the Biscuitroot ACEC.

Thank you for your attention to these areas of concern.

Yours truly,

Donald A. Dryer, Jr.

Appendix II-137
Bureau of Land Management  

SNK 302/1303  

Bureau of Land Management  

SNK 302/1303  

February 2, 1990  


Dear Mr. CARLSON,

I would like to express my concerns regarding the Draft Three Rivers Resource Management Plan and Environmental Impact Statement dated October 1989, especially the first three alternatives.

The overall Draft in not based on any earth science information. Replacing streams and riparian and aquatic areas will not enhance the environment. It will destroy it.

Removing grasses around riparian and aquatic areas will create a fire hazard. The first heavy rain after a fire will wash sediments and silt into the water, killing all living things in it.

Your first three alternatives will uncover the environment and remove, taking away any livestock dust or limiting any forest pods in 30 to 50 acres per week/days. This will adversely affect the economic stability of the local community.

Wetland and riparian restoration will not only result in the local residents losing the recreational opportunities, but will also convert farmland, restricting travel only to small roads and a heavy reliance on already crowded facilities.

Cattle do not conflict with wildlife.

WILD HERD DEATH:
Seed come up downstream away from the vicinity of their calves, consequently, protecting any wildlife in that area as well.

Wildlife are aggressive towards other animals including wildlife.

Please remove the wild horses from our public lands.

1. Do not take the cattle off of the riparian areas. The grass will compete with the biomass plant and eventually crowd them out.

2. Object specifically to the classification of unsatisfactory range conditions, with livestock potential, livestock present productivity, livestock resources condition, and unsatisfactory livestock management on below livestock potential. These classifications do not coincide with the actual livestock capacity of 976 Acre-Feet, average actual use of 481 on page 40 of Volume 1.

I wish to go on record that the views and comments of the Burns community, represented by the Burns Rancher's Association, are consistent with my views and comments. I embrace the Burns Rancher document.

I ask that you leave all livestock allotments as they are.

LOE W. DAVIES  

BC Box 5  

Prineville, OR  

07/71

February 2, 1990

Bureau of Land Management  

ADN Craig M. Hansen and Joshua L. Wehrten  

Bureau District Office  

HC 74, 12933 HWY 20 West  

Hend, Oregon 97732  

Re: Draft Three River Resource Impact Statement

Dear Sirs,

After reviewing the draft of the Three Rivers Resource Management Plan/Environmental Impact Statement, alternative A is our recommendation.

Out of the five (5) Active NRMA's, only one (1) has been eliminated through previous land use planning and environmental impact statements. Having only five (5) NRMA's in Oregon, we feel it is necessary to protect these five remaining NRMA's. We would like to see the natural values emphasized, as in Alternative A.

Please keep us updated on the progress of this RPMIEIS.

Sincerely,

Barbara J. Rehf, executive director

American Mustang and Burro Association  
P.O. Box 7  
Benton City, WA 99320  
(509) 588-6338

Appendix II-138
Dear Mr. Carlson:

This will serve as a follow up to that certain letter of response to the Draft Three Rivers Reservoir Management Plan and Environmental Impact Statement dated January 26, 1989, signed by Patrick J. Wilber, Wright Wilber and G. W. Wilber for Wilber Brothers.

The letter was incorrectly dated 1949, when, of course, it was intended to read 1989. Please reissue this follow-up correspondence, correcting the date, with the original response in your files.

Sincerely,

G. W. Wilber

For: Wilber Brothers
Patrick J. Wilber
Wright Wilber
Josh Dobson, District Manager
Burns BLM Office
NE - 91 128.35 Hwy 80 West
Ness, OR 97758

Dear Mr. Dobson,

Although I did not receive a copy of the Draft Three Rivers RMP and EIS, I would like to comment on what I have heard about this document.

Alternative C, the Preferred Alternative, calls for the conversion of 76,000 acres to cropland with grass seedings. This proposed action would violate Sec. 162 of the RMA, which states that management activities will strive to protect... scenic,.... ecological and environmental values. I urge you to select Alternative A, which would move more closely congruent with the RMA mandates and the national interest.

Water quality in public lands needs immediate attention; I do not think Alternative C goes far enough in improving water quality. The goal should be to maintain water quality in excellent condition.

The RMP does not address the costs of construction of proposed range projects. As a taxpayer, I am tired of having money spent on projects damaging to the ecological integrity of our public lands. Construction of roads, fences, pastures, buildings and resources were only to benefit a small segment of the population and do not bring sufficient revenue back to the public. refers to environmental costs. Please include in the final document cost analyses for all projects, including the cost/benefit ratio.

The document fails to identify old-growth forests. Please include this information.

The document fails to put forth a convincing argument that big game range conditions will improve. It states that... improvements. Please detail methods by which big game range habitat will be protected and improved.

I would like to comment more fully on the Three Rivers Draft RMP & EIS. Will you be extending the comment period? Please send me a copy of the document.

Sincerely,

Elaine Fries
February 12, 1990
3743 NE 33rd Ave.
Portland, OR 97202

Mr. Joshua L. Warburton
District Manager, Bureau District
Bureau of Land Management
2401 NE 122nd
Hyde Park, OR 97306

Dear Mr. Warburton:


I recently received a letter from the Bureau of Land Management at 2401 NE 122nd, where I am employed as the Oregon State Director of the Bureau of Land Management. In the letter, the Bureau took a position on the location of the three rivers, which they claim to be in the public interest. The letter states that the three rivers are in the public interest, and that the Bureau of Land Management will not take any action to change the location of the three rivers.

In my opinion, this is a clear case of a violation of the public interest. The Bureau of Land Management has taken a position that is against the public interest, and has refused to take any action to change the location of the three rivers.

I urge you to consider taking action to change the location of the three rivers in the public interest. The Bureau of Land Management has taken a position that is against the public interest, and has refused to take any action to change the location of the three rivers.

Sincerely,

[Signature]

Appendix II-141
February 12, 1990

Jay Carlson, Planning Team Leader
Great Basin Resource
Hines, OR 97738

Dear Mr. Carlson:

Thank you for the opportunity to review and comment on the draft Three Rivers Ranches Resource Management Plan and Environmental Impact Statement. We have the following general and specific comments:

Text page 2.3:

145-1 The Plan states that monitoring will be accomplished to determine the success of the BMP; yet, there is no indication of a success measure, and monitoring is accomplished using the BMP which will be measured. This is an important step in the development of the Plan. A monitoring program should be established to assess the effectiveness of the BMP, and the Plan should include a description of the monitoring program.

145-2 The Plan states that the Plan will be monitored to assess the success of the BMP; yet, there is no indication of a success measure, and monitoring is accomplished using the BMP which will be measured. This is an important step in the development of the Plan. A monitoring program should be established to assess the effectiveness of the BMP, and the Plan should include a description of the monitoring program.

Text page 3.2 and Appendix 1, Table 1 (appendix pages 1-1 and 1-2):

145-3 The table does not quantify water quality at all, but gives a summary of a subjective evaluation of condition and trend. This is not sufficient to assess the effectiveness of the BMP.

Does specific data exist which lists water temperature, turbidity, silviation, etc. for the listed water, and which established a trend or any other method? If not, Appendix Table 1 should list specific data and specific factors and cause, and then apply those factors to each resource, and assess the condition. This is necessary in order to determine whether improvements in water quality have been made.

Text page 3.3:

145-4 As stated on this page, the parameters of soil, surface water, and ground water, etc., are defined and thus, the BMP does not address the problem of erosion, siltation, or groundwater pollution. The Plan does not address the problem of erosion, siltation, or groundwater pollution. The Plan does not address the problem of erosion, siltation, or groundwater pollution.

How many graying systems have been implemented to date, compared with those proposed in the Creekley and Eagle EIS and John Day? 507. The Plan states that the Plan failed to address the problem of erosion, siltation, or groundwater pollution. The Plan does not address the problem of erosion, siltation, or groundwater pollution.

Text page 3.16 and Appendix 3:

145-5 Table 3-1 (pages 3-3 and 3-4):

To our knowledge, the BLM has completed no ecological site inventory or range condition classification based upon ecological potential of the range. This is specifically true of the West Sagehen Allotment (TMT) and the Bulk Allotments. The MCNP does not support carrying capacity. The BLM has failed to address the problem of erosion, siltation, or groundwater pollution. The Plan does not address the problem of erosion, siltation, or groundwater pollution.

Appendix II-142
promulge the BLM to further reduce livestock grazing, to the detriment of the livestock permits of the allotment. We oppose to this action any Hill view such action as being in violation of the Executive Order 12690 and demand restitution of loss of grazing revenue and value to the land owners involved. This proposal is not supported.

Appendix page 3-138 proposes to allocate forage to the West Sengren Allotment to be grazed by livestock using this area, they have come under the current grazing conditions, which the BLM may continue to do. The proposed forage on the allotment would not be used, the allotment would be unable to be done. Instead, the BLM allocates forage use and 90% of the livestock use as a result of this "allocation".

Appendix page 3-139 lists as a conflict on the West Sengren Allotment the present status of species and their habitat, and proposes to prevent significant risk to the well-being of special status species. First of all, the presence of one or more special species in an area which also contain other species, be they livestock, other wildlife, or other vegetation, does not itself constitute a conflict. To our knowledge, no information is which supports the notion that wildlife grazing, livestock grazing, or the lack of other vegetation, is a result of the well-being of either sagebrush or Cusick's buckthorn. We feel it is a significant risk to put to significant risk of the present situation, which is "there is a threat" and "is threatened" in our document. All evaluation of this allotment contained no data which supports a proposition opposite of ours.

4. Table 3-1 (appendix page 3-170)

Table 3-17 lists a conflict on the West Sengren Allotment the present status of species and their habitat, and proposes to prevent significant risk to the well-being of special status species. First of all, the presence of one or more special species in an area which also contain other species, be they livestock, other wildlife, or other vegetation, does not itself constitute a conflict. To our knowledge, no information is which supports the notion that wildlife grazing, livestock grazing, or the lack of other vegetation, is a result of the well-being of either sagebrush or Cusick's buckthorn. We feel it is a significant risk to put to significant risk of the present situation, which is "there is a threat" and "is threatened" in our document. All evaluation of this allotment contained no data which supports a proposition opposite of ours.

5. Table 3-24

5a. Western sage grouse are currently sport-hunted in the state of Idaho. It is possible that their numbers are threatened or endangered under the provisions of the Act. Similarly, the Idaho Wildlife Act (appendix page 3-170) lists as a conflict on the West Sengren Allotment the present status of species and their habitat, and proposes to prevent significant risk to the well-being of special status species. First of all, the presence of one or more special species in an area which also contain other species, be they livestock, other wildlife, or other vegetation, does not itself constitute a conflict. To our knowledge, no information is which supports the notion that wildlife grazing, livestock grazing, or the lack of other vegetation, is a result of the well-being of either sagebrush or Cusick's buckthorn. We feel it is a significant risk to put to significant risk of the present situation, which is "there is a threat" and "is threatened" in our document. All evaluation of this allotment contained no data which supports a proposition opposite of ours.

6. Table 3-32

6a. "Future demands" by wildland managers for maximizing wildlife use which does not currently exist, and the proposed actions include restrictions to livestock use. On the basis of predictions of future demand which does not exist and cannot be accurately predicted, the phrase "future demands" means those which currently exist and that predicted they will continue into the future. It seems obvious that the current and future demands are already being met, since the wildlife already are satisfying their demands for forage.

7. Text pages 3-24

7a. "Future demands" by wildland managers for maximizing wildlife use which does not currently exist, and the proposed actions include restrictions to livestock use. On the basis of predictions of future demand which does not exist and cannot be accurately predicted, the phrase "future demands" means those which currently exist and that predicted they will continue into the future. It seems obvious that the current and future demands are already being met, since the wildlife already are satisfying their demands for forage.
proposed to drastically change management direction. This assumption can be considered valid in light of the BLM’s change-at-a-stake proposal contained in this Plan.

Text page 4-2 (WATER QUALITY): Alternatives A - C

The 1982 EIS, pages 2-30, states that sediment yields are low in the EIS area and are generally low, and that stream flow quality is generally high except with disturbance, floods and unusual events. It also states that most of the streams in the EIS area are intermittent; flow only as a result of snowmelt or rainfall in which the intensity exceeds the capacity of the soil-aquifer system. The 1982 EIS also notes that new in the EIS area occurs during snowmelt and that on expectation water quality under normal flows would occur as a result of any of the alternatives. The text in direct conflict with the predictions contained in these sections of the current Draft RMP/EIS is the BLM's monitoring data which indicates the former impact statement was in error, those data should be discontinued and presented in this Plan. This Plan itself states that no differentiation can be made between naturally occurring erosion and accelerated erosion in the area for which it was written. BLM's monitoring data, lea, that site-specific research which supports the claim that utilization of upland forage species will have the predicted even on water quality. The basis for presenting such a conclusion.

Text page 4-3 (WATER QUALITY): Alternatives A - C

We know of no research which supports the proposed removal or restriction of utilization levels on the basis of improvement of water quality, except the studies contained in this Plan. The 1982 EIS, pages 2-9, and present Plan is in direct conflict with the 1982 EIS. Lack of information on whether the standards of the individual PTEs are consistent with the standards of the 1982 EIS.

The text contains the following word on the basis of the information contained in this Plan:

Alternatives A - C

Alternatives A - C
The No Action Alternative C (the preferred alternative) provides the BLM with the ability to make specific adjustments to specific case-by-case problem areas to correct the specific problem area in order to make this opportunity applicable to Alternative C. Neither of these alternatives is a thorough "new" alternative and both are applied in the same way.

If the assumptions made in this Plan are to be accepted, but the management action proposed here would be committed, and MONITORING will be conducted to assess the effectiveness of the proposed method of control, and correct the potential loss of the potential during the evaluation period, stability is an important factor of livestock grazing and livestock grazing production without specific proof. This Table lists the accuracy and the information for which different scenarios are presented.

The Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. The Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. The Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers.

The Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. The Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. The Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers.

This Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. This Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. This Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. This Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers. This Plan contains no economic analysis of the alternatives and does not spell out the nature of local decision makers.
Appendix II-146
We believe the EIR has taken the no action option of this alternative literally. The no action alternative does not conclude the no action from 8 specific issues, including riparian habitats, on specific allotments and implement grazing systems or enhancement projects to rectify identified problems. The no action alternative does not imply that the EIR is doing nothing -- only that it will continue to implement the type of management system identified in 1987, or 1977, or 1967, or whatever system as appropriate on a case-by-case basis. We believe there to be questionable validity when an area with a current declining trend would continue to deteriorate. If the EIR has done enough sampling to determine that a grassing system or intensity is causing harm to a particular population of sensitive species, this conclusion is completely unfounded.

Table 2-1 (appendix page 5-9) verifies that the EIR has absolutely no basis for concluding that any alternative would have any effect on "playa habitats." Since it has no current data on condition or trend of the subject areas. We repeat our request for the listing in this document of the specific parameters of condition and trend, on the repeated rejection of those parameters which have resulted in the conclusions of both conditions and trends in this table. It appears that the only collection of area to be listed is in the east. Where the area has actually been described. We recently read in the past, the particular area was excluded from livestock use.

The EIR also has no basis in fact for concluding that playas or meadows would suffer declining trend of no or adverse, or even positive significant impact of any of the Alternatives. Lack of condition and trend data and lack of specific parameters for specific parameters, no conclusion can be made. That a seeding would improve or harm their purpose. That proposed seeding would be developed into their own pastures, which would enable management of it completely unrelated to native vegetation. Even if this is the case, there exists no reason to conclude that the method which would lead to the predicted increased utilization of precious, and expensive resources, is the conclusion that the grazing per se would lead to deterioration of the playas.

The conclusions of this section are based on current data but on biased and unprofessional "dose and go" speculation.

We fail to understand the conclusion that grazing plays a role prior to July 31 will provide one for the future. More for others. Most fords in the cold desert regime make their growth, flowers, etc., typically, and vegetatively long before the first of August. While livestock certainly does consume forage, their dietary use is generally very low. If the conclusion is based on the assumption that grazing on July 31 is "best for grasses, and therefore competitively "good for forbs in the long term, the conclusion is still un-founded, since it is both the degree of utilization and the overall grazing management with which would ultimately be used within the particular grazing management system which would be seen to be an absolute level in those areas. The July 31, and therefore the grazing system, would be opposed to in general. Furthermore, no data has been supplied in this Plan which would lead to the conclusion that forages are currently a limiting component in the "area" Magazines or the "area" of the "area." If indeed any habitat component is deficient for this species anywhere in its range, we re-oppose the conclusion of conflict between those.

Likewise, no evidence is presented in this Plan that the Long-hilled Duriv is no longer seen due to the current management of the range in this resource area, so that the conclusion of no livestock grazing from April to June 90 is necessary. The livestock have been on the western range well over 100 years, and the greater numbers than presently exist, and they do not "need" intensive management at present, and the Long-hilled Duriv is still around, finding nesting sites and raising its young.

Absolutely no medical proof that domestic sheep, by the mere fact of their species, present a danger to California Wildlife. The construction of livestock watering facilities would in any case be harmful to the environment for the conclusion that the restriction of those actions would be beneficial to wildlife.

We take strong exception to the conclusion that "reduced livestock grazing pressure would benefit some of these species." If the EIR has the evidence that grazing is harmful to the multiple uses or renewable resources of a specific area, it certainly is presumed to perturb that situation. Lacking knowledge of the habitat requirements of the particular species, and lacking a knowledge of interactions, and therefore potential conflict, between species, and lacking the specific knowledge that a grazing system or intensity is causing harm to a particular population of sensitive species, this conclusion is completely unfounded.

The wilderness use does not prohibit livestock improvements in wilderness study areas. Certain types of facilities, such as water tanks and water wells, are prohibited, but livestock watering facilities are allowed. But livestock watering facilities are not allowed. The construction of livestock watering facilities would not in any way impair the suitability of the area for consideration as wilderness anything which can be constructed and/or used without long-term impairment qualified. The public test is whether the area would have been excluded from designation as wilderness if the project existed at the time of designation and whether construction would remove the area from consideration as wilderness. Spring developments, troughs, and reservoirs have been constructed in BLM/WSC areas throughout the west since the 1960s guidelines were established.

149-71 The size of operation which the EIR believes to be self-contained businesses has little to do with the importance of the operations contemplated in this Plan. A family farm with a 100 cow permit is just as important to that family as a 1,000 cow permit to a corporation, and perhaps more so. The implication in this Plan is that any operation of less than 300 cattle or 300 livestock of consideration as one of over 300 cattle. We will remind the BLM that the regulations of 43 CFR apply equally to all permittees who are dependent by use upon the public land.

Subsequent of BLM forage is a prohibited practice and not considered for the remainder affected by the proposals of this Plan.

We take strong exception to the conclusion that "many ranchers could implement some of the practices shown to be possible, and curfew only the cash costs of the fencing efforts. No other cash costs are calculated in the EIR. Capital, labor, and livestock is not a matter of concern, nor is the possession of needed equipment. No data was included, and the cost analysis of the situation facing ranches, the area of the BLM, and shows a good understanding of capital and agriculture in general, which have very high capital investment and relatively low rates of capital expenditures.

Table 2.1 (MANAGEMENT DIRECTIVES BY ALTERNATIVE) Our comments on specific sections of this table are contained in our above comments of the text and appendices of this draft EIR.

Thank you for the opportunity to comment on the subject document.

Sincerely yours,

Dick Raley
Harrison Creek Enterprises
145-56 Ref to responses 144-21.

145-57 Suitable reservoir sites in the areas listed for planuse have not been identified. Many reservoirs have been attempted in some of these areas and have failed. Therefore, no reservoir recommendations are made. It is estimated that a 1,000-gallon quater would only supply water to 10 cattle for 10 days or about 3 to 4 AUMs.

145-58 See glossary 142/2060, pp. 1-51 and 1-55, which define satisfactory and unsatisfactory big game habitat conditions. The management actions are designed to correct any habitat deficiencies.

145-59 Trendle (1974) described one of the preferred microenvironments as antelope habitat. It is the type of habitat in areas having 10 to 30 percent forb composition. This is true because antelope prefer areas with forbs throughout the season. The recommended management actions to improve forb availability would improve antelope habitat.

145-60 Ref to responses 2-29, 1-26, 1-44, 144-2 and 144-43 and Appendix 1, Table 4, PGR/PEIS.

145-61 Ref to responses 2-4, 2-5 and 144-45.


145-63 Ref to responses 1-19 and Appendix 3 of the PGR/PEIS.

145-64 Ref to responses 1-19 and 7-13.

145-65 There is a difference between grazing of upland forbs versus forbs along the rivers. Forbs along the rivers constitute the only forbs. This can take place throughout the year, dependent upon the size of the river and precipitation.

145-66 Ref to responses 1-19.

145-67 Ref to responses 1-19 and 137-4.

145-68 When habitats conflicts have been identified for particular species, management actions have been formulated to resolve or alleviate these conflicts. A data base and information became available, management actions within the scope of this EIS will be initiated as a case-by-case basis to resolve identified conflicts.

145-69 Wilderness MP does not prohibit livestock improvements in Wilds. The portion of the reach of the Middle Fork of the Malheur River and Elkwater Creek as within the 2,000-acre administered primitive management area which was proposed and accepted through a resource management decision in the previous Gready or MPF.

The 2,000 acres basically includes the area along the river and creek that is within the steep, canyon walls. There are no range improvements other than a couple of drift fences. The recommendation in the Gready MPF note allowance of cattle as a restricted use.

145-70 Some heavily grazed areas will have important cultural resources present that have not been documented and where no projects are planned, including riparian zones. Any management practices that reduce overall impacts to these areas may beneficially affect cultural sites by inhibiting soil erosion and trampling of sites caused by livestock grazing. Livestock grazing may be detrimental to cultural resources in many situations where hard data is lacking, some rare or unique archeological sites or highly sensitive cultural sites frequently occur or near low water, including riparian zones.

145-71 The intent of recognizing the number of large and small operations is to better display the impacts to smaller operations. Without this division, large operations statistically overwhelm the smaller operations. The text has been changed to better express this intent.

145-72 The word "many" should be replaced by the word "some."
Appendix

January 15, 1990
20 Box 473
Moses, OR 97738

Dear Sir:

I am writing in response to your draft Three Rivers Resource Management Plan/EA. In further reviewing the documents, I found another item that I would like to propose for your consideration.

I ask that you further define your management direction for ORV areas to show what areas are actually located and specifically where these areas would occur. In Table 2.1-13, you state: "I maintain the development of usable ORV areas and cross-country routes (including snowmobiles and motorcycles), including areas away for the population centers of the county to increase the number of out of county users." These areas are not identified in the document.

The low rainfall and slow vegetation growth on many of the lands administrated by the BLM doesn't permit very rapid recovery once damage has occurred. In fact, the tracks made by homeowners over 100 years ago can still be seen in some areas. I question you as to whether the results of encouraging ORV cross country travel is something the BLM would really want to live with in the future.

I have further concerns regarding the effects of ORV travel on native wildlife and plants, especially on sensitive and rare species. There is considerable concern about the fate of bison in Nevada due to ORV impacts. I would like to see similar situations developing here. We also have some species that are unique.

Another aspect that I feel needs to be spelled out in the document is how you will discourage and handle unauthorized entry by ORV users from BLM-managed lands into private ownerships. There are a number of private and other public lands interspersed with BLM land with very little boundary designation.

Prior experience in working on the Mark Twain National Forest in Missouri and the Sierra Nevada, I know that letting ORV use develop without control is not the way to go either. Unauthorized use is much harder to contain than use that is planned for. It is imperative that both trails and ORV use be carefully planned to first, prevent resource damage and second, to limit damage should it occur.

I also ask that the types of ORV use and the scale of those uses that would be acceptable to your management be considered and spelled out in your final plan.

Sincerely,

Jane M. Swanson

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446-1 Refer to responses 1-23. The ORV use intended for management within the WA includes cross-country motorcycle, specialized vehicle and 2 and 4-wheeled drive vehicles on designated roads and tracks as allowed on a case-by-case basis. Other uses include off-road vehicle use in specific areas (the only area is Sandy Hill) and snowmobile use in areas north and west of Burns which are adjacent to the Malheur National Forest. Since the snowmobile use is in areas at lower elevations than those in the forest, the use is more short-term (fall-winter), sporadic and in some winter seasons, almost nonexistent. The known areas of use for the existing off-road vehicle uses and snowmobile use are noted in the Recreation Map B-1. These uses will not be maintained. The existing off-road vehicle designations in USGS/OSIS, Table 33 listed as open, closed and limited are now noted in a new Map B-2, in the Proposed Plan.

Unacceptable resource impacts should have been more appropriately stated as "considerable adverse effects," while difficult to define precisely, this term does not include ecological impacts of short duration and small area which do not affect endangered species, critical habitats or life spaces of flora and fauna. However, damage in any degree of a significant cultural site shall be considered a "considerable adverse effect." For Bureau purposes, Section 4(a) of 40CFR 1504 is a tool to be used to protect areas when protection is needed, until the areas can be protected through the planning system and given a proper designation, and for emergencies such as fire, flooding or unusually deep snow (for wildlife protection), etc.

Section 4(a) requires closure or restriction of an area despite any current designation made under Section 3 of 40CFR 1504 when it is determined that ORV use will cause or is causing considerable adverse effects. However, there must be a clear showing, not merely suspicion, that the use of ORVs will, in fact, have a considerable adverse impact. When such conditions prevail, immediate closure or restriction must be made. Restrictions may be made for a specific type of vehicle causing the adverse effects. Under Section 4(a), closure or restriction may be made without public participation, and the closure or restriction may be rescinded without public participation.

In any case, ample public notice will be given of the action to be taken on the area and the statement of fact that all feasible action will be taken to mitigate the adverse effects.

446-2 Refer to Response 1-23

446-3 Refer to responses 1-23 and 446-1.

446-4 Refer to response 1-23 and 446-1.

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Table 1.1-31 does mention "unacceptable resource impacts," but exactly what is unacceptable is not spelled out. This leaves room for considerable amounts of interpretation, with the potential for BLM having to defend its position against an organized group's interpretation and all the associated political pressures.

BLM should be trying to promote both as appreciation for the unique ecology of the forests and an attitude of responsible use to protect that ecology. Too many people travelling Route 95 "for fun" and "for fun" parkingapplauds flat east of Bend suitable for all manner of land use.

The open-ended vague direction of your current plan provides an opportunity for user groups to propose uses and facilities that would have severe impacts to the land and resources, while at the same time placing the burden of proof on the BLM to deny that use. More specific direction in your plan would avoid this situation.

Thank you for the opportunity to comment.

Jane M. Swanson

Appendix|1-149
I am not commenting on all the Three Rivers Management Plan and Environmental Impact Statement. As western range service has commented at each of the issues.

147-1 I want to comment on a few issues, as follows: I am opposed to fencing any of the streams in the NM. Very little, if any, off-site fencing will be available to replace the NM's lost in fencing riparian areas. Thus, off-site fields are presently being grazed. Anually.

147-2 If BLM area managers force a problem in an allotment, they should work with the ranchers to find a solution instead of saying nothing. This letter proposes a reduction in BLM's, which may not solve the problem in any way.

147-3 I see no reason for enacting the wild horse and wolf management areas. BLM should be able to maintain the numbers below the maximum in all WMA's. The wild horse adoption program should not be competing with the commercial horse business. Declaring a wild horse area in area of critical environmental concern may not be legal.

The wild horse billions that are taken from the Burns wild horse corral and returned to the BLM, should be destroyed and/or re-introduced. I foresee no reason for changing the present grazing system. dryness may. No private property societies should be held to the federal government.

Thank you for allowing me to make comment.

Sincerely,

Alice Aley
Alpine, UT
M. 72 Box 55
Princeton, OR 97751

Appendix II-150

The routes portrayed on the LR-3 in the Proposed Plan are along existing roads and trails on private lands where no legal access has been acquired. Horse policy, as stated in Manual 2100.06, 16 to acquire lands and interest in lands, such as easements, which are needed to provide public use and enjoyment of the public lands. Access to be acquired would be through negotiated agreements or by other means, such as exchange or donation. Condensation would only be considered in rare instances where critical access is needed to public lands, such as firebreaks, access to water, and for other reasons.

The access portrayed are generally the best available vehicular route into an area. If an alternate route does exist, it is often limited by difficult terrain, long distance or other private lands. Prior to pursuing an acquisition of any given access, alternatives would be considered carefully to determine the feasibility of the acquisition.
Appendix II-151

149

149-1 Refer to response 1-11.

150

150-1 Refer to response 12-4. Also refer to responses 1-11, 1-13, 1-2, 1-10, 2-18 and 3-6.
150-2 Refer to response 12-1.
150-3 Refer to responses 12-1 and 12-7.

The Text Reference

Bureau of Land Management
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Appendix II-151

Review Comments for the October 1988
Draft Resource Management Plan

February 9, 1990

Dear District Manager,

I am writing to you concerning the Three Rivers Resource Management Plan and Environmental Impact Statement.

You must develop allocations in C to protect and maintain rangelands, riparian and stream ecosystems to their natural and healthy condition.

Cattleraising should be reduced or eliminated where appropriate, as well as created grasslands. Winter range grazing should be given priority over livestock allocation. Also with this management plan it is imperative that Wild & Scenic River designation be given for all of the South and Middle Forks of the Malheur River (except for the stretch through the Honinna area) all of Lower Creek and all of the Owyhee River.

Lastly, I ask that all ancient forest areas that are left be identified and protected. Remember, the stands of ancient trees in the Pacific Northwest are the last remaining in the world. Costs of construction of new roads and other range-related projects should be included under the various alternatives as well as the environmental impact on the areas.

Please review this Resource Plan and Impact Statement and make the necessary changes to ensure and protect a most magnificent natural area.

sincerely,

Connie Loomis

District Manager
Bureau of Land Management
Highway 24 West
Niwot, Oregon 97703
Appendix II-1

52

Appendix II

151

GRANDE RONDE RESOURCE COUNCIL, INC.

District Manager

BLM-Boise

Hines, OR 97733

Dear Manager-DRBC:

Our group has a strong interest in public lands and your wise stewardship of public resources. We submit for your review the following comments on the Draft Three Rivers Management Plan and Environmental Impact Statement.

1. There is a measure of irresponsibility and a lack of professional management in allowing livestock overgrazing of public lands already degraded by cattle. By your own assessment the condition of extensive areas of public lands in your district are in poor and "fair" condition. 1,085,290 acres of a total of 1,855,439 acres. The riparian zones on our public land under BLM-Boise District management have suffered for years from excessive cattle populations. Not to propose a substantial reduction in BLM is a serious failure in the objectivity of the RMP-DRBC planners. We propose that considerable reduction in grazing be an essential component in several of the alternatives.

2. Our emphasis here is a reflection of problems pointed out in the 12, 11, 9, and 8 areas. The RMP-DRBC has in its draft form given a flawed design. The range of alternatives is extremely limited. Every alternative emphasizes exploitation of public land at the expense of the owners - the American public. Alternative A is the only rational approach, merely because the others are not unacceptable.

3. Although we recognize that the designated forest acreage is relatively small (9,294 acres) for intensive management (Table 4.D.) it is disturbing to find no reference to preserving old growth or to establishing new stands for the benefit of water quality, wildlife habitat and recreation. It is alarming to find that you insist on exploiting even this small acreage.

4. The significance of this reduction would be very high" is totally unsubstantiated. "Significance to what? to whom? to ecosystems? and "very high" is a most unspecific and imprecise way of measuring anything at all. We urge a reconsideration of the value of public forests that will lead to a plan more appropriate to the multiple values they represent.

5. Recreation is dealt with in the RMP-DRBC as incidental to grazing and is another example of multiple uses being referred to but ignored in practice. The two volumes of information and proposals deals largely with grazing and grazing problems, and there is no real plan to provide more sites for campgrounds and for proper control of OHV use.

Project Office Box 2306, La Grande, Oregon 97850

151-6

6. Stating that Riparian Habitats would benefit from "the various grazing treatments" p. 4-25 is unadvisable to stating that you intend to put out the fire after you have ignited it. The best and obvious "treatment" is to prohibit grazing within drainages. The proposed alternatives give little or no attention to large reduction in the expensive practice of grazing on public lands.

151-7

7. The RMP-DRBC totally omits financial accounting to the taxpayers on the costs of various aspects of the document. The financial aspects are only presented on p. 4-49 that Alternative C would cost the taxpayers $4,315,131 to benefit a limited number of grazing permits - amounting to a subsidy of nearly $50,000 for each permit. This is a glaring example of special interest welfare.

151-8

8. Scrutiny of the very brief references to wetland habitat p. 3-27 and Table 3-12 reveals how apparently irrefutal BLM procedures have been in protecting wetlands. Of the 1351 acres not classified as "uncontrollable" only 50 are in "good" condition for a measme 3.7 percent. Since these areas have been under BLM jurisdiction for many years, there is reason to believe that BLM management practices and decisions have failed to protect this resource. Furthermore, it is puzzling to read on p. 4-28 that BLM prefers now to wait until 1997 before altering any of the previously destructive practices. We feel to understand why immediate action for repairing wetland habitat damage is not underway.

151-9

9. We are very much opposed to vegetation manipulation in particular we reject the notion that monoculture on public lands benefits our society. Converting the natural variety of vegetation and the habitat it provides for numerous insects, plants and animals is a desacration of public land for private gain. Multiple-use is a charade under this pretense and is a publically subsidized measure for a very few local individuals.

151-10

Our intent in presenting this critique is to encourage you to reassess BLM approaches to managing public lands. There are some positive tendencies in the RMP-DRBC but unfortunately they only begin the shift from a discriminating special-interest management philosophy. Much serious revaluation of BLM procedures will be necessary before our public lands will be in good to excellent condition.

For the DRPC Conservation Committee

Robert Bates, Chair

901-96

BLM District

U.S. Congress

U.S. Senate

Sierra Club

Wilderness Society

Gov. Goldsmith

References
Bureau of Land Management
Rutina District Office
Att. W. Leach
INC 74-1533
Day 10 West
Times, Oregon 97730

Dear Mr. Wahrhurt,

Following are our comments concerning "Three Rivers Management Plan and Environmental Impact Statement which we would like to supplement because of our concern about riparian habitat, aquatic habitat and water quality Management Directives by alternative (Table 2.3) systems which are widely recognized as promoting the most rapid riparian recovery practicable (note that full recovery under even the most favorable management may require many years in some cases)." This language is vital to successful management systems in many areas providing for and planning processes for the presently limited to fully utilize modern technology and management to enhance and facilitate for all resources and uses.

Levels of concern depend on timing of use duration of use are the most important grazing management practices needed to solve problems and conflicts in wetland complex. Land use levels to meet resource objectives need to change with different times of use and with the duration of grazing -- the described tillage levels are unrealistic and without supporting data. The 30 percent utilization levels in the upper watershed and on uplands is not appropriate with modern grazing systems.

Juniper encroachment due to ecological succession and fire suppression as a major restoration is needed in the upper watershed. The NVPP and future BLM's need to emphasize vegetative manipulation to optimize long term desired use. Juniper decreases and erosion increases at junipers take over many areas in the NE. As such as 50 - 70 percent of visitation precipitation is intercepted and lost in the form of evaporation in small junipers stands in addition to direct competition for available sunlight. Vegetative manipulation should be done by mechanical means on low production sites while fires should be used where possible.

The Diamond Craters NPA of June 1, 1983 will be the primary determinant for the NVPP. The NPA was designed as an NPAAC just like the earlier NPAAC's. All fires will be controlled to prevent loss of human life or property within the NPAAC or to prevent the spread of fires to areas outside the NPAAC where life or property may be threatened. Use of heavy equipment for building fires will not be allowed. Prescribed burning and precipitation measures and techniques may be allowed when necessary for the protection of public health or safety (Recreation Management Plan, 1985).

The recreation management plan for Diamond Craters NPAAC which was written and presented to the public in 1983 states the process for acquisition through land exchanges of purchase. These are:

(1) 3127, Sec. 16, T. 13 S., R. 32 E.
330 acres

(2) 3126, Sec. 36, T. 13 S., R. 32 E.
330 acres

(3) 3126-62, Sec. 36, T. 13 S., R. 32 E.
40 acres

Total 660 acres

The following description in the Recreation Management Plan offers an explanation for the project:

"If these private lands are offered for sale or exchange the bureau should actively seek to acquire these in cooperation with the FWS to secure the choice of the few parcels within the property boundaries. A trail goes through Section 16 and a sale county road goes through Section 36. Both provide access to fringe of the lake. Areas where adverse effects are possible through removal of materials, dumping and possible pollution.

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To the extent that methods and parameters can be agreed upon and are supporting and verifiable, a check list with data base can be developed that can be effectively used for decision making.

The monitoring plan should be designed to reduce adverse effects from plan implementation and demonstrate the effectiveness of mitigation. It should include types of surveys, location of sampling, parameters to be measured, indicator species, budget, procedures for using data or results in plan implementation and availability of results to interested and affected groups. Appendices A and C of the Final Project National Forest Plan, October 1987, includes the approach to water quality and fish listing monitoring which we will follow and accomplish the stated objectives.

As an integral part of monitoring a "build" feedback mechanism is needed so that activities causing a problem will be corrected before they are allowed to continue and/or additional monitoring practices or programmatic options are considered with appropriate review. The feedback mechanism will ensure that mitigation measures, management practices, standard operating procedures, capacity of monitoring, and required administrative, and timber sale administration are adjusted when monitoring indicates a need. Special grants allowable administration may be discussed which will increase the success and effectiveness of mitigation measures should be discussed.

The RMP also needs to describe project monitoring. This primarily means on-site inspection and administration during activity, verifying that a particular activity is occurring as prescribed in contracts, leases, or permits. Discussions should include: frequency of on-site inspections for different activities, both during and after activities which trigger when specialists make site visits; and chain of command for how on-site corrections and decisions are made.

Thank you for the opportunity to review this draft EIS. Because of the critical need for improving water quality in the Malheur and Malheur Lake Basins we recommend close coordination with the Oregon Department of Environmental Quality. Please contact Wayne Elson at (503) 442-1463 if you have any questions about our comments. 

Appendix II-154

The draft EIS lacks a definitive no action alternative. Council On Environmental Quality Regulations, §1502.14(c). A no action alternative that is a continuation of existing management plans would allow the reader to have a reference point from which to compare the action. Alterative A, "variable no action" alternative needs to be included in Chapter 4 so that the environmental consequences of NO action is understood for each of the resource categories. The draft EIS uses the term "Baseline Level" in some of the comparison tables. This needs to be explained.

The text states that the environmental consequences of management activities will have a "positive effect on water quality." The implicit reason is that integrated management practices will allow existing degraded conditions to recover. This assumes guaranteed implementation of the plan. This is a significant assumption that needs to be explained further. What changes will be needed in the day-to-day operation of the plan to effect these changes? Will increased staffing or budgets be required? Are these circumstances where this new management approach would not be achieved?

With respect to state coordinator we would suggest the consistency with the State Water Quality Management program be added (page 1-14).

The inclusion of existing conditions for individual streams is good (Appendix 1, Table 2). The future condition or water quality goals for individual streams should also be included in the final EIS. Does this table agree with the Oregon Statewide Assessment of Nonpoint Sources of Water Pollution? The source for this data should be cited. Alternatives for water quality category such as I, M, and C should be explained with the table.

When the terms poor, fair, good, excellent are used to describe environmental conditions (such as Tables 110, 111, and 112 which describe aquatic, riparian, and wetland habitats) they should be defined. I.e. "the water quality classification on page 4-3 for example, is "fair" or "good" water quality consistent with Oregon Water Quality Standards and the Federal Water Pollution Control Act? Standards and are beneficial uses being fairly set?

The text states that for Alternative C, one mile of stream would decline to poor water quality, apparently due to fish stocking. This does not appear to be consistent with Oregon Water Quality Standards and the Federal Water Pollution Control Act?

We are pleased that a detailed monitoring and evaluation plan will be included with the final EIS. The monitoring plan should respond to the issues and concerns identified in the scoping process. It will enhance the ability of the public to verify the environmental effectiveness of those described in the RMP.

Good monitoring can be critical to assurance of minimal environmental consequences. This is why we believe that the RMP should contain as much detail as possible on monitoring. We recognize that detailed monitoring may not be possible in conjunction with each activity. We encourage using opportunities to coordinate the efforts with agencies. To the extent that methods and parameters can be agreed upon and are supporting and verifiable, a check list with data base can be developed that can be effectively used for decision making.

The monitoring plan should be designed to reduce adverse effects from plan implementation and demonstrate the effectiveness of mitigation. It should include types of surveys, location of sampling, parameters to be measured, indicator species, budget, procedures for using data or results in plan implementation and availability of results to interested and affected groups. Appendices A and C of the Final Project National Forest Plan, October 1987, includes the approach to water quality and fish listing monitoring which we will follow and accomplish the stated objectives.

As an integral part of monitoring a "build" feedback mechanism is needed so that activities causing a problem will be corrected before they are allowed to continue and/or additional management practices or programmatic options are considered with appropriate review. The feedback mechanism will ensure that mitigation measures, management practices, standard operating procedures, capacity of monitoring, and required administrative, and timber sale administration are adjusted when monitoring indicates a need. Special grants allowable administration may be discussed which will increase the success and effectiveness of mitigation measures should be discussed.

The RMP also needs to describe project monitoring. This primarily means on-site inspection and administration during activity, verifying that a particular activity is occurring as prescribed in contracts, leases, or permits. Discussions should include: frequency of on-site inspections for different activities, both during and after activities which trigger when specialists make site visits; and chain of command for how on-site corrections and decisions are made.

Thank you for the opportunity to review this draft EIS. Because of the critical need for improving water quality in the Malheur and Malheur Lake Basins we recommend close coordination with the Oregon Department of Environmental Quality. Please contact Wayne Elson at (503) 442-1463 if you have any questions about our comments.

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Thank you for the opportunity to review this draft EIS. Because of the critical need for improving water quality in the Malheur and Malheur Lake Basins we recommend close coordination with the Oregon Department of Environmental Quality. Please contact Wayne Elson at (503) 442-1463 if you have any questions about our comments.

Appendix II-154
2 February 1990

Jay Carlson  
SHEEP Team Leader  
Bureau of Land Management  
3106 Bayshore Highway  
Menlo Park, CA 94025  

Dear SHEEP Team,

I am responding to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement. I live a block away from the Bayshore area and am increasingly concerned about our loss of land and water that emphasizes natural values.

I suggest that natural values be stressed over commodity production. In my opinion, the purpose of an environmental impact statement is to project the future consequences of our actions. Long range, we must keep natural values.

My suggestions for alternative are:

Water Quality (stream miles)  All A
Water Quality (surface area)  All A
Forest Management (acres)  All A – less than suggested
Public Use Agriculture (principal field)  All A – less than suggested
Grading Management (Initial exceeding 10 feet)  100,000
Special Recreation Management Area  17,676

Energy & Minerals:

Solid & Liquefied Minerals (acres)  All A
Fluid Energy Minerals (oil & gas lease acres)  All A

Although writing a resource management plan is not easy, the hardest part is making a commitment to the future, even though short-term fixes are sold. I commend you on your efforts so far and hope to see Haynes County enjoying another optimistic water cycle. I wish you the best with all the beautiful landscapes.

Sincerely,

[Signature]

Erikson Ohlson, Ph.D.

Appendix H-155
February 1, 1990

Jay Carlson
Bureau of Land Management
3110 Highway 20 West
Hillsboro, OR 97124

February 1, 1990

Mr. Carlson:

As you are aware, the reduction in AUM’s is due to the current drought conditions. The proposed reduction is necessary to protect the range resources and ensure their long-term viability.

I appreciate your comments and will continue to work with all parties involved to address the needs of the property.

Sincerely,

Tom O. Smith
Superintendent

Bureau of Land Management

City:   State:   Zip Code:

Signature:

Enclosure: Supplemental Comments

Ref: Appendix II-1

155

No comment identified.

Appendix I-156
January 24, 1980

Jay Court - MWCDES
Alaska District Office
Bureau of Land Management
P.O. Box 1213
20 West Rosewood
Juneau, AK 99801

Comments and Response to
Draft Three Rivers Resource Management Plan
and Environmental Impact Statement

The draft Three Rivers Resource Management Plan raises many concerns. The full impact of reduced grazing as proposed in alternatives A, B, and C cannot be evaluated accurately, but the negative impact upon the community and individuals already depends.

The negative reactions of residents and conclusion on livestock grazing are questionable. Management objectives vary, especially in the areas of wildlife habitat, aquatic and riparian habitats. The conditions existing for the surface water and aquatic and riparian habitats are unsatisfactory and seem to be the "heart" of the proposed reductions in livestock grazing. Yet, if cattle were to be removed from these areas, wouldn't wildlife and fish benefits still exist? These reactions and storage objectives are unreasonable and expensive fencing systems are implemented?

157-1 There is absolutely no basis for drying wildlife and wild horses, presently exist in grazing areas. This has already been considered. In the Westak Springs allotment, estimated capacity (2095 acres) in 1985's high active acreage (167,567 acres) and the range was classified mustang/feral. Appendix A-10-11. Yet the argument that if livestock is allowed to exist, then livestock needs must be satisfied. The best system for the Westak Springs management is in error. The area mapped as winter range (CH-30) was burned off in 1984 by lightning. This area doesn't provide any increase. The area mapped as winter range is also a short distance from the Northwest National Wildlife Refuge. The refuge provides up to 150,000 Dad. with a greater variety of feed. Any increase in 100,000 Dad. in the Westak Springs' area would certainly not be realistic.

157-5 The wild horse numbers in the Westak Springs allotment are above the maximum allowed. In order to improve range, the first thing to do is bring those numbers back down to the proper level. Appropriately fenced must be adequate as the wild horse numbers are reproducing at a fast rate. Any reduction of livestock numbers for horses is unfeasible.

157-4 Alternatives A and C will result in a substantial loss of our base property value. The proposed BMP sections may result in reducing the size of our operation so that it is no longer an economic unit. Therefore, we request that if alternatives A, B, or C are considered that prior to issuing the Final Three Rivers Resource Management Plan, an Environmental Impact Statement, a "Threat Evaluation Assessment" be completed as authorized by

157-9 Refer to response 3-10.

157-6 Refer to response 3-8.

157-8 See Appendix A, Table 1, MWCDES and Appendix A, Table 1, Proposed Plan.

157-9 Refer to response 3-8.

157-7 Refer to response 3-4.

157-3 Refer to response 2-4.

157-2 The evaluations are done and figured are in the BMP/DEIS (see Appendix 1, Table 5).

157-5 The wild horses and burros are currently substantially below the maximum number allowed in the Westak Springs area as listed on an inventory report dated June 8, 1983. Also, refer to response 2-6.

157-4 This area is generally used in early winter before snowfall and temperatures become too severe and in late winter after snowfall. Also, refer to response 2-10 and 3-10.

Appendix II-1 57
February 9, 1992

Mr. Joshua Farber
District Manager
District Land Management
300 North Auburn Office
606 West Auburn
Auburn, Oregon 97302

Dear Mr. Farber:

I am concerned that the results of the study you presented in January, which I believe has been published in the journal "Journal of Range Management," are not fully considered in your proposed plans for future grazing management. Although the study concludes that there are potential benefits from grazing, there are several aspects of the study that I believe need further clarification:

1. **Grazing Intensity and Recovery Time**: The study suggests that increased grazing intensity will lead to faster recovery times. However, it does not provide specific data on the exact conditions under which this recovery occurs. More detailed information on the methodology and results would be helpful.

2. **Biological Diversity**: The study highlights the importance of maintaining biodiversity. However, the methods used to measure biodiversity and the implications for grazing management are not clearly explained. Further research is needed to ensure that these findings are fully understood.

3. **Economic Aspects**: The economic implications of the study are not fully addressed. The cost-benefit analysis for different grazing intensities and recovery times should be more explicitly discussed.

4. **Environmental Impact**: The study mentions that grazing can have negative impacts on the environment. However, the methods used to assess these impacts are not detailed. It would be beneficial to have a more comprehensive analysis of the environmental effects of grazing.

I believe that with more detailed information, we can make more informed decisions about future grazing management practices. Please consider sharing additional data and methodologies with the stakeholders to ensure that we have a clear understanding of the study's implications.

Sincerely,

[Signature]

William C. Armstrong
Department Head

---

Note: The text contains references to figures or tables that are not present in the image. The author suggests referring to specific sections of a report or document, which are not visible in the provided image.
Dear Mr. Warburton,

I am writing you on behalf of the Association of Oregon Archaeologists (AOA), to urge the BLM to designate the Obidian Cultural ACEC described in the Three Rivers Resource Impact Statement, Appendix A-2 and A-3. The designation of this ACEC candidate should be included in the preferred alternative, as the Obidian sources included in this ACEC candidate have significant cultural and geologic values and a long history of human use from prehistoric times to the present. Current use by archaeological professionals, rock hounds, and avocational flintknappers is high, especially for example at Little Glass Butte. Special management is needed to protect the prehistoric cultural values as well as to conserve the geologic resource for continued long-term use. If these five obidian sources are designated as the Obidian Cultural Area of Critical Environmental Concern, a management plan specifically addressing these sources should be developed. This management plan should include the following:

1) All current collecting of raw obidian material from the ACEC should be by permit only. The quantity of material to be removed should be fixed in the permit. The number of permits issued each year should be determined based on objectives set in the management plan for assuring long-term availability of obidian at these sources.

2) Flintknapping should not be allowed on existing prehistoric sites. Near-by areas with no prehistoric material should be designated for replicative and/or experimental use. These replication areas should be recorded with these locations reported to the Oregon State Historic Preservation Office. Flintknapping activities conducted on these replicative sites should be conducted on renewable surfaces such as tarps. All debitage should be removed from the replication areas by the person(s) conducting the flintknapping activities. The objective of this recording and debitage removal of replication areas is to prevent mistaken identification of current flintknapping sites with as prehistoric sites, and to prevent mixing of debitage and artifacts from current-use sites with that of prehistoric sites.

3) Camping and construction of structures should be prohibited in the Obidian Cultural ACEC.

Thank you for your continuing efforts in managing this and other valuable cultural and geologic resources on Burns District in a positive and balanced program.

Sincerely,

Tom Connolly
President, AOA

Appendix II-159
February 7, 1995

Jay Caron
Box 921
Bonneville District Office
Narrows of Land Management
P.O. Box 2553
Spokane, WA 99220

February 7, 1995

Jim Miller
Narrows of Land Management
P.O. Box 2553
Spokane, WA 99220

Dear Mr. Miller,

I would like to endorse the letter sent to your office by the Narrows County Councilman, Cattlin, and the document prepared by Humble Associates and Humble Ranch Advisory.

I have a few thoughts of my own to pass along. We have a permit in the west and will abide by it, but I am not sure it is enough. Our permit and understanding as to what we are supposed to do is not clear. It is not clear what is expected of us in the enforcement of our permit and the requirements in the document.

I feel that the recommendation concerning the alternative A, B, and C should not be implemented. Our community is in a strong position and the economic impact would be significant.

Sincerely,

Lori Miller

March 18, 1995

Janet M. McVay
P.O. Box 82
Antelope, OR 97723

District Manager
Narrows of Land Management
P.O. Box 2553
Spokane, WA 99220

Dear Sirs,

I suggest that Alternative A or B be softened or removed.

I think the GIS should be used more effectively to assist in the decision-making process.

I would suggest that the GIS be used to evaluate the potential impact of Alternative C.

I would like to request a meeting to discuss the GIS and its potential use in the decision-making process.

Thank you.

Janet M. McVay

161-1 Refer to response 2-44.

161-2 Refer to response 12-1.

161-3 Refer to response 12-7.

161-4 Refer to response 1-13.

161-5 Refer to response 1-78.

161-6 Refer to response 3-6.

161-7 Refer to responses 2-0, 2-10 and 1-13.

161-8 The manager at the field level who is currently responsible for the implementation of the GIS is the Area Manager, Craig W. Ramsey. The manager who has the authority to approve the GIS is the State Director, Dean Blakes.

Appendix II-160
Appendix II-161

Refer to response 6-13.

The South Barrows ACE designation will be retained. The Bureau expects to continue the activities begun under the Stephenson multiagency study plan. The Proposed Plan presents management actions that the Bureau expects to undertake for PAUACEs and other special status plant species.

162-1

Bureau of Land Management
Bureau District Office
HE 7A-1939
Highway 20
Hines, Oregon 97731

To Whom It May Concern.

There has been much work and research put into the preparation of the Three Rivers Resource Management Plan, and many people have made contributions. There are two areas about which I wish to comment.

This is because I personally have spent a lot of time doing research on the area, the issues involved in land use assignment, and the different people who benefit from how the areas are managed. I am not against grazing, per se; however, I am in favor of managing when areas are open to grazing.

First, in Vol I Chapter 2 page 46 and Vol II Appendix 7-II the BISCOOTROOT CULTURAL ACE; I have agent 11 years conducting plant community research on Dinking Water in the areas where the Bureau Peacock dig these spring "root" areas. This work has been done with two anthropologists with them studying the social aspects of the activities and I studying the plant dynamics and change in relation to environmental changes, human activities, and animals making an impact on the plants (antelope, rodents, rabbits, and cattle). This is a total systems approach; however, the food plants are only available and above ground from April into early June.

Elsewhere in the larger mountain west, research has been done to indicate that cattle prefer not to graze on the alternating apple and emulous lilliums. This is not the case on Dinkingwater. However, I can understand the concern in the stress of the uses and the limited availability of food and the stress of the area through one of the more valuable areas, consisting of quails with keels through the area, and actual grazing of the area around the Biscoo Pierce the area has not been due to any costs every year and can no longer the competition of both cattle and deer. I recommend that if there is grazing in the area that it be avoided from early April through the middle of June.

The anthropologists working with the Bureau Peacock recommended earlier that the main Pine Creek camp site not be used for a gravel pit; however, this information was not available when the decision was made or it was ignored. This is one of many similar areas that are ruin in some plants during the season, but are "best roots" during other parts of the year. This is not the first significant root gathering site I have been eroded by the meadow plover. How that site has been "claimed" by the Bureau Peacock as a site used for centuries by their ancestors. The gravel pit should be abandoned and no more pit excavation allowed.

My colleagues and I plan to continue our research if "unlimited" influences do not destroy the resource entirely. If the BHP is truly going to manage for "multiple use" in this relatively undisturbed area, the species, and in particular the variety of "root plants" and the use for planting may be important. In the variety of "root plants" and the use for planting, the use should be on the list for a CULTURAL ACE.

page 2

Another concern of mine that I have studied, pushed and worked with the BHP to protect and manage visibly, is the management of the STEPHENSON RAILLESSWED ACE protection. In the case of the BHPs and other plant areas of concern. The BHP hasbotanical information on the plant communities. Hells Canyon Field Station is helping with research in these areas and these studies should continue. I suggest that the ACEs listed in Vol II appendices 7-II should have limited disturbance and "unlimited" use. One of the goals of BHP is to encourage internal and scientific research in these areas by scientists from all over the US. The philosophy of this country appears to be that grazing is a "given" and that the public must come up with reasons not to graze. That is backwards. Each area is unique and can tolerate different rates of disturbance. Each area has unique management needs; for example, the slightest disturbance is paramount change. The following guidelines should determine the use not human assumptions.

Thank you for the time, effort, and thorough discussion of the documents for managing the Three Rivers.

Sincerely,

[Signature]

Lorrie A. Kowaleg
Botanist/ECologist/Arborist

Appendix II-161
Concerning the Three Rivers Resource Management Plan, there are some specific observations concerning the effect of the House Butte allotment and the effects this plan would have on their permit.

In reference to the Biscuits Crude ACEC, any reduction in this area could have a negative effect on the present livestock use on the House Butte allotment #327. The present BLM allotment #329 has been in place since 1931 and over the past 60’s, the allotment has become much more severely overgrazed than it is under the present allotment. This overgrazing has a negative effect on the species of plants that are utilized by the Indians. The species gathered by the Indians are more palatable and would be much more difficult to graze sustainably.

In the 1950’s, between 1950-60, the House Butte area had much heavier livestock use, and the Biscuits Crude ACEC was grazed much more severely than it is under the present allotment. This overgrazing has a negative effect on the species of plants that are utilized by the Indians. The species gathered by the Indians are not palatable (except for wild onions), therefore, livestock grazing would help the species gathered by the Indians by reducing the competition for these plants.

In the 1950’s, between 1950-60, the House Butte area has much heavier livestock use, and the Biscuits Crude ACEC was grazed much more severely than it is under the present allotment. This overgrazing has a negative effect on the species of plants that are utilized by the Indians. The species gathered by the Indians are not palatable (except for wild onions), therefore, livestock grazing would help the species gathered by the Indians by reducing the competition for these plants.

Concerning range improvements on the House Butte allotment, the preferred alternative for this allotment presently has 2 spring developments for improvements. This falls short of a range management program. There are at least 4 springs to develop on the allotment. Three of these reservoirs could also make for a better distribution of livestock, as well as a much better, or at least equal, amount of forage.

Areas with woody riparian shrubs. There is no valid scientific basis behind this decision and is obviously aimed at reducing cattle numbers even more. It is believed this would adversely affect everyone. Allowing everyone to graze public lands. The continual fencing of reservoirs adversely affects permits on the House Butte allotment. These reservoirs, as shown on a map, are riparian areas that improve forage utilization.

Another concern for the House Butte allotment is the unsatisfactory conclusion by the BLM that livestock grazing adversely affected the population of sagebrush. This statement couldn’t be further from the truth. There are several large areas of sagebrush in this allotment, as any researcher who might be doing a study of this area would see if they had taken the time to carry out anything approaching a valid, scientific study.

We believe this is not the decision that will improve the condition of the land and its resources. It is our belief that the BLM in management decisions made to improve the public land. The current trend with the BLM would be to reduce livestock numbers and then to reorganize the data to fit that pre-determined conclusion. This is a process that is not used to improve the condition of the land and its resources. It is our belief that the BLM would make better decisions if they were allowed to make decisions based on the best available science.

The rancher of today recognizes the need for stewardship of the land and has cooperated with the BLM in all management decisions made to improve the public land. The current trend with the BLM is to reduce livestock numbers and then to reorganize the data to fit that pre-determined conclusion. This is a process that is not used to improve the condition of the land and its resources. It is our belief that the BLM would make better decisions if they were allowed to make decisions based on the best available science.

Respectfully submitted,

[Signatures]

Appendix II-1 62
Appendix II-163

164

164-1 Refer to responses 2-10.

165

165-1 Refer to responses 4-14 and 11-13.

165-2 This will be corrected in the FEMP/FEIS.

165-3 Refer to response 8-4.
Dear Mr. Carlson:

(If you are facing a reduction in AUMs, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed EIS actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to signing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Fattage Implication Assessment" be completed as authorized by Executive Order 12086 and the November 6, 1989 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Moniz.

The reallocation and/or reduction of AUM's livestock-forage is one hectare will reduce the value of our base
property by approximately $1,000 per AUM (or $640 per AUM). Please consider this economic loss in the requested "Fattage Implication Assessment."

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1998 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environments, Impact Statement are consistent with our views and comments.

This response is in our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizational letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

Enclosure: Supplemental Comments

January 17, 1998

Appendix II-164
Feb. 13, 1990

Mr. Jay Carlson
Burns District Office, BLM
Hwy. 20 W., Burns, Ore. 97720

Dear Mr. Carlson:

We just wanted to write a line or two to let you know how we feel about the reduction of Acre's on our BLM permit.

If our permit is cut 50-75% this naturally reduces our income and our land value by the same percentage.

The water situation needs to be improved in our area so that we could raise the feed better.

We sincerely hope that some consideration will be given to the points which we have mentioned above.

Sincerely,

Mary C. King

168-1 Refer to responses 2-7, 2-11, 1-49, and Appendix J, Table 7, BMP/HEIS.
February 12, 1990

Craig M. Hansen, Area Manager
Three Rivers Resource Area
Burne District, BLM
P.O. Box 20 West
Rincon, Oregon 97383

Re: Comments on Draft Three Rivers RMP and EIS

Dear Mr. Hansen:

These comments are submitted on behalf of Portland Audubon Society (PAS), and are intended to supplement those submitted on their behalf by Linda Craig. We appreciate the considerable effort expended in the preparation of the Draft Three Rivers RMP and EIS, and especially the efforts of Jay Carlson to explain the details of the document to people like us.

My comments will be limited to that portion of the document that deals with the potential for gold mining on BLM land in the Resource Area and the potential environmental impact associated with that possibility.

Given the significant developments in cyanide heap leach gold mining activities in the BLM Vale District, and the recognition that claims staking activity is increasing in the Three Rivers Resource Area (p. 9-17), we believe you should conduct a more thorough and detailed analysis of the likelihood of such activity and its potential impact on the environment within the Three Rivers Resource Area. As it stands now, the document barely acknowledges the potential for such development and associated impacts. See p. 1-11, App. 5-17.

The "generalized mining scenario" that you included, pp. 9-18 to 9-20, deals entirely with the economic impacts of a hypothetical gold mining and processing operation. It is interesting and informative. However, a similar analysis of the environmental impacts of such a hypothetical operation should be included. You might determine, for example, that there is insufficient surface water or groundwater available to support such an operation, which might in turn affect your management of the resource.

Experience has shown that cyanide heap leach gold mining and processing operations are likely to contaminate the land, air, and water and are likely to have at least some impact on wildlife. The availability of groundwater is a critical issue for wildlife and range condition in the Three Rivers area. You stated that an analysis of the impact of the overall RMP on groundwater will not be attempted because of the lack of data (p. 1-2). With the undeniable potential impact of gold mining on the groundwater resource, through both contamination and depletion, we believe you are obligated to develop the data to support a better analysis. In the absence of any such data, but with the knowledge that such developments are reasonably likely to occur, the data must be developed or a worst case analysis conducted.

Similarly, the potential effects of mineral development on surface water quality are "impossible to predict." (App. 1, 7-4) Again, if some effect is reasonably anticipated, the data must be developed or a worst case analysis conducted.

Finally, the degree of reclamation of the land disturbed by the gold mining operations would have a long-lasting affect on the wildlife in the area and on the recreational use of the area. These issues should be thoroughly explored in determining the management plans for the area for the next 10-15 years.

As you may know, the Vale District of the BLM is preparing an EIS on a gold mining and milling operation proposed for Grassy Mountain in Malheur County. Ralph Mifflin of that office would certainly have an abundance of information on the potential environmental impacts of such a scenario.

Again, we appreciate the opportunity to review and comment on the draft RMP and EIS. We would be happy to work with you to fill some of the gaps in the analysis, and we look forward to reviewing a more detailed analysis of gold mining prospects in the Three Rivers Resource Area in the final RMP and EIS.

Sincerely,

Richard A. Parrish
For Portland Audubon Society

CC: Jay Carlson, RMP/EIS Team Leader

Appendix II-166
January 17, 1990

Joshua L. Wambrun, District Manager
Narahi District Office
Bureau of Land Management
474-10 Highway 20 East
Hines, OR 97738

Dear Mr. Latturco:

The January 17, 1990 Middle Range and Western Range Service Comments and Responses to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Middle Range document. This response has been submitted to you. We do not include a full copy of our comments for the reason that it would be an exact duplication of the Middle Range document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

Enclosures: Supplemental Comments

Appendix II-1 67
This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

sincerely,

[Signature]

[Enclosure: Supplemental Comments]
February 17, 1980

Dear Mr. Warburton:

We wish to go on record that the January 17, 1980 Middle Jocko and Western Bearhead PAH Draft Three Rivers Draft Resource Management Plan and Environmental Impact Statement are consistent with our views and concerns. The enclosed response to our endorsement of each PAH draft document. There are several other areas of concern that this letter will address.

174-1 The description of the entire Active Resource Management Area (36,619 acres) as an area of without environmental concern will have a dramatic ecological effect on at least one ranch. Before the change is even considered the final Three Rivers DRMP is issued a complete "Drafting Application Assessment" should be prepared to discuss (

174-2 Livestock and wild horses have run together successfully for years. The complete elimination of livestock grazing is not justified. The public should not have higher priority for forage than other multiple uses. Livestock grazing preferences were legally established long before the passage of the RMA. Reviewing the permits in the decision making process would be beneficial to both the RMA and the permittees.

174-3 There is no scientific data that indicates that livestock was has any negative effect on the sagebrush population. The restrictions on livestock in the sagebrush grazing grounds are unfounded and should be eliminated.

174-4 The conclusion of cattle on the pianotron Cultural Site is not supported. The report states "these areas be used to be a high value resource due to the quality and quantity of roots available." Direct grazing has been going on in this area for years and the quality and quantity have remained high, even with root harvesting. There is no justification to change the practice.

174-5 The surface water quality and aquatic and riparian habitat conditions ratings appear to be unrealistic and unnecessarily restrictive. If water quality conditions are as poor as DRMP states (50% of the streams are reported to have poor surface water quality) one would expect that there would be no fish left in the resource area. These water quality ratings (surface, riparian and aquatic) are the basis for the majority of the adverse impacts to livestock grazing.

174-6 All available information indicates that current upland grazing practices are having no significant adverse impacts on surface water quality. There is no evidence that current upland grazing practices are having any adverse effects on riparian or aquatic areas. The current upland grazing practices have a very low impact on riparian or aquatic areas.

174-7 The proposal to reserve livestock from streams will disrupt current, successful livestock grazing systems and will have long-lasting adverse impacts on livestock operations. Only a portion of the stream are publicly owned. Therefore, RMA's proposed actions will have very little, if any, effect on overall stream conditions.

174-8 The riparian vegetation is the higher elevation is one of the biggest problems facing the Jocko and Bearhead today. On the northern slopes of Steens Mountain the riparian vegetation has increased at least ten times in the last thirty years. Thus, removing much of the moisture that could otherwise be used for the production of forage.

Thank you for allowing me to comment.

Sincerely yours,

Darrell Clark
Steele Mountain Ranch, Inc.

Appendix II - 169
Dear Mr. Warburton:

Gentlemen:

Last night I spent a few minutes browsing thru the Draft Three Rivers Resource Management Plan.

I would have liked you to pick Alternative B - Emphasis Natural Values with Community Protection as your Preferred Alternative. Given the political situation you folks are in, this, especially in the County Board of Supervisors, your choice of Alternative C was probably the wise choice.

The one thing that really bugged me about this Plan was the lack of reference to it by name to either the Quaker Partridge or the California Quail. I do not realize what an important resource these beautiful little birds are in some of the local fields. I spend more than a week every year to try to get a few of the wonderful little birds I am certain not along out there when I am hunting them and all of my hunting effort is spent on the lands that the management, as I don't say for the benefit of members permission to hunt these birds on private land.

In my opinion, the Quaker Partridge and the California Quail deserve more than to be lumped in to the category "game animals and upland game birds", a category that itself received very little analysis effort from you. I am sure that you spent big bucks to counting these little birds. I know that this would not be realistic. But I think you need to draw in your plans some segment of how important these birds are to some of us, and also some awareness of how important your management actions are to these birds. For example, I know the locations of groups of Quail that exist only because you folks have developed water sources. Should you rely on the latter for quail, that may or may not fare well than I talk for your annual report on resident waterfowl are a potential risk of extinction. I want to thank you for putting out the signs that you folks plan to your excellent 10,000,000 safe quail population. My hat off to you.

So please, in your final draft, don't ignore these two species. They are the main reason I moved to Oregon to live!

Sincerely,
[Signature]

January 17, 1990

Joshua L. Warburton, District Manager

Box 796

Hines, OR 97738

176-1 Refer to responses 2-1 through 2-96 which are responses to issues submitted by Riddle Ranch and Western Range Service letter.

Appendix H-170
February 11, 1990

Dear Sir,

In reference to the Three Rivers Management Plan, the undersigned, encourage you to increase the forage allocated to the same area what your preferred alternative suggests, thereby decreasing the number of domestic livestock further.

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Appendix II-171
February 10, 1994

Dear Mr. Carlson,

I, Alice K. Baker, would like to go on record, as to agreeing with the statements set forth by Mitch and Linda Baker. Please see attached copies. Thank you.

Sincerely,

Alice K. Baker
P.O. Box 469
Burns, OR 97720

---

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
AG 74 12933 Highway 20 West
Burns, OR 97720

Dear Mr. Carlson:

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a Pre-Depositional Hearing was scheduled for the date of January 18, 1979, authorized by Executive Order 12530 (see the November 8, 1978 Memorandum to the Assistant Secretary and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation energy usage or 5,725 AUM's livestock forage reduction will reduce the value of our base property by approximately $11,750. (Assume $55 per AUM value). Please consider this economic loss in the requested "Taking Implication Assessment."

The letters from the Harney County Cattlemen, Stockgrowers, P.A. Bureau, Sheep & Woolgrowers and the January 17, 1979 Mitchie Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Middle Ranch document. Their response has been submitted to you. We do not include a copy of the text only for the reason that it would be an exact duplication of the Middle Ranch document and organization letter.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Alice K. Baker

Envelope: Supplemental Comments

Appendix II-172
Dear Mr. Carlson:

We would like to go on record as approving the comments expressed by the Harney County Cattlemen, the Stockgrowers, the Farm Bureau, and the Sheep and Woolgrowers associations, in response to the Three Rivers Resource Management Plan and Environmental Impact Statement. As their document areas record, we will not include copies of their text as presented in the Middle Ranch document.

The proposed BLM actions would lead to a reduction of cattle grazing on public lands. This would come to be detrimental, not only to ranch operations, but also to the economy of Harney County and to the businesses that are dependent upon the stock industry.

We feel that increasing will harm horsera and horsera here in a big detriment to the range. These animals destroy more forage than most any type of livestock as they just eat green roots. They do this even evan there is no evidence of food or soil that seems to have certain types of routes. If any damage is being done to the vegetation area, in the Stockgrower allotment, it would probably be done by horsera. We would therefore object to prohibiting cattle and sheep from grazing in these areas.

We object to the designation of the Stockgrower, the Bartlett Mt. and Oyette Mt. areas as Higher Sheep habitat. These animals are not native to the area and we see no reason to introduce them there. It seems that multiple uses should apply to animals that are native to the area.

Thank you for considering our comments and input in this matter.

Sincerely yours,

[Signature]

Clive A. Miller & Nicola L. Miller

February 14, 1990

Appendix II-1
Appendix II-1

The residents and the reduction of
50,000 hogs placed on 5,500 allotment
site reduces the value of Black Butte
Company's land property by approximately
$7,500.

This letter from the Haywood County
Cattlewomen's Club (President, S. E. Smith;
Secretary-Treasurer, I. V. Johnson) and the January 1978
Riddle Ranch and Eagle Range Areas
Committee and response to the Public Hearings
Management, Cattle, and
Environmental Impact Statement are
concerned with all plans and comments!
This request for permission of
such letter with Riddle Ranch document.
Their response has been submitted to you.
Work and result of full copy of that only
for the record that it would be an exact
duplicate of this Riddle Ranch document
and organization letter.
The additional comments we have are
enclosed herein and are supplemental to
our principal request.

Of special concern to Black Butte
Company is the proposed phase removal
of Affected Allotment 53-41. Where are 30
Cattle want to go now, since we are providing
this!
Appendix II-175
To: Area Resource Manager

The Appendix II-176 plan, formerly known as Plan to Include, proposes the route from home to home along major river routes in the Three Rivers Plan for the following reasons.

1) This recreational area was earlier given to the people as an opportunity to develop, but few offered support.
2) The costs for development and upkeep were as high as the major reason.
3) The cost was only increased by the deterioration of the trail and its wooden railroad structures.
4) The chance of connecting the entire trail with future land use on adjacent private lands.
5) The attempt to bring alive a "dead horse" which was earlier killed from lack of public support would severely influence the credibility of the plan with the public.

We ask that you reconsider this proposed access route and remove it entirely from the Three Rivers Management Plan.

Thank you,

Raymond, William, and Frank

Michael, Ray, and Frank

January 24, 1990
Baker, Oregon

Appendix II-176
Dear Mr. Carlson,

Our Harmony County Cattlemen want to go on record that the January 17, 1996 Riddle Ranch and Western Ranch Service comments and response to the Hart County Wildlife Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is being submitted in lieu of a full copy of the Riddle Ranch document. Your response has been submitted to you. We do not include a full copy of the text only for the point that it would be an exact duplication of the Riddle Ranch document.

There are several other areas of concern that this letter will address.

The designation of the entire Kierc Active Forest Management Area (AFMA: 294.62 square acres; an Area of Critical Environmental Concern (ACEC)) could have a dramatic ecological effect on at least three ranges if AUM’s are also considered. This management tool has been used to establish recreation areas, livestock use, and wildlife use. AUM’s in this area have been used as a management tool to establish the entire Kierc AFMA, therefore, conflicts and issues that arise in this area are not properly accounted for. The Riddle Ranch document is the definitive management plan for the entire Kierc AFMA.

As defined by the United States Fish and Wildlife Service, “area of critical environmental concern” (ACEC) is defined: A critical area is a place where an endangered or threatened species occurs and is faced with extinction. This area must be protected from the use of fire and/or increased livestock numbers. A range that would be affected by the Riddle Ranch document would be affected by the Establishment of ACEC’s.

The Riddle Ranch document is the definitive management plan for the entire Kierc AFMA. Any changes to this plan would have a dramatic effect on the entire Kierc AFMA. Therefore, any changes to the Riddle Ranch document should be made by the United States Fish and Wildlife Service.

Sincerely yours,

Kathy Dyer, President
Harmony County Cattlemen
Field, Texas

Appendix II-177
Dear Mr. Carlson,


Thank you for your attention.

Sincerely,

Andy Kerr
Director of Conservation

Friday, February 16, 1990

Appendix II-178
February 14, 1990

Joshua L. Warbuton, District Manager
Bureau of Land Management
Burns District Office
PO Box 42933
Burns, OR 97723

Re: Three Rivers Resource Area

Dear Mr. Warbuton:

The National Wildlife Federation (NWF) has a vital interest in the health and rehabilitation of wildlife, wetlands, and fisheries in the State of Oregon. Due to the documented critical dependence of wildlife, wetlands and fish on riparian and upland ecosystems, and pursuant to 43 C.F.R. 21.2, NWF formally requests affected interest status in every Allotment Management Plan and Allotment, particularly in the riparian and upland systems in the Three Rivers Resource Area. Please reference the NWF comments on the Three Rivers draft analysis sent to you loby.

Thank you.

Sincerely,

[Signature]

Bruce Apple
Director

/Cc: Dean Bibles

January 20, 1990

Jay Carlson
R.M.
Highway 20 West
Maupin Oregon 97037

Re: Three Rivers Resource Management Plan

Mr. Carlson:

I doubt your Management plan for North Yamhill County will survive intact. I hope not. If it does, it will accomplish what decades of Democratic gradualism has repeatedly failed:

Total mistrust of government programs.

Funding off of multiple use resources by any practical use, such as mining, ranching or timber harvesting.

Severance of communications in good faith between government and citizens.

Provision of almost complete absence of influence of government policy.

Trigger a declaration of war between our grass roots industry and your organization.

I cannot stand by in silence while you here, burros, horses and rich men abuse curtailments and preferred occupants of the land that was once productive and immune for men and animals alike, transfer the hardships and sacrifices of the pioneers. The land has been better managed by those who lived on it than it ever will be by an empire of those who play games with the lives and futures of our people.

The "Plan" is unnecessary. It is built upon untrue suppositions of conditions which do not exist. If, it is implemented, would be disastrous to the only long-term industry that can be depended upon to keep our local economy alive. The other one is already thrown against to death. I see no scientific basis for the construction of the proposed river policy that will promote the land resources. The results of your plan by itself and at present are already failed to demonstrate any effects of undue grazing practices. I do not believe it provides the spectrum of alternatives, or was conceived in an open manner as is required by law.

In short, Mr. Carlson, the 'plan' would build another iron curtain...another Berlin wall. Government employees would well guard the fate of the last one.

[Signature]

Doc Carpenter

Appendix II-179
February 16, 1990

Jay Carlson
Appraiser Team Leader
Bureau of Land Management
Burns District Office
HC 74-12523
Burns OR 97720

THE WILDERNESS SOCIETY
OREGON

FAKED February 16, 1990 to 503-573-7600

The Wilderness Society (TWS) is a national conservation organization that is devoted exclusively to public lands management issues. Founded in 1935, the Society has more than 350,000 members and 15 offices nationwide. The Society's staff of more than 150 includes scientists, economists, biologists, lawyers, policy analysts, legislative specialists, and federal agency land management specialists.

TWS has three full-time, fully-staffed regional offices in the Northwest: Portland, OR; Seattle, WA; and Boise, ID. Many of our members engage in issues on Bureau of Land Management (BLM) lands in Oregon. Maintaining resource values is of vital interest to TWS. These values include biological diversity, natural beauty, recreation, water quality, wildlife habitat, and ecosystem viability.

We are pleased that you provided the Three Rivers Draft MP/FEIS for our comment. We support the Pacific Northwest Natural Resource Center, National Wildlife Federation detailed comments which have been submitted to your office. In addition, we are particularly concerned with the expansion of off-road vehicle (ORV) use and call to your attention Executive Orders 11944 and 11089 (Appendix I). Your ORV alternative to solicit ORV use is inconsistent with public policy, and must be replaced with a policy to permit ORV use at least on no greater current levels.

TWS

Laurence Tuttle
Regional Director
OREGON

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APPENDIX 1
Executive Orders

EXECUTIVE ORDER 11944
Use of Off-Road Vehicles on the Public Lands

An estimated 1 million off-road vehicles, including motorcycles, dune buggies, all-terrain vehicles, and others are on the United States public lands. ORVs are mainly used in areas far from urban centers to access remote backcountry areas where opportunities for non-motorized recreation are limited.

CONSIDERING the need for some action on the public lands to control and minimize the effects of ORV use and providing for the protection of public lands and resources, I hereby order:

Section 1.各部门 coordination activities to minimize the effects of ORV use. The President shall be authorized to take such action as may be necessary to ensure that ORV use is consistent with the Public Land Management Act of 1976 (10 U.S.C. 1433) and to ensure the protection of public lands and resources.

Section 2. Publication of a final decision by the Secretary of the Interior, following public comment, for ORV use on public lands. The President shall be authorized to take such action as may be necessary to ensure that ORV use is consistent with the Public Land Management Act of 1976 (10 U.S.C. 1433) and to ensure the protection of public lands and resources.

This order is effective immediately.

February 16, 1990

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EXECUTIVE ORDER 11089
Off-Road Vehicles on Public Lands

By virtue of the authority vested in me by the Constitution and the laws of the United States of America, in order to carry into effect the policies of the Congress relating to the management and use of public lands, it is hereby ordered that:

Section 1. The Secretary of the Interior is authorized to make such rules and regulations as are necessary to ensure that ORV use is consistent with the Public Land Management Act of 1976 (10 U.S.C. 1433) and to ensure the protection of public lands and resources.

Section 2. The Secretary of the Interior is authorized to make such rules and regulations as are necessary to ensure that ORV use is consistent with the Public Land Management Act of 1976 (10 U.S.C. 1433) and to ensure the protection of public lands and resources.

This order is effective immediately.

February 16, 1990

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Appendix II-180
Appendix -181
Refer to responses 2-46.

Refer to responses 2-46.

Refer to responses 42-44 and 46-1.

Refer to response 2-9.

Refer to response 2-67.

Refer to responses 4-6 and 4-7.

Refer to responses 4-8 and 4-9, respectively.

Refer to responses 2-63.

Refer to responses 2-64 and 2-68.

Refer to response 2-6.

Refer to response 2-69.

Refer to response 4-14.

Refer to response 4-13.

Refer to response 4-16.
Dear Mr. Carlson:

After studying the BLM’s 1968 test, it is evident that the BLM is blaming the cattle for all of the range problems. Contrary to your beliefs, the so-called Wild Horses, are to blame for most of the problems. First of all, government horses are not managed. They are left on the range twelve months of every year. They compete with big game animals, deer, elk, and antelope. This condition is real critical to big game animals especially during the winter months.

The BLM is famous for letting their horses proliferate to the point that they devastate the range. A good example of that is the Yak Creek Field.

The Rex Clemens Ranch has a grazing right in the Yak Creek Field, but has not been able to use this field for several years due to the overpopulation of government horses. The horses have abused the riparian area in this field to the point of no return.

The BLM has made no effort to correct this problem. The only way to correct this problem is to fence the horses out since this is private property.

It is my opinion that the BLM is influenced too much by special interest groups that don’t make a living in Harney County. I believe the BLM should get back to the basics of land management and raise fewer government horses.

Following is a listing of the ranch allotments:

<table>
<thead>
<tr>
<th>#</th>
<th>Name of Creek</th>
<th>AUMS</th>
</tr>
</thead>
<tbody>
<tr>
<td>5219</td>
<td>Hamilton FFR</td>
<td>19</td>
</tr>
<tr>
<td>5307</td>
<td>Smith Creek</td>
<td>1,919</td>
</tr>
<tr>
<td>5308</td>
<td>Kiger</td>
<td>586</td>
</tr>
<tr>
<td>5321</td>
<td>Hamilton Individual</td>
<td>150</td>
</tr>
<tr>
<td>5323</td>
<td>Clemens FFR</td>
<td>70</td>
</tr>
<tr>
<td>5330</td>
<td>Deep Creek</td>
<td>120</td>
</tr>
</tbody>
</table>

The Clemens Ranch Allotments if a 20 to 30 % reduction in allowable AUM’s is taken the result will be a significant reduction in the value of the base property associated with these BLM permits. At $50.00 per AUM value, a cut would reduce the base property value by:

\[
\text{3,150 AUMs} \\
\text{X 20%} \\
\text{= 630 AUMs} \\
\text{X $50.00} \\
\text{= $30,000.00}
\]

Similarly:

\[
\text{1,575 AUMs} \\
\text{X 30%} \\
\text{= 473,250.00}
\]

The reductions in livestock grazing resulting from BLM proposed alternatives will force many livestock operators out of business. This is contrary to the criteria for the completion of the proposed alternative. (Chapter 3 page 21). The most ideal effect of BLM’s proposed allocation A, B, and C is that many ranchers and long term residents of Harney County will be forced out of business.

BLM’s proposed preferred alternative will reduce the value of the Rex Clemens Ranch Inc. base property associated with its BLM grazing permit. BLM’s preferred alternative will have unreasonable and unacceptable economic damage to our livestock operation and livelihood. This will reduce the total number of livestock that the ranch operation can run on a long term basis.

Appendix H-183
we are writing to request on the draft three Rivers Resource Management Plan. In short, the plan perpetuates the overexploitation of grass and underexploitation of maintaining natural systems. We recommend a more holistic plan (with a few minor exceptions) and does not conform to the spirit of wildlife and principles.

The forage allocation of 197 is 197.4 HEM for livestock is far too high. However, statements that it will increase above this level are even more disturbing. Too much emphasis is placed on short-term grazing as a small number of ranchers. We believe that the forage allocation can be increased to the extent desired by most livestock operators greatly. The quality of the available forage is increased and the overall livestock operators greatly. The quality of the available forage is increased. However, more to the public is a concern. The state of wildlife viewing, similar, has a value even though the land does not show large amounts of it emphasis on commodity sales. The absence of habitat analysis for non-game animals is a glaring oversight. Non-game animals need forage for food and shelter. They are an integral part of the ecosystem of the area should reflect the impact on them. Most Americans are not viewing non-game wildlife and enjoyment that is not a trip with the public masses instead. The for cattle operators, the plan should include specifics to begin studies of non-game wildlife and the impact of grazing on them. Native grasses and other vegetation have value.

193-1 Refer to responses 2-10.
193-2 Refer to responses 2-11.
193-3 Refer to responses 2-12.
193-4 Refer to responses 1-8 and 11-14.
193-5 Refer to responses 1-10 and 11-16.
193-6 Refer to responses 1-13.
193-7 Wildlife and scenic areas require greater conservation investment, where more intensive recreation management is needed and where recreation is the principle management objective for which the Bureau plans and manages. The remaining public lands are considered extensive recreation management areas (ERMAs). Where recreation is not a principle management objective and where limited areas or responsibilities require minimal recreation investment. These areas, which comprise the bulk of the public lands, use recreation visitors the freedom of recreational choices with minimal regulatory constraints.

The Bureau utilizes this categorization of lands in order to set budget priorities and avoid the limited recreation dollars in areas where they will do the most good and require the most benefit for the recreating public. The ERMAs are where funds are spent for development plans, interpretive plans and construction of facilities such as campgrounds, picnic areas, trails, interpretive signs, signs, parking areas, etc. The BLMs also receive funds to enhance recreation opportunities but not to the extent the intensive special areas. Funds are often spent for signage, maps, road improvements, primitive sites, access, boundary marking, etc.

193-8 Refer to responses 193-7.
193-9 Refer to responses 3-3 and 3-25.
193-10 The type of decision sought in this comment are outside the scope of the RNP. The BLM provides comprehensive resource management prescriptions; hunting priorities are set at the RNF level.

Appendix II-184
January 19, 1990

District Manager
Bureau of Land Management
RC-74/21331 Hwy 30 West
Roseburg, Oregon 97470

Dear Person:

Regarding the Draft Three Rivers Resource Management Plan and Environmental Impact Statement:

I am very upset with this plan and I demand that the BLM develop an alternative to restore and maintain rangeland in excellent, natural condition. Cattle grazing should be reduced or eliminated where appropriate. At a minimum the BLM should adopt alternative "A".

I insist that water quality, riparian and aquatic habitat be improved/maintained in excellent condition, and that all adverse impacts be identified and mitigated.

I ask that all cattle of construction of new roads and other rangeland projects be included under the various alternatives along with their environmental impacts.

I ask that all created wheatgrass seeding proposals be eliminated.

I demand that livestock habitat protection and impacts be addressed in the plan and further, that forage allocations do not conflict with natural range.

I request that the Mustang River forage allotment for All of the South Fork and Middle Fork milk Creek rivers (except for the above through the Great basin area); All of Bluepeter Creek, and All of the Silvies river.

I also recommend the wildlife winter range forage allocations be given priority over livestock allocations.

Sincerely,

Quinton Myers

Matthew Holmes—Comments on 3 Rivers Resource Management Plan and EIS.

Dear Editor:

Please excuse my poor handwriting!

Bravo! The document is a major improvement in providing information to all interested parties, but you still left out some important information. When is the economic analysis of the various alternatives? No benefit/cost analysis? How can you decide on an alternative without reference to how much it will cost? I'm sure you would agree that this information is vital for a well-informed decision (by you and the public).

The data shows that you are over-ranging and that the majority of livestock animals are in poor condition and declining. There is nothing in the document that tells me how soon RUMS 11 will be reduced.

There's nothing in the document that tells me you're going to halt the decline or the stream does as I indicated earlier, it would be great to see how various management options pennant economically.

If you reduced to selling one of your management objectives, please remove the emphasis on values objective—though I barely show up in the name.

Jay, you mentioned a story about a guy from BLM. Did you produce a report or memo? If so how could you send me a copy or give me his name and phone number? Thank you,

Matthew Holmes

927500 Ristenbatt Rd. Bend, OR 97701

194-1 Refer to response 1-11.
194-2 Refer to responses 2-44 and 6-4.
194-3 Refer to response 12-7.
194-4 Refer to response 1-11.
194-5 Refer to response 2-78.
194-6 Refer to response 3-6.

195-1 When comparing non-monetory values to values commonly measured in dollars, the development of proxy monetary values is required to prepare a benefit cost analysis. Because a single proxy dollar value cannot adequately represent the breadth of subjective values held by individuals, benefit-cost analyses are of limited value where choices about non-monetary values are being made.

195-2 Refer to responses 28-3 and 94-2.
195-3 Refer to responses 2-11.
195-4 Refer to response 3-13 and Table 4.19, p. 4-25 (BMP/DRIS).

Appendix II-185
Appendix II-186

Dear Mr. Carlson:

The letters from the Bureau of Land Management, Farm Bureau, Sheep & Woolgrowers, and the January 17, 1990 Public Meeting and Western Range Cowpunchers have gone unanswered. The draft Three Rivers Resource Plan and Management and Environmental Impact Statement are consistent with my views and comments.

I also want to comment on the Dorrance allotment #2215. We as a family have been using this allotment for many years. We have never abused it. I was surprised to find it listed as unsatisfactory condition in the draft three Rivers Statement. I want to go on record that I disagree with the "C" Selective Management Category strongly.

Sincerely,

Norma L. Dorrance

Appendix II-186

Dear Mr. Carlson:

The letters from the Bureau of Land Management, Farm Bureau, Sheep & Woolgrowers, and the January 17, 1990 Public Meeting and Western Range Cowpunchers have gone unanswered. The draft Three Rivers Resource Plan and Management and Environmental Impact Statement are consistent with my views and comments.

Allotment #2215, Dorrance allotment has been used by my family for three generations. I just don't see it in the "needs improving category". Half of it is used as a source of water for private land. We certainly haven't been abusing either property. The other part of the allotment is in good range condition. Also, your draft study has the capacity almost double of actual water so I find it hard to understand it being in unsatisfactory condition.

Sincerely,

Maurice R. Dorrance
Dear Mr. Carlson;

In our review of the Three Rivers Resource Management Plan, we would like to make a few general comments followed by more specific comments related to the Silvies allotment (16).

First, we believe that the development of a plan such as this should involve the adjacent land owners/grantees and the actual planning process through one or in small group meetings. Not to explicitly involve people such as ourselves appears to us as a real lack of concern for the community. Secondly we wonder if there is really much of a need for such a plan in that it is so complex, ambigous, and cumbersome as to render it useless. Wouldn't it be better to concentrate on the individual allotments plans making sure they meet the criteria already in force? Also, we feel that there seems to be an over emphasis on the wildlife in relation to the amount of consideration given resolving wildlife/livestock/environment conflicts.

Now, more specifically in regards to the Silvies allotment, we would like to comment on the following items:

1. Appendix 3-11 - RRM figures show that actual use is 2,586 AUM's while the estimated capacity is 2,011 AUM's. You might be interested to note that in 1979 the BLM range staff and I established figures on an acre by acre basis what the RRM usage would be for each pasture since all of the pastures on the allotment have mixed ownership. The preferred usage of 2,000 AUM's was based on a total ranch usage of 48,000 AUM's, including the RRM and USFS allotments. Since that time the management on the ranch has added 3,000+ AUM's on USFS allotments while at the same time reducing the total AUM's used on the ranch to a maximum of 29,000 AUM's. Plus, the past three years our actual total usage for the ranch has been 18,000 to 22,000 AUM's. Therefore we would seriously challenge the accuracy of your figures on actual usage.

2. The BLM also notes that the wetlands habitat is less than satisfactory condition. Should that be a priority on streams that are only seasonal at best, and make up 12% of the RRM ownership in the Silvies allotment?

3. Charlie Smith Butte Reservoir - although our research is not quite complete, we believe that the dam is only on the east side of the RRM line and that none of the reservoir lies within RRM ownership. Also the reservoir is not filled by natural drainage but is filled by ditches coming out Cottonwood and Bridge creeks. This water is only available when needed on other parts of the ranch.

4. Dog creek, Ponderosa creek, Mountain creek and Flat creek are short season streams only.

5. A reservoir on Poison Creek would be complicated by the short supply of seasonal water. Plan the problem of the water being needed during the irrigation season.

6. We believe that the Three Rivers Management Plan needs to have the above mentioned conflicts resolved along with the concerns expressed before it is adopted in a final form. Allotment Management Plans and range management philosophies only work when we are working together towards the better utilization and protection of our range resources.

Appendix II-187

Ponderosa Ranch

Heidi Johnson, Manager
Ponderosa Ranch

Feb. 17, 1996

Jay Carlson - BLM/SIS
Burns District Office

HC 74 Box 1333 Highway 20 West
Hines, OR 97738

198-1 Refer to response 27-6.

198-2 Refer to p. 1-3. BLM/WS for a description of the Purpose and Need for the RRM. Appendix 3, Table 6, provides a comprehensive and detailed treatment of the management needs for individual allotments.

198-3 Refer to responses 2-11 and 2-17.

198-4 Refer to response 7-12 and BLM/WS, Appendix 3, Table 4. Also, the disproportionately high amount of wildlife use in relative scarce wetlands makes the wetlands high priority.

198-5 Aerial photos and topographic maps indicate that the dam and a portion of Charlie Smith Butte Reservoir are on BLM land. If surveys show differently the area will of course not be under BLM jurisdiction. Regardless, this reservoir has and should continue to provide good resting water for wildlife.

198-6 Refer to response 43-14.

198-7 Site-specific objectives and feasibilities of the proposed reservoir on Poison Creek have not been fully analyzed. Prior to any project work, a feasibility determination should be accomplished.
Dear Mr. Carlson:

In reference to our additional needs this fall. We feel that our present ADW's are not necessary. There is no sign of disease in our animals, in fact they are in fine condition. Especially calves, at the end of the growing season last year we took a census that our calves are of good growth and our range will have plenty of carry over feed for the winter months. Our policy will be to feed our cattle and damage the pasture. Why? In Forest Creek, I believe you study was done on a small herd and not an entire herd. Our cattle would drop 10,000 to 15,000 a town for food. It's not to the future.

Sincerely,

[Signature]
[Name]
[Address]

Appendix I-188
Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternative A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12086 from the November 13, 1986 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel.

200-1

Disapplication and/or reduction of 25 AUM's livestock forage in 2001-2002 will reduce the value of our base property by approximately $650. (Assume $25.50 per AUM value).

Please consider this economic loss in the requested "Takings Implication Assessment." The letters from the Seavy County Cattlemen, Stockgrowers, Farm Bureau, Sheep & Stockgrowers and the January 17, 1998 Middle Ranch and Western Range Service Comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is in accordance with such letters and Middle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Middle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

Enclosure: Supplemental Comments

201

Comment of the Draft Three Rivers Resource Management Plan and Environmental Impact Statement - Seavy County Cattlemen - Whereupon we believe that the company properly in line when the specific area in which the problem many occur, in the hikers area, between Park Creek and the North Union drainage, area was located. This problem could be countered by developing roads in the area. Between Road 1320 and the railroad, which being the level that might alter the field in a reverse manner. Also, the northeast corner of the 160 acre field, which the trail to the north, which is primarily for the wildlife habitat only. The trail traverses through the area that the number which the problem is

[Signature]

AppendixII-189
The Bureau, frequently authorized granting permits and other members of the public to construct developments on public land. Prior to authorization, the Bureau prepares NEPA documentation and analyzes the proposal project. This is designed to be a 1-year process from proposal to construction. Refer to response 129-1.

Sincerely,

Mary Wharton
Alderman 3rd District
Craney St., 97732

Dear Sir,

I am writing in response to your Three Rivers Management Plan, I must say that your preferred alternative, if instituted, will be a "far cry" better than current management.

Although it seems you are intending to make significant improvements to your riparian systems through the reduction of H.1. on these vital areas, I don't think you are going far enough, I would like to see complete protection and restoration of all important riparian areas, if it means permanent fencing or the restriction of livestock in any alluvial fan that contains the water courses, this would include pools, reservoirs, and springs as well.

I would also like to see more emphasis on improving range conditions for elk than the preferred alternative suggests, although it is sure that any area ranchers and the relatively inexpensive grazing opportunities on "our" land, considering the value of riparian habitat in our districts, I don't understand why the public must forgo our priorities for these few.

Thank you,

James D. Reed

Appendix II-190
RESOLUTION

WHEREAS over 20% of the land in Harney County is owned and managed by the government;

WHEREAS the wealth of natural resources these public lands contain has provided the economic base upon which our communities have been founded;

WHEREAS direct payments to the county amounted to $4.3 million in fiscal 1989;

WHEREAS these direct payments comprise a significant share of our local governmental revenue and reduce the property taxation burden on property owners;

WHEREAS the majority of the Family Wage jobs in our county depend upon the economic outputs from our federal lands;

WHEREAS successful implementation of our Regional Strategy for the diversification of our economy relies upon the maintenance of the Wood Products Industry;

WHEREAS Federal lands supply over 90% of the raw material which supplies our local wood products plants;

WHEREAS Federal lands supply 15-20% of the forage consumed by livestock in Harney County;

RE: THIS RESOLUTION on the 11th day of February, 1990, the Harney County Chamber of Commerce Board of Directors did and will only support those Federal Land Management Plans which will ensure the maintenance of livestock grazing and timber harvesting at or near the levels of recent history.

Signed:
Harney County Chamber of Commerce
Board of Directors

HARNEY COUNTY CHAMBER OF COMMERCE
164 W. 5th Street, Burns, Oregon 97720

January 17, 1990

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
RH 74-19233 Highway 20 West
Hines, OR 97731

Dear Mr. Warburton:

The January 17, 1990 Riddle Ranch and Western Range Service Comments and Responses to the Draft Three Rivers Project Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

Enclosure: Supplemental Comments

RETURN COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS SMPS/EIS

AppendixI: 191
Dear Mr. Warburton:

The Oregon Natural Desert Association appreciates the opportunity to comment on the Draft Three Rivers Resource Management Plan. We also appreciated the opportunity to have Jay Carlson and Rob Burns of your office meet with us on February 2.

Our primary concern deals with the range of alternatives presented. Specifically, we take issue with the "arrow and biased nature of the alternatives used to portray the spectrum between the commodity and natural values alternatives. Fifty-six years after the Taylor Grazing Act mandated conservation and improvement of our western public lands and thirteen years after FLIPMA, we still have of 95 streams identified in the ROSE area, one in good or excellent condition and 62 in poor condition. Of the 94 wetlands identified, 46 are in good condition and 48 are in poor condition. Over the 16 million acres in the livestock grazing program, 64% are now classified in "fair" to "poor" condition. This will improve to 60% in the preferred alternative. A 4% improvement over the next 15 years! At that rate, how many years will it take for the entire range to be in good or better condition? None of the alternatives in this document deal with the incredible task of restoring the land to a healthy, ecological state.

Further, any alternative should be able to answer the following questions: What has been the consequence on natural systems and sensitive resources by livestock and what specific actions are being proposed to maintain these systems in a

Appendix II-192
Appendix II-193
The FPFO encompasses all ownerships of forest land (federal, state, and private), and all resources provided by our forests (fish and wildlife, soil, air, water, recreation, grazing and timber).

The objective of the FPFO is to identify opportunities and describe actions to deal with issues related to the allocation of management areas, and to develop policies and programs that support these opportunities.

In the FPFO, the Board of Forestry has directed the Department of Forestry to:

1. Assist the State of Oregon in the analysis of federal management areas and help forestry land use recommendations that recognize that forests are dynamic and most forest uses are compatible; and
2. Actively and cooperatively review federal management plans to improve the technical quality of the analysis and incorporation of existing wildlife, soil, water, and timber practices.

The Forestry Program for Oregon (FPO) describes the Board of Forestry's guidance to the State Forester, Legislature, Governor, state and federal agencies and to the citizens of Oregon on matters of forest policy which the Board considers important. The Board considers the five identified issues for your consideration.

A. Grazing Management Issue. The Department of Forestry encourages:

1. Integration of sound grazing management practices, compatible with timber management and wildlife habitat goals, on public and private forest lands; and
2. Improvement in the administration of grazing programs and permits on federal lands.

B. Wildlife Forage and Habitat Condition Issue. The Board and Department encourage:

1. Grazing programs that increase forage production for livestock and wildlife, while maintaining or returning grazeable forest land and riparian areas to excellent condition.

C. Fire Management Issue. The Board and Department encourage:

1. Recognition that fire plays a natural role in maintaining the forest environment and wildlife habitat; and
2. Cost-effective federal fire management policies that emphasize planned ignition fires over natural ignition fires and that consider impacts to the state of Oregon's forest fire protection program.

D. Special Management Area Issue. The Board of Forestry recommends that habitat should be managed based upon sound research data and the recognition that forests are dynamic and most forest uses are compatible over time and that forest management standards and regulations should be established for the protection of necessary habitat based upon the knowledge available and that are consistent with

Information provided in the Management Plan and DEIS present five alternatives. In the Department of Forestry encourages the integration of forest uses that are compatible, and most forest uses are compatible. The Board also encourages the maintenance of a commercial forest base as possible, and the identification of alternative practices that are appropriate for the state of Oregon's forest protection program. The Preferred Alternative of the alternatives considered, is the most similar in composition to the policies and programs recommended in the FPFO.

Discussion of Forest Land Management

Information provided in the Management Plan and DEIS about the current condition (values, species and stocking (formation) of the Ba's forest land and analysis of different possible silvicultural management techniques are not adequate. Discussion about these factors is insufficient for the Department to determine if the identified environmental consequences are correct and the proposed management directives are sufficient to meet RM management requirements and policies and programs recommended in the FPFO.

Thoumg management directives related to Forestry and Woodlands contained in Table 2.1 and Appendix 2 (General Best Forest Management Practices) for the following silvicultural practices are included in these planning elements of the plan and DEIS a significant and important. This guidance is listed below with the five identified issues for your consideration.

3. Grazing Management Issue. The Board and Department encourage:

1. Integration of sound grazing management practices, compatible with timber management and wildlife habitat goals, on public and private forest, and
2. Development of grazing improvements, such as water, fencing, salt, etc., and utilization of sound grazing practices:

a. To reduce additional (needed protection of riparian areas or other sensitive areas); and

Additionally, the "Best Management Practices" are indicated to be taken in large part from the Oregon Forest Practices (DFE, 1989). In 1989, the Forest Practices Act was
amended and significant changes were made to rules related to forest practices in riparian zones. I have included a copy of the current eastern Oregon Forest Practices Rules for your use and suggest that special attention be directed to rules 629-24-446. With these new riparian rules, it is unlikely that the procedures suggested to meet the Forest Practices Act under Alternative E would always result in compliance.

In Chapter 3 (Description of the Affected Environment), limited description of existing silvicultural practices is made. This description indicates that overstory removal and seed trees are the usual harvest and reforestation methods. Additionally, tree planting as a method of reforestation is indicated as having significant animal damage. The description of the affected environment would be significantly enhanced by including descriptions of the major forest ecotypes, their extent, current inventory, and how past and current management practices have affected the condition of the forest.

Additionally, discussion in Chapter 4 (Environmental Consequences) should include consequences to forest land or vegetation forest tree species composition and diversity, and forest insect and disease resistance. The Department of Forestry’s review of overstory removal silviculture on some federal lands in eastern Oregon has indicated that residual stocking is not always optimal and adequately protected, nor is the residual favored species always the most desirable in terms of desired product, insect and disease resistance, and other factors (visual for instance). Therefore, information provided in the Plan and DEIS should also provide the reviewer at least some idea about the consequences of existing and proposed silvicultural practices. Discussion about what combination of silvicultural practices will optimize timber production should also be included.

Finally, discussion of silvicultural practices that can be used to meet timber management objectives while also enhancing other objectives should be provided. Conversely, silvicultural practices that can be used to enhance other objectives (riparian and visual) while also providing timber production should also be identified and discussed for possible use in those forest land areas currently set aside or proposed to be set aside from timber production.

Appendix II-1 95
ATTN: Craig M. Hansen

I wish to voice my support for the Niper herd.
I feel Alternative A will benefit them best.

Thank you,
W. C. Richard

I am a member of the Niper
Mestizo Association.

---

3 Rivers

4.4A Position relates to
Draft Three Rivers Proposed
Management Plan.

The NMT encourages the BLM to
adopt Alternative A-
Expanding Natural Values

The NMT further recommends a
change to Table 12, removing
the word adoption
There

Date 3/6/90
Chairman: J. Martinez

---

209
No comment identified.

210
This has been done. See the Proposed Plan, Wild Horses and Burros.
111

2/3/90

P.O. Box 573-76

Kiger Mestaño Association
Post Office Box 412
BURNS, OR 97720

Bureau of Land Management, Burns District Office
Attn: Craig M. Hansen, 60-12533
Highway 20 West
BURNS, OREGON 97720

Dear Mr. Hansen,

After careful study of the Three Rivers KMK ZIS I would urge you to adopt alternative A for various reasons foremost of which is the fact that of the wild horses and as such all the way to the upper range as this other animal that without being required for the special interest groups.

212

February 21, 1990

On the other hand, the Kiger Mustangs for the purpose of breeding these animals as they will not become extinct should some disaster befall the rov that are left. Thus I feel it is imperative to do all we can to help preserve these wild Mustangs as part of our western heritage and alternative A would benefit the Kiger herd best.

Sincerely,

Ann G. Roda
613 V. A. Barr Rd.
Mt. Shasta, Ca. 96067

212

No comment identified.
Appendix II-198
I appreciate this opportunity to express my opinion on an issue I feel is of importance not only for America and its people but also for all the future generations to come. May I make clear how strongly and how important I feel this issue is. We MUST NOT allow anyone to further comprize our Natural Heritage or Environment. I am specifically referring to the management of wild horses of the Middle mountain and Kiger herd.

It has been the habit and history of this country to ship and ship away at our resources until only a shell is left behind. Often then a memo plaque inscribed with a picture will be the only thing left to remind us of the forefathers and their foresight and imagination. Thus, the horses of the Middle Mountain and Kiger herd have been decreed by our leaders to be a free gift to the public. This is an opportunity for them to expand and enforce protection for the resource that remains. It is my feeling that the horses are a gift to the public and deserve to be honored with the respect we give to our Natural Heritage.

It has also been the habit and history of Land Management Policies to favor those who claim their economic existence is threatened unless they are allowed to further exploit public land. The cattle industry has long been the favored recipient of government assistance and historically has received continued expansion of public land use. So much so that it has become an expected ritual. Hence, the larger you claim the more you get. It is my feeling that the horses should be given no more consideration than the cattle. We must conserve yet we must conserve for the future and not only for the good of the cattle. We must conserve for the benefit of a relative few to the general public.

I have been to the Kiger area, seen the horses, and talked with several locals and B.L.M. personnel concerning the Kiger herd. In this I have found that the B.L.M. personnel are seeking a competent and honest effort to promote and provide the new found information about the Kiger herd and their special qualities. On the other hand, I found the locals lacking knowledge of the horses and their special traits. In this regard I am always at a loss. The horses are a special breed. They are a special breed. They are a special breed.

214-1 The Kiger wild horses do not face a reduced grazing area. The Kiger 1964 is the same size as in 1972 when the Wild Free-Roaming Horse and Burro Act was enacted. There is no proposed increase in grazing use for livestock in this area. Section 314(d) of the Federal Land Policy and Management Act of 1976 states that "management be on the basis of multiple use and sustained yield..." Exclusion by horses in the Yukon Springs would violate this mandate of multiple use. Removal of livestock from all reported areas would also violate the multiple-use intent of MLPA. There is no intent to exclude this land from use by either wild horses or livestock.

214-2 Refer to responses 21-2 and 214-1.
Debra R. Hammar
215-215
February 25, 1996

Subject: BLM's Proposed Plan and Environmental Impact Statement (EIIS)

Dear Mr. Hammar,

After carefully reviewing the Environmental Impact Statement for the BLM's Proposed Plan, I am in complete support of Alterative A as the only acceptable management plan.  This alternative is the only plan that will protect and preserve the unique heritage of the area known as the Rogue Wilderness.  By choosing Alternative A, not only will the Rogue Wilderness be guaranteed the opportunity to exist in their natural state, but the American people will benefit by having a tribute to our national heritage.

As a society that in very proud of its history, an often pay tribute to places, buildings and objects that represent our heritage in use of places to teach and demonstrate, let us not destroy a LIVING HISTORIC remembrance that we are and how we originated.

Then there are those who are opposed to Alternative A, who do not understand the value we are putting and not what we originally were.

Sincerely,

[Signature]

January 17, 1989

Jay Carstairs
Bureau District Office
Bureau of Land Management
1790 12th Street, 20th Floor West
Eugene, OR 97401

REVIEW COMMENTS FOR THE OCTOBER 1989 BLM DRAFT THREE RIVERS REPORT

Dear Mr. Carstairs,

(I am not sure if you are familiar with the next two paragraphs.  If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value.  The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit.  Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the final Three Rivers Resource Management Plan and Environmental Impact Statement (EIIS), the document be committed to us, and be authorized by Executive Order 12298 (see the November 8, 1980 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of _80_AWR livestock forage to Alternative C will reduce the value of our base property by approximately _80_AWR (approximate $80 per AWR value).  Please consider this economic loss in the requested "Takings Involuntary Assessment."

The letters from the Burns City, Burns, and the January 17, 1988 BLM Draft and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of each letter to the BLM document.  Their response has been asked to you.  We do not include a full copy of text only for the reason that it would be an exact duplication of the BLM document and organization letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

[Signature]

January 17, 1989

[Address]

City State Zip Code

[Signature]

Enclosure: Supplemental Comments

Appendix II-200
Bureau of Land Management
Rums District Office
1011 E. Main St.
Rums, OR 97747

Dear Sirs,

I am concerned with the fate of the wild horse problem in the Rums District. The plan for eliminating the wild horses on the range for the National Forest is inadequate. If quality horses are put back on the range, the horses would be destroyed because of overpopulation. It will not be long until the range is unsaltable due to overpopulation.

If quality horses are put back on the range, the horse herd will not be rounded up due to the risk of overpopulation. If poor quality horses are turned into the range, it will be a good time for the horses gathered will be unproductive.

I am concerned that the plan for the future will be good in continuing the quality horse program and good in the management plan so that it cannot be changed without input.

I am aware of the need for a new program and the need for the quality of the horses in the future. I am aware of the need for a new program and the need for the quality of the horses in the future. I would like to know what can be done to make the quality of the horses in the future.

Sincerely,

[Signature]

217-2

217-2 Refer to response 124-4.

Appendix II-201
Joseph Oregon
February 24, 1994

Dear:

As a person who has adopted cows and calves from the BLM program, and also the owner of Circle K Ranch, Mustang, Oregon. I wrote to you my view and wrote to the people who are suggesting alternative to the Three Horse Reserve Management Plan. In my opinion, it would be a shame and failure of these Wild horses to be shipped of being. They are a prominent part of our history, just as much as cattle and sheep are. After all cattle and sheep were and are still funded by private interest stories.

The be a people such as ourselves, you should be preserved. I feel strongly that the horses should be preserved in all areas of this country. I also think that Oregon should be an area where the horses are protected.

Thank you,

Elain Apple
Rt. #1 Box 416
Joseph Oregon 97846
February 11, 1990

United States Department of the Interior

FISH AND WILDLIFE SERVICE

McDonald National Wildlife Refuge

Princeton, OR 97758

(503) 493-2612

219-1

The recommended changes have been made, see DMP/RWS Maps 59-1 and WC-1.

February 20, 1990

Cindy Hansen

Bureau District Office

Bureau of Land Management

509 W. 7th Street

Montana, OR 97758

220-1

Refer to Response 2-11.

Appendix it-203
Mr. Craig Hansen
February 1, 1990
Page 1

Mr. Craig Hansen
February 1, 1990
Page 2

![American Rivers](image1)
even ignoring, the required corridor of streamside lands may exclude resource values that should be evaluated together with the values of the stream itself.

3. Classification

American Rivers agrees that an appropriate classification of the 6.4 segment of the Middle Fork Malheur River and Bluebuckett Creek is wild. See RMP at 4-41.

4. Management standards

American Rivers commends the Three Rivers planners for setting forth in the Draft RMP detailed management prescriptions for potential wild and scenic designation. Our only concern is that other RMPs have failed to include such prescriptions. The management prescriptions in the Three Rivers RMP are consistent with the BLM Guidelines and will provide appropriate guidance to BLM and the public of those actions that are appropriate within the relevant river corridor. E.g., Guidelines, Section VIII A.3.a., at p. 11.

Unfortunately, the RMP includes other language which confuses the relevant prescriptions. For example, the RMP states that there is a timber harvest prohibition within "perennial streams." RMP at 4-41. The appropriate standard, as is set forth in Appendix 11, prohibits timber harvest within the relevant stream corridor. Further, the RMP improperly suggests that such a prohibition would not apply to an intermittent portion of an eligible stream. American Rivers suggests that appropriate changes be made to the discussion of wild and scenic rivers found at RMP 4-41.

5. Interagency agreements

American Rivers recommends that the Three Rivers planners enter into an agreement with the Ochoco National Forest (or other relevant federal or state agencies) to study rivers which flow across lands administered by both agencies, particularly Silver Creek.

We understand that "Table 3" affirmatively finds "segment A" of the Middle Fork Malheur River and Bluebuckett Creek to be suitable for designation. See also RMP at 4-41. However, there are statements within the discussion of suitability that suggest the BLM has not yet made a suitability determination. For example, there are contradictory statements that BLM does have the ability to manage the river segment but also that it is not feasible for BLM to manage its land under wild and scenic designation. See appendix 11-6. The planners are flatly wrong to suggest that acquisition of private lands is necessary for designation. There are numerous rivers designated by Congress and managed by federal agencies, including BLM, which include segments of private land.

Confusion over whether the RMP finds "segment A" to be suitable is fueled also by the statement: "[t]he suitability analysis, adequate consideration will be given to rights held by owners..." See Appendix 11-4 -- 11-7. We trust the Final RMP will be clear with respect to this important issue.

We trust these comments are helpful during the Resource Management Plan process. We look forward to participating further in the RMP process. If you have any questions concerning any of the matters set forth above, please do not hesitate to communicate with me.

Sincerely,

[Signature]
Department of the Interior
Public Lands Counsel
[Stamp]
[Address]

cc: Gary Marsh

Refer to Tables 2.17, 2.18 and 2.19, RMP/FEIS.
Refer to responses 208-17 and 208-19.
Refer to responses 3-8 and 208-19.
Refer to responses 3-4 and 208-19.
Refer to responses 3-4 and 208-19.
Refer to additional information has been added. See Tables 2.17 through 2.19, RMP/FEIS.
Refer to Table 2.18, RMP/FEIS.
Table 3.14 has been corrected. Refer to Table 3.18, RMP/FEIS.

The Federal/Final EIS has been changed to state that the proposed boundaries will follow the "ris of the canyon and may be greater or less than one-quarter mile from high water level of the river and creek.

Refer to footnote on Table 2.20 and the narrative in the RMP/FEIS which describes the proposed river corridor boundaries.

The impact analysis is discussed RMP/FEIS notes prohibition of timber harvest in the stream corridor.

The Bureau is requesting information on "sectors of scenic rivers in the analysis model" of the Wild and Scenic Rivers Act states "there shall be no alteration or existing rights which would be adversely affected by the facility or existence of such a river" which would enter into the river segmentation if the area was included in the National Wild and Scenic Rivers System. In the suitability analysis, adequate consideration will be given to rights held by owners, applicants, lessees, or claimants.

Appendix II-205
Dear Mr. Edmon.

As permitted in the Thane River项目 area, I would like to take this opportunity to voice my concerns about the proposed plan.

First of all, let me say I found one viable alternative presented. There was no alternative developed with grazing in mind. Recreation and wildlife are once again taking over.

Changes are probably needed, but any and all changes should be reasonable. I found a great lack of concern for the livestock industry.

I find it very disturbing to see how much private property has been proposed for acquisition by the Federal in these potential acquisition study public areas or a few very special groups? This needs to be worked before any changes are implemented. Are these acquisitions truly the best for all?

In reading through this ill-written document, I find many inaccuracies. In the preferred alternative one action that is implemented does not provide for the continued opportunity for ranching operations typical of the American western heritage. If the preferred or any alternative is adopted, this entire way of life is gone.

Recreation is a key issue. Too much recreation has been planned for. Not only are the private land owners over-run for the recreational users, there is ATV use being planned.

Water quality and riparian areas are greatly discussed. Poor water quality and depleting riparian areas are being blamed entirely on grazing. This is very hard to believe. Extensive road systems, logging, recreation, and the use of ATVs are contributing to poor water quality. Camping in riparian areas is very devastating to these fragile ecosystems. How can we balance what a herd of elk can do to a creek bottom? I find it hard to believe that grazing is the only detrimental activity to riparian areas and wildlife.

Resting is also a good activity! Or my knowledge camping in a riparian area is not. Staying should have some guidelines.

ORV and ATV's are the dream and doom of the future. We have not begun to see the damage to both public and private property. These vehicles should have kept on the trail.

Now to the specific allotments I am concerned about.

UPPER VALLEY 3C & Crew Creek

The majority of area in the Upper Valley allotment is privately owned. In Part 2, owned by two Wilson, Catherine and Floyd, by this be conflicting information with the information provided in Appendix.

Appendix H-206
Appendix II-207
Appendix II-208
Appendix II-209
225

The information requested is beyond the scope of the NOP. The planning process is designed to identify existing land use or management problems/opportunities on Bureau-administered lands within the planning area and to consider a range of alternative actions for resolving the problems and utilizing the opportunities. Investment of public funds is discussed through a host array of Federal law and affected through annual congressional appropriations to BLM and other Federal agencies. Such investment is focused through implementation of the NOP on the problems/opportunities identified in the planning process. While considerable interagency and interjurisdictional cooperation is utilized to address management concerns in a joint federal, state, and local effort, implementation of the NOP was conducted through commands of understanding, cooperative agreements, interagency agreements or other similar vehicles. However, the scope of management prescriptions covered through the NOP is confined to the planning area.

224-4 The wide variation of landform and vegetation communities found in the RA makes use of uniform suitability criteria infeasible. Allowance specific evaluations to address areas which are unusable for a variety of reasons. At this time, unusable areas have not been identified.

224-5 Please refer to BLM/DEIS page 3-16. The initial adjudication, circa 1956, determined total preference at 189,995 AUMs. Subsequent adjudications, primarily in the 1970’s and 1980’s, put 13,913 AUMs into suspended tenure and set active preference at 130,722 AUMs. Additional information on carrying capacity and actual use can be found in Appendix 1, Table 9 of the Proposed Plan. Allowances of resources outside the planning area (see map GEN-1, in the BLM/DEIS) are beyond the scope of the NOP and are, therefore, not included in the NOP. Additional information on grazing permits in Appendix 3, Table 6, in the Proposed Plan in Appendix 1, Table 9 for allotments in the planning area.

224-6 The discussion on BLM/DEIS page 4-10 and 11 evaluates the effects of range improvements on forage production. Without range improvements, the short-term grazing levels could be expected. An analysis of the effects of the preferred alternative on resources values is discussed in Chapter 4, BLM/DEIS.

224-7 Impact assessments are performed on a project or resource specific basis at the activity planning level. Overall NOP level benefit-cost analysis for the various alternatives to the BLM/DEIS are not performed due to the lack of project-specific data, mitigations and interactions necessary for such analyses. Much of this information becomes available only after consultation, coordination and negotiation with affected interests conducted at the activity planning level.

THE AMERICAN ALPINE CLUB

Conservation Committee
4001 S.W. 95th Place
Portland, Oregon 97219

January 30, 1990

District Manager, Bureau of Land Management
Mr. John Verbrugge
Bonneville District Office
Hines, Oregon 97844

Dear Mr. Verbrugge:

The American Alpine Club has a deep seated problem with your proposed Three Rivers Resource Management Plan. As we interpret the plan, it places too much emphasis on cows and not enough emphasis on natural resources. When BLM is going to wake up to the fact that your agency is supposed to be a steward of public lands, and not just to browse the ranchers?

Nearly all riparian and aquatic habitats are in poor condition. Nearly all of your cones is in the same shape. Your attention to native plant and animal has been unimpressive.

In managing the Three Rivers area, we believe that the BLM should:
• repair riparian habitats
• eliminate created shrub grass
• get the cows off sensitive lands
• adopt Alternative "A" which would at least allow some refugees from overgrazing

The American Alpine Club is committed to following BLM's management process. We hope our comments will be seriously considered.

Sincerely,

Nicholas S. Deroe

Appendix II-210