Proposed Two Rivers Resource Management Plan

Environmental Impact Statement
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 1969.

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 D. Reams
State Director, Oregon State Office

Ardell E. Magnuson
District Manager, Prineville District
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 292,756 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:

Brian Cunninghame
RMP/EIS Team Leader
Bureau of Land Management
Prineville District Office
185 East Fourth Street
P.O. Box 550
Prineville, OR 97754
Telephone (503) 447-4115
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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 132,000 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.


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 to 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 exclosures 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 33,610 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.
7. Approximately 150,000 acres would be limited or closed to off road vehicle use.

8. Four areas would be designated as research natural areas or as areas of critical environmental concern. Other unique wildlife or ecological values would be maintained or enhanced.

**Alternative E (Emphasize Natural Values)**

This alternative emphasizes the enhancement of natural values.

1. All riparian areas located on public lands would be excluded from livestock grazing.

2. Management of wildlife 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. Livestock grazing would be eliminated from public lands in the planning area.

4. No public lands would be offered for sale, however, exchanges would occur to enhance wildlife, riparian, watershed, visual and other natural values.

5. No regularly scheduled forest product sales would occur. Harvest of diseased or damaged timber would occur if it did not conflict with wildlife and fisheries habitat, visual, riparian or the protection and enhancement of other resource values. This would amount to approximately .02 MMbf/year.

6. Exploration and development of mineral resources would be allowed where no significant conflicts exist with wildlife, riparian, recreation or scenic values. Existing no surface occupancy stipulations on oil and gas exploration and development would be expanded to include 200,000 acres.

7. Approximately 200,000 acres would be limited or closed to off road vehicle use.

8. Ten areas would be designated as research natural areas, areas of critical environmental concern or outstanding natural areas. Other unique wildlife or ecological areas would be maintained or enhanced.

### Summary of Environmental Consequences

**Soil**

The rate of soil erosion over both the short and long term would decrease under Alternatives A, B, D and E due to improved streambank stability. There would be no change under Alternative C.

**Water**

None of the alternatives would significantly affect overall water yield. Water quality would improve under Alternatives A, B, D and E due to increased streambank stability. This would result in a slower and extended release of water, thus improving water quality during critical low flow periods. Water quality under Alternative C would remain unchanged.

**Vegetation**

Minor changes in vegetation types would occur under all alternatives. Ecological condition and plant diversity would also change under every alternative with the greatest change occurring under Alternative E.

Riparian vegetation would show improvements under every alternative except C. Alternatives A, D and E would show the greatest improvement.

Forest vegetation would be affected to the greatest degree under Alternatives A, B, C and D through timber harvesting. No significant impacts would occur under Alternative E. No significant impacts to threatened, endangered or sensitive species would occur under any alternative.

**Wildlife**

Habitat diversity and condition of winter ranges would improve under Alternatives A, B, D and E due to the implementation of grazing systems, decreased stocking rates, or exclusion of livestock. However, adverse impacts to upland habitat would also occur under Alternative B due to forestry practices, mineral operations, acquisition of public access and ORV use.

Fencing of riparian habitats to exclude livestock under Alternatives A, D, and E would significantly improve habitat conditions. Lesser improvement would occur under Alternative B.

No significant impacts would occur under Alternative C.
Fish habitat would improve and fish populations would increase on all streams under Alternatives A, D and E as a result of riparian fencing and exclusion of livestock. Overall improvements would also occur under Alternative B with no change under Alternative C.

**Livestock Grazing**
Long term increases in forage available to livestock are projected to occur under Alternatives A and B. Forage levels would remain the same under Alternative C and decrease under Alternative D and E. Under Alternative E no livestock grazing would occur on the public lands.

**Forest Products**
Annual timber harvest levels would be the greatest under Alternative B and slightly less under Alternatives A, C and D. Timber harvest would be reduced to custodial level under Alternative E.

**Energy and Minerals**
Impacts to oil and gas availability (no surface occupancy restrictions) would be greatest under Alternative E followed by Alternatives D, C and A. The number of acres with no surface occupancy stipulations would be reduced from present levels under Alternative B.

**Economic Conditions**
Increased income to livestock operators and farmers utilizing public land would occur under Alternative B. Some gains and some losses of income would occur under Alternative A. There would be no change under Alternative C. Alternatives D and E would reduce overall farm and ranch income from present levels. Under no alternative would there be a significant impact on the local economy as a result of changes in the use of public lands.

**Recreation**
Recreation use levels would not be significantly affected under any of the alternatives. All alternatives except C would, however, increase overall use levels slightly. Use levels would not be affected by Alternative C.

**Cultural Resources**
Appropriate measures would be taken to identify and protect cultural sites prior to ground disturbing activities. No impacts would occur to known cultural sites under any alternative.
Table 1 Summary, Long Term Environmental Consequences: Comparison of Alternatives

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<tr>
<td>Long Term Loss or Gain in Value</td>
<td>dollars</td>
<td>--</td>
<td>+129,000</td>
<td>+366,000</td>
<td>0</td>
<td>-237,000</td>
<td>-1,066,000</td>
</tr>
<tr>
<td>Recreation</td>
<td>visitor</td>
<td>62,000</td>
<td>+L</td>
<td>+L</td>
<td>NC</td>
<td>+L</td>
<td>+L</td>
</tr>
<tr>
<td>Visitor Use Levels</td>
<td>days</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Off Road Vehicle Limitation/Closure</td>
<td>acres</td>
<td>20,000</td>
<td>10,000</td>
<td>20,000</td>
<td>150,000</td>
<td>200,000</td>
<td></td>
</tr>
<tr>
<td>Protection of Values</td>
<td></td>
<td></td>
<td>+L</td>
<td>+L</td>
<td>NC</td>
<td>+L</td>
<td>+M</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protection of Values</td>
<td></td>
<td></td>
<td>+L</td>
<td>+L</td>
<td>NC</td>
<td>+L</td>
<td>+M</td>
</tr>
<tr>
<td>Visual Resources</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protection/Enhancement of Visual Quality</td>
<td></td>
<td></td>
<td>+L</td>
<td>-L</td>
<td>NC</td>
<td>+L</td>
<td>+M</td>
</tr>
<tr>
<td>Special Management Areas</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Protection of Values</td>
<td></td>
<td></td>
<td>+L</td>
<td>-L</td>
<td>-L</td>
<td>+L</td>
<td>+L</td>
</tr>
</tbody>
</table>

+ = 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 planning area is bounded by four national forests—Mt. Hood, Deschutes, Ochoco 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 Ochoco 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

Table 2. Public Land Acreage, Two Rivers Planning Area

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

*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.
Areas Considered for Wilderness Designation in Separate Studies

Two Rivers Planning Area Boundary
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.
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.


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 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 7,500 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
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 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

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Table 3 Existing and Proposed Grazing Systems

<table>
<thead>
<tr>
<th>System 1</th>
<th>Existing</th>
<th>Proposed RMP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No. Allot./Acres</td>
<td>No. Allot./Acres</td>
</tr>
<tr>
<td>Improve</td>
<td>1</td>
<td>12/50,178</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>22/83,243</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>25/70,271</td>
</tr>
<tr>
<td>Maintain</td>
<td>1</td>
<td>12/15,560</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>14/17,514</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>15/18,460</td>
</tr>
<tr>
<td>Custodial</td>
<td>1</td>
<td>12/3,568</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>57/25,078</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>64/27,884</td>
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<tr>
<td>Total</td>
<td>1</td>
<td>369,306</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>93,105,835</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>104,179,59</td>
</tr>
<tr>
<td>Totals</td>
<td>233,292,736</td>
<td>233,292,736</td>
</tr>
</tbody>
</table>

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

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**

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

1 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.

2 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 on 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

<table>
<thead>
<tr>
<th>Public Land Open to Development</th>
<th>190,000</th>
<th>26.9%</th>
</tr>
</thead>
<tbody>
<tr>
<td>with Standard Stipulations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Open to Development with Restrictive Stipulations</td>
<td>132,000</td>
<td>18.6%</td>
</tr>
<tr>
<td>Closed to Leasing</td>
<td>3,000</td>
<td>4%</td>
</tr>
<tr>
<td>Reserved Federal Mineral Estate</td>
<td>383,000</td>
<td>54.1%</td>
</tr>
<tr>
<td>Open to Leasing with Standard Stipulations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td>708,000</td>
<td>100%</td>
</tr>
</tbody>
</table>

†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."

 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 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;

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.

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.
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.
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.
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:

- 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:

<table>
<thead>
<tr>
<th>Soil Erosion Potential</th>
<th>Acres</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slight</td>
<td>48,700</td>
<td>15</td>
</tr>
<tr>
<td>Moderate</td>
<td>162,330</td>
<td>50</td>
</tr>
<tr>
<td>Severe</td>
<td>81,175</td>
<td>25</td>
</tr>
<tr>
<td>Critical</td>
<td>32,500</td>
<td>10</td>
</tr>
<tr>
<td>Total</td>
<td>324,705</td>
<td>100</td>
</tr>
</tbody>
</table>

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:

<table>
<thead>
<tr>
<th>Species and Habitat Type</th>
<th>Public Land Acres</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer Winter Range</td>
<td>252,000</td>
</tr>
<tr>
<td>Elk Winter Range</td>
<td>4,540</td>
</tr>
<tr>
<td>Elk Year Long Range</td>
<td>560</td>
</tr>
<tr>
<td>Antelope Year Long Range</td>
<td>800</td>
</tr>
<tr>
<td>Potential California</td>
<td></td>
</tr>
<tr>
<td>Big Horn Sheep Range</td>
<td>14,000</td>
</tr>
<tr>
<td>Long Billed Curlew Nesting Habitat</td>
<td>6,000</td>
</tr>
<tr>
<td>Wild Turkey Year Long Habitat</td>
<td>1,360</td>
</tr>
<tr>
<td>Waterfowl Nesting and Rearing Habitat</td>
<td>1,280</td>
</tr>
<tr>
<td>Raptor Nesting Habitat</td>
<td>Rivers &amp; Ledges of Major Canyons</td>
</tr>
</tbody>
</table>

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 T. 5 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:

<table>
<thead>
<tr>
<th>Creek Name</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fall Canyon Creek</td>
<td>Add Rb</td>
</tr>
<tr>
<td>Harris Canyon Creek</td>
<td>Delete St</td>
</tr>
<tr>
<td>Buckhollow Creek</td>
<td>Add Ch (Chinook)</td>
</tr>
<tr>
<td>Finnegan Creek</td>
<td>Add St</td>
</tr>
<tr>
<td>Cottonwood Creek</td>
<td>Add St</td>
</tr>
<tr>
<td>Ward Creek</td>
<td>Add St</td>
</tr>
</tbody>
</table>

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.
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 Planning Council and Grazing Board on June 14 and 20, 1985 respectively. The District Planning Council and Grazing 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. Forest 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
Bohemian Mine Owners Association
Brooks Resources Corporation
Cascade Holistic Economic Consultants
Chevron Resources Company
Columbia River 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 Cattlemen'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 re-evaluated 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 RMP 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
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
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 (RNA) in conjunction with the Forest Service. The area has long been considered for RNA status, and the nearly pristine juniper savannah will be a worthy addition to the RNA system. If there is anything I can do to facilitate communication between you and the Ochoco National Forest, please let me know.

I am not in agreement, though, with the proposal for an RNA within the Governor Tom McCall Preserve. There are several reasons for this. The area does not represent a prime or pristine grassland ecosystem, and does not fill a specific RNA cell/element need. It is also too small. I would recommend that the 12.5 acres be established as an Outstanding Natural Area instead.

If you have any questions please do not hesitate to get in touch with me.

Sincerely yours,

Sarah Greene
Research Natural Area Scientist
Pacific Northwest Region

cc: Bill Hopkins, Jim Rogers, Curt Soper

We agree. The proposed designation for this 12.5 acre parcel has been changed to an Area of Critical Environmental Concern (ACEC). Outstanding Natural Area (ONA).
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.

For the last 30 years, I have spent quite a bit of time hiking, fishing, hunting, birding, and just being in the out-of-doors. One of the things that has always puzzled me has been the way that the cattle have been allowed to use certain areas. In some of the areas that I have hiked there has been a marked decline in the number of big game animals, and it happens 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 been aware that many of the cattle have roamed and grazed from the streams. I am aware of the fact that there has been some concern voiced in recent years about some of the riparian habitat of wildlife which may have to be protected from the cattle away from the streams, but this concern needs to be strengthened. It is imperative to allow them to graze away from the streams, but it's unrealistic to think that all the streams will be fenced, when there are other alternative areas available.

In reviewing the figures for the grazing allowances allowed in this area, I see that there are a total of 252 AUM's for a total price of $29,439. These allotments produced a total income in 1984 of $64,980. Given the fact that half of this amount came from the USFWS, the USFWS should operate this program with the highest possible priority in the future.

The obvious answer is that you can't. In effect, the rest of the land forage, they should pay a market value for the AUM's that they receive without being subsidized by the taxpayer. The increased number of fish & game in the area that would result from the removal of the cattle would have a very minimal effect on the quality or quantity of water in the rivers or their tributaries.

Over the last 30 years, I have spent quite a bit of time considering livestock grazing management, riparian management, and forestry, although we will speak to all of these issues on the next time. The obvious question to me is why there is grazing allowed on all of these lands, given all of the destruction that it does. We only provide 3% of the forage for the average ranch. The obvious alternative to public grazing would have a very minimal effect on the quality or quantity of water in the rivers or their tributaries.

6. MINERAL RESOURCES:
Oregon Trout supports alternative "D." We strongly request that a fisheries biologist or planner be included in staffing for any timber harvesting near riparian zones. Whether under public or private management, the owner of riparian land has a responsibility to see that the resident and migratory population of fish which use the habitat. Oregon Trout believes that good stewardship of riparian land must be maintained.

7. OFF ROAD VEHICLE USE:
Oregon Trout opposes alternative "D." Where such mining would have a negative effect on the quality or quantity of water in the rivers or their tributaries.

8. RESEARCH NATURAL AREA:
Oregon Trout favors alternative "D" as written.
Oregon Trout would like to compliment the Bureau of Land Management on a concise, thorough document. It is heartening for us to see a governmental agency believe some of the "bad press" so frequently and capriciously heaped upon agencies in general. We place importance on thinking things through before opening the fecal floodgates. We very much appreciate the effort you have made it easy for us to arrive at our choices, and allowed us to receive a valuable education in the process. Thank you.

We would implore the BLM to focus upon enforcement of their management policies, regardless which options are selected. You hold in your hands much of our quality of life, and that of our children. We fervently hope that the conclusions you have delineated here, that whatever alternatives are selected must be brought into reality. Cost usage that sufficient efforts and funding are devoted toward enforcement of your policies.

Thank you for the opportunity to comment.

Very Respectfully,

Mike McLucas
The Oasis Resort
P.O. Box 365
Maupin, Oregon 97037
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

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: Commissioner, Washington, D.C., Attention: 150

May 11, 1985

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

Dear Mr. Magnuson:

I have not lived or worked in the Two Rivers area so I respond to the draft EIS in overall philosophy rather than in specifics. My personal preference is alternative B emphasizing natural values. However, I realize this plan would be unacceptably disruptive to local people and politically unrealistic. Therefore, I recommend alternative D emphasizing natural values accommodating commodity production.

Through the years range lands have been largely overgrazed and mismanaged. I feel that the overall human benefit would be achieved by restoring, as quickly as possible, these lands to a good vegetative cover with clean streams, abundant fish, wildlife, and improved character approaching the conditions that existed before the impacts of domestic livestock grazing. I believe that Alternative B would do the job assuming proper funding.

In general I do not support the concept of disposal of public land by sale. Exchanges are acceptable, but sales are preferable. Further, I do not believe that land turned into private ownership is any more subject to the risk of single use management. In the long run, the public would loose with any significant land disposal program.

It always bothers me to see cattle in the streams. They cause so much damage to the riparian zones. I have seen studies where riparian fencing has done so much to restore natural values. I encourage the maximum use of this management tool.

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

Sincerely,

John W. Anderson
We agree. The proposed designation for this 12.5 acre parcel of Sutton Mountain was 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, the Sutton Mountain area is being proposed as an RNA, in conflict 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 12.5 acre parcel at Novena Preserve as an RNA seems inappropriate for the area—perhaps listing it as an Outstanding Natural Area would suit it better. Third, 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.

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

May 20, 1985

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 specific 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, the Sutton Mountain area is being proposed as an RNA, in conflict 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 12.5 acre parcel at Novena Preserve as an RNA seems inappropriate for the site—perhaps listing it as an Outstanding Natural Area would suit it better. Third, 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.

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

May 5, 1985

Dear Mr. Magnuson:

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

Since BLM lands belong to all of us, I believe Alternative C 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 areas. I believe that part of Sherars Road out of Sherars Bridge is on BLM land. I know, this work important pioneer road should be included in the Special Management Areas.

Sincerely yours,
Lawrence Nielsen

---

Oregon Natural Resources Council

June 5, 1985

Dear Mr. 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/DEIS 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 intensive 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.

Derek MacDonald, Ph.D.

---

Lawrence Nielsen, Ph.D.
Science Consultant and Lecturer

May 29, 1985

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

Dear Mr. Magnuson:

I have studied the "Two Rivers Resource Management Plan". I favor Alternative E, but I could live with Alternative D. I consider Alternative D, E, F, and G to be unsatisfactory.

Since BLM lands belong to all of us, I believe Alternative C 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 areas. I believe that part of Sherars Road out of Sherars Bridge is on BLM land. I know, this very important pioneer road should be included in the Special Management Areas.

Sincerely yours,
Lawrence Nielsen
process. In addition to analyzing the environmental impacts of the sales, FLMF imposes other criteria:

1. Difficult and unnecessary to manage. The OHM doesn't analyze the existing management or assessment costs of lands for disposal. Or the worth of the disposal process.
2. The tracts are not required for any Federal purpose. You do not identify the existing purposes of such tracts.
3. Disposal will serve important public objectives, and contribute to the sustainability of the public land system. 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

Is your summary description of the alternatives you use the phrase, multiple use and the discussion that follows this phrase is not sufficient to lead to a multiple use alternative. Multiple use isn't mentioned specifically. We recommend using a multiple use alternative, which emphasizes commercial exploitation. We recommend that the multiple use be used in all alternatives, or none.

WILDERNESS AND RIVERS

You eliminate two major issues from detailed study in the RMP – Wilderness and Recreation Use of the Lower McKenzie and John Day Rivers.

Recreations require the articulation of wilderness planning with the land use considerations that OHM expresses for multiple use, and also multiple use should be addressed in this AMP.

174,000 XWA's occur on the river. PDA of public land recreation within the planning unit. In terms of size, numbers of people, and public concern in Oregon, recreation use of the lands in the river area should be a major component of the AMP. Over several pages discussing the allocation of 17,778 AUM's of livestock forage – worth only $24,000.

SPRING DEVELOPMENTS

3. Development reduces wet meadow/marsh environments and riparian vegetation, replacing them with pipes and metal troughs. We suggest that you fence springs and collect trough water until it flows out of the fenced area. If there isn't enough water there, then the spring area should simply be fenced for wildlife.

MONITORING

We strongly disagree with your perspective on monitoring of grazing prior to making changes in livestock forage use. OHM range managers are either professionals who know what land use policy and multiple use means or disinterested, or have no idea what land use policy means. You proceed to mandate a philosophy of changing numbers of livestock takes away one of the range conservation major tools and completely destroys the livestock planning portion of the AMP about half useless. If you can't control numbers, you can only permit use as livestock on a livestock management tool. Starting from ground zero with a new monitoring program during forty years of Taylor Grazing Act management. You and I know that some of your allotments are in poor condition.

UTILITY CORRIDORS

Should "utility/transitations corridors identified..." be all that western Utility groups...designated without further review?...map

The land tenure map, like all the other maps in the document, is simply too small to be very useful. The maps in Oregon OHM Grazing Act's are far superior.

RECREATION

SPRING DEVELOPMENTS

2. The life form presentation, especially in Appendix P, is helpful. However, the AMP fails to analyze habitat to individual species. A point that we have discussed in the past, and take strong issue with again, is your statement that Oregon Department...is all about. You don't even state what ODFW management objectives are for the species within the planning unit.

PLANNING OBJECTIVES AND PRACTICES

You should include an objective for purchasing land where public benefits will accrue. Overall, the objectives are too generalized. The plan should list those objectives to specific pieces of ground. For instance, you say that ODFW are to be allowed steps in sensitive areas. The purpose is to label those places. And aren't there unique sites that we don't want packed away?

DOMINANT

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, than a multiple use standard?

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

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

Sincerely,

Don Tryon
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 no use designation, providing for operational consistency among the BLM, state governments, and other resource agencies. The purpose of an RMP is to analyze and determine the total land and resource base that will be developed. Since the general resource allocations 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.

This RMP/EIS analysis the environmental consequences of selling 11,930 acres of land if they meet the criteria set forth in the proposed plan. This RMP in combination with site-specific environmental assessments termed to this EIS will meet the requirements of FLPMA and NEPA.

As mentioned on page 5 of the Draft RMP/EIS, wildness planning is not experienced by the Two Rivers RMP/EIS as recognized and provided for throughout the plan under all alternatives. Although measures are made by Oregon or designations as non-wilderness, the wilderness study areas will be managed to protect wilderness values. The land use activity that those areas will be made by Oregon riparian habitat. You are correct in that some developments do dry up the riparian area around the source, but this can be mitigated by running the overflow pipe well away from the trough and then designing this newly created riparian area.

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 Water Quality, and the Oregon Environmental Quality Commission. The riparian habitat is a very important resource area for recreation planning on the Two Rivers RMP/EIS. Any alteration or change in the riparian area should be made in a manner that is consistent with the overall goals of the Two Rivers RMP/EIS. Similarly, recreation planning on the John Day River, as it was Oregon State Wildlife Division, also needs to be.

Environmental access to the public lands is restricted, either by potential recreation designations or by control of access. Access may be affected by a closure or limit on the public lands. The public lands are managed to limit access to certain areas, which in some cases is necessary to protect the environment. The discussion of grazing access on page 40 of the Draft RMP/EIS should be noted to any persons interested in public access or wildlife management. The phrase "it was removed" was used to indicate that for the purposes of analysis in this document certain access determinations made regarding current potential livestock management for many of the areas.

Due to the relaxed landscape patterns of these scattered lands near Little of the basic data needed to make detailed use or natural areas are available for much of the area in the Two Rivers Planning area. Some small allotments have been created over the years. Many specific areas locations are of parks, campuses, scenic areas, etc.

Appendix Q lists the name, location, special status as well as accessibility of public access to the two identified special management areas. The Appendix D of the Draft RMP/EIS also identifies specific locations of each of the areas shown in the map. The five alternative scenic areas and their study areas designated as areas of scenic or historic interest will be considered in the future. The authorizing agencies, such as the Oregon State Parks Department, will be responsible for implementing the approval for these designations.

The policy requires that all public lands be designated as either open, closed, or closed to off-road vehicle use. Even though located on federal-owned public lands, the need to identify lands that are suitable or suitable for off-road vehicle use still exist.

Appendix D lists the criteria for public access as well as the criteria for the designation of scenic areas and study areas. The criteria for public access are based on the following:

- The purpose of an RMP is to analyze and determine the total land and resource base that will be developed.
- The purpose of the RMP is to evaluate and determine the total land and resource base that will be developed.
- The purpose of the RMP is to evaluate and determine the total land and resource base that will be developed.
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- The purpose of the RMP is to evaluate and determine the total land and resource base that will be developed.

In summary, the current procedures for scenic areas are designed to protect the source from erosion and to provide a protected riparian habitat. You are correct in that these developments do dry up the riparian area around the source, but this can be mitigated by running the overflow pipe well away from the trough and then designing this newly created riparian area.

The utility/transmission corridors identified by the ad hoc Western Utility Group as they affect public land in the Two Rivers Planning area are all currently not used in any different land use. The Fullaction plan identifies corridors of arterial, road, and rail transportation and utility corridors. The corridor plans do not identify specific corridors, but rather corridors of potential development. The corridor plans are designed to protect the source from erosion and to provide a protected riparian habitat. You are correct in that these developments do dry up the riparian area around the source, but this can be mitigated by running the overflow pipe well away from the trough and then designing this newly created riparian area.
June 6, 1985

Mr. Brian Cunninghame
COPIERS Team Leader
Bureau of Land Management
Prineville District Office
P.O. Box 550
Prineville, Oregon 97630

Dear Mr. Cunningham:

The Wildlife Management Institute is pleased to comment on the

13-1.

PRESERVATION MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT, program.

We prefer Alternative B, Improved Habitat. Yellow and accompanying

13-2.

Commitments.

We commend you for the amount of riparian protection proposed in Tran

13-3.

sformed Alternative B. That alternative, however, has some major deficien

13-4.

cies.

No costs of development are given, and no cost benefit ratios are 

13-5.

provides. Appendix L notes that there will be 60.24 acres of managemen

13-6.

tending, 32.23 miles of riparian fencing, 14 artificial feeding sites and 780

13-7.

shares to livestock. Each of these new AUM will return

13-8.

over the government investment, then the
cost of the above development can be no more than $34,806. We know from ex

13-9.

dence that developments cost many times that amount. However,

13-10.

Fencing alone probably runs in excess of $1,000 per mile. Thus, the 

13-11.

management plans continue and increase habitat to livestock and improve menta

13-12.

sional goals. Obviously, the need for support of the livestock industry is 


planning, with substantial increase in public user fees for commodity.

13-14.

We hope the lands are Section 15 leases, scattered and present manage

13-15.

sional goals relate to game management units only, not individual ranges as shown in Table 16 in

13-16.

13-17.

management units. Monitoring as described in Appendix F is part of the plan and will be 

13-18.

in the upcoming Record of Decision and Rangeland Program Summary. 

13-19.

of public land forage in only 3 percent.

13-20.

We are pleased to present for commercial timber operations. (Page 40), what is local will capacity? What are the historic BLM sales? How dependent are

13-21.

some small but scattered stands of virgin and growth stock. Why does the plan provide for preservation of these? And why no snag program?

13-22.

Current allowable populations and the Oregon Department of Fish and Wildlife’s 

13-23.

use area should be shown in Table 18.


The Island as a research national area has been of interest to us for 

13-25.

for many years. We have written numerous letters to the USDA Forest Service Re­

13-26.

representative. 

Sincerely,

Daniel A. Poole
President

*DEDICATED TO WILDLIFE SINCE 1911*

13-1.

A benefit/cost analysis will be done on each project before it is 

13-2.

benefit/cost analysis addresses only tangible benefits 

13-3.

and no cost benefit ratios are 

13-4.

pertinent economic analysis indicates that projects such as riparian 

13-5.

construction and maintenance. Also see responses to comment 23-9.

13-6.

Forest management in the planning area is within the principles of 

13-7.

timber sales in the planning area from 1972 through 1982 averaged 22,1

13-8.

our district snag policy in all cases. 

13-9.

It is the district policy to maintain a minimum of two snags/acre plus 

13-10.

the Oregon Department of Fish and Wildlife for game populations and management goals relate to game 

13-11.

of public land forage is only 3 percent.
An analysis of the potential for wilderness designation of the public lands in Oregon is contained in the Draft Oregon Wilderness Environmental Impact Statement released for public review and comment in April 1985.
ARCO Exploration Company
Exploration Operations - Western U.S.
12011 Balm Avenue
Suite D
El Segundo, California 90245
Telephone (213) 275-7300
June 19, 1985

Mr. Gerald E. Magnuson
District Manager
Prineville District
Bureau of Land Management
P. O. Box 5540
Prineville, Oregon 97754

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

Dear Mr. Magnuson:

ARCO Exploration Company would like to take this opportunity to express our opinion regarding the Two Rivers Proposed Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS). ARCO has several thousand acres of Federal mineral property in the area 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 recommendation to include energy and minerals as an issue in the proposed RMP. Since there is wide industry interest in this region for oil and gas, geological resources and minerals, it is only appropriate that these resources be specifically addressed during the planning process for the Two Rivers Resource Area.

Second, we appreciate and support BLM's inclusion of the no surface occupancy stipulation criteria, which contain a statement that a NO surface stipulation can be waived if approval is obtained from the LIA (current market conditions) and if additional criteria are met. However, we are still concerned that BLM has utilized this restriction only in the cases where all activities have been determined to be necessary and where all activities are necessary. As such, we have submitted an alternate proposal which we believe provides a balance between necessary development and non-essential development. This alternative includes two specific criteria, one being that the occupation of the area be made on a case-by-case basis. We believe that this action would cause no significant impact on the area and may even be enhanced as a result of reclamation procedures.

Further, we believe that most of the acreage in question does actually fall within the river canyons, and NO surface stipulations are probably not even necessary. Current technology would not accommodate development in steep canyons. Therefore, Alternative D could be construed as an overkill in terms of protecting an already inaccessible resource.

In conclusion, we support BLM's restoration of the river canyons as an issue in the planning process. We also support the NO surface occupancy stipulations as necessary to ensure that oil and gas resources remain equal to all other resources in the planning process. As it stands in the draft RMP/EIS, the river canyons and other areas will be afford equal treatment regardless of actual use of those resources.

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,

C. M. Mosley
Public Lands Analyst

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United States Department of the Interior
FISH AND WILDLIFE SERVICE
Division of Biological Resources
L. W. Mooney
Public Lands Analyst

MEMORANDUM

To: Prineville District Manager, Bureau of Land Management
From: Field Supervisor, Ecological Services, Portland Field Office
Subject: Review of Two Rivers Resource Management Plan, Draft Environmental Impact Statement

We have reviewed the draft EIS for the Two Rivers Management Plan. As indicated in our memo dated October 9, 1984, we do not believe the proposed alternatives would have a significant adverse impact on fish and wildlife resources. We believe, however, that additional studies should be conducted to assess the potential impact of any proposed development.

We have received the draft EIS for the Two Rivers Management Plan. As indicated in our memo dated October 9, 1984, we do not believe the proposed alternatives would have a significant adverse impact on fish and wildlife resources. We believe, however, that additional studies should be conducted to assess the potential impact of any proposed development.
June 20, 1985

United States Department of the Interior
ATTN Gerald E. Magnuson
Bureau of Land Management
Prineville District Office
P.O. Box 830
Prineville, OR 97754

Gentlemen:

SUBJECT: PUBLIC COMMENTS
TWO RIVERS RESOURCE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT
PRINEVILLE DISTRICT, OREGON

In regards to your recent request for public comment on the above subject matter, we feel that of the five alternatives available alternative 4 (Mineral Community Production and Enhancement of Economic Benefits) is the best choice.

We also feel it is very important to protect wildlife habitats as well as other natural values for many years responsible oil companies such as Shell Western E&P Inc. as well as many others have taken drastic measures to minimize the impact of their operations on the environment and will continue to do so in the future.

In addition, it is important to remember that placing excessive restrictions on public lands limits opportunities to discover and develop our domestic energy resources, resulting in increased dependence on foreign sources of hydrocarbons.

Areas which may contain valuable energy resources should be allocated to land uses that would minimize the restrictions on exploration and development of these resources. Shell Western E&P Inc. is interested in the exploration of the subject area for its oil and gas potential. Therefore, we feel a strong need to have as much undeveloped land as reasonably possible to remain open for exploration and development purposes. We would like you to take these factors into consideration while drafting the final resource management plan and again, urge you to choose alternative "B".

Charles (Chuck) Chase

EASTERN OREGON MINING ASSOCIATION, INC.
P.O. Box 932, Baker, Oregon 97814

June 21/85

Brian Cunningham
Team Leader
Bureau of Land Management
Prineville District Office
110 East Fourth Street
Prineville, Oregon 97754

Gentlemen:


While reviewing the plan we would support the Preferred Alternative, Alternative A. We feel that this alternative will give the best balance between the conditions of the region and the need to protect recreation, wildlife and the recreational opportunities.

We thank you for this opportunity to review the plan and participate in the planning process, please keep us informed of the progress of the plan as it moves into the planning process.

Sincerely yours,

Charles Chase

President
June 25, 1985

Mr. Magnuson:

We have reviewed the Two Rivers Environmental Impact Statement and have

19-1

seen it to be the most comprehensively and thoughtfully developed document we have ever seen. We feel that the twenty years required under Alternative A to achieve the

19-2

211 acres of wildlife habitat "will amount" as shown on Table 30 could be considerably increased.

19-3

We question some statements and conditions shown, however, as follows:

19-4

We feel that the twenty years required under Alternative A to achieve the 60% or more riparian vegetative potential shown on Page V, Summary is excessive. If properly managed, five to ten years should be an adequate period of time. fenced studies have shown short this short time ability.

19-5

We can't understand the condition of fish and wildlife habitat is shown under Table I, Alternative C-Existing 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 I, it is difficult to see how 1.4+ MM. of timber can be removed annually as proposed under Alternative A, B, C and D on 11,000-acre of commercial forest without adverse impact on wildlife populations. Presumably, many of these areas include Timber in High Value, extending from waterways to ridge tops, and are extensively forested with dense species which may be difficult to harvest in a manner which will not have significant adverse impact on wildlife moving from upland to water courses. Since the 1.4+ MM is shown here is of relatively small economic importance to the timber industry, perhaps the 60% of wildlife habitat "set aside" as shown in Table 40 could be considerably increased.

We appreciate your frank appraisals concerning livestock grazing as shown on page 4, Issues, including the fact that "there is a conflict of use between livestock grazing and other important resource uses," an admission not often seen in federal land management statements.

In Table I, page 9, goal II it is difficult to see how it is possible to meet wildlife objectives as shown in the discussion. How can he accomplished under any of the alternatives? According to Table I, Summary, wildlife and fish habitat would be reduced under Alternative B. Also, page 9, chapter 4, discusses adverse impacts of forestry practices.

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

Thank you for this opportunity to submit input.

Sincerely,

Portland Chapter
Izaak Walton League of Amer.
Public Lands Grazing Comm.

June 26, 1985

Gerald E. Magnuson, District Manager
Bureau of Land Management
Prineville District
P.O. Box 550 (185 E. 4th Street)
Prineville, Oregon 97754

Dear Gerry:

I want to thank you for coordinating with Mike Golden in arranging the June 21 meeting for discussion of our draft comments to the Two Rivers Resource Management Plan, DEIS.

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

Bob Jubber had a very positive report of the meeting. It is evident that these types of meetings between our agencies are beneficial in: (1) getting 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. Weland, Chief
Environmental Management Section
OREGON DEPARTMENT OF FISH AND WILDLIFE
Comments on the DEIS Two Rivers Resource Management Plan
OR 850403-010-4
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. Combine the idea of stable wildlife populations and their dependence upon stable habitats should be brought out in the explanation.

20-2
On page 33, 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 habitats much more readily than if each species were considered alone. Thus it is possible to predict the effect of various manipulations on wildlife."

20-3
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 supported 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 Umatilla 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.

20-5
Big sagebrush should be added to the list of cover species in the second sentence. It is about the only thermal cover... with a strong commitment by BLM to a monitoring program, as was discussed at the June 21 meeting.

Livestock Grazing

20-6
On page 4, item 2, Livestock Grazing Management, second sentence "Some management changes may be appropriate... to restockfish, expand, improve or protect riparian areas..." Restocking 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 (foremost areas are needed for stocking levels, season of use, grazing systems, range development projects, and land treatments). Since the tall shrub, tree, and brush/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 hearty supports this commitment. This direction, along with a sound monitoring system, will receive strong support from ODFW.

Riparian Management

Fish habitat

Alternative A, item 1, page 9 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 Deuk Brick, Nora Creek, and Mud Spring Creek (Fried Creek tributary), all of which support resident trout and steelhead production.

The following waters need the following corrections on pages 130-131:

- Fall Canyon Creek
  - Add St.

- Buckhollow Creek
  - Add Ch (Chinook)
  - Add St.

- Shoshone Creek
  - Add St.

- Cottonwood Creek
  - Add St.

- Ward Creek
  - Add St.

Riparian potential, as defined by the Prineville District, should be more clearly defined in the EIS. This could be more visibly shown by the use of photos of examples of various levels of potential (LOW, MOD, etc.) along with text.

20-7
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.

20-8
Riparian potential, as defined by the Prineville District, should be more clearly defined in the EIS. This could be more visibly shown by the use of photos of examples of various levels of potential (LOW, MOD, etc.) along with text.

The Department's riparian habitat standard 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 NWPP. Proposed land use Alternatives B and C in October 2004. We also restate our preference for 840 miles of riparian area protection which was included in these 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 1 shows 627 acres on the John Day in poor (early seral) ecological condition. Table 12 shows an ecological trend rating of stable for 293 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 will 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 visibly shown in the BLM riparian video program. Under intensive grazing management, 60 percent of potential may be difficult to achieve even in 20 years.
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 stands and where they are the stands located. This information should be included in Table 15 on page 5. 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

STAGES, OLD/GROW WOODY HABITAT

We found only one reference to this habitat in the EIS. On page 111, the only reference to the Wildlife Tree (Stage/Down Log Policy, Instruction Memorandum 84-314) is a paraphrase of the General Guidance section. Is there a 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 out public ownership is the option favored by ODFW. The zoning methods developed by BLM for the EIS is commendable.

20-13

APPENDIX I POTENTIAL LAND DISPOSAL TRACTS IN ZONE 3, page 116 lists the following tracts which are included in the 1963 Intensive Cooperative Management Agreement between BLM and ODFW (Land Commission). The agreement describes these lands within the six-mile corridor of the Deschutes, Metolius, and Crooked rivers on which the primary uses are to be intensive wildlife management, recreation use, and public access.

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

2) Lands in Township 5S, Range 14W, totaling 1,781.61 acres.

BLM Planning and Resource Interrelationships

With the exception of the cooperative management agreement on the White River Wildlife Area, the discussions on pages 6, 7, 8 and 9 of the EIS make no reference to other specific agreements and coordinated plans, such as:

2) Lower Deschutes (Coordinated Resource Management Plan (Maps Canopy to Deschutes Roth)).
3) The Deschutes River Trout Management Plan (ODFW).

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

20-14

See text changes for page 10.

20-15

See text changes for page 19.

20-16

We also consider old growth stands to be important. However, ODFW has stated that "critical" areas are those areas that are vital as part of an unbroken line. This line also refers to the quality of the habitat, type of ownership, the number of acres, etc.

20-17

We also consider old growth stands to be important. However, ODFW has stated that "critical" areas are those areas that are vital as part of an unbroken line. This line also refers to the quality of the habitat, type of ownership, the number of acres, etc.

20-18

As in the case of the Douglas Fir, in Caplogs, up to 10,000 acres, some stands are used extensively as a firebreak for logging access and corridor management. We also agree that old growth stands are important. The Department has stated that the old growth habitat should be integrated into a larger system of wildlife management. The endangered species also have a right to use the corridor. We also agree that old growth stands are important. The Department has stated that the old growth habitat should be integrated into a larger system of wildlife management. The endangered species also have a right to use the corridor.

20-19

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20-20

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20-21

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20-22

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20-23

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20-24

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20-25

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20-26

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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 willow
Understory tree - Coyote willow, McKenzie willow, whiplash willow
Herbaceous - Nebraska sedge, Baltic rush, 3 square bullrush, red top, 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 35% 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
The DEIS presents little discussion of the existing water quality for lakes, rivers, or streams in the Two Rivers planting area. Nearly 50 percent of the wildlife species in the area utilize this habitat during all seasons of the year. Water quality is discussed in one paragraph in the Water Quality section. The DEIS does not make clear, however, the differences between various alternatives in terms of effects on fishing. Fishing can successfully exclude livestock from grazing in these areas, but could also adversely affect water quality. Some, for example, could be excluded depending on fence design. Game populations can also suffer if uncontrolled travel corridors are blocked or if access to water is limited. 

Riparian Management

We are pleased to see the recognition given to the importance of riparian vegetation for fish and wildlife habitat and water quality. The Final EIS should discuss existing conditions in more detail, and identify areas where planned activities may be in conflict with water quality standards. Water quality improvements are necessary. (Refer to comments under Riparian Management, above.)

Threatened and Endangered Species

The DEIS identifies 31 species of plants which are threatened or endangered in Oregon and which may occur in the Two Rivers planning area. The Final EIS should discuss the significance of impacts associated with these species. Without such discussion, potential conflicts between riparian management and habitat of threatened and endangered species could escape impact analysis.

Ecological Condition

The discussion regarding ecological condition and climax communities appears to be at variance with widely accepted definitions. For example, the definition of climax communities in the Ecological Condition section is not consistent with published definitions. The DEIS should clarify the discussions regarding ecological condition. The definitions used should be reexamined and supported by reference to appropriate literature. (This will include revising Appendix O.)

Potential impacts should then be resubmitted based on these definitions. The Final EIS should discuss the impacts of the alternatives on ecological conditions. The definitions must be adequate to identify and mitigate impacts. The Final EIS should clarify the discussions regarding ecological condition. The definitions used should be reexamined and supported by reference to appropriate literature. (This will include revising Appendix O.)
Appendix 14 in the Draft RMP/EIS lists every stream on public land in the planning area. A detailed description of water quality for each of these streams is included.

Appendix 1 in the Draft RMP/EIS lists the standard operating procedures for forest practices on all public forestlands in the planning area, including criteria for fish habitat and other resource values. If an exception is identified for the specific environmental resource in question, training conducted on all forest practices, they will be addressed at that time.

The table entitled Management Directions by Alternative on page 20 and 21 of the Draft RMP/EIS specifically lists not only the number of miles of riparian zone proposed but also the number of acres of riparian vegetation that would be excluded.

Appendix 8 in the Draft RMP/EIS discusses the specific design features of not only features but also those developed for the project area. Special considerations to be given to wildlife are also described. The benefits to wildlife from riparian management are discussed and referenced on page 63 of the Draft RMP/EIS. Riparian recovery is very important to wildlife and fisheries habitat as is stated in several locations in the Draft RMP/EIS.

No significant adverse impacts resulting from past timber harvesting are known in the planning area, and no timber harvesting operation is presently occurring.

Using the planning and environmental analysis of a proposed timber sale or forest development project, standard and site specific environmental regulations are monitored. Montecito Ecological Assessment software impacts are analyzed. Mitigation measures needed to protect the environment are calculated. Results are then incorporated into the project sale and project contracts.

Monitoring is accomplished through normal procedures such as contract administration, weekly field inspections, and field service to locate conditions with project goals and mitigation measures, and assess the success of the project. Monitoring is then the responsibility of the landowner from this point on. Monitoring is also needed to improve future plans.

In other instances, specific systems have been developed to monitor the biological and physical impacts of actions implemented. For example, the "Periodic Forest Inventory" is designed to evaluate, on a broad basis, established silvicultural timber harvests. This inventory data reflect impacts resulting from past actions and is adjusted for in the reclamation of allowable harvest levels.

The term "range condition" is not used anywhere in the document. All described changes in vegetation, along with current conditions, are expressed in terms of actual ages, which reflect the current ecological condition of vegetation rather than a measure, such as, as compared to climax, as we know it. Range condition is a subjective term and refers to the condition of the range with regard to its specific use, i.e., livestock grazing. Early seral vegetation, an absence of cheatgrass, for example, could be in range condition if the predominant use was for early spring grazing.

We do not agree that burning will maintain a sagebrush community in an earlier stage than others. Virtually all the sage sites for the John Day River Baseline, as compiled by the U.S. Soil Conservation Service in their RangeBaseline, show native lands characteristic of deposits of 50 to 80 percent of the vegetation to climax condition. Prescribed fire, when conducted with the proper intensity and timing, removes much of the stand canopy and results in a producible grassland/sage community, more mosaic remaining climax condition. sagebrush community. A prescribed fire to achieve a productable grassland/sage community, more mosaic remaining climax condition. A prescribed fire to achieve a productable grassland/sage community, more mosaic remaining climax condition.
June 30, 1985
Mr. Gerald E. Magnuson
District Manager, Prineville District Office
P. O. Box 550
Prineville, OR 97754

Dear Mr. Magnuson:

This letter is in response to the Two Rivers management Plan/Draft.

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

1. No reduction of registered acres. We appreciate the statement (in page 34) that future grazing levels will be no less than existing levels. We would have preferred to see the statement that future grazing levels will be no less than existing levels and will not exceed existing levels.

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 rangeland conditions. How can you expect cattle to graze in riparian zones and expect that available forage will increase? Far too little forage now is allocated to game and non-game wildlife. We would like to see the Prineville District recognize that the public lands are overgrazed and that AUMs must be reduced.

We appreciate your efforts to improve the quality of the Two Rivers management Plan.

Sincerely,

Linda G. Daily
Audubon Society of Portland

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We 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 the steep slopes.

2. Riparian areas are managed to 60% of full potential. 60% over 20 years seems a low goal achieved at the expense of wildlife. We would urge that you keep cattle off some of the riparian areas and manage for a higher percentage of full potential.

3. Negative environmental impacts to soil and water resources. Table 31 on page 55 states that forestry practices, mineral exploration, and GFP use and reclamation have negative impacts on soil and water resources. We think that any negative environmental impacts are not consistent with the Plan's statement to improve the public lands or at least hold the status quo. We urge that you reexamine these plans and reduce negative environmental impacts.

4. Planned grazing increases in Spring Basin WMA. According to FLPA, grazing in WMA's is to be held to 1976 levels. How many AUMs were in 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 WMA.

Sincerely yours,

Linda G. Daily
Audubon Society of Portland
Dear Mr. Magnuson:

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

I. Soil

The effect of crested wheatgrass seedings on wildlife needs to be addressed. A similar table with the following information would be particularly helpful. (A second piece of information that is missing is a projection of how each alternative would affect overall erosion in the Two Rivers Planning Area.)

<table>
<thead>
<tr>
<th>Alternative</th>
<th>Erosion Potential</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Critical</td>
</tr>
<tr>
<td>B</td>
<td>Slight</td>
</tr>
<tr>
<td>C</td>
<td>Moderate</td>
</tr>
<tr>
<td>D</td>
<td>Moderate</td>
</tr>
<tr>
<td>E</td>
<td>Slight</td>
</tr>
</tbody>
</table>

Soil conservation is a major consideration in the Two Rivers Planning Area, and it is critical that any alternative selected considers the impact on soil and water quality. The preferred alternative should include: a.) less than optimal water quality as determined by water temperature, turbidity, and water quality standards. Therefore impacts to soil are not discussed in any greater detail than what is shown on pages 58 and 59 of the Draft EIS.

The magnitude of these factors depends heavily on the particular actions taken to implement the preferred plan. They will be considered in greater detail in the following sections. They are: a.) ecological condition of nonriparian land and its effects on forage production, and b.) economic impacts (see page 65.)

Erosion Potential

60 acres of dryland pasture in the Two Rivers Planning Area on page 3 of the Sisters Grazing Management Program Draft EIS. Note detailed information concerning the habitat of each species to be addressed in Appendix 6. The following information is missing:

<table>
<thead>
<tr>
<th>Species</th>
<th>Habitat Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>White oak</td>
<td>Low intensity</td>
</tr>
<tr>
<td>Bunchgrass</td>
<td>Moderate intensity</td>
</tr>
<tr>
<td>Juniper</td>
<td>High intensity</td>
</tr>
<tr>
<td>Sagebrush</td>
<td>Moderate intensity</td>
</tr>
<tr>
<td>Creaseweed</td>
<td>Low intensity</td>
</tr>
</tbody>
</table>

The ecological condition of wildland and its effects on forage production, and economic impacts will be described in greater detail in the following sections. (See Appendix 6.)

Economic Impacts

40 acres of dryland pasture in the Two Rivers Planning Area on page 3 of the Sisters Grazing Management Program Draft EIS. Note detailed information concerning the habitat of each species to be addressed in Appendix 6.

Economic impacts (see page 65.)

5. Economic impacts (see page 65.)

Economic impacts (see page 65.) fail to recognize major economic factors: a.) BLM administrative costs, b.) economic benefits of improved fishing and hunting conditions with improved water quality conditions, and c.) total dollars spent by BLM (in terms of administrative costs plus range development and maintenance) for each AUM grazed. c.) economic benefits of improved fishing and hunting conditions with improved water quality 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. The single use of livestock grazing in the Two Rivers Planning Area will not be adequate to maintain the preferred alternative in the following areas: a.) vegetation, b.) seeding of crested wheatgrass. Therefore impacts to soil are not discussed in any greater detail than what is shown on pages 58 and 59 of the Draft EIS.

Respectfully yours,

Craig Miller
Conservation Committee Chairman
Central Oregon Audubon Society
Mr. Brian Cunningham
RMP/EIS Team Leader
BLM
185 E Fourth St.
P.O. Box 550
Prineville, OR 97754

Dear Brian,

Thank you for the opportunity to comment upon the Two Rivers Resource Management Plan Environmental Impact Statement.

The BIA's preferred alternative (A) does not represent the maximum timber production alternative. For the following reasons, we prefer alternative (B), commodity production.

A considerable amount of forest land across the state has been declared unsuitable for timber production. While we cannot dispute that these withdrawals without "ground truthing", to further reduce the number of acres within your preferred alternative (A) places an additional burden upon the remaining productive forest land base.

Although the acreages are not large, why not place the multiple-use set aside acreage within the forest lands that are designated unsuitable for timber production?

The Wilderness Study areas are also constraining the land base. Thus, placing further additional management constraints on the forest land base.

Selecting alternative (B) allows for the maximum use of previously designated commercial forest land.

Loggers’ Assurance Co. (LACO)

AFFIRMATIVE ACTION — EQUAL OPPORTUNITY EMPLOYER

July 1, 1985

Gregory A. Millar
Forest Planner

cc: F.F. (Monte) Montgomery
    William Level, State Director
    Gerald Magnuson, District Manager