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Bureau of Land Management

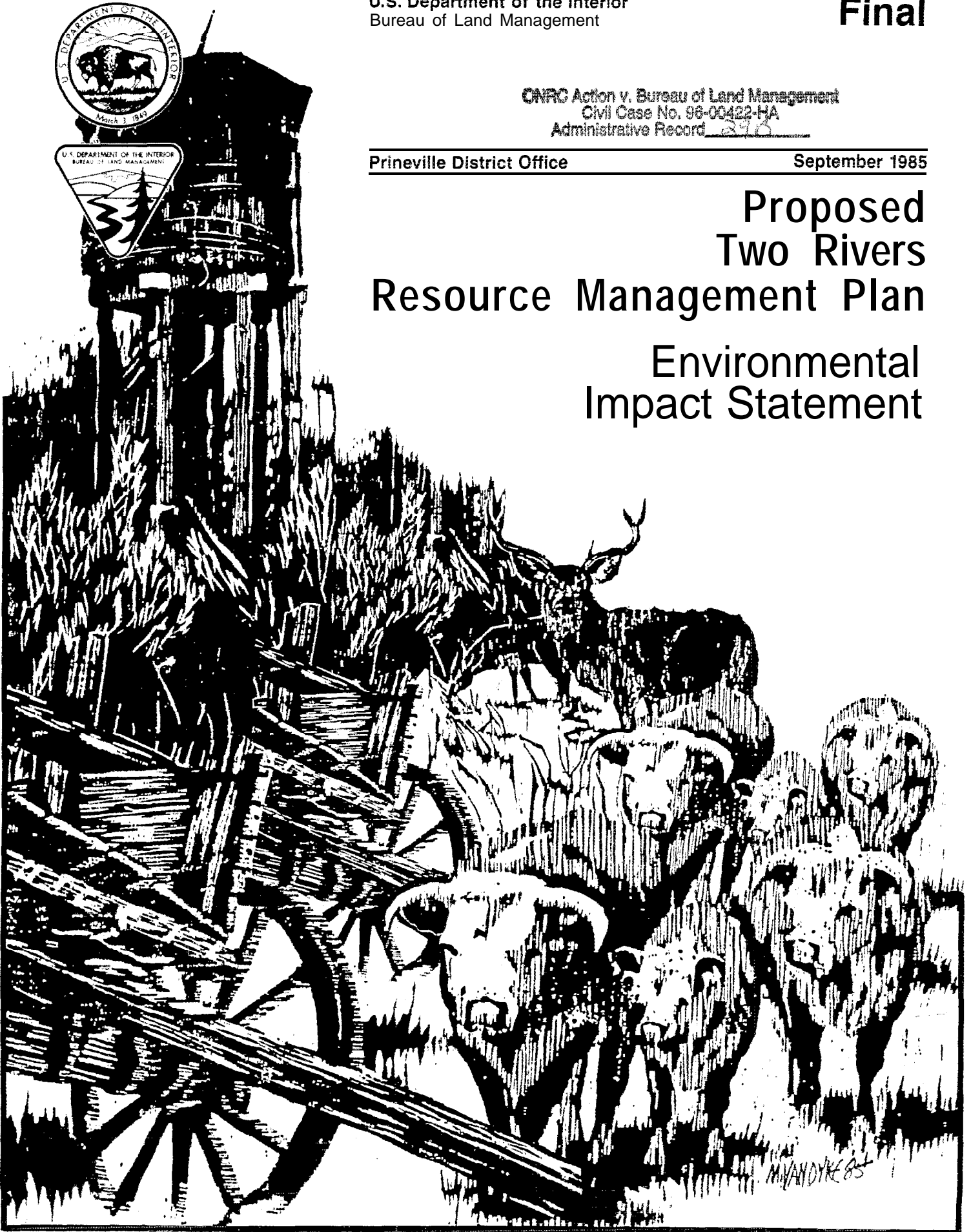
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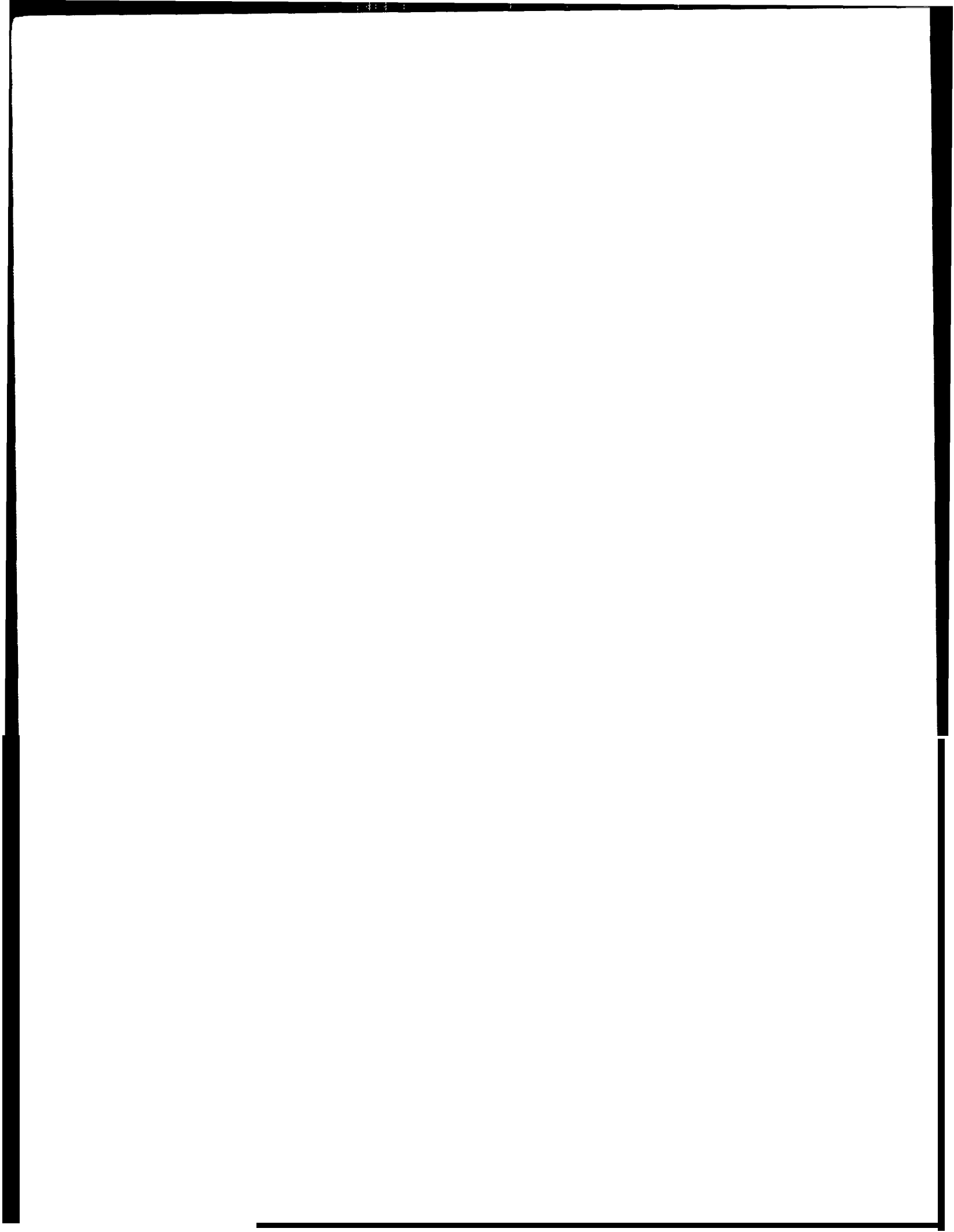
CNRC Action v. Bureau of Land Management  
Civil Case No. 96-00422-HA  
Administrative Record 270

Prineville District Office

September 1985

# Proposed Two Rivers Resource Management Plan Environmental Impact Statement







# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

PRINEVILLE DISTRICT OFFICE  
P.O. Box 550 (185 E. 4th Street)  
Prineville, Oregon 97754

Dear Public Land User:

Enclosed for your review and comment is the Two Rivers Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Two Rivers Planning Area, Prineville District, Oregon. The Bureau of Land Management has prepared this document in partial fulfillment of its responsibilities under the Federal Land Policy and Management Act of 1976 and the National Environmental Policy Act of 1989.

The Proposed RMP and Final EIS is published in an abbreviated format and is designed to be used in conjunction with the Draft RMP/EIS published in April 1984. Additional copies of the Draft RMP/EIS are available upon request from Bureau of Land Management, 185 East Fourth Street, Prineville, Oregon 97754.

This Proposed RMP and Final EIS contains a summary from the draft, introduction, the proposed plan, text revisions to the Draft RMP/EIS, public comments received on the draft, and the Bureau's response to these comments. If you wish to comment for the District Manager's consideration in the development of the decision, please submit your comments by November 15, 1985. Your comments should be sent to:

District Manager  
Bureau of Land Management  
P.O. Box 550  
Prineville, Oregon 97754

The plan decisions will be based on the analysis contained in the EIS, any additional data available, public opinion, management feasibility, policy and legal constraints. The approval of the plan will be documented in a record of decision, which will be completed later and will be available to the public.

The proposed plan cannot be approved until after the Governor of Oregon has had an opportunity to review it. Approval of the plan will also be subject to the final action on any protests that may be filed. Any person who participated in the planning process and has an interest which is or may be adversely affected by the approval of this RMP may protest such approval. A protest may raise only those issues which were submitted for the record during the planning process and should be filed with the Director (202), Bureau of Land Management, 1800 C Street, N.W., Washington, D.C. 20240 within the official protest period ending November 15, 1985. Protests must contain the following information:

-The name, mailing address, telephone number, and interest of the person filing the protest.

---A statement of the issue or issues being protested.

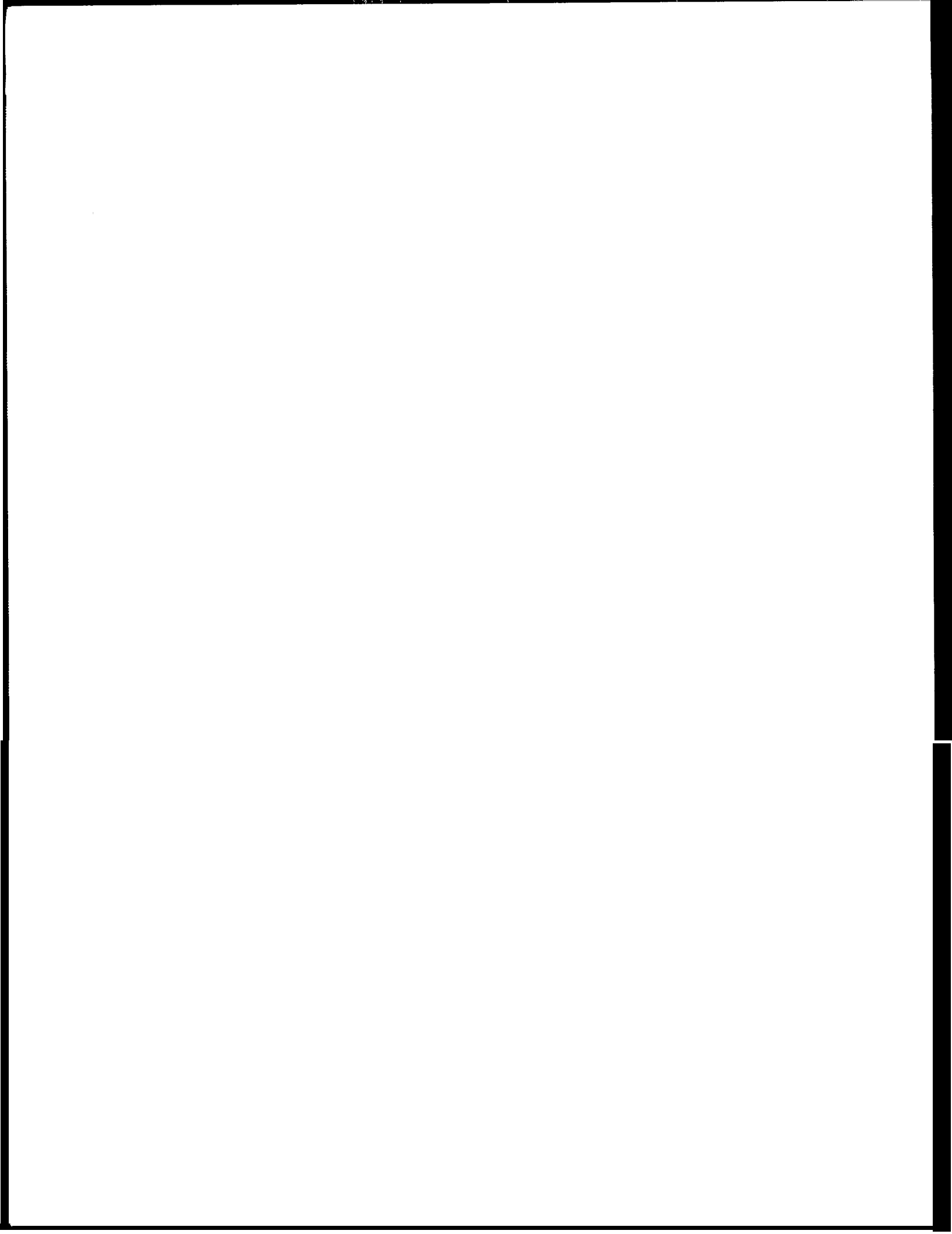
---A statement of the part or parts of the plan being protested,

-A copy of all documents addressing the issue or issues that were submitted during the planning process of the protesting party or an indication of the date the issue or issues were discussed for the record.

-A concise statement explaining why you feel the decision is wrong.

Sincerely yours,

Gerald E. Magnuson  
District Manager



U.S. Department of the Interior  
Bureau of Land Management

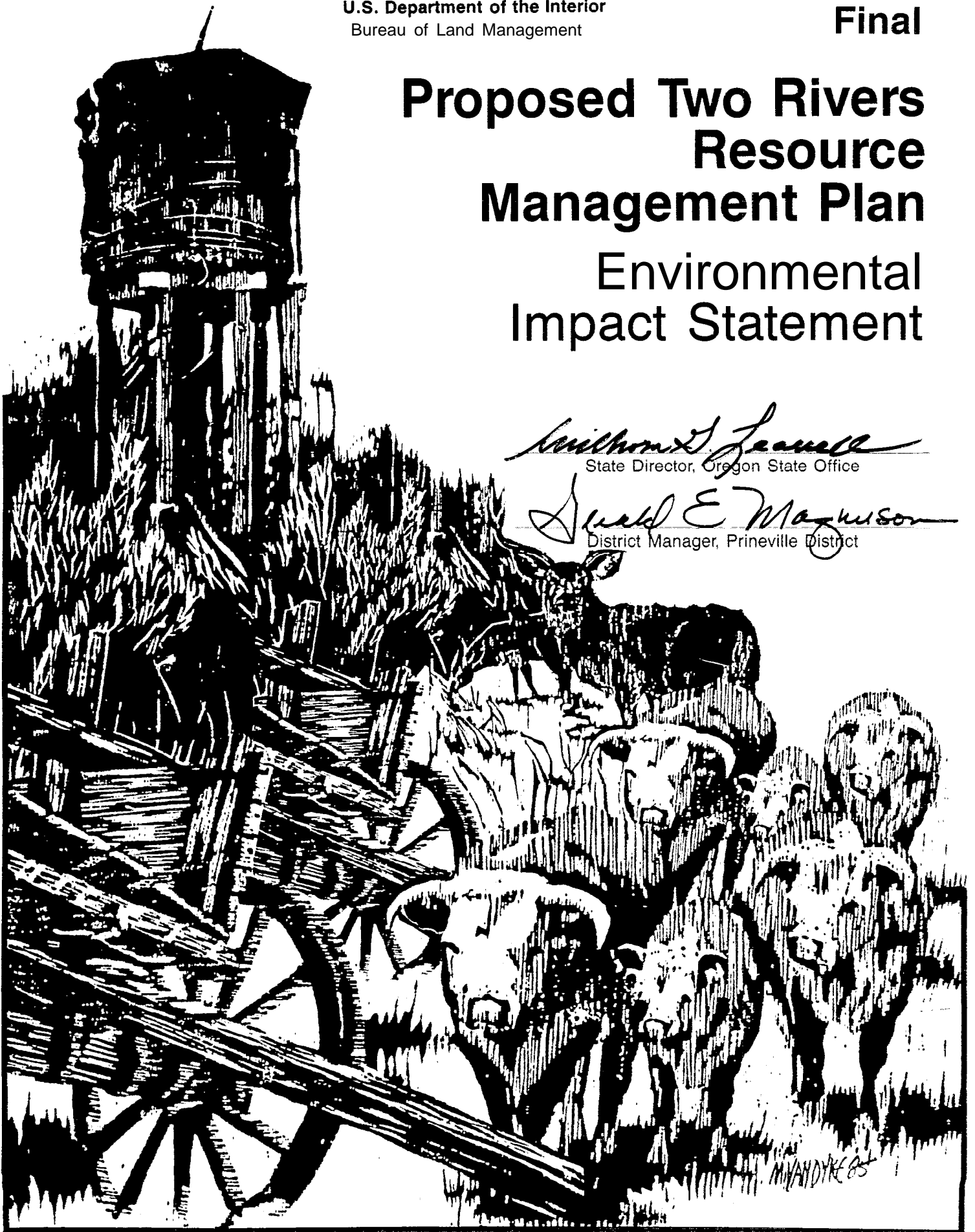
Final

# Proposed Two Rivers Resource Management Plan

## Environmental Impact Statement

*William J. Seavey*  
State Director, Oregon State Office

*David E. Magnuson*  
District Manager, Prineville District



MYANDYRE85

# **Proposed Two Rivers Resource Management Plan and Final Environmental Impact Statement**

## **Final RMP/EIS Department of the Interior, Bureau of Land Management, Prineville District**

1. Type of Action: Administrative (X) Legislative ( )

2. Abstract: This Proposed Resource Management Plan/Final Environmental Impact Statement when combined with the Draft RMP/EIS discusses resource management on 324,705 acres of public lands administered by the Bureau of Land Management in the Prineville District. Implementation of the Proposed Plan provides for harvest of timber on 10,715 acres with a sustained annual harvest level of 1.41 million board feet (MMbf); grazing management would continue on 292,736 acres (233 grazing allotments) of public land; riparian vegetation condition would be improved on 1,057 acres; wildlife and fish habitat would be maintained or improved; approximately 1,000 acres of public land would be offered for sale annually; and cultural, soil, water botanical, visual and recreational resources would be protected.

3. Five alternatives are analyzed:

- A. Preferred (Proposed Resource Management Plan)
- B. Emphasize Commodity Production and Enhancement of Economic Benefits
- C. Continue Existing Management (No Action)
- D. Emphasize Natural Values While Accommodating Commodity Production
- E. Emphasize Natural Values

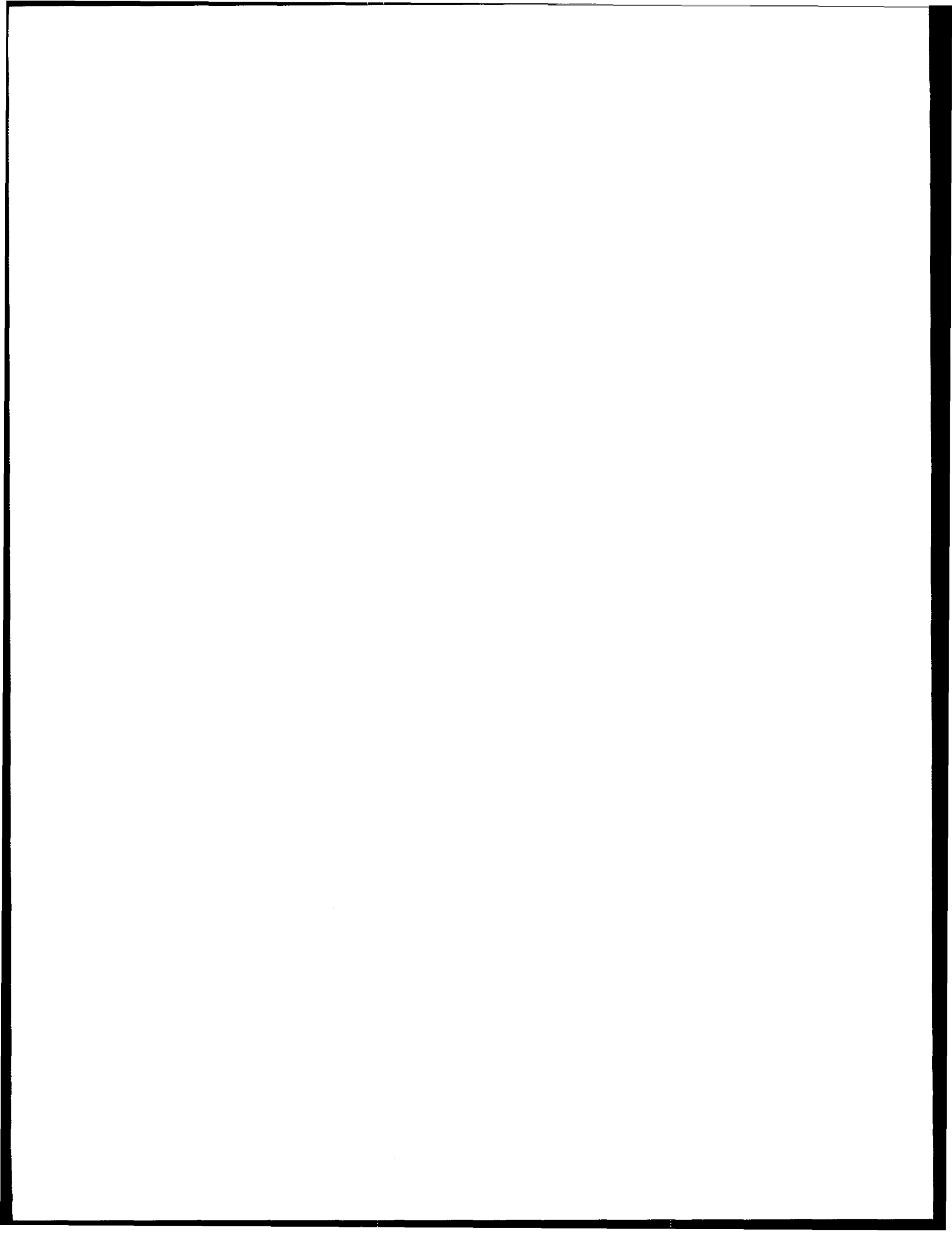
4. The comment period will end November 15, 1985.

5. For further information contact:

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RMP/EIS Team Leader  
Bureau of Land Management  
Prineville District Office  
185 East Fourth Street  
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# Summary

Five multiple use alternatives for the management of public lands in the Two Rivers Planning Area have been developed and analyzed in accordance with the Bureau's planning regulations issued under authority of the Federal Land Policy and Management Act of 1976. The alternatives respond to eight major issues: livestock grazing, riparian management, wildlife habitat, land tenure and access, minerals management, forestry, recreation and special management areas identified through the planning process. The purpose of the proposed alternatives is to present and evaluate options for managing, protecting and enhancing public resources.

Each alternative is a master plan that would provide a framework within which future, more site specific decisions would be made, such as defining the intensity of management of various resources, developing activity plans (e.g., grazing allotment management plans and transportation plans) or issuing rights of way, leases or permits.

## The five alternatives considered are:

### Alternative A (Preferred Alternative)

The Preferred Alternative combines the management, production, use and protection of resources on the public lands in the Two Rivers Planning Area. Management would be directed toward multiple use of natural resources from the public lands while protecting or enhancing natural values. This alternative is the Bureau's favored management approach.

1. All riparian areas along the Deschutes and John Day rivers and their major tributaries would be managed to full potential, with a minimum of 60 percent of the vegetative potential to be achieved within 20 years.

High mid seral to low late seral ecological condition would be managed for on upland vegetation except where wildlife needs would dictate otherwise.

2. Forage requirements according to Oregon Department of Fish and Wildlife management objectives for deer and elk on public lands would be met. Upland vegetation would be managed to achieve maximum wildlife habitat diversity. All streams with fisheries or fisheries potential would be managed to achieve a good to excellent aquatic habitat condition.

3. Forage available for livestock would remain at 17,778 AUMs in the short term and would be projected to increase to 19,920 in the long term. Projects would be implemented as necessary to maintain current livestock grazing levels and to meet riparian and upland vegetation management objectives.

4. The preferred method of land disposal throughout the planning area would be through exchange. A total of 33,600 acres would be considered for sale if no apparent exchange opportunity exists and if no significant resource values are identified. Approximately 1,000 acres of land would be sold annually.

5. There would be 10,715 acres of commercial forestland on which the sustained timber harvest level would be based. The sustainable harvest level would be approximately 1.41 MMbf annually or 14.1 MMbf for a ten year period.

6. Public lands would remain open for exploration and development of mineral resources and related rights of way. Restrictive stipulations for oil and gas exploration and development would remain in effect on 132,006 acres of public land, to protect areas with high visual quality.

7. Approximately 20,000 acres would be limited or closed to off road vehicle use.

8. Five areas with identified outstanding natural or cultural values would be designated as research natural areas, areas of critical environmental concern, or outstanding natural areas. Other unique wildlife or ecological values would be maintained or enhanced.

### Alternative B (Emphasize Commodity Production and Enhancement of Economic Benefits).

This alternative emphasizes providing economic benefits. Multiple use management would emphasize the production of goods and services on public lands within the Two Rivers Planning Area to meet local and possibly regional demands.

1. Riparian areas would be managed to achieve a goal of 60 percent of potential production.

2. Forage needs in accordance with the Oregon Department of Fish and Wildlife management objectives for deer and elk would be met.

3. Forage available for livestock would increase to 19,189 AUMs in the short term and projected to increase to 24,217 AUMs in the long term.

4. A total of 143,000 acres would be considered for sale if no apparent exchange opportunity exists and if no significant resource values are identified,

5. There would be 10,984 acres of commercial forestland on which the sustained timber harvest level would be based. The sustainable harvest level would be approximately 1.45 MMbf annually or 14.5 MMbf for a ten year period,

6. Public lands would remain open for the exploration and development of mineral resources and related rights of way. The area of no surface occupancy restriction would be reduced to 60,000 acres within the one half mile wide State scenic waterways corridor in the Deschutes and John Day canyons,

7. Approximately 10,000 acres would be limited or closed as off road vehicle use.

8. Two areas would be designated as a research natural area and an area of critical environmental concern. Unique values within other special management areas would be maintained where no significant conflicts with commodity production occur.

### **Alternative C. Continue Existing Management (No Action)**

This alternative allows for the management and flow of outputs from the public lands and resources in the planning area at their present levels. The planning area is presently operating under a 1975 Management Framework Plan (MFP). Formal management direction is derived from the MFP with on the ground actions following an interdisciplinary analysis process.

1. Existing riparian enclosures would be maintained on 16 percent of the riparian areas. The remainder would continue to be grazed by livestock.

2. Existing wildlife habitat management plans would be continued. Forage needs for deer and elk according to Oregon Department of Fish and Wildlife management objectives would be met.

3. Forage available for livestock would remain at 17,778 AUMs.

4. Up to 4,000 acres would be available for disposal if no significant resource values are identified.

5. There would be 10,833 acres of commercial forestland on which a sustained timber harvest level would be based. The sustainable harvest level would be approximately 1.43 MMbf annually or 14.3 MMbf for a ten year period.

6. Public lands would remain open for exploration and development of mineral resources and related rights of way. Existing stipulations for no surface occupancy on oil and gas exploration and development would be maintained on 132,000 acres to protect areas with high visual quality.

7. Approximately 20,000 acres would be limited or closed to off road vehicle use.

8. Efforts to protect identified special management areas would continue,

### **Alternative D (Emphasize Natural Values While Accommodating Commodity Production)**

This alternative emphasizes protection, maintenance and enhancement of the natural environment within the planning area. The production of commodities would occur where significant conflicts with the protection of natural values could be avoided or mitigated.

1. Riparian areas totalling 1,070 acres would be excluded from grazing. The remaining 210 acres, where fencing to exclude livestock is not feasible, would be managed to maintain or achieve 60 percent of potential.

2. Management of wildlife habitat on public land would receive special consideration in all areas. Deer and elk forage requirements in accordance with Oregon Department of Fish and Wildlife management objectives would be met,

3. Forage available for livestock would decrease to 12,309 AUMs in the short term and projected to be 13,834 AUMs in the long term.

4. A total of 33,618 acres would be available for disposal if no apparent exchange opportunity exists and if no significant resource values are identified.

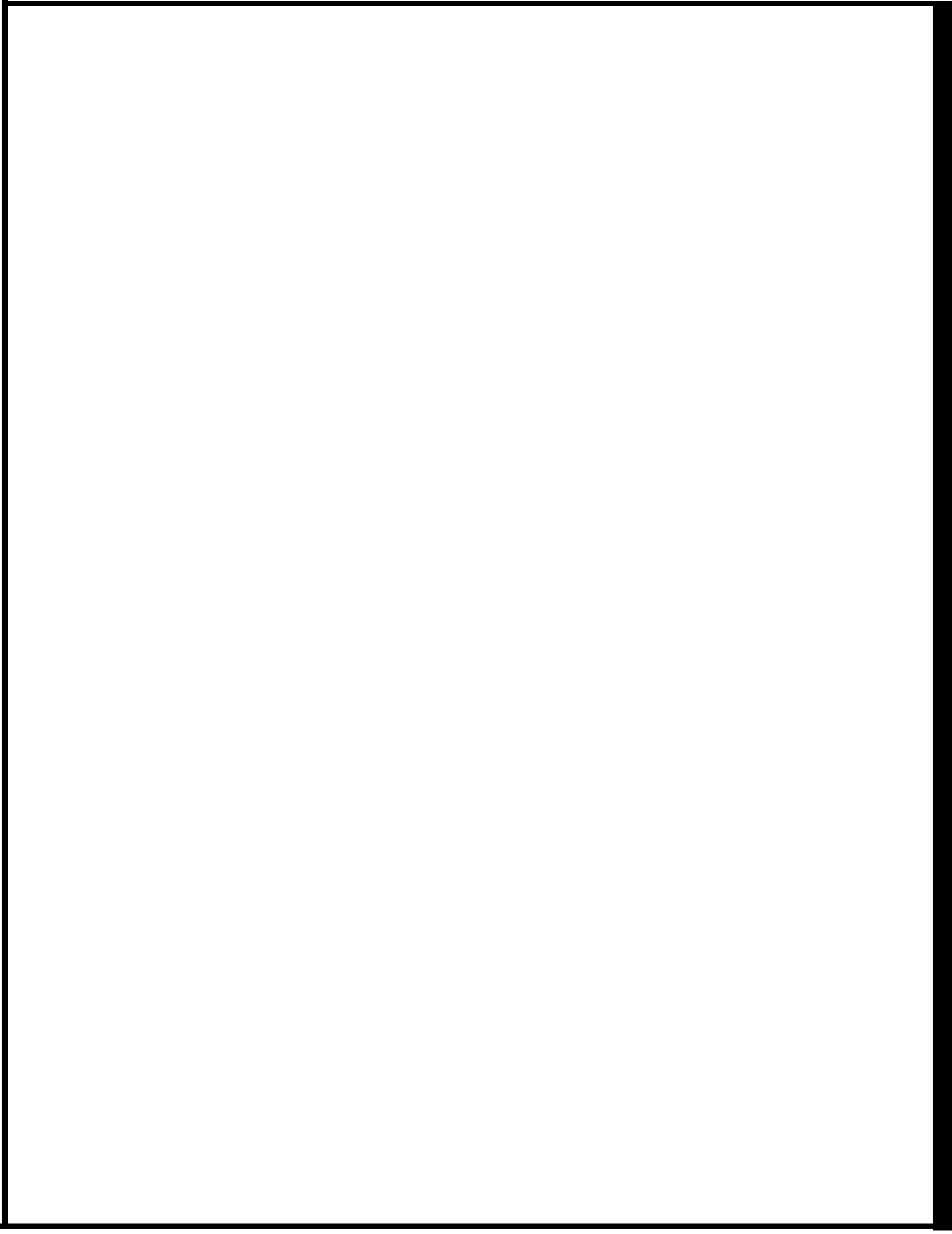
5. There would be 10,745 acres of commercial forestland on which a sustained timber harvest level would be based. The sustainable harvest level would be approximately 1.42 MMbf annually or 14.2 MMbf for a ten year period.

6. Public lands would remain open for exploration and development of mineral resources and related rights of way where no significant conflicts exist with wildlife, riparian or recreation values. Existing stipulations for no surface occupancy on oil and gas exploration and development would be expanded to include 150,000 acres.

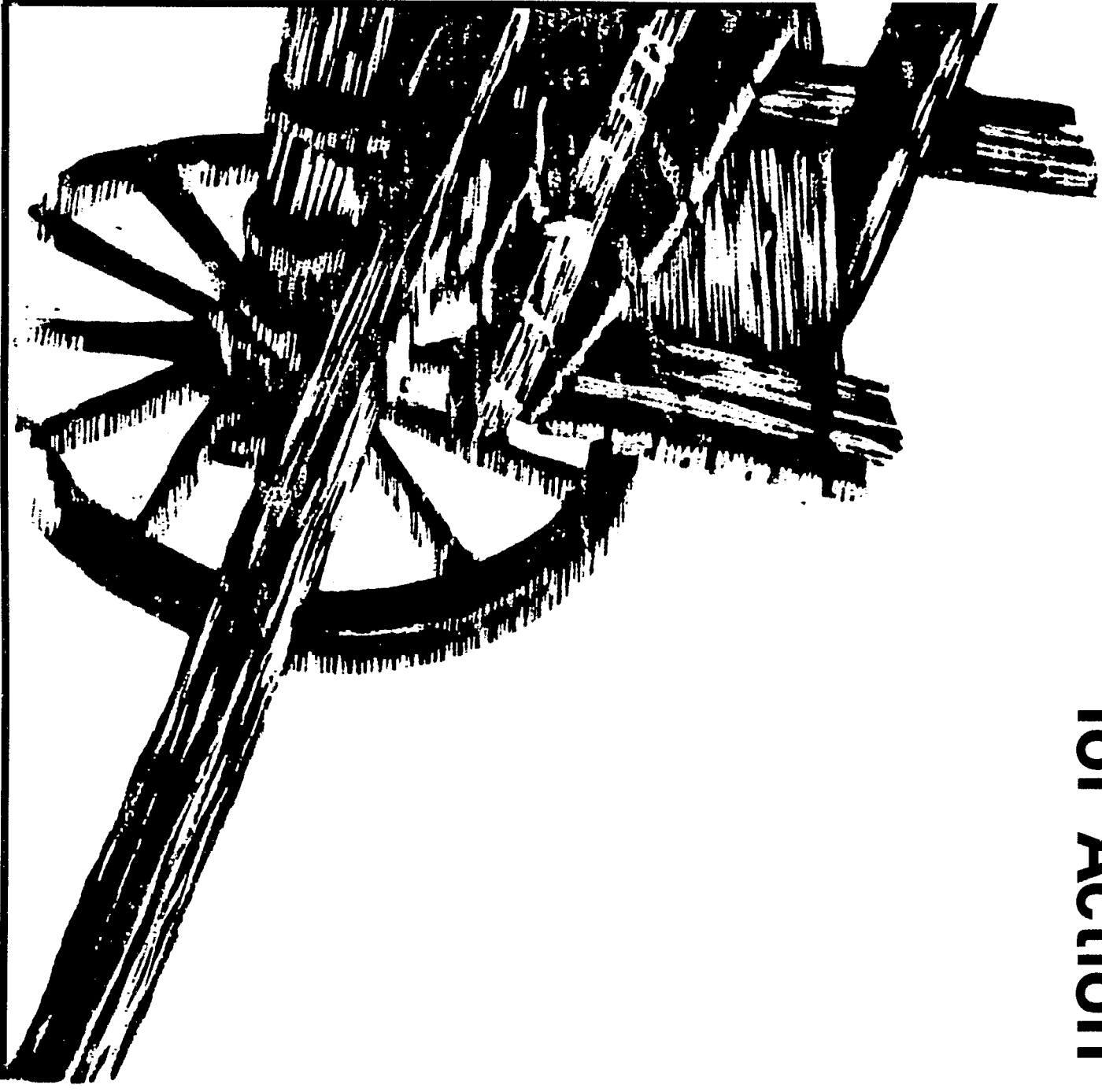
**Table 1 Summary, Long Term Environmental Consequences: Comparison of Alternatives**

Resource	Unit of Measure	Existing Situation	Alternative A (Preferred)	Alternative B (Commodity Production)	Alternative C (Existing Management)	Alternative D (Natural Values w/Commodities)	Alternative E (Natural Values)
Soil							
Streambank Stability	--	--	+M	+L	NC	+M	+M
Water							
Quality	--	--	+L	+L	NC	+L	+L
Vegetation							
Vegetation Type	--	--	+L	+L	NC	+L	+L
Ecological Condition	000's of acres						
Climax		25	24	24	17	24	24
Late Seral		107	168	168	101	168	175
Mid Seral		95	65	64	90	65	59
Early Seral		88	58	56	107	58	57
Other		9	9	12	9	9	9
Plant Diversity	000's of acres						
High		95	116	115	94	115	116
Low		220	199	200	221	200	199
Unknown		9	9	9	9	9	9
Riparian	acres						
Climax		223	1,024	821	368	1,024	1,024
Late Seral		196	0	0	140	0	0
Mid Seral		137	256	332	60	256	256
Early Seral		724	0	127	712	0	0
Threatened, Endangered or Sensitive Species	--		NC	NC	NC	NC	NC
Wildlife	--						
Upland Habitat			+M	-L	NC	+M	+M
Riparian Habitat		--	+H	+L	NC	+H	+H
Fish		--	+M	+L	NC	+H	+H
Livestock Grazing Available Forage	AUMs	17,778	19,920	24,217	17,778	13,834	0
Forest Products							
Sustainable Harvest Level	MMbf	1.43	1.41	1.45	1.43	1.42	.2
Energy and Minerals	acres						
No Oil & Gas Leasing		3,000	3,000	3,000	3,000	3,000	3,000
No Surface Occupancy (Oil and Gas)		132,000	132,000	60,000	132,000	150,000	200,000
Economic Conditions							
Long Term Loss or Gain in Value	dollars	--	+129,000	+386,000	0	-237,000	-1,066,000
Recreation							
Visitor Use Levels	visitor days	62,000	+L	+L	NC	+L	+L
Off Road Vehicle Limitation/Closure	acres	--	20,000	10,000	20,000	150,000	200,000
Cultural Resources							
Protection of Values	--		+L	+L	NC	+L	+M
Visual Resources							
Protection/Enhancement of Visual Quality	--		+L	-L	NC	+L	+M
Special Management Areas							
Protection of Values	--	--	+L	-L	-L	+L	+

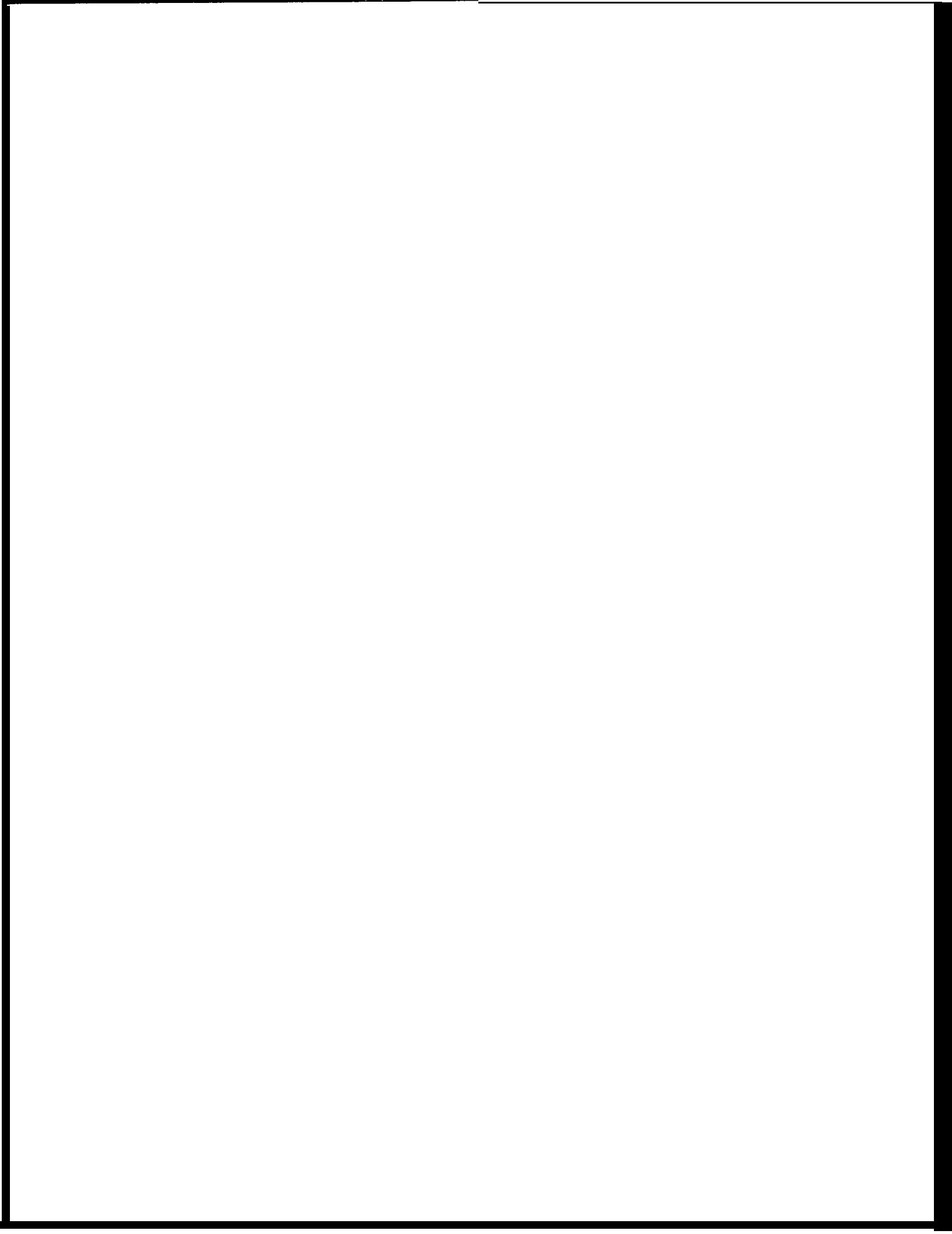
+ = beneficial impact  
 - = adverse impact  
 NC = no change  
 L = low  
 M = moderate  
 H = high



# Chapter 1 Purpose and Need for Action



Old wagons on the banks of the John Day River



# Introduction—The Planning Area

This Resource Management Plan/Environmental Impact Statement (RMP/EIS) is designed to provide a comprehensive framework for managing public lands in the Two Rivers Planning Area and allocating resources in that area for the next 10 to 15 years. The document analyzes impacts associated with management of 324,705 acres of public land and 384,074 acres of subsurface mineral estate underlying private land in the Two Rivers Planning Area where the Bureau of Land Management (BLM) is the administering agency. The two rivers, for purposes of identification in this document, are the John Day River and the Deschutes River.

The land being considered in the Two Rivers RMP/EIS is located in the Central Oregon corridor between the Cascade Mountain Range on the west, and Morrow and Grant counties to the east, in an area north from Crook and Deschutes counties to the Columbia River as shown on Map 1. The area includes public lands scattered across seven counties as shown in Table 2.

**Table 2. Public Land Acreage, Two Rivers Planning Area**

County	Public Land Administered by BLM <sup>1</sup>	Private Surface Federal Subsurface Mineral Estate	Total Acreage of County
Crook (Big Summit Prairie)	4,431	1,201	1,908,000
Gilliam	52,913	53,825	1,312,000
Hood River	360	96	343,000
Jefferson	45,844	79,570	1,149,000
Sherman	54,576	24,357	534,000
Wasco	71,429	103,901	1,531,000
Wheeler	95,157	121,124	1,092,000
Total Acreage	324,705	384,074	7,869,000

<sup>1</sup>Acreages of public land in the planning area were audited after the Proposed Land Use Alternative brochure was published. Acreage figures reflect changes that include listing lands withdrawn for power sites along the Deschutes and John Day rivers; land acquired and ultimately disposed of through exchanges; acreages within the Crooked River National Grasslands that were not withdrawn by the U.S. Forest Service; and land disposed of through public sale.

The planning area is bounded by four national forests—Mt. Hood, Deschutes, Qchoco and Umatilla—and the John Day Fossil Beds National Monument, which is administered by the National Park Service. Also located adjacent to the planning area is the reservation of the Confederated Tribes of Warm Springs.

Big Summit Prairie is a blend of public and private lands, an island that includes approximately 4,400 acres of BLM land surrounded by the Qchoco National Forest in Crook County. Transfer of the Prairie to the jurisdiction of the U.S. Forest Service has been considered for several years. The recently announced BLM/USFS interchange would accomplish this transfer. The Prairie is included, and will be analyzed as a part of the Two Rivers RMP/EIS since it was still BLM responsibility at the time this document was being prepared. Map 2 shows the boundary and public lands within the Two Rivers Planning Area.

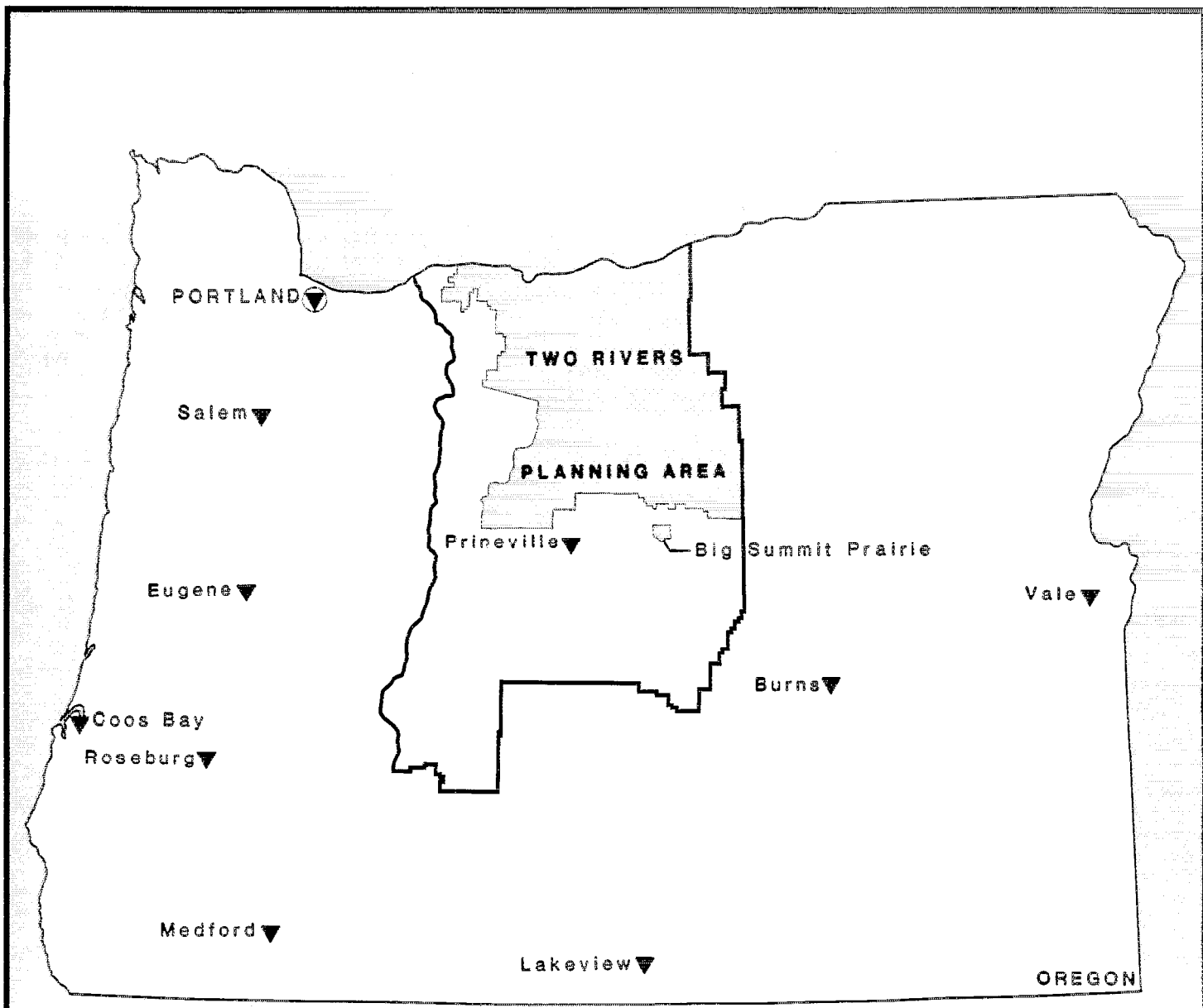
The Bureau of Land Management administers the public lands in the planning area from the District Office in Prineville, Oregon. The intermingling of public land with other Federal lands administered by other agencies has led to cooperative management on some of the lands.





## Purpose and Need

The resource management plan, by its very nature, suggests guidelines for the management of public lands in the Two Rivers Planning Area. It also provides a platform for management of all resources and uses within the principles of multiple use and sustained resource yield.

The preferred alternative identified in this document was selected on the basis of input from public meetings and comments made through correspondence, contacts with local governments, suggestions from user groups, and staff discussion as explained in Chapter 4. The plan was developed under the requirements of the Federal Land Policy and Management Act (FLPMA) and involved interdisciplinary planning processes applicable to multiple use and sustained resource yield.

This RMP/EIS is written in compliance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality regulations and in specific response to litigation in the Natural Resources Defense Council et al. versus Rogers C. B. Morton et al. 1973 (U.S. District Court for the District of Columbia, ref. Case No. 1983-73). That suit alleged that the Bureau of Land Management's programmatic grazing EIS did not comply with the National Environmental Policy Act. As a result of the settlement of this suit, BLM agreed to prepare site

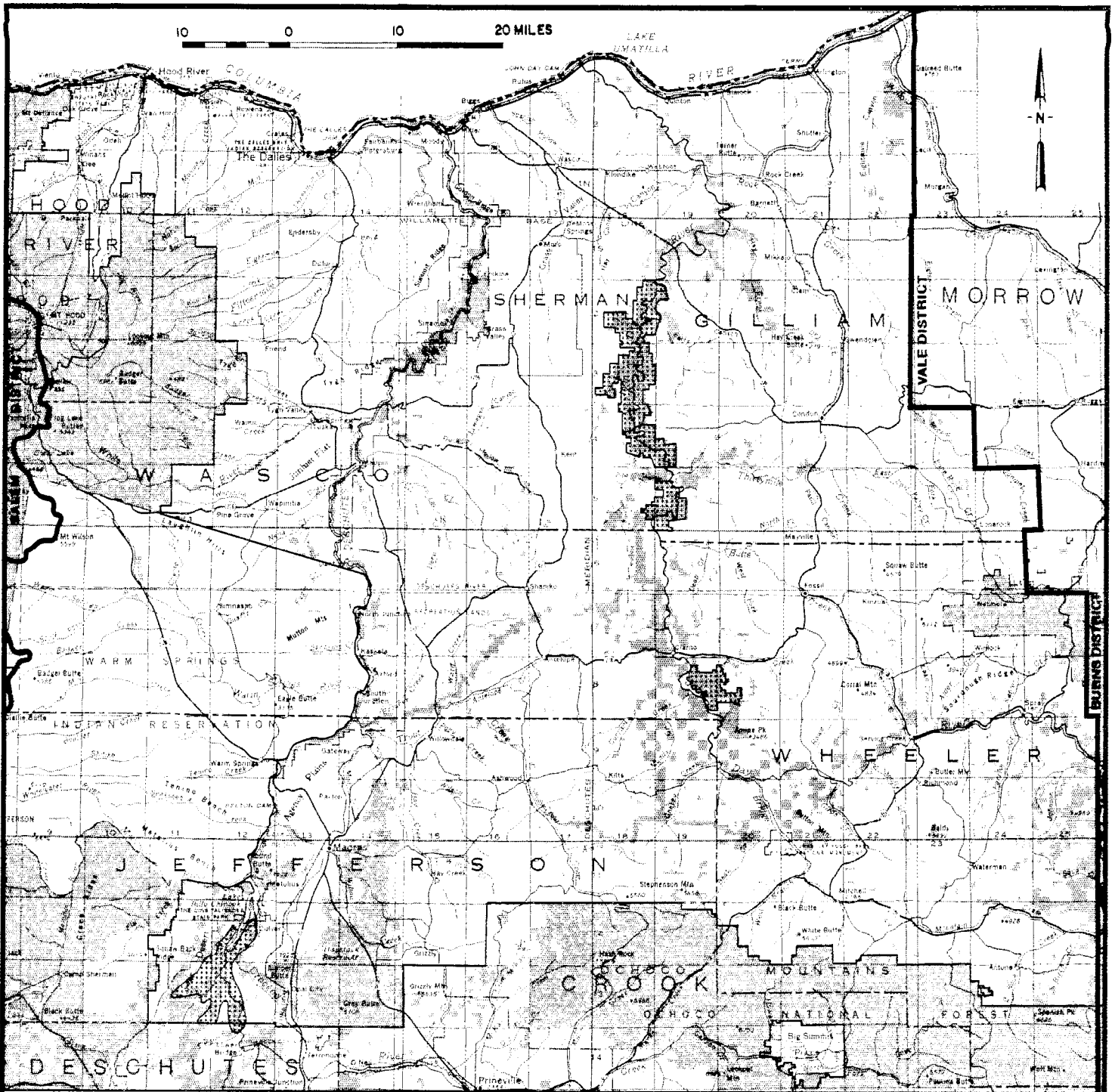






-  BLM State Office
-  BLM District Office
-  District Boundary
-  Two Rivers Planning Area

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**PRINEVILLE DISTRICT**  
 1985

**MAP 1**  
**General Location**





-  BLM Land (Public Land)
-  U. S. Forest Service
-  Areas Considered for Wilderness Designation in Seperate Studies
-  Two Rivers Planning Area Boundary

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

PRINEVILLE DISTRICT

1985

**MAP 2**  
Planning Area  
and  
Land Status

specific grazing EISs. The Two Rivers RMP/EIS will meet this requirement for this planning area.

## **Planning Process and Criteria**

The Bureau of Land Management planning process involves public involvement at various stages. Four public meetings have been held on the Two Rivers Planning Area—two in Condon and two in Grass Valley (one during the scoping process and one during the review period of the Draft RMP/EIS). The resulting responses have been incorporated in the preparation of this proposal.

The planning process is designed to enable the BLM to accommodate the uses the public wants to make of public lands while complying with laws established by the Congress and policies implemented by the executive branch of the Federal government.

## **Issues**

Federal planning regulations generally equate land use planning with problem solving—resolving issues. That problem solving process included application of the principles of multiple use and sustained resource yield set forth in the Federal Land Policy and Management Act and through other applicable laws.

A number of specific issues were identified in public comments at the meetings, in response to a brochure and to other documents on the planning area, and on the basis of input from a number of groups and governmental organizations.

Those identified issues which have been analyzed in detail in the Draft RMP/EIS are: riparian management; wildlife habitat management; grazing management; forestry; minerals management; land tenure and access; recreation management, excluding recreation river use and wilderness; and designation of special management areas.

### **1. Wildlife Habitat Management**

Habitat available for big game and other animals is not adequate in some areas. Improvement in riparian and upland habitat will contribute to year round accessibility of food and shelter for wildlife.

### **2. Livestock Grazing Management**

There is a conflict of use between livestock grazing

and other important resource uses. Some management changes may be appropriate to improve range condition and provide equitable forage opportunities for livestock and wildlife, to reestablish, expand, improve or protect riparian areas, and to address nonconsumptive uses. Solutions are needed for stocking levels, season of use, grazing systems, range development projects, and land treatments. Improvement in ecological condition will be slow unless it is coupled with a reduction in sagebrush and juniper cover in some areas. Poor livestock distribution is evident in some allotments, which results in heavy use of favored areas and minimum use elsewhere. That condition will have to be corrected if proper ecological condition is to be maintained or achieved.

### **3. Riparian Management**

Overall condition of riparian vegetation in the planning area is at less than potential.

Protection of riparian areas along the two rivers and their tributaries is essential to improve watershed condition as well as fish and wildlife habitat. By building fences, regulating livestock access to the riparian areas, or changing the timing of livestock grazing, the integrity of the riparian habitat will be protected and/or improved for fish spawning, waterfowl nesting, and use by big game.

### **4. Forestry**

A commercial forestland base and a sustainable allowable harvest level needs to be established which will provide timber sales to assist in meeting local and regional needs. Other resource values need to be protected through appropriate land use allocations restricting or excluding timber harvesting activities.

### **5. Minerals Management**

Conflicts related to mineral exploration and related rights of way exists. The need to allow maximum mineral availability while protecting other resource values must be achieved.

### **6. Land Tenure and Access**

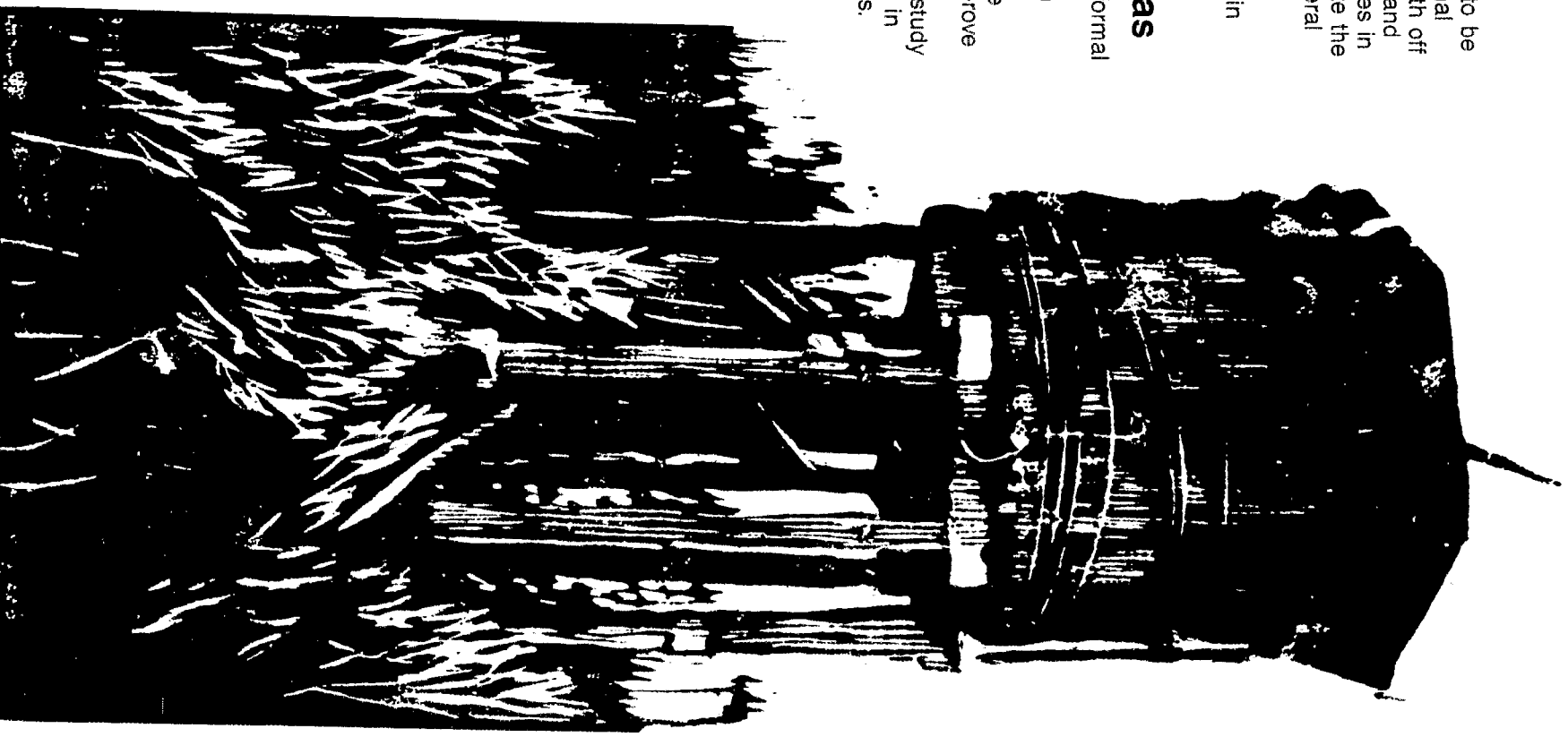
Adjustments in land ownership in parts of the planning area are appropriate to achieve more efficient management and utilization of public resources. Areas need to be identified that should remain under BLM management as well as those which should be exchanged, transferred or sold. Agricultural use and occupancy of public land needs to be addressed and resolved.

## 7. Recreation Management

Known or potential conflicts that exist between recreation and other resource programs need to be resolved. The demand for dispersed recreational opportunities needs to be considered along with off road vehicle use in relation to its accessibility and its effects on the land and other resource values in the planning area. The need exists to recognize the interests of rockhounds and other special mineral interests. Recreation river use and wilderness designation have been or will be analyzed in separate documents. They are not considered in this RMP/EIS.

## 8. Special Management Areas

Some areas warrant special consideration for formal designation as areas of critical environmental concern, outstanding natural areas or research natural areas. These special areas have been identified and considered for designation in the appropriate categories to further protect or improve habitat of threatened, endangered or sensitive species; provide for scientific and educational study opportunities; and to protect cultural resources in accordance with Federal laws and requirements.



Old railroad water tower at Harris Canyon



# Chapter 2

## Proposed Resource Management Plan



Old windmill in Ferry Canyon

## Introduction

Chapter 2 describes the proposed plan, which provides a mid ground or balance between the protection of fragile and unique resources and the production and development of renewable and nonrenewable resources. Management actions were selected on the basis of their ability to resolve the issues raised during the planning process, satisfy planning criteria and public input, and mitigate environmental consequences.

The proposed plan (proposed action) is patterned after the Preferred Alternative identified in the Draft Two Rivers Resource Management Plan and Environmental Impact Statement (RMP/EIS). No significant changes have occurred in the plan.

Approval of the RMP will mark the completion of one stage of the planning process. The RMP is not a final implementation decision on actions which require further specific plans, or decisions under specific provisions of law and regulations. More site specific plans or activity plans, such as habitat management plans (HMPs) will be done through the resource activity programs. Procedures and methods for accomplishing the objectives of the RMP will be developed through the activity plan. Further environmental analyses will be conducted and additional engineering and other studies or project plans done if needed.

## Goal and Objectives of the Proposed Plan

### Goal: Provide for Commodity Production While Protecting Natural Values

#### Objectives:

1. Maintain forage production and livestock use at 17,778 AUMs. Maintain current livestock grazing levels and meet riparian and upland vegetation management objectives.
2. Manage riparian areas along the Deschutes and John Day rivers and their major tributaries to full potential, with a minimum of 60 percent of the vegetative potential to be achieved within 20 years.
3. Provide forage to meet management objective numbers of the Oregon Department of Fish and Wildlife for deer and elk. Manage upland vegetation to achieve maximum wildlife habitat diversity. Manage all streams with fisheries or fisheries potential to achieve a good to excellent aquatic habitat condition.
4. Place emphasis on retaining and expanding, by

exchange of public land, holdings in: (1) areas of national significance, (2) areas where management is cost effective, and (3) where land is most appropriately managed in public ownership due to significant multiple resource values. Public lands having no reasonable opportunity for exchange would be offered for sale if they are: (1) difficult and uneconomical to manage and are not needed by another agency; (2) no longer needed for the specific purpose for which they were acquired or for any other Federal purpose; (3) provide greater benefits to the public in private ownership. The transfer of public lands to other public land management agencies would occur if more efficient management of the land would result.

Authorize agricultural use of public lands if proposals are consistent with the management and protection of other values. Pursue attempts to acquire limited public access through exchange or negotiated easement, consistent with management objectives.

5. Intensively manage commercial forestlands suitable for timber production but recognize harvest restrictions or exclusions to protect riparian vegetation, wildlife, visual and other resource values.

6. Keep public lands open for exploration and development of mineral resources and related rights of way. Retain restrictive stipulations for oil and gas exploration and development on 132,000 acres of public land.

7. Designate public lands as open to off road vehicles except in areas where that use would not be appropriate or where significant damage to soils, vegetation, wildlife or other natural values is resulting from that use.

Areas which have high or moderate quality collectible mineral resources, including plant and invertebrate fossils, would be available for rockhound purposes and would be recognized in land use decisions. Public use areas would be reviewed on a case by case basis to insure that no significant conflict exists with the protection of other natural values.

8. Designate areas with identified outstanding natural or cultural values as areas of critical environmental concern. Maintain or improve other unique wildlife or ecological values.

# Planned Management Actions Under the Proposed Plan

This section describes the planned actions and determines priorities for implementing those actions. The management actions would be used to resolve the planning issues identified,

The priorities were established based on public input, administration policy, and Department of the Interior and BLM directives. These priorities may be revised as policy and directives change.

The highest priority for each resource is maintaining its base. This includes funding normal operating costs, completing administrative duties, and processing public inquiries. Priorities are placed in one of three categories—high, medium or low based on a comparative ranking of the management actions,

The listed support actions are foreseeable at this time. The need for additional support actions such as engineering and other studies or specific project plans may be identified as a result of further planning. All such actions will be designed to achieve the objectives of the RMP. Additional environmental analyses will be conducted where appropriate to supplement the analysis in the Draft RMP/EIS.

## Wildlife and Fish Habitat

Livestock use on approximately 16,000 acres of deer and elk winter range and 7,580 acres of curlew nesting habitat will be managed to be compatible with, or improve, wildlife habitat values. Upland vegetation will be managed through grazing management and range/wildlife habitat development to provide maximum wildlife habitat diversity (ecological condition of high mid seral to low late seral stage) and to provide sufficient forage to meet the big game management objectives of the Oregon Department of Fish and Wildlife,

Fish habitat developments on approximately 87 miles of tributary streams include: log and rock placements; gabion developments; tree and shrub plantings; and riparian habitat improvement used to achieve a good to excellent aquatic habitat condition. The fish habitat developments will be concentrated on the tributary streams of the Deschutes and John Day rivers. They will not include direct instream improvements in the main river channel.

### Implementation

Sufficient forage and cover will be provided for wildlife on important habitat to maintain existing

population levels or meet management objective levels as established by the Oregon Department of Fish and Wildlife. Specific forage and cover requirements will be incorporated into allotment management plans in areas of primary wildlife use.

Range developments will be designed to achieve both wildlife and range objectives. Existing fences may be modified, and new fences will be built to allow wildlife passage. Where natural springs exist, development will provide a more dependable water source for wildlife and livestock. Water troughs will accommodate use by wildlife and livestock. The spring area and the overflow will be fenced to prevent trampling,

Vegetative manipulation projects will be designed to minimize wildlife habitat impact and to improve habitat when possible. The Oregon Department of Fish and Wildlife will have an opportunity to review all projects involving vegetation manipulation,

Habitat management plans will be written for selected areas of wildlife habitat, e.g., bighorn sheep, bald eagles, resident and anadromous fish. The plans will include detailed information on species emphasis, management objectives, constraints, planned actions, coordination with other programs and agencies, environmental analyses, implementation schedule and cost analyses and evaluation procedures. Priorities will be determined by need (shortage of habitat, conflict with other uses, potential or opportunity for improvement! etc.).

Crucial habitats will be monitored for forage production, habitat condition changes, and overall effectiveness of improvements. Monitoring studies will include browse, photo trend, eagle inventory% and remote sensing. Wildlife habitat monitoring will enable the Bureau to make decisions on forage allocation and seasonal use restrictions made after monitoring described in grazing management.

Streams will be monitored to ensure maintenance of water quality and riparian conditions and to evaluate the effectiveness of stream improvement practices. This monitoring includes riparian inventory and photo trend, water quality inventory, biotic condition index, fish census and remote sensing of riparian habitat. The priority in which these streams will be monitored for improvement is based upon characteristics of the fisheries, intensity of management! and available funding.

Continued seasonal restrictions would be applied to mitigate impacts of human activities on important seasonal wildlife habitat. Some important types of habitat include deer winter range, raptor nesting habitat, and curlew nesting habitat.

The priority for implementation will be as follows:

**High**—Monitor, maintain or improve habitat for threatened or endangered species, e.g., bald eagles.

Monitor, maintain or improve aquatic habitat on those streams having good potential for fish management. Priorities will be based upon criteria set forth in the Draft RMP/EIS. Monitor, maintain or improve riparian habitat as identified in the Draft RMP/EIS. Monitor, maintain or improve bighorn sheep range.

**Medium**—Monitor, maintain or improve winter range for deer and elk. Place priorities for specific treatment in those areas having the greatest

problems, the best potential or both, Monitor, maintain or improve aquatic habitat streams having nonintensive management values.

**Low**—Monitor and maintain aquatic habitat on streams having little or no fish management value. Monitor, maintain or improve habitat for game and nongame species of high interest in the area.

## Livestock Grazing

The availability of forage will remain at 17,778 AUMs in the short term. Sixty miles of fence will be constructed, approximately 7,800 acres of sagebrush will be controlled through prescribed burning, and 13 springs will be developed. As a result of range developments and improving



Mule deer near Stephenson Mountain



ecological condition, available forage for livestock is projected to increase to 19,920 AUMs in the long term as monitoring indicates these increases are appropriate. Livestock use in the Horn Butte (2571) and Hi Meadows (2644) Allotments will be managed to enhance habitat for the long billed curlew.

Changes in periods of use or exclusion through construction of 131 miles of riparian protection/exclusion fence, or a combination of both will occur where necessary to meet objectives of this alternative. Intensive management, which will encourage a change in ecological condition toward climax, will be implemented on 259,000 acres. On the remaining 34,000 acres there will be less intensive management which will either improve or maintain existing conditions. Table 3 indicates the number of allotments and areas of public land and under what grazing systems they are now grazed by livestock and how they will be grazed in the future. No allotments or entire pastures within allotments are proposed for exclusion of livestock at this time.

### Implementation

Implementing and monitoring the livestock grazing portion of this plan will require several separate



Cattle grazing on public lands

actions that overlap in time, some of which are underway. These actions include development of allotment management plans (AMPs) and Cooperative Resource Management Plans (CRMPs); monitoring to determine stocking levels and forage use decisions; and monitoring to determine if selective management criteria are being fulfilled.

The priority for implementation will be as follows:

High-Implement AMPs/CRMPs based upon selective management. Priorities for AMP/CRMP implementation are as follows:

- Complete or revise partially completed AMPs/CRMPs;
- Improve category allotments;
- Maintain category allotments;
- Custodial category allotments.

Medium-Monitor allotments to establish stocking rates where data indicates reduction in forage use or where data is inconclusive or nonexistent.

Low-Issue grazing decisions where no reductions are required or reductions are negotiated with lessee.

### Riparian

All riparian areas along the Deschutes and John Day rivers and their major tributaries will be managed to reach full potential, with a minimum of 60 percent of the vegetative potential to be achieved within 20 years. Livestock grazing will be managed to reach the stated riparian objectives.

### Implementation

Management actions within riparian areas will include measures to protect or restore natural

**Table 3 Existing and Proposed Grazing Systems**

System <sup>1</sup>	Existing Situation No. Allot./ Acres	Proposed RMP No. Allot./ Acres
Improve		
1	12/50,178	59/183,692
2	22/163,243	0
3	25/70,271	0
Maintain		
1	12/115,560	32/147,264
2	14/17,514	9/5,250
3	15/19,460	0
Custodial		
1	12/13,568	66/28,043
2	57/125,076	67/128,467
3	64/27,864	0
Total		
1	36/69,306	157/1259,019
2	93/1105,835	76/133,717
3	104/117,959	0
Totals	233/292,736	233/1292,736

<sup>1</sup> Systems which will encourage an upward change in ecological condition (early spring, deferred, deferred rotation, winter, rest rotation).  
<sup>2</sup> Systems which will maintain or improve existing ecological conditions (deferred use one of three years).  
<sup>3</sup> Systems which will encourage a downward change in ecological condition (spring/summer).

functions, as defined by Executive Orders 11988 and 11990. Management techniques will be used to minimize degradation of stream banks and the loss of riparian vegetation. Roads and either linear facilities will avoid riparian areas where feasible. Riparian habitat needs will be considered in developing livestock grazing systems,

## Forestry

Maintaining or improving site productivity will be a basic objective in all forestry practices. Harvesting minor forest products such as posts, poles, firewood, etc., will be guided by similar considerations.

Decisions on forestry practices (treatments) will be made with two primary objectives: (1) Successful reforestation; and (2) Increasing subsequent growth of commercial species. In this process, specific mitigation recommendations will be used to minimize unavoidable, adverse impacts and to resolve conflicts with other resource values.

There will be 10,715 acres of commercial forestland on which a sustained harvest level will be based. The sustainable harvest level will be approximately 1.41 MMbf annually or 14.1 MMbf for a ten year period. Management practices will be designed to recognize harvest restrictions for the protection of riparian vegetation, wildlife, cultural or other natural values.



Ponderosa Pine in Johnson Heights

Minor forest products, such as posts, poles, firewood, etc., will be sold where those sales are compatible with other resource values.

## Implementation

**Table 4 Forestry Practices and Land Use Allocations Under the Proposed Plan**

Intensive Timber Production Base (acres)	10,715
<b>Harvest Level <sup>1</sup></b>	
Yearly Average	1.41 MMbf
<b>Treatments <sup>2</sup></b>	
Transportation System	
New Construction	6miles/17acres
Improvement	7miles/15acres
Timber Harvest Clearcut	65 acres
Partial Cut	2261 acres
Timber Harvesting Method	
Cable	84 acres
Tractor	2242 acres
Slash Disposal	
Broadcast Burn	65 acres
Pile and Burn	1658 acres
Lop and Scatter	365 acres

<sup>1</sup>For purposes of analysis, volume calculations are based on the current annual sustainable harvest level of 132 board feet per acre. This figure may change when an extensive forest inventory is completed and the sustainable harvest level is recalculated, however, the associated land use allocations and management direction will not change.

<sup>2</sup>Figures are estimates based on a five year timber sale plan and were made to facilitate impact analysis. Acreages may vary with implementation.

## Mineral Resources

### Leasable Minerals

Leasable minerals will continue to be made available on most of the land where the surface is also publicly owned. Restrictions or changes in lease stipulations will apply only to areas not presently leased or areas presently leased where leases will be renewed. Leases will not be granted on 12.5 acres of public lands within the Governor Tom McCall Preserve; two parcels of public land totaling 76 acres within the Columbia Gorge; 250 acres of public lands within the proposed Island Research Natural Area; and 2,617 acres of public lands within The Cove Palisades State Park.

Approximately 188,000 acres of public land will be open to exploration—subject to standard lease requirements and stipulations. A restrictive no surface occupancy stipulation for fluid minerals

exploration and development will be maintained on 132,000 acres of public lands in the planning area--lands identified as nationally significant or visually sensitive!

Exceptions to the stipulation of no surface occupancy will be evaluated using the following criteria:

(1) Evidence of exploration or similar activities would not be visible from the surface of either the John Day River or the Deschutes River. Activities within other areas of the river corridors may be visible, but should not attract attention, or leave long term visual impacts,

(2) All activities involving exploration would use existing roads to the fullest extent possible,

(3) Any proposed exploratory drilling pad or road construction for access to a drilling site would be located to avoid canyon slopes and areas of high visibility. In these areas roads and drilling sites would be fully rehabilitated when operations have been completed.

When leases are issued or renewed with the NSO, the criteria for exception will be included in the stipulation.

## Implementation

**Table 5 Mineral Leasing Direction Under the Proposed Plan**

Public Land Open to Development with Standard Stipulations	190,000	26.9%
Open to Development with Restrictive Stipulations <sup>1</sup>	132,000	18.6%
Closed to Leasing	3,000	.4%
Reserved Federal Mineral Estate Open to Leasing With Standard Stipulations	383,000	54.1%
Totals	708,000	100%

<sup>1</sup>The restrictive no surface occupancy stipulations reads as follows: "Because of the high scenic and recreational values, no surface occupancy is allowed on the part of the lease falling within the John Day River canyon or the Deschutes River canyon, unless written permission is granted by the BLM deputy state director for minerals with the consent of the Prineville BLM District Manager." (Restrictions or changes in lease stipulations would apply only to areas not presently leased or areas presently leased where leases are renewed.)

## Locatable Minerals

Areas not specifically withdrawn from mineral entry will continue to be open under the mining laws to help meet the demand for minerals. Mineral exploration and development on public land will be regulated under 43 CFR 3809 to prevent unnecessary and undue land degradation. No new mineral withdrawals are proposed in this plan. The Bureau will recommend that the existing protective withdrawal at the Macks Canyon Archaeological Site be retained.

## Salable Minerals

Salable minerals, including common varieties of sand, gravel, and stone will continue to be made available for local governments. The salable mineral program involves several quarries where State and County road departments obtain rock for road surfacing material. New quarry sites may be developed as needed if they are consistent with the protection of other resource values.

All public lands are open to recreational mineral collection unless specific minerals are subject to prior rights, such as mining claims.

## Reserved Federal Mineral Estate

The reserved Federal mineral estate will continue to be open for mineral development. Conveyance of mineral interest owned by the United States, where the surface is, or will be, in non Federal ownership, may be enacted after a determination made under Section 209(b) of FLPMA finds:

(1) That there are no known mineral values in the land, or

(2) That the reservation of mineral rights in the United States would interfere with or preclude non mineral development of the land and that such development is a more beneficial use of the land than mineral development.

All land tenure adjustments will consider the effect on the mineral estate. If the lands are not known to have mineral development potential, the mineral interest will normally be transferred simultaneously with the surface.

## Land Tenure and Access Exchange, Transfer or Sale

The preferred method of disposal will be through exchange to achieve goals of public value enhancement in all three zones. The transfer of public lands to other public land management agencies will occur if more efficient management of the land will result. Public lands listed in Appendix J of the Draft RMP/EIS, as revised, will be

considered for sale (totaling 33,310 acres) if no apparent exchange opportunity exists and if no significant resource values are identified. This could average as much as 1,000 acres per year. Public lands in Zone 1 on Map 3 of the Draft RMP/EIS, as revised, will be retained, or may be exchanged for lands with even higher public value. Lands in Zone 2 will require site specific analysis to determine sale potential.

## Agricultural Use of Public Lands

Public lands with agricultural potential will be considered for sale if they meet the sale criteria. Existing and potential agricultural use of public lands in the planning area will be authorized by permit or lease if the following criteria are met:

- (1) The use does not conflict with riparian area management, important wildlife habitat, recreational use of public lands, or other significant resource values.
- (2) The use is compatible with historical use on adjacent private lands.
- (3) The use would maintain or enhance other resource values, such as providing feeding or nesting areas for wildlife.

Agricultural use will be permitted on an estimated 450 acres and another 300 acres now under cultivation will be reclaimed. Private appropriation of water from the John Day River as it relates to agricultural use on adjacent public lands will be coordinated through the Oregon Department of Fish and Wildlife, the Oregon



Wheat field on the Columbia Plateau

Water Resources Board, and the Oregon State Parks and Recreation Division of the Department of Transportation.

When significant conflicts occur, resource values on public lands will be protected and agricultural use will not be authorized.

## Public Access

Additional public access may be acquired to serve tracts in Zones 1 and 2 if access is consistent with management objectives. Where public access is desired, the minimum access needed to achieve management objectives will be acquired. The preferred method will be through negotiated purchase of an easement or exchange.

## Implementation

The proposed plan designates the following land transfer actions in priority order:

1. BLM/Other Federal Jurisdictional Transfers;
2. Transfers to State and Local Agencies (R&PP and other actions);
3. State Exchanges
4. Private Exchanges;
5. Sales;
6. Desert Land Entries.

This proposed plan considers 33,310 acres as potentially suitable for sale depending on resource considerations. Therefore, 291,395 acres of public land do not lend themselves for sale designation.

## Recreation

### Off Road Vehicles

The use of off road vehicles on public lands will be regulated in accordance with the authority and requirements of Executive Orders 11644 and 11989 and regulations contained in 43 CFR 8340.

### Open Designation

Public lands which total approximately 263,000 acres will be open to off road vehicle use since no significant impacts are occurring and off road vehicle use is essential for conducting other authorized resource uses.

An estimated 61,685 acres of public land within special management areas where off road vehicle use would not be appropriate and in other areas where significant damage to soils, vegetation, wildlife, or visual qualities is resulting from off road vehicle use will be limited or closed as follows:

### Limited Designation

Vehicle travel on public lands in the following areas will be restricted to existing roads and trails, year long. In addition, a seasonal closure will be implemented when appropriate to prevent excessive damage to soil and vegetation. During this period vehicle travel will be confined to designated roads only.



Chukar hunter in the Deschutes River Canyon

1. Deschutes River as shown on Map 11 in the Draft RMP/EIS—2,500 acres.
2. Horn Butte Wildlife Area as shown on Map 13 in the Draft RMP/EIS—6,000 acres.
3. Macks Canyon Archaeological Site as shown on Map 13 in the Draft RMP/EIS—25 acres,
4. Spanish Gulch Mining District as shown on Map 13 in the Draft RMP/EIS—335 acres.
5. Existing ORV use areas in and adjacent to the John Day River Canyon as shown on Map 11 in the Draft RMP/EIS—10,000 acres.
6. John Day River Canyon from Butte Creek to Cottonwood Bridge—35,000 acres.

Vehicle travel in the following areas will be restricted to designated roads and trails on public land, year long.

1. Primitive and developed recreation sites adjacent to the Deschutes River (including but not limited to Steelhead Falls, Trout Creek, South Junction, and Beavertail)—582 acres,
2. Spring Basin near the John Day River as shown on Map 11 in the Draft RMP/EIS—6,000 acres.
3. Oregon Trail Historic Sites at McDonald and Fourmile Canyon as shown on Map 13 in the Draft RMP/EIS—424 acres,

### Closed Designation

Vehicle travel on public lands in the following areas will not be allowed so as to protect unique natural values and riparian habitat as well as preventing excessive soil and vegetation disturbance.

1. The Governor Tom McCall Preserve at Rowena as shown on Map 13 in the Draft RMP/EIS—12.5 acres.
2. The botanical/scenic areas within the Columbia Gorge as shown on Map 13 in the Draft RMP/EIS—76 acres.
3. The Island in The Cove Palisades State Park as shown on Map 13 in the Draft RMP/EIS—250 acres.
4. Mecca Flat adjacent to the Deschutes River near Warm Springs—320 acres,
5. Public lands in the vicinity of the BLM field headquarters at Maupin—160 acres

ORV use in wilderness study areas is guided by the Bureau's "Interim Management Policy and Guidelines for Lands Under Wilderness Review." Areas designated as wilderness through legislation would have ORV use restricted by the specific legislation and/or Bureau's "Wilderness Management Policy."

### Rockhounding

Collectible mineral resources with moderate or high value, including plant and invertebrate fossils, will be available for rockhounding and recognized in land use decisions.



Rockhounds digging in agate beds near Antelope

### **Implementation**

All public lands in the planning area will be designated under the BLM off road vehicle regulations as part of the Two Rivers Resource Management Plan Record of Decision and publication of the designation order in the Federal Register.

### **Special Management Areas**

The thirteen special management areas identified on Table 16 of the Draft RMP/EIS will be managed as follows:

#### **The Island in The Cove Palisades State Park**

Designate and manage 250 acres of public land as an Area of Critical Environmental Concern; Research Natural Area. This includes 80 acres of USFS land and will necessitate a cooperative management agreement.

The designation and management of this area will be designed to protect and preserve what is considered to be the best remaining example of the western juniper/big sagebrush/bluebunch wheatgrass ecotype plant association in the region. It is also a raptor, deer, and waterfowl use area and contains outstanding scenic vistas of Lake Billy Chinook and the Cascades,

### **Deschutes and John Day River Canyons (Including the Red Wall)**

Continue managing areas of high visual and natural quality in the canyon areas (approximately 139,000 acres) while allowing other compatible uses in the same area. Continue cooperative role with the State Parks and Recreation Division of the Oregon Department of Transportation in managing the public lands consistent with the intent of the Oregon Scenic Waterways Act.

### **John Day River State Wildlife Refuge, Horn Butte Curlew Area and White River Wildlife Areas**

Incompatible uses will be excluded from these areas. They will be managed to meet forage and habitat needs for big game and non game species as recommended by the Oregon Department of Fish and Wildlife. The Horn Butte Curlew Area which totals 6,000 acres will be designated as an Area of Critical Environmental Concern. The designation and management of this area will be designed to protect and preserve the important nesting habitat for the long billed curlew which exists as a result of a bluebunch wheatgrass, Sandburg bluegrass, needlegrass, snakewood and gray rabbitbrush habitat type,

### **The Dalles Watershed**

Continue management agreement with the City of The Dalles. Surface disturbing activities will be excluded from this 410 acre area if they would have an adverse effect on the watershed.

### **The Governor Tom McCall Preserve at Rowena and the botanical/scenic areas within the Columbia Gorge.**

Designate 12.5 acres within The Governor Tom McCall Preserve as an Area of Critical Environmental Concern; Outstanding Natural Area. The important botanical and scenic qualities of 76 additional acres (in two parcels) outside this preserve, but within the Columbia Gorge, will also be preserved with a designation as an Area of Critical Environmental Concern; Outstanding Natural Area. The designation and management of these areas will be designed to protect and preserve the Idaho fescue/hawkweed and Columbia Gorge forest complex ecotypes or plant associations which exist in the areas. Four rare plants are also within this preserve. High visual qualities are also present and can be seen from both Oregon and Washington highways within the gorge.

## **Historic Spanish Gulch Mining District**

The 335 acre Spanish Gulch Mining District will be designated as an Area of Critical Environmental Concern to protect and maintain significant historical values.

This mining district is an important historic gold mining area dating back to the mid 1800s. Remnants of early mining activities include an old stamp mill, mineshafts and several old cabins.

## **The Oregon Trail Historic Sites at Fourmile Canyon and McDonald and the Macks Canyon Archaeological Site.**

The unusual qualities of these sites will be maintained and protected, Intensive management plans, as well as public information and interpretive plans will be developed for these areas.

## **Implementation**

Designation of the five special management areas as areas of critical environmental concern with three areas being managed as either a research natural area, or an outstanding natural area will be completed upon filing of the record of decision and publication of the designation order in the Federal Register. Additional survey work will be initiated on Sutton Mountain and on the Sherars Bridge Road to determine if the areas meet the criteria for one of the above designations. Any areas which are nominated and found to meet the criteria for classification as an Area of Critical Environmental Concern in the future will receive interim protective management until formal designation occurs.



The Island in The Cove Palisades State Park

## **Monitoring the Two Rivers Resource Management Plan**

The implementation of the Two Rivers RMP will be monitored during the life of the plan to ensure that management actions are meeting their intended purposes. Specific management actions arising from proposed activity plan decisions will be compared with the RMP objectives to ensure consistency with the intent of the plan. Formal plan evaluations will take place at intervals not to exceed 5 years. These evaluations will assess the progress of plan implementation and determine if:

- management actions are resulting in satisfactory progress toward achieving objectives.
- actions are consistent with current policy.
- original assumptions were correctly applied and impacts correctly predicted,
- mitigation measures are satisfactory.
- it is still consistent with the plans and policies of State or local government, other Federal agencies, and Indian tribes,
- new data are available that would require alteration of the plan.

As part of plan evaluations the government entities mentioned above will be requested to review the plan and advise the District Manager of its continued consistency with their officially approved resource management related plans, programs and policies. Advisory groups will also be consulted during evaluations in order to secure their input.

Upon completion of a periodic evaluation or in the event that modifying the plan becomes necessary, the Prineville District Manager will determine what, if any, changes are necessary to ensure that the management actions of the plan are consistent with its objectives. If the District Manager finds that a plan amendment is necessary, an environmental analysis of the proposed change will be conducted and a recommendation on the amendment will be made to the State Director. If the amendment is approved, it may be implemented 30 days after public notice.

Potential minor changes, refinements or clarifications in the plan may take the form of maintenance actions. Maintenance actions respond to minor data changes and incorporation of activity plans. Such maintenance is limited to further refining or documenting a previously approved decision incorporated in the plan. Plan maintenance will not result in expansion in the scope of resource uses or restrictions or change the terms, conditions, and decisions of the approved RMP. Maintenance

actions are not considered a plan amendment and do not require the formal public involvement and interagency coordination process undertaken for plan amendments. A plan amendment may be initiated because of the need to consider monitoring findings, new data, new or revised policy, a change in circumstances, or a proposed action that may result in a change in the scope of resource uses or a change in the terms, conditions and decisions of the approved plan.

## **Ongoing Management Programs**

The Two Rivers RMP focuses on eight significant resource management issues. Other ongoing BLM management programs and actions discussed in the proposed plan will continue. This section briefly describes these programs and management actions to eliminate confusion regarding their status relevant to the RMP.

### **Soil, Water and Air Management**

The inventory and evaluation of soil, water and air resources on public lands will continue. Soils will be managed to maintain productivity and to minimize erosion. Corrective actions will take place, where practicable, to resolve erosive conditions. Water sources necessary to meet BLM program objectives will be developed and filed on according to applicable State and Federal laws and regulations. Water quality of perennial streams will continue to be monitored, and climatological data will continue to be gathered.

### **Threatened, Endangered or Sensitive Species Habitat**

No land tenure adjustments, programs or other activities will be permitted in the habitat of threatened or endangered species that would jeopardize the continued existence of such species. Management activities in the habitat of threatened or endangered and sensitive species will be designed specifically to benefit those species through habitat improvement.

The Oregon Department of Fish and Wildlife and the U.S. Fish and Wildlife Service would be consulted before implementing projects that may affect habitat for threatened or endangered species. If an adverse situation for threatened or endangered species is determined through the BLM biological assessment process, then formal consultation with the U.S. Fish and Wildlife Service would be initiated under Section 7 of the Endangered Species Act of 1973, as amended.



## Threatened or Endangered Plant Species

Prior to any land tenure adjustments or vegetative manipulation is allowed, the BLM requires a survey of the project site for plants listed or proposed for listing as threatened or endangered species, or its critical habitat. Every effort will be made to modify, relocate, or abandon the project to obtain a "no effect" determination. If the BLM determines that a project cannot be altered or abandoned, consultation with the U.S. Fish and Wildlife Service will be initiated (50 CFR 402; Endangered Species Act of 1973, as amended).

## Fire Management

The main emphasis of a fire management program in the Two Rivers Planning Area will continue to be prevention and suppression of wildfire to protect public values such as timber, vegetation, visual resources and adjacent private property. Prescribed fire will be used to reach multiple use objectives. When prescribed fire is considered under various programs it will be coordinated with the Oregon Department of Forestry and adjacent landowners and carried out in accordance with approved fire management plans and appropriate smoke management goals and objectives,

## Noxious Weed Control

Infestations of noxious weeds are known to occur on some public lands in the planning area. The most common noxious weeds are diffuse, spotted and Russian knapweed, yellow star thistle, dalmation toadflax, and poison hemlock. Control methods will be proposed and subjected to site specific environmental analyses. Control methods will not be considered unless the weeds are confined to public lands or control efforts are coordinated with owners of adjoining infested, non public lands. Proper grazing management will be emphasized after control to minimize possible reinfestation.

## Withdrawal Review

Review of withdrawals will be completed by 1991. These withdrawals may be continued, modified, or revoked. Revocation of withdrawals will be recommended by BLM where they are no longer needed or where they are in conflict with the RMP if the withdrawal review process determines they are no longer needed. Their revocation and opening to applicable public laws would be consistent with the plan. Upon revocation or modification, part or all of the withdrawn land may revert to BLM management. No additional BLM withdrawals are proposed.

## Utility and Transportation Corridors

All utility/transportation corridors identified by the Western Regional Corridor Study of May 1980, prepared by the Ad Hoc Western Utility Group are currently occupied and will be designated without further review. Corridor widths vary, but are a minimum of 2,000 feet. No additional crossing sites on the BLM managed portions of the Deschutes and John Day rivers will be permitted. No facilities will be allowed parallel to the railroad right of way in the Deschutes Canyon. Applicants will be encouraged to locate new facilities (including communication sites) adjacent to existing facilities to the extent possible.

All rights of way applications will be reviewed using the criteria of following existing corridors wherever practical and avoiding proliferation of separate rights of way. Recommendations made to applicants and actions approved will be consistent with the objectives of the RMP. All designated areas of critical environmental concern and wilderness study areas will be considered right of way exclusion areas. Public lands will continue to be available for local rights of way, including multiple use and single use utility/transportation corridors following existing routes, communication sites, and roads. Issuance of leases and/or patents under the Recreation and Public Purposes Act and other permits or leases for development of public lands will also continue. Applications will be reviewed on an individual basis for conformance with the Two Rivers RMP to minimize conflicts with other resources or users.

## Cadastral Survey and Engineering Programs

Cadastral surveys and engineering activities will continue to be conducted in support of resource management programs. The road maintenance program will continue. Existing approved contracts will not be affected by the RMP.

## Land Sales

Sales of public land will continue to be conducted under the authority of Section 203 of the Federal Land Policy and Management Act of 1976 (FLPMA) which requires that one of the following conditions exist before land is put up for sale: (1) Such tract, because of its location or other characteristics, is difficult and uneconomical to manage as part of the public lands, and is not suitable for management by another Federal department or agency; or (2) Such tract was acquired for a specific purpose and the tract is no longer required for that or any other Federal purpose; or (3) Disposal of such tract will

serve important public objectives, including but not limited to, expansion of communities and economic development, which cannot be achieved prudently or feasibly on land other than public land and which outweigh other public objectives and values, including, but not limited to, recreation and scenic values, which would be served by maintaining such tract in Federal ownership.

All sales of public land will be preceded by field inventories, environmental assessments and public notification procedures. Activity plans for land sales are not required under BLM policy.

## **Land Exchanges**

Exchanges of public land will continue under Section 206 of FLPMA which requires:

- A determination that the public interest will be well served by making an exchange;
- Lands to be exchanged are located in the same state; and
- Exchanges must be for equal value but differences can be equalized by payment of money by either party not to exceed 25 percent of the total value of the lands transferred out of Federal ownership,

Exchanges will be made only when they will enhance public resource values and only when they improve land patterns and management capabilities of both private and public lands within the planning area by consolidated ownership and reducing the potential for conflicting land use.

## **Visual Resources**

Before the BLM initiates or permits any major surface disturbing activities on public land, an analysis will be completed to determine adverse effects on visual qualities. Activities that will result in significant, long term adverse effects on the visual resources of the John Day or Deschutes River canyons in areas normally seen from these rivers will not be permitted.

Activities within other areas of high visual quality that may be seen might be permitted if they do not attract attention or leave long term adverse visual changes on the land. Activities in other areas may change the landscape but will be designed to minimize any adverse effect on visual quality.

## **Cultural Resource Management**

Cultural resource clearances will be completed on all projects that include surface disturbance which require BLM approval or are initiated by the BLM.

Sites will be evaluated to determine eligibility for nomination to the National Register of Historic Places. Inventories will be conducted to determine the amount and extent of the cultural resource in the planning area,

## **Wilderness**

Areas under wilderness review will continue to be managed following the guidance of the Bureau's Interim Management Policy for Lands Under Wilderness Review. This policy will be in effect until areas are released from interim management. Areas designated wilderness will be managed under the guidelines of BLM's Wilderness Management Policy.

## **Requirements for Further Environmental Analysis**

This environmental impact statement may best be described as a programmatic statement for the Two Rivers Planning Area. Site specific environmental analysis and documentation (including categorical exclusion where appropriate) will be accomplished for each proposed project. Interdisciplinary impact analysis will be tiered within the framework of this and other applicable environmental impact statements.

# Chapter 3

## Text Revisions



Abandoned homestead at Twickenham

# Introduction

Significant revisions and corrections to the Draft Two Rivers Resource Management Plan and Environmental Impact Statement (RMP/EIS) are presented in this chapter. The page numbers that appear in bold print throughout this chapter indicate the page of the Draft RMP/EIS on which the addition or correction would appear if the entire draft were being reprinted.

**Page V** Under Alternative B delete "Multiple Use" from beginning of second sentence.

**Page 7** Under state and Local Governments. After second sentence insert: Other agreements between BLM and ODFW which affect the management of the public lands include:

- *Intensive Cooperative Management Agreement* (Deschutes) BLM/ODFW, April 1, 1963.
- *Lower Deschutes Coordinated Resource Management Plan* (Macks Canyon to Deschutes mouth).
- *The Deschutes River Trout Management Plan* (Oregon Department of Fish and Wildlife).

All current agreements remain unchanged and will not be affected by this RMP/EIS.

**Page 8** Table 3 under Wildlife Goal 1—Discussion—Reword first sentence to read: "All alternatives except Alternative B are consistent with the objective:

Under Wildlife Goal 3—Reword the discussion to read: "Alternatives A, D, and E are consistent with the objective by improving habitat diversity and increasing wildlife species diversity, which would enhance the quality of public enjoyment of wildlife. Alternative B would not be consistent with this objective. Alternative C would maintain the existing situation.

**Page 16** Under Locatable Minerals, After first sentence add: Approximately 240 acres of public land at the Macks Canyon recreation/archaeological site next to the Deschutes River are currently withdrawn from mineral entry.

**Page 28** Under Soil after second paragraph insert the following:

Soil erosion potential for the public lands within the planning area area is as follows:

Soil Erosion Potential	Acres	Percent of Total
Slight	48,700	15
Moderate	162,330	50
Severe	81,175	25
Critical	32,500	10
Total	324,705	100

**Page 32** Under Wildlife-Upland Habitat Diversity, after 1st sentence add: Habitats that contain a wide diversity of vegetative species and structure provide for a wider variety of wildlife species. These diverse habitats and resulting wildlife communities are much more stable than those which are monotypic in nature.

**Page 33** After 1st paragraph add: This grouping process enables the land manager to evaluate the response of wildlife to habitat much more readily than if each species were considered alone. Thus it is possible to predict the effect of various manipulations on wildlife.

Under Big Game Habitat-Mule Deer and Black-tailed Deer in the second sentence add big sagebrush to the list of cover species.

**Page 34** Table 16 should be revised as follows:

Species and Habitat Type	Public Land Acres
Deer Winter Range	252,000
Elk Winter Range	4,540
Elk Year Long Range	580
Antelope Year Long Range	800
Potential California	
Bighorn Sheep Range	14,000
Long Billed Curlew Nesting Habitat	6,000
Wild Turkey Year Long Habitat	1,360
Waterfowl Nesting and Rearing Habitat	1,280
Raptor Nesting Habitat	
	Rivers & Ledges of Major Canyons

**Page 35** See Revised Map 5.

**Pages 33, 34 and 35** All references to Blacktail deer should be changed to Black-tailed deer.

**Page 54** Public land acreage for Horn Butte Wildlife Area should be changed from 4,300 acres to 6,000 acres.

**Page 116** Delete parcels located in 9 T. 6 S., R. 13 E., Sections 14, 15 and 22 totaling 300.32 from the list of potential land disposal tracts in Appendix

totals by 300 acres for zones 1 and 3 listed on pages 17, 20, 21 and 22 of the Draft RMP/EIS. A modification of Map 3 to include 300 acres of public land into zone 1 in the above mentioned township, range and section has been made, but not reprinted in this document.

**Page 117** For allotment 2536 (Spring Basin) under Alternative D, short term— change 175 AUMs to 45 AUMs.

**Pages 130-132** The Fish Species Present Column should be corrected as follows:

Fall Canyon Creek	Add Rb
Harris Canyon Creek	Delete St
Buckhollow Creek	Add Ch (Chinook)
Finnegan Creek	Add St
Cottonwood Creek	Add St
Ward Creek	Add St

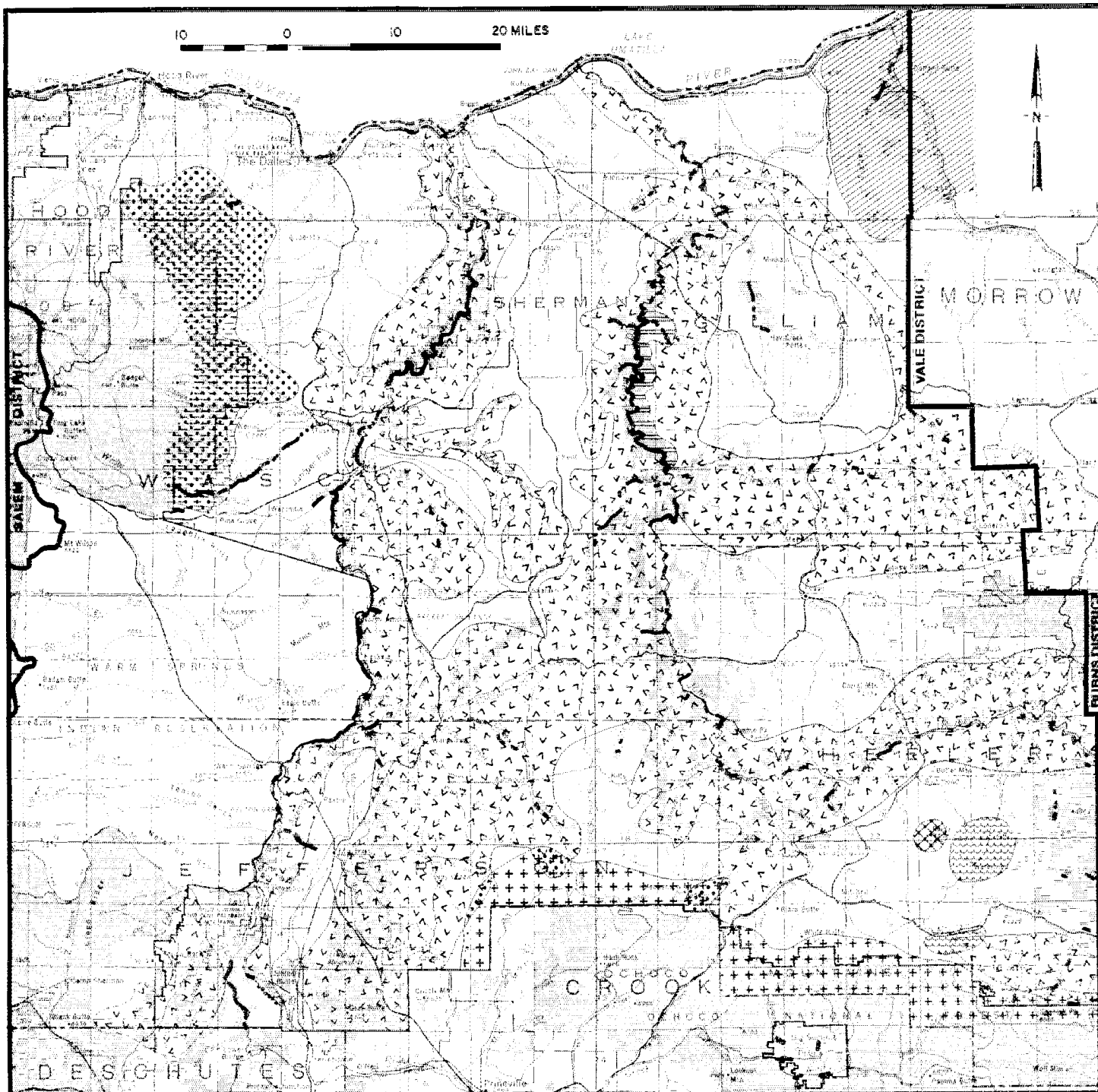
### **Response to comments other than direct written comments contained in the final RMP/EIS.**

#### **Comment**

Hood River County expressed interest in acquiring the 262 acres of forested public land within Hood River County.

#### **Response**

The lands identified by Hood River County are public lands listed as potentially suitable for disposal. Prior to any final disposal action, the County will be notified to determine their interest in acquiring these lands under the Recreation and Public Purposes Act or through sale or exchange.



-  Deer Winter Range
-  Elk Winter Range
-  Elk Yearlong Range
-  Antelope Yearlong Range
-  Potential California Bighorn Sheep Range
-  Deer/Elk Winter Range
-  Long Billed Curlew Nesting Habitat
-  Wild Turkey Habitat
-  Riparian Areas on Public Land

U. S. DEPARTMENT OF THE INTERIOR  
 Bureau of Land Management  
**PRINEVILLE DISTRICT**  
 SEPTEMBER 1985

**REVISED MAP 5**  
**Riparian Areas**  
**and**  
**Wildlife Habitat**

# Chapter 4 Consultation and Distribution



Trout Creek near Ashwood

## Introduction

The Two Rivers RMP/EIS was prepared by an interdisciplinary team of specialists from the Prineville BLM District Office. Writing of the RMP/EIS began in October 1984; however, a process that began in March 1984 preceded the writing phase. The RMP/EIS process included resource inventory, public participation, interagency coordination, and preparation of a management situation analysis (on file at the Prineville District Office). Consultation and coordination with agencies, organizations, and individuals occurred throughout the planning process,

## Public Involvement

A notice was published in the Federal Register and local news media in April 1984 to announce the formal start of the RMP/EIS planning process. At that time a planning brochure was sent to the public to request further definition of issues within the planning area. An opportunity was provided to submit comments on proposed criteria to be used in formulating alternatives.

In May 1984 a notice of document availability was published in the Federal Register and in the local news media for the Two Rivers Resource Management Plan Proposed Land Use Alternatives brochure. An outline of proposed alternatives, major issues and revised planning criteria were included in this document. Three alternatives portrayed various resource programs showing a range from emphasis on production of commodities to an emphasis on enhancement of natural values with a middle ground alternative attempting to provide a balance between the two. The fourth (no action) alternative reflected existing management. The proposed alternatives brochure included a map on allotment categorization for grazing management and another map which divided the public lands into three different zones for the purpose of identifying public land values. Neither map generated any comment or public objections during the EIS scoping process.

On April 12, 1985, a notice of document availability was published in the Federal Register and in local news media for the Draft Two Rivers Resource Management Plan/Environmental Impact Statement. Public meetings were held in Condon on May 21, 1985 and in Grass Valley on May 22, 1985 for the purpose of receiving oral and written comments. The Draft RMP/EIS was also discussed with the District Advisory Council and Grating Board on June 14 and 20, 1985 respectively. The District Advisory Council and Grating Board supported riparian management as proposed and the need for maintaining a balance with livestock grazing was voiced. Land sales, mineral leasing and agricultural

permits were supported as proposed. Concern was expressed about ORV use and rockhounding as it could affect private land.

## Agencies and Organizations Contacted or

### Consulted

The RMP/EIS team contacted or received input from the following organizations during the development of the RMP/EIS:

### Federal Agencies

U.S.D.E. Bonneville Power Administration  
U.S.D.I. Bureau of Mines  
U.S. Environmental Protection Agency  
U.S.D.I. Fish and Wildlife Service  
U.S.D.A. WREST Service  
U.S.D.I. National Park Service  
U.S.D.A. Soil Conservation Service

### State and Local Governments

Department of Fish and Wildlife  
Department of Forestry  
Department of Land Conservation and Development  
Department of Lands  
Historic Preservation Officer  
Department of Geology and Mineral Industries  
Oregon State Parks and Recreation Division of the  
Department of Transportation  
Department of Water Resources

Crook County Commissioners  
Gilliam County Commissioners  
Hood River County Commissioners  
Jefferson County Commissioners  
Sherman County Commissioners  
Wasco County Commissioners  
Wheeler County Commissioners

### Organizations

Atlantic Richfield Company  
Brooks Resources Corporation  
Central Oregon Audubon Chapter  
Central Oregon Flyfishers  
Environmental Research Committee  
Meridian Land and Mineral Company  
Natural Resources Defense Council, Inc.  
Oregon Council of Rock and Mineral Clubs  
Oregon Hunters Association  
Oregon Natural Heritage Data Base  
Oregon Natural Resources Council  
Southern California Edison Company  
University of Oregon/Land Air Water/An Independent  
Law Student Group  
Western Utility Group



## List of Agencies, Persons and Organizations to Whom Copies of the RMP/EIS Have Been Sent.

### Federal Agencies

Advisory Council on Historic Preservation  
U.S. Environmental Protection Agency  
U.S.D.A. Forest Service  
U.S.D.A. Soil Conservation Service  
U.S.D.D. Army Corps of Engineers  
U.S.D.E. Bonneville Power Administration  
U.S.D.I. Bureau of Indian Affairs  
U.S.D.I. Fish and Wildlife Service  
U.S.D.I. Geological survey  
U.S.D.I. National Park Service  
U.S.D.I. Bureau of Mines  
U.S.D.I. Bureau of Reclamation  
U.S.D.C. National Marine Fisheries Service

### State and Local Government

Crook County Court  
Crook County Planning Commission  
Central Oregon Intergovernmental Council  
East Central Oregon Association of Counties  
Gilliam County Court  
Gilliam County Planning Department  
Hood River County Planning Department  
Jefferson County Commissioners  
Jefferson County Planning Department  
Oregon State University Extension Service  
Department of Environmental Quality  
Department of Fish and Wildlife  
Department of Geology and Mineral Industries  
Division of State Lands  
Department of Land Conservation and Development  
Department of Forestry  
Parks and Recreation Division of the Department of Transportation  
Department of Agriculture  
Historic Preservation Officer  
Clearinghouse, Executive Department A-95  
Intergovernmental Relations Division  
State Library  
National Association of Conservation Districts  
Sherman County Court  
Sherman County, Planning Department  
Warm Springs Tribal Council  
Wasco County Planning Department  
Wheeler County Planning Department

### Interest Groups and Organizations

1000 Friends of Oregon  
American Fisheries Society  
American Forest Institute  
AMOCO Production Company  
Associated Oregon Industries  
Associated Oregon Loggers Inc.  
Association of Oregon Archaeologists  
Atlantic Richfield Company  
Audubon Society  
Bohemia Mine Owners Association  
Brooks Resources Corporation  
Cascade Holistic Economic Consultants  
Chevron Resources Company  
Columbia Rivet Intertribal Fish Commission  
Columbia Gorge Coalition  
Confederated Tribes of Warm Springs  
Defenders of Wildlife  
Desert Trail Association  
East Cascade Action Committee  
East Oregon Forest Protective Association  
Eastern Oregon Mining Association  
Environmental Education Association of Oregon  
Federation of Western Outdoors Clubs  
Friends of the Earth  
Geothermal Resources Council  
Industrial Forestry Association  
Izaak Walton League  
League of Women Voters  
Mazamas  
National Mustang Association  
National Public Lands Task Force  
Natural Resources Defense Council  
National Wildlife Federation  
Native Plant Society of Oregon  
Nature Conservancy  
Northwest Environmental Defense Center  
Northwest Federation of Mineralogical Societies  
Northwest Mineral Prospectors Club  
Northwest Mining Association  
Northwest Petroleum Association  
Northwest Pine Association  
Northwest Power Planning Council  
Northwest Timber Association  
Oregon Cattleman's Association  
Oregon Council of Rock and Mineral Clubs  
Oregon Environmental Council  
Oregon Hunter's Association  
Oregon Natural Heritage Data Base  
Oregon Natural Resources Council  
Oregon Sheep Growers  
Oregon Sportsman and Conservationists  
Oregon Trout  
Oregon Wilderness Coalition  
Pacific Gas Transmission Company  
PNW Research Natural Area Forestry Science Lab  
PNW 4 Wheel Drive Association  
PNW Forest and Range Experiment Station

Public Lands Council  
Public Lands Institute  
Rocky Mountain Realty, Inc.  
Sagecountry Alliance for a Good Environment  
Shell western F&P, Inc.  
Sierra Club  
Society for Range Management  
The Oregon Group  
The Wilderness Society  
The Wildlife Society  
Waldo Mining District Association  
Western Council; Lumber Production and Industrial Workers  
Western Forest industries Association  
Western Land Exchange  
Western Oil and Gas Association  
Wildlife Management Institute

Approximately 467 additional individuals and organizations who have expressed an interest in use and management of public lands in the planning area were also sent copies of the RMP/EIS. Included in this group are all grazing lessees within the planning area, members of the State legislature, U.S. Congressional delegation, and various educational institutions.

## Consistency Review

Prior to approval of the proposed RMP, the State Director will submit the plan to the Governor of Oregon and request that he identify any known inconsistencies with State or local plans, policies or programs. The Governor will have 60 days in which to identify inconsistencies and provide recommendations in writing to the State Director. The consistency of the plan with the resource related plans, programs and policies of other Federal agencies, State and local government and Indian tribes will be reevaluated in the future as part of the formal monitoring and periodic evaluations of the plan.

## Comment and Protest Procedures

If you wish to make comments for the District Manager's consideration in the development of the decision, please submit your comments by November 15, 1985 to the District Manager Prineville District Office. The plan decisions will be based on the analysis contained in the EIS, and additional data available, public opinion, management feasibility, policy and legal constraints.

Any person who participated in the planning process and has an interest that is or may be adversely affected by approval of the proposed RMP may file a written protest with the Director of

the BLM within 30 days of the date the EPA publishes the notice of receipt of the proposed RMP and final EIS in the Federal Register. Protests should be sent to the Director, Bureau of Land Management, 18th and C Streets NW, Washington D.C. 20240 by November 15, 1985. The protest shall contain the name, mailing address, telephone number, and interest of the person filing the protest; a statement of the issues being protested (raising only those issues that were submitted for the record during the planning process); a statement of the parts of the plan being protested; copies of all documents addressing the issues submitted during the planning process by the protesting party, or an indication of the date the issues were discussed for the record; and a concise statement explaining why the decision is believed to be wrong.

The Director shall render a prompt written decision on the protest setting forth the reasons for the decision. The decision shall be sent to the protesting party by certified mail and shall be the final decision of the Department of the Interior.

## Comment Analysis

Changes or additions to the draft arising from public comments are included in Chapter 3 of this Proposed WMP and Final EIS. The letters which were received have been reproduced in this proposed RMP and final EIS, with each substantive comment identified and numbered. BLM responses immediately follow each of the letters.

**The agencies, organizations and individuals who commented on the Draft Two Rivers RMP/EIS are as follows:**

1. Don Childs
2. U.S.D.A. Pacific Northwest Forest and Range Experiment Station
3. Jim Myron
4. Oregon Trout
5. Oregon Forestry Department
6. U.S.D.I. Bureau of Reclamation
7. R. Mariner Orum
8. Oregon Natural Heritage Data Base
9. William Berray
10. Lawrence E. Nielsen
11. State Parks and Recreation Division of the Department of Transportation
12. Oregon Natural Resources Council
13. Wildlife Management Institute
14. John R. Swanson
15. ARCO Exploration Company
16. U.S.D.I. Fish and Wildlife Service
17. Shell Western E&P, Inc.
18. Eastern Oregon Mining Association, Inc.
19. Portland Chapter of Izaak Walton League
20. Oregon Department of Fish and Wildlife
21. U.S. Environmental Protection Agency
22. Audubon Society of Portland
23. Central Oregon Audubon Society
24. Associated Oregon Loggers, Inc.

P.O. Box 504  
Stanford, Oregon 97375  
April 6, 1985.

255 Dept. of Interior  
Dank Site: Trawl you for  
standing on the Two Rivers  
management plan. I have  
traveled the country and  
lived in the same natural  
state as it  
Have studied the document  
thoroughly and have picked  
up alternative A, as the best  
open field lands have been  
of study and blaming to  
blame them for future  
consequences.

Sincerely,  
Don Hill

2



RECEIVED  
APR 10 1985  
SAC, PORTLAND  
SAC, STANFORD  
SAC, ASTORIA  
SAC, SEASIDE  
SAC, TULASTON  
SAC, WASHBURG  
SAC, WYOMING

TO: ASAC - The proposed designation for ASAC 447 area project has been  
changed to an area of critical environmental concern, according  
to the Act.

Gerold Magnuson, District Manager  
Bureau of Land Management  
Box 550  
Prineville, OR 97554

Dear Mr. Magnuson:

I have looked over the draft Environmental Impact Statement for the Two Rivers  
Resource Area, and have several comments to make. I am pleased that you have  
decided to proceed with the establishment of the Island Research Natural Area  
and that you are working with the Forest Service. The area has long been  
considered for that status. If the Island Research Natural Area will be a  
worthy addition to the NMA system, I think the Island Research Natural Area  
will be a worthy addition to the NMA system. If there is any opposition, please  
let me know. I fully support the Island NMA proposal.

2-1

I am not in agreement, though, with the proposal for an NMA within the  
government land (BLM) preserve. There are many reasons for this. The area  
does not represent a prime or pristine grassland ecosystem, and it is not  
a specific NMA establishment area. It is also too small. I would recommend  
that the 12.5 acres be established as an outstanding natural area instead.

Sincerely yours,  
Suzanne Stearns

Suzanne Stearns  
Research Natural Area Scientist  
Pacific Northwest Region  
GCI  
1111 SW Main  
Van Buren  
Cort Soppe





4-17-85

Gerald C. Magnuson, District Manager, Bureau of Land Management, Prineville District Office, 500 E. Bond, Prineville, OR 97554

Mr. Magnuson,

Subject: Draft EIS Two Rivers Resource Management Plan

Thank you for sending me the above referenced document. I have spent some time reviewing it and would like to share with you some of my thoughts.

Over the last 20 years I have spent quite a bit of time in various parts of this area hunting, fishing, duckhounding, raising and just enjoying the pleasures of being in the outdoors. One of the things that has always bothered me has been the way that the cattle have been allowed to overgraze certain areas. In some of the areas that I have hunted there has been a marked decline in the number of big game animals and I happen to believe that one of the main reasons for this reduction is due to the competition with cattle for the available forage. I have also seen declines in the quality of some of the streams in the area due directly from the fact that the cattle are allowed to graze down into the stream beds rather than being fenced away from the streams. I am aware of the fact that there has been some concern voiced in recent years with regard to the state of some of the riparian zones and that some of the areas have now been fenced to keep the cattle away from the streams, but such some needs to be done in this area. I realize that cattle need to drink, but it's unacceptable to allow them to graze into the stream beds, when there are other alternatives available.

In reviewing the figures for the grazing allotments allowed on this area, I see that there are a total of 233 allotments for a total acreage of 220,736. These allotments produced a total income of \$55,400. Given the fact that half of this amount goes to the private landowner, it would seem how you can operate this program with just \$10,000 of income. The obvious answer is that you can't. In effect, the rest of the taxpayers are subsidizing the cattle ranchers so that they can graze their cattle on public lands. Your report stated that the grazing on BLM lands produces 2% of the forage for the average rancher. The obvious question to ask is who is grazing allowed on all of these lands, given all of

the destruction that it does, when it only provides 2% of the forage for the average cattle operation. Removal of these lands from public grazing would have a very minimal effect on the cattle industry. For those three ranches who depend 100% upon BLM forage, they should pay a market value for the AUM's that they receive without being subsidized by the taxpayer.

Given these facts, it's my conclusion that the only logical alternative in your proposal is Alternative E which manages the land for it's natural values. I'm sure that the increased recreational opportunities available under this alternative would provide the government with thousands of dollars more income annually than do the grazing allotments. The increased number of fish & game in the area that would result from the removal of the cattle would be a natural asset that would could all benefit from. Who knows, maybe some of the cattle ranchers would be convinced to get out of the cattle business and take advantage of some of the opportunities for profit that would be available as a result of the increased recreational activities in this area.

I hope to be able to attend one of your public meetings during May and I would appreciate it if this letter were placed in the public record.

Sincerely,

John M. ... 225 S. W. 11th Av., Canby, OR 97013

cc: DNRC, Oregon Trout, Sierra Club



# Oregon Trout

27 April 1985

From Mike Bellows, Northwest Regional Director, Bureau of Land Management, 500 E. Bond, Prineville, OR 97554

### URGENT

The comments address the draft of the Two Rivers Resource Management Plan, Environmental Impact Statement, 1985.

Oregon Trout concerns itself exclusively with the wild populations of trout, salmon and steelhead which use Oregon's rivers and streams. We fervently believe that these wild species are a priceless, irreplaceable legacy, their survival and propagation must be given priority consideration in any management plan. Concurrently, Oregon Trout recognizes the requirement for the land to serve the economic needs of the state, and such needs certainly deserve prime consideration. We do not believe that these two needs are mutually exclusive, fish, cattle, forestry, mineral exploitation and recreation can co-exist and benefit, if choices are made in a climate of thoughtful stewardship of the land and its life. Oregon Trout feels that such a climate has been largely absent in the past, and hopes that more serious care can be exercised in the future. Once the wild species die out, they are forever gone, and forever is a long time indeed.

Specifically, Oregon Trout wishes to emphasize three of the eight issues under consideration: livestock grazing management, riparian management, and forestry, although we will speak to all issues, to the extent that they affect the foregoing.

### 1. RIPARIAN AREAS

Assuming that the 1,070 acres to be excluded in alternative "D" and the remaining 210 acres of that alternative represent the total of riparian areas under public management, Oregon Trout favors alternative "D" in the strongest terms. If the above is not the case, Oregon Trout favors alternative "D" with the following modifications: delete the words "1,070 acres," and insert the words, "all riparian areas." Delete the phrase, "The remaining 210 areas," and insert the phrase "any riparian areas."

We cite your data in table 12, which shows 91.4% of all riparian acreage in the John Day Basin under BLM management to be classified as being in "poor" condition.

As previously stated, Oregon Trout fervently believes that unrestricted access by cattle to the riparian zone is the chief source of damage to fish habitat, particularly in the fragile desert ecosystem under BLM management. Snows and static back stockings are absolutely

4-1 Imperative to the survival of wild salmonids, and it is our responsibility to afford these qualities. We believe that 50 per cent of riparian potential is barely enough, and should it require 70 years to achieve that benchmark protection under alternative "A," many wild species would have become extinct by then.

### 2. MANAGEMENT OF WILDLIFE HABITAT

Oregon Trout addresses alternative "D."

### 3. FORAGE AVAILABLE TO LIVESTOCK

From the data Oregon Trout has available, we believe that the fragile desert areas of the two basins are currently overgrazed, with 59 per cent of the land's ecological condition classified as being poor than late. Several agencies condition by your own figures, it seems very ill advised to increase the AUM's by 12%, as proposed by alternative "A." Much of the land is currently failing under grazing stress, there is little to no justification for increasing that stress.

4-2

### 4. DISPOSAL OF PUBLIC LANDS

Oregon Trout supports alternative "B" with the following modification: following the words "disposed of," add, "Any sale of riparian land shall carry restrictive covenants to protect the riparian vegetation to 50 per cent of potential."

4-3

Whether under public or private management, the owner of riparian land has a responsibility to the wealth of the resident and anadromous population of fish which must use the habitat. Oregon Trout believes that good stewardship of riparian lands exercised by governmental agencies should not cease when title is passed to private hands.

### 5. COMMERCIAL FORESTLAND

Oregon Trout supports alternative "B." We strongly request the following steps be taken when timber is harvested near riparian areas: 1. Minimum management requirements be established, using salamanders as an indicator group. 2. Funding be made available through Knutson Vandenberg, F.R.T., or funds within the bureau for repair of any damage in the riparian zone. 3. A fisheries biologist or planner be included in staffing for any timber harvesting near riparian zones.

4-4

### 6. MINERAL RESOURCES

Oregon Trout strongly favors alternative "D," where such mining would have no effect whatsoever on the quality or quantity of water in the rivers or their tributaries.

### 7. OFF ROAD VEHICLE USE

Oregon Trout favors alternative "E" as written.

### 8. RESEARCH NATURAL AREAS

Oregon Trout favors alternative "D" as written.



6



United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
1964  
WASHINGTON, D.C. 20250

DATE: 08 116  
120.1

MAIL ROOM

Memorandum

To: District Manager, Prineville District Office, Bureau of Land Management, Prineville, Oregon  
From: Regional Environmental Officer, Bureau of Reclamation, Boise, Idaho  
Subject: Review of Draft EIS--Two Rivers Resources Management Plan (BLM NEI 85-11)

The subject document has been reviewed by appropriate members of our staff, and we have no objections to its contents. Please let us know if we can be of further assistance in the review process.

cc: District Manager, Washington, D.C., Attention: 150

7

DATE: 08 116  
120.1

Mr. R. M. Graham  
District Manager  
Bureau of Land Management  
P.O. Box 100  
Prineville, Oregon 97754

Dear Mr. Graham:

I have just finished my work on the Two Rivers area and I respond to the BLM EIS on behalf of the Bureau of Reclamation.

We presented our views on alternative B in our comments on the EIS. However, I believe that this would be an unnecessary disruption to local people and financially unwise.

Therefore, I recommend alternative B emphasizing natural values. Administrative comments are attached.

Through the years, range lands have been largely overgrazed and depleted. I feel that the present range level would be adequate to produce an adequate number of these lands to a good extent. Range with open streams, abundant fish, wildlife, and recreational opportunities are the conditions that existed before the impacts of livestock grazing. I believe that alternative B would do the job, assuming proper funding.

I do not support the removal of riparian or riparian zone private lands, but very low riparian zone lands would be available for the rest of riparian zone. I have seen studies where riparian zone lands are private ownership are areas subject to the risk of private development. In the long run, the private would have with only a minimal land disposal program.

I have noticed a lot of silt in the streams. They cause a lot of damage to the riparian zone. I have seen studies where riparian zone has done much to restore natural values. I encourage the Bureau to use this management tool.

I hope that these few comments will be of use to management of your district.

Sincerely,  
R. Markher Oram  
R. Markher Oram



# Oregon Natural Heritage Data Base

1234 NW 25th Avenue • Portland, Oregon 97210 • (503) 228-9550

May 20, 1985

Gerald Magnuson  
Bureau of Land Management  
P.O. Box 553  
Prineville, Oregon 97754

Dear Mr. Magnuson:

Thank you for giving the Oregon Natural Heritage Data Base the opportunity to comment on the EIS for the Two Rivers Resource Management Plan. Our overall impression of the plan is that it is comprehensive in nature and addresses the issues that are most crucial for the Prineville District. We are happy to see that Threatened and Endangered species are listed as elements of concern regarding management activities in the Resource Area and that special effort has been made to identify sites that warrant possible designation as ACECs, RNAs, and ONAs.

Regarding the special management areas listed in the EIS we have some specific comments. First, we are pleased the "The Island" is being proposed as an RNA, in conjunction with adjoining Forest Service land. This site will make an excellent addition to the RNA system in the region and its designation will give it the protection that is needed for its management. Second, the proposed designation of the 11.5 acre parcel at Buena Preserve as an RNA seems inappropriate for the site--perhaps listing it as an Outstanding Natural Area would suit it better. Third, the proposal of ACEC status for the 11 other sites listed on page 54 of the EIS is to be commended. We fully support this designation for these worthy areas on the Two Rivers Resource Area and feel the benefits derived from their designation will accrue for many years to come.

A special issue addressed in the EIS that we are particularly interested in is riparian habitat management. The Preferred Alternative calls for substantial improvement in riparian habitat through fencing and close monitoring of grazing situations. We fully support this effort and would like to see an even greater emphasis be made on the monitoring of riparian conditions and the rehabilitation of streams in the Resource Area. By designation of

## The Nature Conservancy

- 8-1. We agree. The proposed designation for this 11.5 acre parcel has been changed to an Area of Critical Environmental Concern, Outstanding Natural Area.
- 8-2. Sutton Mountain was not proposed as a special management area primarily for two reasons. First, although the *Thelypodium nudum* and unique plant communities are known to exist in the area, the exact location, and ownership, and extent of these features has not yet been documented. We are reluctant to designate an area for special management unless a staff member has personal knowledge of the area. A survey will be conducted and if it is found to meet the criteria, it will be added in the future. Meanwhile, no actions will be taken on public land in this area that would jeopardize the unique plant communities.
- Second, the situation is compounded by the fact that less than half of the Sutton Mountain area is in public ownership. Efforts toward consolidation through exchange are in order, as you suggest.
- 8-3. The District has in the past and continues to work with the Oregon Natural Heritage Program. We agree to put more effort in the future into filling empty cells from the Two Rivers planning area and anticipate that some substantial needs will be met. The aquatic cell rips, however, do not now exist on public land in the planning area, according to the intensive riparian inventories conducted over the past several years.

several of the proposed ACECs, riparian enhancement will be given a substantial boost and should be pursued promptly. Two areas in particular that would benefit from ACEC status are the Horn Butte Wildlife Management Area and the White River Wildlife Management Area. Both areas are important watershed areas and support miles of riparian habitat that is critical to the wildlife. Horn Butte also has some bunchgrass sites that are worthy of protection.

8-2

One of the omissions that we noticed in the EIS was the lack of mention of Sutton Mountain, site of a federally-listed candidate Threatened plant--*Thelypodium nudum*--and several representative plant communities in good condition, as a potential ACEC. We understand that the broken ownership of the parcel greatly inhibits designation and thus efforts towards consolidation would be in order. A second omission in the EIS was the lack of mention of the Resource Area's continued participation in the effort being made to fill empty cells in the Oregon Natural Heritage Plan. The Resource Area is included in the High Lava Plains Columbia Basin province which currently has several unfilled terrestrial and aquatic cells that may be found on BLM land. The highest priority for the province is to locate suitable sites for the aquatic cell types, of which none have currently been filled in the Plan.

8-3

The Oregon Natural Heritage Data Base would be happy to work with District personnel in checking potential sites to fill cells needs in the Oregon Natural Heritage Plan. We are also available for consultation in the development of management plans for ACECs and habitat management plans for wildlife species and for riparian areas.

Thank you for your consideration.

Sincerely,

*Dick Vander Schaaf*  
Dick Vander Schaaf  
Public Lands Protection Planner

8-1

May 21, 1985

Mr. Dick Vander Schaaf  
BLM, 1111  
William Street Northwest  
Portland, OR

Dear Dick:

Thank you for your letter of May 14, 1985, regarding the Two Rivers Resource Management Plan. I will respond to the following: 1) 2) 3) 4) 5) 6) 7) 8) 9) 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24) 25) 26) 27) 28) 29) 30) 31) 32) 33) 34) 35) 36) 37) 38) 39) 40) 41) 42) 43) 44) 45) 46) 47) 48) 49) 50) 51) 52) 53) 54) 55) 56) 57) 58) 59) 60) 61) 62) 63) 64) 65) 66) 67) 68) 69) 70) 71) 72) 73) 74) 75) 76) 77) 78) 79) 80) 81) 82) 83) 84) 85) 86) 87) 88) 89) 90) 91) 92) 93) 94) 95) 96) 97) 98) 99) 100)

*William Barry*  
William Barry  
Bureau of Land Management  
Portland, Oregon



Lawrence E. Nielsen, Ph. D.

Science Consultant and Lecturer

May 27, 1985

1029 N. W. 12th Way, Astoria, Oregon 97103

PL-100-546-1-85

Mr. Gerald E. Magnuson  
Bureau of Land Management  
Box 550  
Prineville, OR 97754

Dear Mr. Magnuson:

I have studied the "Two Rivers Resource Management Plan". I favor Alternative B, but I could live with Alternative D. I consider Alternatives A, B, and C to be unsatisfactory.

Since BLM lands belong to all of us, I believe Alternative B is best for the largest number of people and for our children and grandchildren. For this reason, I am against the sale of BLM land in general, although exchanges make sense in some cases.

The number of cattle on BLM lands should be decreased and the grazing fee increased. The taxpayer should not have to subsidize the ranchers. We have been in a wet cycle, so the destruction caused by too many cattle has not been so evident the last few years. However, in dry years, such as possibly this year, the destruction caused by overgrazing and by cattle getting to water along streams will be very noticeable. It will take years for the habitat to be restored.

I am personally familiar with the following Special Management Areas: Deschutes River Canyon, The Island in Cove State Park, Governor McCall Preserve, Oregon Trail Historic sites, and Spanish Gulch Mining District. I agree that an effort should be made to preserve these sites. I believe that part of Sherars Road out of Sherars Bridge is on BLM land. If true, this very important pioneer road should be included in the Special Management Areas.

Sincerely yours,

*Lawrence Nielsen*

Lawrence Nielsen

10-

10-1. Segments of this historic road are located on public land. The significance of this area is not only in the road but in the historic and prehistoric use and development at nearby Sherars Falls located on private land. The road segment located on public land will be protected.

1



Department of Transportation  
PARKS AND RECREATION DIVISION

535 TRADE STREET SE SALEM, OREGON 97310

June 3, 1985

Gerald E. Magnuson  
District Manager  
Bureau of Land Management  
Prineville District Office  
PO Box 550  
Prineville, OR 97754

RE: Two Rivers RMP

Dear Mr. Magnuson:

The State Parks and Recreation Division has appreciated the opportunity to review and participate in the development of the Two Rivers Resource Management Plan. We believe that the preferred alternative provides a realistic approach to the management directions in areas under consideration. We are pleased to see recognition of the State scenic waterways program on both rivers and the unique character of the island at The Cove Fallisades. In reference to the latter, the Division has consistently recognized the special characteristics associated with it. Because the property has essentially been managed as part of The Cove Fallisades State Park we would appreciate the opportunity to participate in the management scheme for the island that would be developed under a proposal to designate it as a RNA.

Sincerely,

*Alan J. Cook*

Alan J. Cook, Manager  
Planning and Grants

AJC:slb  
65200

cc: Gerry Lewis, Region 4  
John Lilly  
Larry Jacobson

12



Oregon Natural Resources Council

Main Office: 101 Lincoln Street Eugene, Oregon 97401 (503) 344-0675

Metz Office  
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121 NW 5th Avenue  
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In reply respond to Don Tryon, P.O. Box 550, Jean Bay, OR 97845

June 3, 1985

Bureau of Land Management  
P.O. Box 550  
Prineville, OR 97754

Dear Gerry Magnuson:

Enclosed are our comments regarding the recently released Draft Two Rivers Resource Management Plan/Environmental Impact Statement.

On page 159 you comment that, "Problems were encountered in preparing this RMP/EIS due to limited vegetative resource data..." We appreciate the candor. We also believe that the comment underscores the need to continue the inventory process and to maintain full time botanists and range ecologists on your district.

We also find your resource outputs a bit optimistic in the preferred alternative. In this age of austere budgets and economic uncertainty in the private sector, we believe that a more modest, less intense approach to management would be appropriate.

Actually, the very readable document seems more like an informal "State of the District" report, with one brief section on "Vision of the Future" than a management plan or an EIS.

SCOPE OF THE PLAN

You claim that defining the intensity of management of various resources is beyond the scope of the RMP. We disagree. An RMP's purpose is to be comprehensive, interdisciplinary plans that fully comply with the requirements of the National Environmental Policy Act? We feel that they should describe the affected environment and existing situation; and then allocate lands for specific purposes in the form of clearly articulated prescriptions directed at achieving the goals associated with the allocation. For instance:

LAND SALES

You state that, "A total of 53,000 acres would receive additional study to determine whether they should be sold or otherwise disposed of. Approximately 1,000 acres of land would be sold annually." Our interpretation of 43 USC 1715 is that public land sales constitute a major federal action. Sales must be tied specifically to NEPA compliance RMP's, not some unspecified "additional study"

12-1

12-2

including any land use plan or other special resource

process. In addition to analyzing the environmental impacts of the sales, BLM imposes other criteria:

- 12-2
1. Difficult and uneconomic to manage. The RMP doesn't analyze the existing management or management needs of the lands proposed for disposal. Or the costs of the disposal process.
  2. The tracts are not required for any Federal purpose. You do not identify the existing purposes of each tract.
  3. Disposal will serve important public objectives, and outweigh other public objectives and values, including but not limited to recreation and scenic values. You fail to identify existing public values or the public objectives that will be served by selling specific pieces of land.
- We recommend that you:
1. Do the necessary analysis for those lands which you realistically intend to sell over the next 10 - 15 years as part of this RMP process, or.
  2. Suspend the land sales program for this round of planning.

MULTIPLE USE

- 12-3
- In your summary description of the alternatives you use the phrase, "Multiple use management would..." in reference to the Leasing Commodity Production alternative. Multiple use isn't mentioned in reference to any other alternative. Multiple use does not imply exclusive commercial exploitation. We recommend that the term multiple use be used in all alternatives, or none.

WILDERNESS AND RIVERS

- 12-4
- You eliminate two major issues from detailed study in the RMP -- wilderness and Recreation use of the Lower Deschutes and John Day Rivers.

Regulations require the articulation of wilderness planning with the comprehensive planning process. As needed, wilderness should again be addressed in this RMP.

578,000 RW's occur on the rivers. 80% of public land recreation within the planning unit. In terms of time, numbers of people, and public concern in Oregon, recreation use of the lands in the rivers area should be a major component of the RMP. You spend several pages discussing the allocation of 17,778 AUM's of livestock forage - worth only \$24,000.

OPENING DEVELOPMENTS

- 12-5
- As a policy you intend to develop natural openings. Existing developments reduce wet meadow/marsh environments and riparian vegetation, replacing them with pipes and metal troughs. We suggest that you fence springs and collect trough water shortly

(2)

- 12-10
- While it is true that species respond to structure, it is not necessarily true that different plant species of similar structure can be substituted for each other. Different species provide different nutritional outputs, and serve different secondary functions -- such as nesting materials.

- 12-11
- A point that we have discussed in the past, and take strong issue with again, is your statement that Oregon Department of Fish and Wildlife Management objectives for specific species will be met by all alternatives. We believe that a broad range of alternatives will provide different levels of habitat availability and quality, and therefore different carrying capacities for wildlife species. You should display these carrying capacities. The US Forest Service has developed benchmarks for wildlife populations and displaying wildlife levels and aspects by alternative. That, we believe, is what the BLM process is all about. You don't even state what BLM management objectives are for the species within the planning unit.

GRADING

- 12-12
- You state that "Twenty four allotments are being grazed under Coordinated Resource Management Plans (CRMP) or some other documented type of grazing." What other types of documented grazing?

For each of the allotments you should identify (in addition to the information displayed) the existing and proposed grazing system. Whether a CRMP, GMA or other agreement exists, the parties to the agreement, and date of agreement. If an AMP is completed, the date of the AMP and a statement identifying whether the goals and objectives of the AMP are consistent with the RMP. If they aren't, the AMP should be revised.

SPECIAL MANAGEMENT AREAS

- 12-13
- You list Special Management Areas, their general location, special resource values and acreage. But you don't plan anything associated with them. You don't state what special allocation each area should fall into or what kind of management will be initiated to achieve the as yet unstated objectives. Prior to the completion of the RMP, we suggest you try to put together a group of knowledgeable individuals to help structure RMP planning components for the special management areas.

RECREATION

- 12-14
- We object to the emphasis placed on OHV use in the plan. Only .08% of the recreational use in the planning area is classified as OHV use. It should receive allocations of open land commensurate with the demand. We take exception to your statement that OHV restrictions will adversely affect hunting. Shooting at game from motorized vehicles is illegal in Oregon. Responsible hunters use established roads and open areas to drive to their hunting areas. They don't road hunt, or worse - OHV hunt.

(4)

- 12-5
- before it flows out of the fenced area. If there isn't enough water to do that, then the spring area should simply be fenced for wildlife.

MONITORING

- 12-6
- We strongly disagree with your perspective on monitoring of grazing prior to making changes in livestock forage use. RMP range managers are either professionals who know when lands need rest, or they smelt. Automatically mandating a prohibition on changing numbers of livestock takes away one of the range conservationists major tools. And frankly, renders the livestock planning portion of the RMP about half useless. If you can't control numbers, then only period of use remains as a livestock management tool. Starting from ground zero with a new monitoring program ignores fifty years of Taylor Grazing Act administration. You and I know that some of your allotments are in poor condition.

UTILITY CORRIDORS

- 12-7
- Why should "All utility/transportation corridors identified...by the Ad Hoc Western Utility Group...be designated without further review"?

MAPS

- 12-8
- The Land Secure map, like all the other maps in the document, is simply too small to be very useful. The maps in Oregon BLM Grazing EIS's are far superior.

RIPIARIAN SYSTEMS

- 12-9
- Table 15 is very good, but should be expanded and highlighted. You should expand on the components of the habitat condition class rating system.

Throughout the RMP you discuss riparian habitat (or recovery) in your twenty year objective. 50% of biological potential in terms of ecological potential. You should discuss how you know what biological potential of a state is and how you will know when you have reached the 50% recovery level. Also, your short term recovery objective should be defined in percent of recovery that will be achieved over the life of this plan, not five or ten years beyond it.

WILDLIFE

- 12-10
- In some respects your wildlife discussion is excellent, but it does have a few shortcomings.

Your life form presentation, especially in appendix B, is helpful. However, the RMP fails to analyze impacts to individual species, life form groupings or habitat types. It doesn't seem unreasonable to ask BLM to make an estimate of current status of each species, relationship of species status to habitat and whether populations will increase or decrease under each of the alternatives.

(5)

- 12-11
- You don't even quantify the nations major recreational use. We believe that walking for pleasure is a major activity, even on BLM lands within the planning area. More attention should be paid to the activity in this plan.

PLANNING OBJECTIVES AND PRACTICES

- 12-15
- You should include an objective for purchasing land where public benefits will accrue. Overall, the objectives are too generalized. The plan should tie those objectives to specific pieces of ground. For instance, you say that OHV use will be allowed except in sensitive areas where damage will occur. Well, where are those areas. Likewise, you state that mineral and fossil collection will be open and available to the public except where conflict exists with the protection of other natural values. Where are those places. And isn't those unique sites that we don't want packed away?

STANDARDS

- 12-16
- We appreciate the Standard Operating Procedures for Forest practices in Appendix I. Mining, livestock grazing and other commercial use of public lands should have similarly prescriptive practices. You mention, in regard to livestock practices, that fences will be three or four wire. When is a four wire better, from a multiple use standpoint?

Appendix C is an excellent idea, and illustrates that the public lands are indeed very valuable. However, I believe that special values identified are written too much from a sportsman's point of view. Many citizens might be more interested in photography, wildflowers, birds, or camping, for instance.

The RMP is interesting, but it isn't a plan. You could do so much planning on about four sheets of paper. For those of us who had faith in BLM - who believed we could know how much it was costing to manage the lands, and what we were getting for our money - the current crop of RMP's is a bitter disappointment.

Any specifics that you can fit into the final plan would be appreciated.

Sincerely,  
Don Cryan

12-1. The purpose of a Resource Management Plan (RMP) according to the Federal Land Policy and Management Act (FLPMA) is to establish land areas for limited, restricted or exclusive use; designation or transfer from BLM administration. FLPMA requires the use of an interdisciplinary planning process to apply principles of multiple-use and sustained yield. An RMP is a land and resource allocation plan. The purpose of an RMP is to analyze and determine how the total land and resource base will be divided. Once the general resource allocation is made in an RMP, more detailed activity plans such as recreation activity plans, wildlife habitat management plans, livestock grazing allotment plans, etc., will be developed for those individual resources within the site specific areas.

12-2. This RMP/EIS analyzes the environmental consequences of setting 13,310 acres of land of the area the criteria set forth in the proposed plan. This EIS in combination with site specific environmental assessments cited in this EIS will meet the requirements of FLPMA and NEPA.

12-3. See text change for page 9.

12-4. As is mentioned on page 5 of the Draft RMP/EIS, wilderness planning is not appended by the Two Rivers RMP/EIS but is recognized and provided for throughout the plan under all alternatives. Until a Decision is made by Congress on designation or non-designation, the wilderness study areas will be managed to protect wilderness values. The land use allocation for these areas will be made by Congress. BLM's recommendations will be developed through the Oregon Wilderness EIS. This wilderness review process by BLM to Oregon is in accordance with BLM's planning procedures, FLPMA, NEPA, and other applicable guidance.

As with wilderness, the question concerning recreation river management is not whether or not recreation use will be provided for on the public lands within the Deschutes and John Day river corridors. The question is how those uses will be managed specifically within these areas. The allocation for these areas has already been made in terms of the recreation resource on the Deschutes River as a result of its designation as an Oregon State Scenic Waterway as is mentioned on page 5 of the Draft RMP/EIS. Management challenges can only be resolved by continuing coordination of activities among the BLM, Oregon State Parks and Recreation Division of the Department of Transportation, Oregon Department of Fish and Wildlife, Oregon State Marine Board, Confederated Tribes of the Warm Springs Indian Reservation, and private landowners in Jefferson, Sherman and Wasco counties. This group has developed plans for recreational management of this river corridor downstream from Warm Springs. Interagency recreation planning on the Deschutes River has progressed beyond the general resource allocation purpose of the Two Rivers Resource Management Plan. Similarly, recreation planning on the John Day River, also an Oregon State Scenic Waterway, also needs to be

accomplished jointly with other managing agencies and with the public. This will be carried out in a specific River Management Plan that will be developed in coordination with the other managing agencies.

Use of the resources on public lands adjacent to the corridors of the Deschutes and John Day river corridors are addressed in the proposed plan from a perspective of supporting the established primary recreation use of the rivers themselves.

12-5. It is standard procedure to fence the source area of springs when they are developed to protect the source from trampling and to provide some protected riparian habitat. You are correct in that some developments do dry up the riparian area around the source, but this can be mitigated by zoning the overflow pipe well away from the trough and then fencing this newly created riparian area.

12-5. One time inventory information, alone, or in combination with professional judgment, will not be used as the sole basis for livestock use adjustments. Bureau policy requires monitoring studies, along with, or in addition to vegetation production inventories, prior to changing existing livestock grazing preferences. Appendix K in the Draft RMP/EIS displays initial and long term livestock forage use, including the preferred alternative which addresses no short term increases or decreases in livestock forage use. Appendix I describes the Range Monitoring Studies that will be used to determine when livestock use adjustments are required. For analysis purposes, long term available forage for livestock is predicted to increase from 17,775 to 19,300 AUM as a result of range developments and improving ecological condition. During the short term, monitoring data will be collected, conditions evaluated and decisions regarding livestock use adjustments made. No future livestock use adjustments, up or down, will be made unless the situation and conditions warranted such action. Range conditions and trends are two of the factors used in wilderness categorization and in the prioritization of rangeland monitoring effects.

12-6. The utility/transportation corridors identified by the old and Western Utility Group as they affect public land in the Two Rivers Planning different land use. FLPMA directs that the protection of separate rights-of-way should be avoided. The proposed plan recommends that existing corridors to be designated and any new rights-of-way be confined to those corridors wherever possible (See Map 10 in the Draft RMP/EIS for the location of these corridors). Section 503 of FLPMA provides that "wherever possible, transportation and utility corridors may be designated as transportation and utility corridors...without further review."

12-8. Condition class ratings were based on the present condition in relation to scientific vegetative composition and structure. Abiotic factors including high stability and several structural classes of vegetation were rated good or excellent while those with little variability were rated poor or fair.

12-9. See response to comment 12-9.

12-10. Appendix 8 contains an estimate of the current status of abundance at each individual wildlife species. The analysis of impacts on upland habitat and consequently on wildlife populations is contained on page 50 of the Draft EIS.

12-11. Use allotments for meeting management objectives relate only to competitive forage. There would be adequate vegetation available under all alternative allotments to support increases in populations. However, it is not the responsibility of the BLM to increase population levels of sensitive wildlife species. This is the responsibility of the Oregon Department of Fish and Wildlife. The Draft EIS on page 9, Table 3 should also be used.

12-11. "Other documented grazing" includes very basic management agreements where the only thing in writing is a schedule of pasture rotation and to some degree documentation of the management to be initiated by the operator. The discussion of grazing systems on page 140 of the Draft EIS should shed some light on why very site-specific information was not displayed. The phrase "it was assumed" was used to indicate that for the purpose of analysis in this document certain assumptions were made regarding current and potential livestock management for any of the allotments.

Due to the often broken land pattern of these scattered lands very little of the basic data needed to make detailed allotment specific decisions are available for many of the allotments in the Two Rivers Planning Area. Some allotments have never been surveyed for carrying capacity. Many specific fence locations are as of yet unknown.

12-13. Appendix 9 lists the rare, sensitive, special values as well as availability of public areas to the thirteen identified Special Management Areas. Pages 20, 21 and 22 of the Draft RMP/EIS also identifies specific objectives for each of the thirteen areas under each of the five alternatives. For those areas designated as areas of critical environmental concern, a research natural area, or an outstanding natural area, specific management plans will be developed to accomplish the objectives of each of these designations.

12-14. BLM policy requires that all public lands be designated as either open, limited, or closed to off-road vehicle use. Even though levels of off-road vehicle use are currently low, the need to identify which lands are suitable or unsuitable for off-road vehicle use still exist.

Whenever access to the public lands is restricted, either by off-road-vehicle designation or by other means, levels of recreation use are affected. A closure of recreation on off-road-vehicle use may not necessarily affect hunting, fishing or other recreational activities, but it would affect the ability of the public to gain access by vehicle to certain areas where hunting, fishing, rockhounding or other recreational activities occur.

12-15. The objectives for each alternative outlined on pages 10, 21, and 22 of the Draft RMP/EIS outline a general philosophy for management for the issues identified. They are not intended to be a specific statement of where and how each of the resources will be managed; this information is contained in the body of the document. The plan uses the three general objectives to specific parcels of land as shown on Map 5 (Stiparia Area and Wildlife Habitat), Map 12 (Areas of High Visual Quality), and Map 13 (Special Management Areas). All of the areas shown on these maps are considered either as sensitive areas where activities such as off-road-vehicle use, mineral and fossil collection or other activities may conflict with the management and protection of these areas and may need to be regulated.

12-16. In addition to Appendix 3 which outlines the standard operating procedures for Forest practices, Appendix 4 also discusses the design standards and standards operating procedures for range developments. The section entitled Management Guidance common to All Alternatives beginning on page 12 of the Draft RMP/EIS also outlines other "standard operating procedures" for other activities, including livestock grazing, forestry, energy and minerals disposal and the land tenure adjustment program.

Four-wire fences are better from a multiple use standpoint when, because of the fence location, a lighter more impenetrable fence is needed. Ideally, fences should be located where they will receive the least amount of pressure from livestock; on ridges well away from water, etc. However, when fences must be located close to water (such as riparian fences) or when a more suitable riparian location cannot be used due to conflicts with visual, historical or other values the result is often pressure on the fence by livestock. Invariably a four-wire fence won't be the job intended in such a situation. When a four-wire fence is built, it is designed so as to cause little disruption in wildlife movement and access to the area.



Wildlife Management Institute

1000 North 17th Street, Washington, D.C. 20036

DATE: 12/15/73  
TO: DIRECTOR  
FROM: ASST. DIR. FOR  
WILDLIFE  
SUBJECT: WILDLIFE  
MANAGEMENT

June 9, 1973

Asst. Commissioner  
New York State  
Department of  
Environmental  
Conservation  
Albany, New York

Dear Mr. Commissioner:

The Wildlife Management Institute is pleased to comment on the Albany Report on Wildlife Management, Environmental Impact Statement, Wildlife Management.

We agree that the Albany Report is a valuable contribution to the development of wildlife management in New York State.

We would like to see the Albany Report become a model for other States.

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DEVELOPED BY WILDLIFE INSTITUTE

13-1

The Albany Report on Wildlife Management, Environmental Impact Statement, Wildlife Management, is a valuable contribution to the development of wildlife management in New York State. We would like to see the Albany Report become a model for other States.

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As further data become available:

13-2 | We would like to see the Albany Report become a model for other States. We would like to see the Albany Report become a model for other States. We would like to see the Albany Report become a model for other States.

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13-5 | We would like to see the Albany Report become a model for other States. We would like to see the Albany Report become a model for other States. We would like to see the Albany Report become a model for other States.

The Albany Report on Wildlife Management, Environmental Impact Statement, Wildlife Management, is a valuable contribution to the development of wildlife management in New York State. We would like to see the Albany Report become a model for other States.

Director  
Daniel A. Ellis  
President

WMI:BA



ARCO Exploration Company  
Exploration Operations - Western U.S.  
127 1/2 Street  
Mailing address: P.O. Box 9440  
Denver, Colorado 80217  
Telephone 303 775 1000



June 19, 1985

Mr. Gerald E. Magnuson  
District Manager  
Prineville District  
Bureau of Land Management  
P. O. Box 560  
Prineville, OR 97754

Re: Two Rivers Draft Resource Management Plan and  
Draft Environmental Impact Statement

Dear Mr. Magnuson:

ARCO Exploration Company would like to take this opportunity to provide the Bureau of Land Management (BLM) with comments regarding the Two Rivers Proposed Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS). ARCO has several thousand acres under lease in this region of Oregon and has a vested interest in how the BLM plans to manage its lands.

First, we would like to point out that we support BLM's reconsideration to include energy and minerals as an issue in the proposed RMP. Since there is wide industry interest in this region of Oregon for oil and gas, geothermal resources and minerals, it is only appropriate that those resources be specifically addressed during the planning process for the Two Rivers Resource Area.

Second, we approve and support BLM's inclusion of the No Surface Occupancy (NSO) stipulation criteria, which contain a statement that a NSO stipulation can be waived if approval is obtained from the BLM Deputy State Director for Minerals and the Prineville District Manager. However, we are still concerned that BLM has utilized this restrictive stipulation on too broad a basis. Even with the disclaimer, it doesn't appear that BLM has adequately considered the energy resource potential in the Resource Area. BLM has demonstrated through its preferred Alternative that scenic values have been given top priority over oil and gas resource potential. It appears that adoption of this alternative avoids the necessity of making specific decisions with regard to resource conflicts, e.g., scenic values vs. oil and gas potential.

Therefore, we feel Alternative B is a more reasonable and viable management alternative. This alternative reflects site-specific decisions with regard to scenic values in that it requires NSO stipulations only on those areas which have been deemed to contain the most important values. While current NSO stipulations would be lifted from approximately 72,000 acres, leaving 258,500 acres open to leasing with standard stipulations, we do not believe that this action would cause rampant destruction of valuable scenic resources. In fact, the standard stipulations contain provisions for protecting scenic

Mr. Gerald E. Magnuson  
June 19, 1985  
Page 2

values. Since BLM feels that additional protection is essential, a special stipulation could be added to leases in sensitive areas which requires mitigation measures to avoid or minimize adverse impacts. Nevertheless, it should be remembered that oil and gas activities are temporary in nature. Once an operation is completed, the site is usually returned to its previous condition or may even be enhanced as a result of reclamation procedures.

15-1 Further, if most of the acreage in question does actually fall within the river canyons, NSO stipulations are probably not even necessary. Current technology would not accommodate development in steep canyons. Therefore, Alternative K could be construed as overskill in terms of trying to protect an predominantly inaccessible resource.

15-2 We would still like to see BLM incorporate the Fluid Mineral Leasing Guidelines into the final RMP. BLM has developed this process for the sole purpose of ensuring that oil and gas resources receive equal consideration in the planning process. As it stands in the draft RMP and DEIS, aside from the NSO criteria, there is no evidence that oil and gas resources were afforded equitable treatment when planning decisions were being made.

15-3 In conclusion, we support BLM's reconsideration to include energy and minerals as an issue in the planning process. We also support the NSO leasing criteria and conditional waiver, which would evaluate exploration and development proposals on a case-by-case basis. However, we feel the BLM should make specific decisions as to the trade offs between oil and gas potential and scenic resource values. Therefore, we support the implementation of Alternative B, which does make site-specific decisions. Further, we encourage the inclusion and display of the Fluid Mineral Leasing Guidelines in the final RMP.

On a personal note, I appreciate your efforts to keep me informed as to the progress of the plan and your willingness to listen to my views. If you would like to discuss my comments in more detail, please let me know.

Sincerely,  
*G. M. Moseley*  
G. M. Moseley  
Public Lands Analyst

- 15-1. Since the RMP/DEIS is expected to guide resource uses, allocations and prescribe characteristics of use for the next 20-30 years, inclusion of areas where current technology would not accommodate development was done to put all users on notice that critical resource values were present and would be developed under certain guidelines regardless of changes in technology. The river canyons under consideration are of state and national significance for recreational values. The no surface occupancy (NSO) stipulation on leases is designed to reflect this significance while allowing fluid mineral development where compatible on a case by case basis. While use of a no surface occupancy stipulation may seem an "overkill" on steep canyon slopes the stipulation serves to make our proposed management policy in this area clear.
- 15-2. The concept embodied in the fluid mineral leasing guidance, which is a draft proposal at this time, has been incorporated in this RMP/DEIS to the extent possible. This was done by providing a map showing mineral potential map 9 in the draft RMP/DEIS and placing specific acreages of federal mineral interest in 3 leasing categories (Table 8 in the draft RMP/DEIS).
- 15-3. Specific trade-offs between oil and gas potential and scenic resource values were not made in the draft RMP/DEIS due to the lack of site specific proposals for development. In the event of an application for permit to drill within the canyons, an environmental assessment would be developed to address resource trade-offs. Data is similar to other resource programs where any ground disturbing operations would require a site specific analysis. The no surface occupancy stipulation placed on mineral leases is designed to notify lessees of areas of concern while allowing for limited entry evaluated on a case by case basis.



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Division of Biological Services  
Portland Field Office  
727 1/2 S. 24th Avenue  
Portland, Oregon 97202

June 19, 1985

MEMORANDUM

TO : Prineville District Manager, Bureau of Land Management, Prineville, OR  
FROM : Field Supervisor, Biological Services, Portland Field Office, Portland, OR  
SUBJECT: Review of Two Rivers Resource Management Plan, Draft Environmental Impact Statement

We have reviewed the draft FIS for the Two Rivers Management Plan.

As indicated in our memo dated October 9, 1984, we do not believe the preferred alternative would have a significant adverse impact on fish and wildlife resources. We prefer, however, Alternative B which emphasizes natural values with commodities production. This alternative would provide important fish and wildlife benefits not present with the preferred alternative.

*Robert E. Lindstrom*  
Robert E. Lindstrom





6141 S.W. Redgate St.  
Portland, Oregon 97209  
June 25, 1985

10-5

50-50 split between fish, wildlife, and recreation on one hand and livestock on the other is an equitable allocation. We hope this can be considered in future land management statements.

Despite these criticisms, your statement is very good. We hope that your EIS and its contents will be used by BLM as a model for future statements.

Thank you for this opportunity to submit input.

Sincerely,  
*Chra D. Spuman*  
Portland Chapter  
 Trout Writers League of Amer.  
 Public Lands Hearing Comm.

Mr. Gerald Magallon,  
District Manager, Prineville District Office  
Bureau of Land Management  
P.O. Box 590  
Prineville, Oregon 97754

Dear Mr. Magallon:

We have reviewed the Two Rivers Environmental Impact Statement and found it to be the most comprehensive BLM planning document examined to date.

We question some statements and conditions shown however, as follows:  
10-1 We feel that the twenty years required under Alternative A to achieve the 50% or more riparian vegetative potential as shown on Page 9, Summary is excessive. If properly managed, five to ten years should be an adequate period of time. Recent studies have shown this short time ability.

10-2 Why can't the condition of fish and wildlife habitat be shown under Table 1, Alternative C--Skidding Management? Surely the present status of these species under present management is known and should be shown for an accurate comparison with the proposed alternatives. Also in Table 1 it is difficult to see how 1.44 MM bf. of timber can be removed annually as proposed under Alternatives A, B, C, and D on 11,700 acres of commercial forest without adverse impact on wildlife populations. Presumably, many of these acres include timber in steep draws extending from waterways to ridge tops. These are generally on fragile soil types, in semi-arid areas and may be difficult to reforest. Also, the timbered draws and gullies often constitute very important travelways for wildlife moving from uplands to water courses. Since the EIS states that timber harvest is of relatively small economic importance to the community, perhaps the all acres of wildlife habitat "best lands" as shown in Table 10 could be substantially increased.

10-3 We appreciate your frank appraisal concerning livestock grazing as shown on page 4, however, including the fact that "there is a conflict of use between livestock grazing and other important resource users" an administrator not often seen in federal land management statements.

10-4 In Table 3, page 9, goal 2a, it is difficult to see how it is possible to meet wildlife objectives as shown in the discussion. How can this be accomplished under all alternatives--particularly Alternative B, Community Livestock Grazing? According to Table 1, BLM's wildlife and fish habitat would be reduced under Alternative B. Also, page 43, chapter 4, discusses adverse impacts of forestry practices.

The Portland Chapter IWA Public Lands Hearing Committee wants an equitable share of the harvestable supply of vegetation allocated to fish and wildlife habitat and associated outdoor recreation. After the basic requirements of enough riparian vegetative growth is left to restore and maintain plant cover, hold soil in place, and provide a flow of high quality water and wet, the harvestable surplus can be allocated among the various users. We feel that a

- 10-1. See response to comment 10-4.
- 10-2. The condition of wildlife habitat is related to the present ecological condition. Because different species respond to different ecological conditions, objectives and goals aimed at increasing a description of wildlife habitat condition for 20+ species would overwhelm the summary table. The description is contained in the draft EIS/EIS, Chapter 2 - Wildlife.
- 10-3. The Timber Production Capacity Classification (TPCC) does not consider concentrations of wildlife habitat, riparian management, etc. It determines what lands are suitable or not suitable for timber production. Many important wildlife areas (timbered draws and gullies) have already been excluded as noncommercial or non-grazable lands and see Table 10. The net acres of its additional acres specifically for wildlife habitat resolves all known contradictions conflicts between wildlife habitat and timber production identified during inventories conducted prior to the multiple use planning process. If conflicts are identified in the future they will be resolved through the environmental analysis process.
- 10-4. We agree. Alternative B would not meet the objectives of the State of Oregon wildlife goals. See text change for Table 3 on page 9.
- 10-5. Of the total forage produced, a portion is not palatable to livestock but provides important forage for wildlife (some forbs and shrubs). The remainder of the total forage, basically grasses and some forbs, is palatable to livestock. Deer and antelope also utilize grasses as part of their diet during certain times of the year. Total use on the grass-forest part of the ridge that is regulated to that extent plant material remains for plant maintenance and soil protection. The remainder of the plant is available for grazing use, and is referred to as available forage. It is the available grass used for forage which is allocated to livestock and wildlife. Wildlife have use of not only a portion of the available forage but also that portion of grasses and forbs left for plant maintenance which can be used for habitat. Forage not palatable to livestock and the woody part of the total vegetation is also available to wildlife.

20



Department of Fish and Wildlife  
500 SW MILL STREET, P.O. BOX 3653 PORTLAND, OREGON 97208

June 25, 1985

Gerald E. Magallon, District Manager  
Bureau of Land Management  
Prineville District  
P.O. Box 590 (180 E. 4th Street)  
Prineville, Oregon 97754

Dear Gerry:

I want to thank you for coordinating with Mike Gulien in arranging the June 11 meeting for discussion of our draft comments to the Two Rivers Resource Management Plan, REIS.

The time taken from your busy schedule to participate, along with your staff, is greatly appreciated.

Bob Jumper had a very positive report of the meeting. It is evident that these types of meetings between our agencies are beneficial in (1) helping to know one another, (2) in helping resolve conflicts and (3) gaining a better understanding of issues.

We look forward to continued cooperation and coordination in protecting and managing Oregon's natural resources.

The Department's comments to the Two Rivers Resource Management Plan, environmental impact statement draft are attached.

Sincerely,

Michael C. Weisberg, Chief  
Environmental Management Section

MCS  
Attachment



OREGON DEPARTMENT OF FISH AND WILDLIFE  
 Comments on the DEIS Two Rivers Resource Management Plan  
 OR BSG403-010-4

Upland Habitat Diversity (page 32)

20-1 Rephrase the 5th sentence for clarification of wildlife species diversity and its relationship to vegetative diversity and habitat stability. Somehow the idea of stable wildlife populations and their dependence upon stable habitats should be brought out in the explanation.

20-2 On page 32, the discussion of the life form concept does not include the entire context of the explanation as presented in either Wildlife Habitats in Managed Forests or Wildlife Habitats in Managed Rangelands, etc. We suggest completing the thought by adding the following sentences:

"This grouping process enables the land manager to evaluate the response of wildlife to habitat much more readily than if each species were considered alone. Thus it is possible to predict the effect of various manipulations on wildlife."

Big Game Habitat

20- Some omissions and inaccuracies in designation of deer and elk winter range were found in the DEIS. Corrected maps will be provided by our district biologists to assist you in the adjustments. Changes in acreages in Table 16 were suggested to more closely reflect the actual amount of winter range within the planning area. A copy of map 5 is enclosed with additions to winter range indicated (orange) for Wheeler and Gilliam counties. These changes correspond to the respective county land use plan.

20-4 The word "crucial" should be dropped in designating winter range. ODFW considers all winter range important and worthy of designation.

Riparian Management

Fish Habitat

20-7 Alternative A, item 1, page V mentions "Deschutes and John Day Rivers and their major tributaries." "Major tributaries" were not specified in the DEIS. At the recent joint meeting, major tributaries were defined as any perennial stream. We also understand that intermittent streams and some streams which do not occur on BLM holdings were not included. For better clarification, we suggest that a brief statement including this information appear in the EIS.

The list of streams does not include Oak Brook, Nene Creek, and Mud Spring Creek (Trout Creek tributary), all of which support resident trout and steelhead production.

The following waters need the following corrections on pages 130-132:

20-8	Full Canyon Creek	Add <u>2b</u>
	Harris Canyon Creek	Delete <u>2c</u>
	Buckholow Creek	Add <u>2h</u> (Chinook)
	Fireagan Creek	Add <u>2i</u>
	Cottonwood Creek	Add <u>2j</u>
	Ward Creek	Add <u>2k</u>

The recent announcement by BLM (state office) for increased emphasis on riparian management is certainly commendable. The Department of Fish and Wildlife has long emphasized the importance of restoring degraded riparian zones. The values achieved through protection and natural restoration of these important areas are widely acclaimed and well documented.

20-9 Riparian potential, as defined by the Prineville District, should be more clearly defined in the EIS. This could be more vividly shown by the use of photos of examples of various levels of potential (60%, 100%, etc.) along with text.

20-8 Big sagebrush should be added to the list of cover species in the second sentence. It is about the only thermal cover in both canyons. The importance of sagebrush for winter mule deer feed is not mentioned in the EIS. "Blacktail" should be changed to "Black-tailed" where it is used in the EIS.

Appendix F Range Monitoring Studies

Though not clearly stated in the DEIS on page 103, the Department strongly applauds the strong commitment by BLM to a monitoring program, as was discussed at the June 21 meeting.

Livestock Grazing

20-8 On page 4, item 2, Livestock Grazing Management, second sentence "Some management changes may be appropriate..... to reestablish, expand, improve or protect riparian areas;....." Reestablishment of riparian areas would not be possible in most cases without protection of the systems from livestock use. It may also be extremely difficult to expand or improve poor condition riparian areas without protecting them (at least temporarily) from grazing and other controllable negative impacts.

We concur with the third sentence "Solutions are needed for stocking levels, season of use, grazing systems, range development projects, and land treatments."

Since the tall shrub, tree, and tree/shrub plant community structural conditions support the greatest number of wildlife species, conversion of these communities would impact wildlife substantially (see also Wildlife Habitat Management). Livestock distribution is mentioned as a problem in some allotments. BLM expressed a strong commitment to managing distribution of livestock and timing of grazing in order to more fully utilize forage and reduce pressure on concentration areas. The Department heartily supports this commitment. This direction, along with a sound monitoring system, will receive strong support from ODFW.

The Department's riparian habitat standards as set forth in the "Fish and Wildlife Habitat Protection Criteria for Forest Lands" calls for a target of 80 percent potential in 10 years. The exception to this is on streams in Northwest Power Planning Council project areas, where the riparian objective is 100 percent of potential in the shortest possible time. The 80 percent level was also recommended in our response to the PMP, Proposed Land Use Alternatives in October 1984. We also restate our preference for 440 miles of riparian area protection which was included in those earlier comments.

1. Potential as used by ODFW is that as described in "Managing Riparian Ecosystem Zones for Fish and Wildlife in Eastern Oregon and Eastern Washington," Interagency Wildlife Committee, 1979.

The extensive inventory of stream riparian areas in the Two Rivers Planning Area is commendable. Table 12 shows 632 acres on the John Day in poor (early seral) ecological condition. Table 13 shows an ecological trend rating of stable for 603 acres along the John Day inventoried area and only 4 acres declining. These data show that the majority of the riparian acres have reached the poorest condition possible and can decline no further (stable condition).

The Department encourages the BLM to pursue diligently an objective of improved riparian ecosystems in the shortest time possible. We still feel this can best be accomplished by removing cattle from these areas in poor condition. Fencing of riparian areas produces a rapid vegetative response in many cases. This is vividly shown in the BLM riparian video program. Under intensive grazing "management", 60 percent of potential may be difficult to achieve even in 20 years.

Forestry

The EIS discussion of the economic influence to the local area (page 56, 67) emphasizes the insignificant contribution of the

public commercial forest lands in the planning area. The total timber production is about one-half of one percent of the seven county total. The EIS does not seem to support the inclusion of forestry as a major issue on page 4. Some of the forest lands may have higher values for uses other than timber harvest.

20-10

Old Growth

The texts on pages 33 and 40 discuss small scattered stands of old growth and state that almost all the forest land in the planning area has been cut over. An inventory of old growth is not included in the EIS. How many acres of old growth remain and where are the stands located? This information could be included in Table 15 and on Map 3. In addition to the amount and distribution of the remaining old growth habitat, a statement of its relative importance to particular wildlife species should be included in the EIS. Does the plan provide for retaining some old growth or managing for this habitat type?

20-11

Sage, Red/Down Wooded Habitat

We found only one reference to this habitat in the EIS. On page 117, the only reference to the Wildlife Tree (Sage/Down Log Policy, Instruction Memorandum 00-04-215 is a paraphrase of the General Guidance section, first sentence. What provisions are made for this habitat type on the commercial forest land acres?

20-12

Land Tenure and Access

The Department is generally not in favor of the sale of public lands. Land exchange to block up public ownership is the option favored by GDFW. The zoning method developed by BLM for the EIS is commendable.

20-13

Appendix J Potential Land Disposal Tracts in Zone 1, page 114 lists several tracts which are included in the 1983 Intensity Cooperative Management Agreement between BLM and GDFW (Game Commission). The agreement describes those lands within one air mile of the Deschutes.

Metallus, and Crooked rivers on which the primary uses are to be intensive wildlife management, recreation use, and public access.

20-14

Therefore, we recommend that the following tracts be deleted from the Zone 3 acreages, page 116:

- (1) Lands in Township 55, Range 13 and 140 totalling 490.59 acres.
- (2) Lands in Township 55, Range 130 totalling 1,181.61 acres.
- (3) Lands in Township 95, Range 13 and 140 totalling 562.43 acres.

BLM Planning and Resource Interrelationships

With the exception of the cooperative management agreement on the White River Wildlife Management Area, the discussion on pages 6, 7 and 8 of the EIS makes no reference to other specific agreements and coordinated plans, such as:

20-15

- (1) Intensive Cooperative Management Agreement (Deschutes) BLM/GDFW April 1, 1983. See comments in 6, Land Tenure and Access.
- (2) Lower Deschutes Coordinated Resource Management Plan (Markus Canyon to Deschutes mouth).
- (3) The Deschutes River Trout Management Plan GDFW.

What is the relationship of the EIS to these and other existing agreements?

04-14

04-14 See text & page 4 page 11

20-21 See text change for page 11.

20-23 See Revised Map 3 and text change for Range 16.

20-24 We will consider all water courses to be riparian, however BLM Manual says riparian that riparian areas are those areas that are vital to a portion of an aquatic life cycle. This term also refers to state ground lakes, beach meadows, and some water courses, etc.

20-25 See text changes for pages 13, 31 and 32

20-26 It is the goal of the Pennington District to improve riparian systems through changes in livestock grazing season of use and intensity as a first priority and secondly through protection. We also agree that this is an ambitious undertaking that must have the cooperation of the permittees and other public land users.

20-27 The BLM does not administer any land adjacent to these streams, consequently they were not included in the Draft RMP/EIS.

20-28 See text change for pages 110-112.

20-29 The site potential of a riparian system is based on the capability of the area to support various vegetative communities. The factors used include flows (intermittent, perennial, seasonal variations), soils (texture, structure, depth, etc.), stream gradient, aspect, sediment load, water area, bank stability, and the present vegetative community. Vegetative improvement is the difference between the riparian ecological potential and the present plant community. When potential was estimated for the streams in the Pennington District, 100% of the stream areas that have received protection for periods of up to 20 years were good to very good, well riparian (see photos 1 and 2). Only had total livestock exclusion for nearly 20 years, however, it is estimated to only be at 40% of potential. Other areas may respond more quickly, however, many do not. The ability to produce willow is not the only factor in estimating potential, and setting a realistic goal for improvement. A description of different vegetative potential is shown in photos 3 and 4.

20-15 The issues identified and discussed in the RMP are not qualified to reflect relative importance of use to riparian. We make various other issue is riparian. The inclusion of forestry as an issue is based on historical precedent and the decadal extensive forest inventory for the District, to be completed during 1985. This inventory will result in the reevaluation of the District's annual allowable timber harvest. By identifying appropriate land use situations which may restrict or exclude timber harvesting activities on streamland suitable for timber production within the planning area, an appropriate sustained harvest level for the District can be derived. Table 15 in the Draft RMP/EIS recognizes and identifies acreages, by alternative, of forestland which would be set aside for other resources uses than timber harvest.

20-21 See response to comment 13-2.

20-22 The District does have a snag policy (see response to comment 13-3).

20-23 Of the lands listed, only those in Section 16, T. 5 S., R. 13 E. that are under the cooperative agreement since they are within one air mile of the Deschutes River. All other lands identified in Zone 1 potential disposal are outside the one air mile boundary and are not subject to the cooperative agreement. The proposed RMP reflects the inclusion of public lands along Wapinitia Creek in Zone 1 for retention (see text change for page 119).

20-24 See text change for page 7.



Photo 1 Camp Creek Exclosure (Crooked River Drainage) 1966

**Condition:**

Stream gradient - less than 5%

Sediment load - high

Soils - principally Legler silt loams - very deep fine textured, gravel layers present

Stream flow - intermittent

Elevation - greater than 4,000 ft.

Wetted area - less than 10 ft. wide

Estimated at 5% of site potential.

The full potential of the area is:

Dominant tree - Peachleaf willow, lemon <sup>willow</sup>

Understory tree - Coyote willow, McKenzie willow, whiplash willow

Herbaceous - Nebraska sedge, Baltic rush, 3 square bullrush, red <sup>top</sup>, Kentucky bluegrass

Wetted Area - More than 100 ft. wide

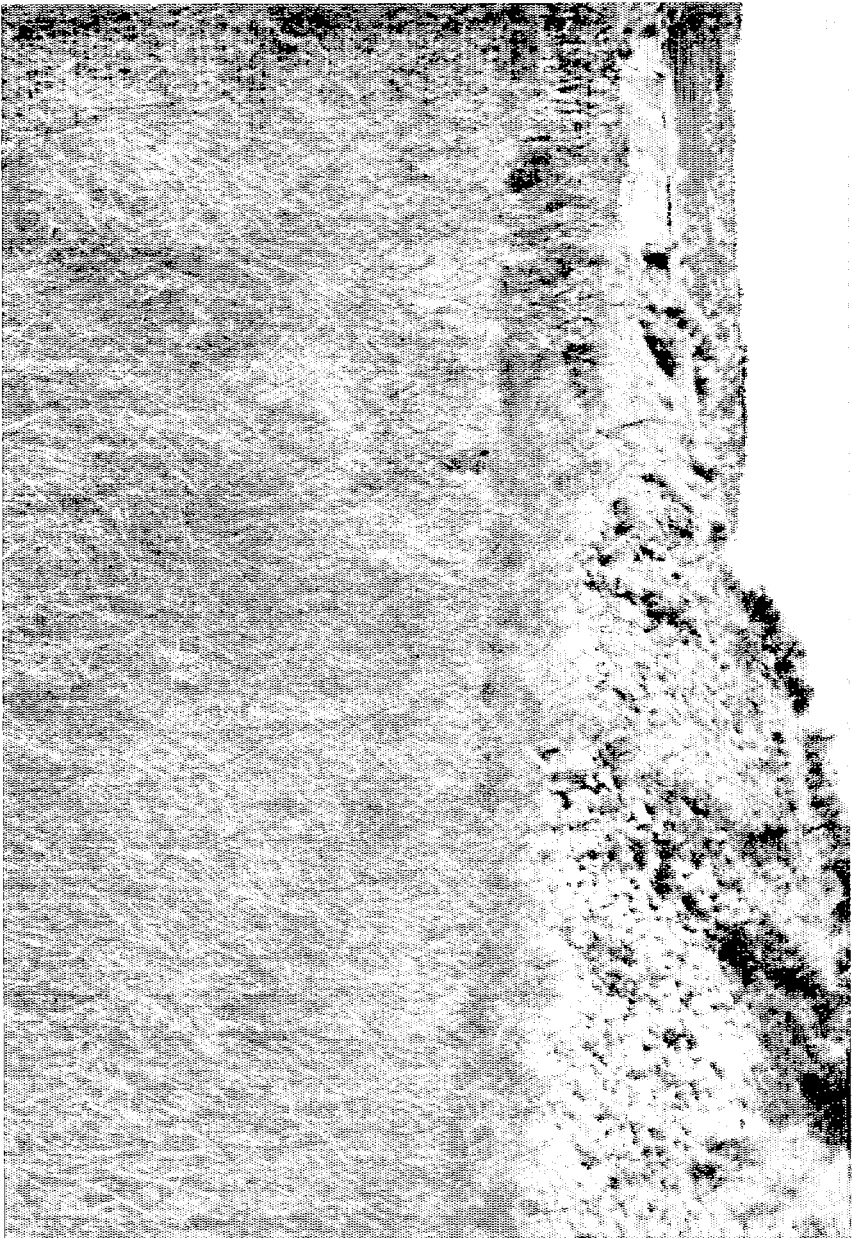


Photo 2 - Camp Creek Exclosure (Crooked River Drainage)  
1985. 19 years of livestock exclusion (Same area as is shown in photo 1)  
Currently estimated at 40% of site potential

Present vegetation:  
Herbaceous - Nebraska sedge, Baltic rush, 3 square bullrush, cattail, Kentucky  
bluegrass, occasional red top  
Tree - Seedling coyote willow and McKenzie willow in scattered patches  
Wetted area - 80% of potential

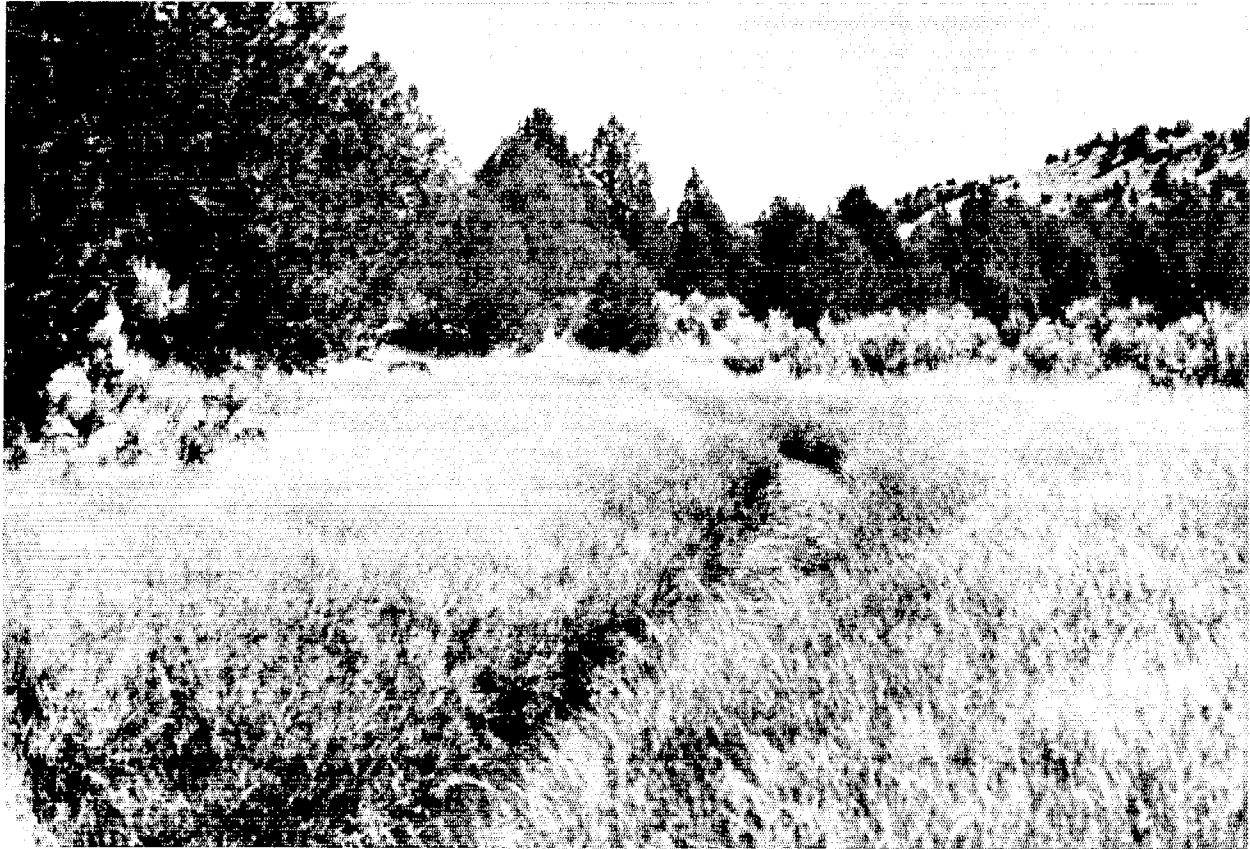


Photo 3 - Bear Creek - Crooked River drainage 1978. 3 years of non use by livestock.

Present: condition:

Stream gradient - less than 5%

Sediment Load - low to medium

Soils - principally willowdale loam, very deep, well drained, stratified alluvium, medium textured, gravel layers common.

Elevation - 3500 ft.

Estimated at 352 of site potential..

Present vegetation - mixed grass, sedge, rush with timothy, orchard grass and Kentucky bluegrass.

The full potential of this area is:

Dominant tree - Patches of water birch/alder

Understory - Coyote willow, silverleaf willow, yellow willow, McKenzie willow.

Herbaceous - Mixed grass, sedge, rush



Photo 4 - Birch Creek (John Day Drainage) 1980

Present condition:

Stream gradient - less than 5%

Sediment load - low to medium

Debris load - medium to high

Spring flow - high

Summer flow - perennial

Soils - moderately deep.

Textures highly stratified sands and loams. Gravel and cobble deposits are 25% to 75% of profile

Elevation - 3200 ft.

Estimated at 75% of site potential.

The full potential of the area is:

Dominant tree - Black cottonwood, white alder

Understory - McKenzie willow, chokecherry

Bitter cherry, woods rose, dogwood

Herbaceous - Mixed grass/forb/sedge/rush/shrub

U.S. ENVIRONMENTAL PROTECTION AGENCY



REGION X  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

JUN 27 1983

Mail Stop 443  
4500 9th

Gerald E. Magnuson, District Manager  
Prineville District Office  
P. O. Box 550  
Prineville, Oregon 97754

Dear Mr. Magnuson:

The Environmental Protection Agency (EPA) has reviewed the Draft Two Rivers Resource Management Plan Environmental Impact Statement (DEIS) prepared by your office. The DEIS presents five alternative schemes for management of approximately 325,000 acres administered by the Bureau of Land Management (BLM) in north central Oregon. The following comments are provided in accordance with our responsibility under Section 109 of the Clean Air Act to determine whether the impacts of proposed Federal actions are acceptable in terms of environmental quality, public health, and welfare.

General

The DEIS correctly describes itself as being programmatic in nature. Programmatic EIS set the general framework for future specific actions, while leaving detailed consideration of potential impacts to project-specific evaluations. For the Two Rivers planning area, those evaluations will most often consist of Environmental Assessments (EAs) rather than EISs. We would appreciate receiving any project-specific EAs having to do with the Two Rivers planning area as they become available. However, project-specific EAs may not always fully disclose all the significant environmental impacts that may occur. Cumulative effects from a number of individual projects within a broad geographic area, for instance, are best discussed in the programmatic EIS since they could easily be overlooked or not recognized while preparing the project-specific EAs. We are therefore especially concerned that programmatic EIS present enough information concerning the affected environment and environmental consequences that potential significant adverse impacts which can be avoided do not "slip through the cracks" of BLM's planning and review process.

There are a few key subjects which, if discussed in greater detail in the Final EIS, would greatly enhance our ability to determine the significance of impacts, which may result from implementing any of the management alternatives presented. These are discussed below.

Water Quality

21-1

The DEIS presents little discussion of the existing water quality for lakes, rivers, or streams in the Two Rivers planning area. Many of the activities discussed—timber harvests, livestock grazing, prescribed burning, mining—can significantly affect water quality. It is difficult to assess the adequacy of measures intended to mitigate the impacts caused by planned activities without information on existing water quality. For example, if water quality is currently somewhat degraded at some location, more stringent controls (beyond Standard Operating Procedures) may be required in order for a planned activity to be compatible with other beneficial uses, such as fish habitat. Still more stringent controls would be required if violations of water quality standards were occurring.

21-2

The Final EIS should discuss existing water quality in more detail, and highlight areas where planned activities may be in conflict with other beneficial uses. A quick comparison of Map 6 and Map 8 (pages 38 and 41, respectively) shows potential conflicts between important fish spawning habitat—for which high quality water is vital—and five of the eleven areas suitable for timber harvest. The Final EIS should then outline mitigation measures beyond Standard Operating Procedures that would be necessary where such conflicts arise. These could include, for example, alternate harvesting methods, larger buffer strips, and closure of certain watersheds to grazing, mineral development, or burning.

Riparian Management

21-3

We are pleased to see the recognition given to the importance of riparian vegetation to fish and wildlife habitat and water quality during all seasons of the year. Fencing is discussed as one means of protecting riparian areas from livestock grazing and human use impacts. The DEIS does not make clear, however, the differences between alternatives in terms of miles of fencing. Fencing can successfully exclude livestock from grazing in these areas, but could also adversely affect wildlife. Game, for example, can be excluded depending on fence design. Game populations can also suffer if accustomed travel corridors are blocked or if access to water is limited. The Final EIS should more thoroughly discuss the fencing of riparian areas, and its consistency with what the DEIS considers to be the benefits of this type of riparian management to wildlife.

Timber Harvesting

Timber harvesting has the potential for causing significant adverse impacts on water quality. In many cases, Standard Operating Procedures or Best Management Practices can adequately protect water quality. In other cases, more rigorous controls are necessary. Refer to comments under Water Quality, above. One of the best methods for ensuring that Standard

21-4

Operating Procedures will indeed be adequate to (1) evaluate the impact from previous harvests which are planned under similar conditions, and (2) enact a monitoring program that is adequate both for enforcement (verifying the existing operations) and for making predictions about future operations. The Final EIS should discuss the impacts of past logging timber harvests and describe the type of monitoring program that will be implemented for future harvests.

21-5

Many of the areas suitable for timber harvests are at or near the boundary of the planning area. The Final EIS should briefly discuss the possibility of coordinating timber harvests in these locations with any that may occur near but outside the planning area. By making sure that activities which take place in nearby areas do not occur too close to each other, potentially cumulative impacts to water quality and to fish and wildlife habitat can be minimized.

Threatened and Endangered Species

21-6

The DEIS identifies 31 species of plants which are threatened or endangered in Oregon and which may occur in the planning area. The DEIS also states that intensive surveys would be performed for these species in conjunction with any ground disturbing activities that are proposed, and that modification or abandonment of those projects could occur should the plants be found in the area. There is, however, no discussion of methods for minimizing impacts to these species, which may result from other planned activities, such as prescribed burning and livestock grazing. The Final EIS should discuss the types of surveys which may be used to discover the presence of threatened or endangered plant species in these broader areas. It should also address the following issues: Are any of these species more likely than others to be destroyed by a particular activity? How will controlled burning, livestock grazing, and competition from subsequent invading grasses, etc., affect the ability of these species to maintain themselves? If the proposed activities could seriously affect these species, how will impacts be minimized?

Ecological Condition

21-7

The discussion regarding ecological condition and climax communities appear to be at variance with widely accepted definitions. For example, "excellent" range condition would normally be associated with earlier seral stages in which grasses dominate the community, rather than with a climax situation. In the same manner, burning of vegetation to increase livestock forage (i.e., range conditions) would not move the community closer to climax but would maintain it in an earlier successional state. Conversely, the "unavoidable invasion of shrubs" does not indicate a move away from climax, rather, it indicates very well that the community has not yet reached climax.

21-7

A full yet concise discussion of ecological conditions and the effects of planned activities over nearly 325,000 acres on those conditions is extremely difficult to present. At the same time, that discussion is essential in an EIS such as this one, in order for the consequences of the programmatic planning decisions to be adequately identified and mitigated. The Final EIS should clarify the discussions regarding ecological condition. The definition used should be re-examined and supported by reference to appropriate literature. This will include revising Appendix C - Potential Impacts, should then be re-evaluated based on these definitions. In this way, the general public can better understand the impacts of the alternatives for resource management in the Two Rivers planning area.

Rating of the DEIS

Based on our review and in consideration of the above comments, EPA has rated the Draft Two Rivers Resource Management Plan Environmental Impact Statement as EC-1 (Environmental Concerns - Insufficient Information). A copy of the EPA rating system for draft EIS is enclosed for your reference. In this case, the EC rating primarily reflects the adequacy rating of 1. We are unable to fully determine from the information presented in the DEIS whether significant adverse impacts which can be avoided or minimized are likely to result from implementation of any of the alternatives. The Final EIS, however, would be a substantially more useful public information and decision-making document through consideration of the above comments.

Thank you for the opportunity to review the DEIS. If you have any questions or would like to discuss EPA's comments, please contact Brian Ross of our EIS and Energy Review Section at 715 593-6515.

Sincerely,

*Robert S. Burd*  
Robert S. Burd  
Director, Water Division







AUBUBON SOCIETY OF PORTLAND

A Society of Natural Resource Stewards

1411 15th Ave. N.E. Portland, Oregon 97232

June 30, 1985

Mr. Gerald E. Magnuson  
District Manager, Pineville District Office  
P. O. Box 150  
Pineville, OR 97134

Dear Mr. Magnuson:

This letter is a few comments on the Two Rivers Management Plan/Draft 219.

In general, we found the Plan easy to read and use. We are pleased to see the following plans in the Preferred Alternative:

1. No seeding of eroded wheat grass. Thank you for printing Table 19 on page 34. It documents the comment we frequently make--that eroded wheat grass plantings are not consistent with the multiple-use mandate on the public lands.
2. Extensive riparian fencing. We are pleased to see the Eugene District act on concerns for wildlife and fish habitat along and in the John Day and Deschutes Rivers and basins.
3. Special management for several riparian areas and ecosystems--RNA status for The Island in the Cove (Palisades State Park, ACEC status for Horn Butte Curlew Area, RNA status for the Governor Tom McCall Preserve, etc.).
4. Recognition of the needs of non-game wildlife for upland vegetation.

We are concerned about other aspects of the Plan as follows:

1. Long-term grazing increases. We believe that grazing increases are not compatible with improving riparian conditions. How can you both restrict cattle from grazing in riparian zones and expect that available forage will increase? For too little forage now is available to game and non-game wildlife. We would like to see the Eugene District recognize that the public lands are overgrazed and that AUMs need to be reduced.

22-1

are and partial, correct. Livestock will be more concentrated in the uplands if riparian fencing occurs, but at the same time, changes in management will be required which will aid in the ecological recovery of the riparian areas. Changing the amount of forage consumed in itself will do little toward reducing overgrazing, unless it is a change in timing of grazing that is needed. And we, as integral part of the plan is to require periodic, regular rest from grazing during the critical growing period of the plants.

Regarding future increases in grazing, these could only be implemented if studies on actual use and utilization show the forage is available. Any such change in use could be given on a temporary basis at first and would be monitored to ensure management objectives were being met. Some increases could occur as a result of prescribed fire and/or seeding under Alternative B, but this involves only 3 percent of the forest public lands now in the planning area. Most production increases are based on anticipated changes in ecological conditions.

2-2 See response to comment 20-2.

The impacts study was intended to reflect distinct, site-specific impacts which are unavoidable, yet not significant. These activities will continue to occur because FURMA mandates that management be on the basis of multiple use and sustained yield (see 162 (a)(7)), that public lands be managed for multiple production (see 101(a)(2)), and that management recognize the nation's need for domestic sources of minerals, food, timber, and fiber from the public lands (see 101(a)(1)). Every effort is made to minimize impacts to our soil and water resources, our scenic, forestry practices, mineral exploration, and recreation are legitimate resource uses under FURMA's concept of multiple use management and some impacts will occur.

Have the Two Rivers EOP/MS does not analyze the Wilderness Study Area issue it is aware you are referring to the Spring Basin Allotment (250), which is that does constitute approximately 25 percent of the Spring Basin WSA. Authorized use in this allotment in 1976 was no AUMs. The preferred alternative calls for an initial allocation of 45 AUMs which appreciates the current active use. Consideration of any future increases would be subject to FURMA and the Bureau's Wilderness Interim Management Policy. The initial allocation portrayed under Alternative D for this allotment is in error. See text change for page 117.

No doubt part of the problem with the John Day River's water quality is soil erosion from surrounding lands. Fewer AUMs would also improve vegetative cover, reducing erosion on these steep slopes.

22-2  
22-3  
22-4  
22-5

2. Riparian areas are managed to 60% of full potential. 60% over 20 years seems a low goal achieved at too slow a rate. We would urge that you keep cattle off more of the riparian areas and manage for a higher percentage of full potential.
3. Negative environmental impacts to soil and water resources. Table 27 on page 59 shows that forestry practices, mineral exploration, and OUV use and roadbuilding have negative impacts on soil and water resources. We think that any negative environmental impacts are not consistent with FURMA's mandate to improve the public lands or at least hold the status quo. We urge that you reconsider these plans and reduce negative environmental impacts.
4. Planned grazing increases in Spring Basin WSA. According to FURMA, grazing in WSAs is to be held to 1976 levels. How many AUMs were on Spring Basin in 1976? We would prefer to see grazing in Spring Basin reduced from the current levels.
5. Sales of the public lands. We prefer that none of the public lands be sold.

Thank you for the opportunity to comment. We would appreciate a response to our comments, particularly regarding grazing in Spring Basin WSA.

Sincerely yours,

Linda S. Craig  
for the Conservation Committee,  
Aububon Society of Portland  
Please reply to 2433 N. W. Quincey, Portland, Oregon 97210.

BUREAU OF LAND MANAGEMENT  
Pendleton District Office  
P.O. Box 550  
Pendleton, OR 97794

10 June 1985

ATTN: Gerald T. Robinson

RE: Two Rivers Resource Management Plan EIS - draft

Dear Mr. Robinson:

Thank you for this opportunity to comment on the Two Rivers RMP draft EIS. The following comments are made on behalf of the Central Oregon Audubon Society.

In general, the draft EIS is commendable in its coverage of the various issues and the range of alternatives. However, some important information is missing that needs to be addressed in the EIS.

1. Soil erosion potential is not adequately addressed. The following information regarding BLM land in the 2 Rivers Planning Area needs to be present in the EIS:

Soil Erosion Potential	# of Acres	% of total acres
1) none		
2) moderate		
3) severe		
4) critical		

A second piece of information that is missing is a projection of how each alternative will affect overall erosion in the 2 Rivers Planning Area.

2. Forage production and its relation to ecological condition needs to be addressed. Maximum forage production occurs when the vegetation is in late seral to climax condition. Non-riparian vegetation should be improved and maintained in late seral to climax condition because it would reduce soil erosion, increase water quality, improve habitat for wildlife and increase forage production.

3. The effect of scattered wheatgrass seedings on wildlife needs to be addressed. A table with the following information would be particularly helpful. (A similar table can be found on page 31 of the Brothers Grazing Management Program Draft EIS, 1982.)

Habitat Type	# of Acres	Reproduction (primary use) Ecosystem
highbrush-sagebrush		
lowbrush-sagebrush		
high brush-sagebrush		
low brush-sagebrush		
white oak dominant		
riparian		
scattered wheatgrass		
etc.		

23-1. See text change for page 18.

23-2. Based on the relatively small amount of soil disturbance anticipated under each alternative and the overall predicted change of ecological conditions toward climax, it was determined that impacts to soil would be minor. Therefore impacts to soil are not discussed in any greater detail than what is shown on pages 18 and 19 of the draft RMP/EIS.

23-3. While a plant community in climax condition might be the ideal for maximum livestock forage, it is generally not in the best interest of multiple use management, particularly as related to wildlife habitat. For wildlife, something less than climax will maximize habitat diversity and hence, species diversity (see page 31 of the draft RMP/EIS). Our goal is somewhere between mid-seral and late-seral condition for most of our upland habitat. We feel this is a good compromise since at these conditions wildlife habitat diversity will be high, the soil will be adequately protected from erosion (generally somewhat less than in climax but not significantly less), and, coupled with riparian habitat improvement, water quality will improve.

23-4. The table shown on page 31 of the Brothers Grazing Management Program Draft EIS is reproduced for the Two Rivers Planning Area on page 31 of the Two Rivers Draft RMP/EIS. More detailed information concerning the habitat interrelationships of each wildlife species is contained in Appendix 6.

The effects of scattered wheatgrass seedings on wildlife needs (as stated on page 31 of the draft RMP/EIS): "seedings have low habitat diversity." This can be further seen in Appendix 6 where it is indicated that relatively few species use scattered wheatgrass and even fewer prefer it. Only 1,160 acres is proposed for scattered wheatgrass seeding and this only under Alternative 2, which is not the proposed plan. Any acreage seeded under this alternative would be at the low end of early-seral condition which would not be expected to improve with management.

23-5. Figures relating average forage production, soil erosion potential, water quality, and wildlife abundance to ecological condition would be meaningless except in general terms as already discussed in 1 above. Some reasons for this include the extreme variability in forage production between two different range sites in the exact same ecological condition (climax upland). For example, one about 4 times the forage potential as established in climax condition, and different erosion potentials and hence, water quality for different sites, even though ecological conditions may be equal.

page 1

4. Ecological condition of riparian lands and its effect on forage production, soil erosion, water quality and wildlife abundance is specifically addressed as illustrated in the following table:

riparian land ecological condition	average forage production (RMP/EIS)	soil erosion	water quality	wildlife abundance
late seral forest				
mid-seral forest				
early seral forest				

5. Economic impacts (page 66) fails to recognize major economic factors such as BLM administration costs for managing the lands under the various alternatives. BLM total dollars spent by BLM in terms of administrative costs plus range development and maintenance for each BLM project, (1) economic benefits of improved forage and hunting conditions with improved ecological conditions.

The underlying philosophy of Central Oregon Audubon Society is that our public lands should, for the benefit of the public, be maintained in the best condition possible. Allow commodity use where resources (market values) would not deteriorate in the long run. Unfortunately that is not the philosophy found in this draft EIS preferred alternative. Continued deterioration of public lands will occur under the preferred alternative in the following areas: a.) erosion, b.) seedling of unwanted wheatgrass, deterioration that has already occurred and is not adequately addressed by the preferred alternative, including a. less than optimal water quality as determined by water turbidity, warmth and water runoff patterns, b.) less than optimal non-riparian range condition (should be late seral to climax). Moreover, it is not clear how improved grazing procedures can be expected to improve overall ecological condition as outlined in the draft EIS.

From our point of view, the alternative most amenable to our basic philosophy would be Alternative 1, although Alternative 2 would be acceptable if the following changes were made: a.) ecological condition of rangelands be improved and maintained in late seral to climax condition, and b.) exclude all seeding of scattered wheatgrass.

The "preferred" Alternative 2 is unacceptable for the following reasons:

1. The single use of livestock grazing is given priority over the multiple uses by multiple forms of life as well as human uses of fishing, hunting, hiking, etc. BLM's preferred alternative shows insensitivity to wildlife values.
2. Range condition will not be adequately rehabilitated, erosion will not be adequately controlled.
3. Under this alternative ranchers will in effect be subsidized by taxpayers to graze on public lands.

Respectfully yours,

*Gerald T. Robinson*  
Gerald T. Robinson  
Conservation Committee Chairman  
Central Oregon Audubon Society  
P.O. Box 550  
Pend, OR 97794

23-6. The magnitude of these factors depends heavily on the particular actions taken to implement the proposed plan. They will be considered in greater detail in the activity plans which will be completed after the RMP. Activity planning requires the specific means by which particular land use decisions from the RMP are to be implemented. Activity plans are narrower in focus than an RMP, more detailed and include benefit-cost analysis when relevant to the specific decision. Benefit-cost analysis in these instances would include changes in administrative costs resulting from proposed changes in management and economic benefits from improved hunting and fishing conditions.

23-7. It is anticipated that resource conditions will improve under the preferred alternative, and deteriorate as you suggest. The key to much of this expected improvement is a change in the timing of grazing use on non-riparian areas to enhance ecological conditions toward climax with a goal of mid-to late-seral condition for maximum habitat diversity and restrictive use or exclusion of grazing in riparian areas. Seeding is not proposed except under Alternative 2.



