

Southeast Oregon Resource Advisory Council
March 15-16, 2018
Burns Paiute Tribe Gathering Center, Burns, Ore.

March 15, 2018

Meeting called to order at 8:05 a.m.

Present: SEORAC members Brent Beverly, Julie Weikel, Jason Kesling, Ken Poole, Ralph Stout, Richard Watts, Don Hodge, Pete Runnels, Dan Morse, Mia Sheppard and Sean Cunningham; Don Gonzales, Vale DM; Tara Thissell, Burns BLM; Holly Orr, Burns BLM ADM; Todd Forbes, Lakeview BLM; Larisa Bogardus, Lakeview BLM; Kathleen Cathey, Sen. Ron Wyden's office; and Susie Koppert, public. Attending by phone: SEORAC members Anne Hiller-Clark and Phil Milburn.

Elect 2018 chair and vice-chair

Julie Weikel/Brent Beverly motion to appoint Jason Kesling chair. All in favor.

Pete Runnels, Julie Weikel motion to appoint Ken Poole vice chair. All in favor.

Review/approve notes from October 2017 meeting

Ken Poole/Julie Weikel motion to approve as corrected. All in favor.

Designated Federal Official Report/Agency Updates

Todd Forbes reviewed the written report submitted by Lakeview, including a proposal to expand the Tucker Hill perlite mine, the lands with wilderness characteristics inventory, the designation of funding for the Beaty Butte Wild Horse Tracing Facility agreement and the draft EA for a gather in 2019, followed by routine bait trapping. He also reported that DM E.Lynn Burkett is taking a new job with the Forest Service and ADM Loretta Chandler has retired.

Dan Morse asked if Lakeview Resource Management Plan Amendment would continue moving forward if the RAC is unable to meet. Todd said he doesn't expect the amendment process to begin in earnest until FY2019.

Jason Kesling asked if a cost-benefit analysis had been done for the Beaty Butte program. Todd explained the financial benefit would lie in not moving large numbers of wild horses to long-term holding. 63 percent of the WHB budget goes to the care of horses in holding facilities, only 37 percent is used to manage the program as a whole.

Don Gonzalez reported that Vale is hoping to finalize the Southeast Oregon Resource Management Plan Amendment before signing the Tri-State Fuel Breaks analysis or the Louse Canyon EIS, which should be available for public comment in August.

The Cow Lakes PAC tripped a sage-grouse population hard trigger and staff are working on the causal factor analysis now. It appears to be the result of wildfire and invasive plants.

Vale releases its planned fire rehab treatments schedule to the public every year and is looking for a way to make this available electronically. It was suggested to invite Sergio

A targeted grazing project designed to reduce annual grasses is expected to begin in the fall.

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The Plan of Operations for Calico Resources' Grassy Mountain mine project is moving forward. Oregon allows the application process to move through the state and federal process simultaneously, which speeds the process.

Don also reported that he had done some research regarding the Owyhee Basin landing strip, which was brought up during the October 2017 meeting. It is landlocked by a WSA, but is used for search and rescue, among other things, and needs repairs. There may be a way to barge or fly in the equipment necessary, rather than restoring a defunct roadway. He will continue looking into the matter.

Tara Thissell presented the Burns District report, noting they have had success with a targeted grazing program similar to the Warm Springs and Drewsey projects. A Steens Mountain ground trapping project has gathered 97 horses so far and there is strong public interest in adoptions.

ESR has begun on 50,000 acres on Cinder Butte, including fence repair, seeding, planting and weed treatment. Several events are coming up, including the Migratory Bird festival, the Gravel Grinder bike event and the Archaeology Road Show. The district is also looking at a new mountain bike trail around Palomino Buttes and will be presenting that to the RAC later.

Fine fuel loads are high due to the 2016-17 snowpack and the district is offering some early release grazing to reduce them.

National Wild Horse and Burro Program update

Julie Weikel reported the Beaty Butte training and adoption program is regarded as a pilot for the national program. Adoptions have dropped steadily since 2006 and it's known that some HMAs will not be restored to ALM in our lifetime under current management practices. She distributed the National Advisory Board's 2017 recommendations to Congress.

Sage Grouse Causal Factor Analysis

PowerPoint attached.

NHPA 106 and Tribal Consultation

PowerPoint attached.

Lands with Wilderness Character

Discussion.

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Tri-State Fuels

Update

Interior reorganization

Briefing

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2018 Field Trips

Discussion considered lands with wilderness character sites on the Lakeview District, Clover Flat treatment area and Tucker Hill mine site for the June meeting; and Grassy Mountain mine site, fuel break sites and the Long Draw Fire recovery zone on the Vale District for the October meeting.

Lands with Wilderness Character

Recommendations attached.

Public comments consisted of an email from Lee Williams regarding the gelding of Kiger mustangs (which was also forwarded to the Steens Mountain RAC, where the Kiger herd is located), and in-person/written comments from Gayle Hunt of the Central Oregon Wild Horse Coalition regarding efforts to re-establish a herd of North American Tarpans.

The meeting adjourned at 12:15 p.m.



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

BLM Sage-Grouse Update – Southeast Oregon Resource Advisory Council Meeting

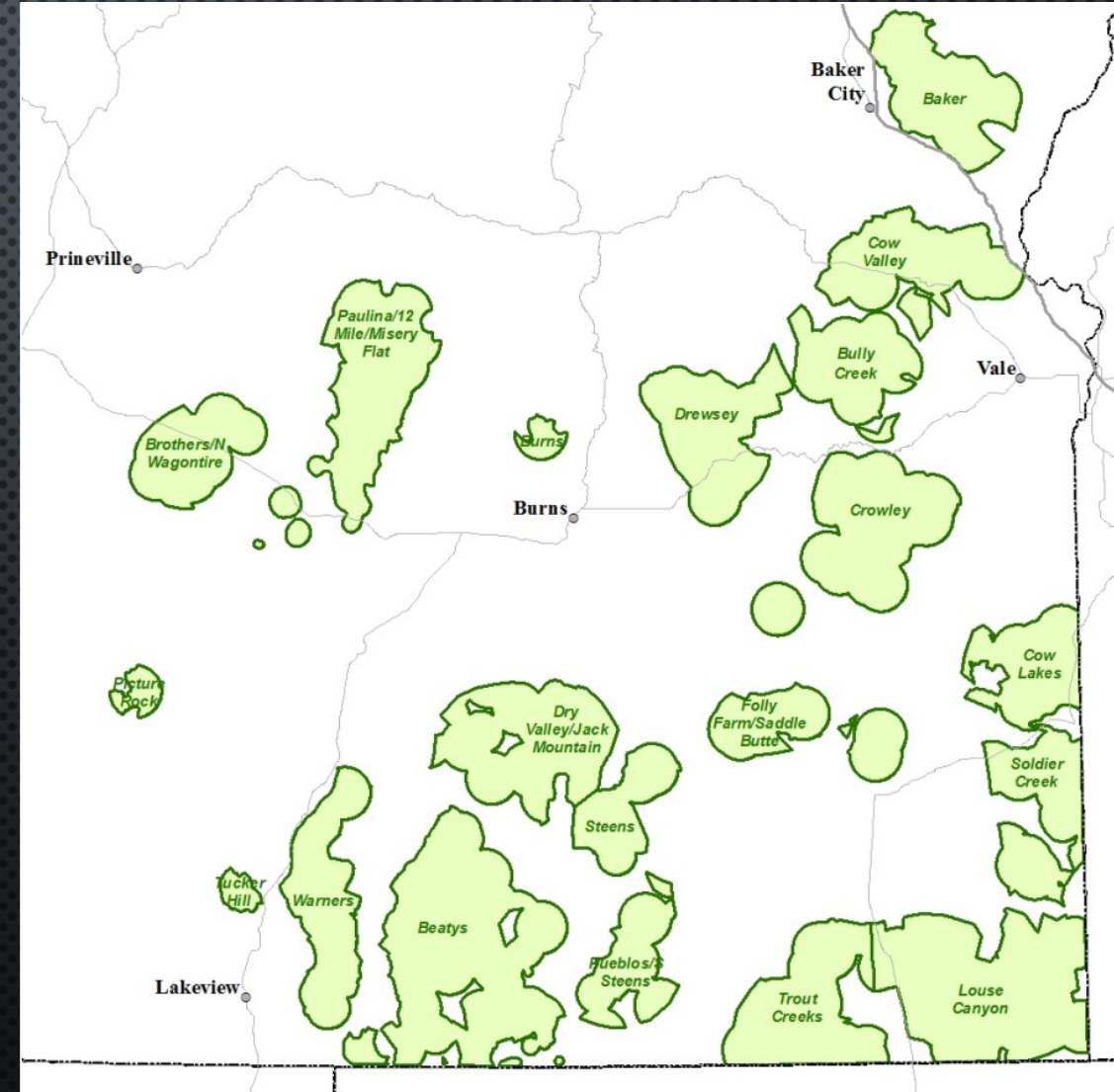


OVERVIEW

- 2017 Adaptive management triggers & Causal Factor Analyses
- Regional Programmatic Environmental Impact Statements
- Integrated Program of Work
- Sage-grouse Planning Strategy
- New 2018 IMs
- AIM monitoring for 2018 & Habitat Assessment Framework

ADAPTIVE MANAGEMENT STRATEGY

- Includes “triggers” based on habitat and population
- Triggers designed as an early warning system that all is not well
- Habitat goal: 70% of the landscape capable of producing sagebrush has at least 5% sagebrush cover and <5% tree cover
- Population goal: Population trends are stable or growing



SOFT AND HARD TRIGGERS

- Soft triggers – intermediate threshold indicating potential need to change management at implementation level
- Hard triggers – threshold indicating larger changes needed to avoid loss of a PAC

HABITAT TRIGGERS

- **SOFT TRIGGER—WHEN THE AREA WITH AT LEAST 5 PERCENT SAGEBRUSH CANOPY COVER AND LESS THAN 5 PERCENT TREE CANOPY COVER DROPS BELOW 65 PERCENT OF THE SAGEBRUSH CAPABLE AREA WITHIN AN INDIVIDUAL OREGON PAC BUT REMAINS ABOVE 30 PERCENT**
- **HARD TRIGGER—WHEN THE AREA WITH AT LEAST 5 PERCENT SAGEBRUSH CANOPY COVER AND LESS THAN 5 PERCENT TREE COVER DROPS BELOW 30 PERCENT OF THE SAGEBRUSH CAPABLE AREA WITHIN AN INDIVIDUAL OREGON PAC OR WHEN THE AREA SUPPORTING AT LEAST 5 PERCENT SAGEBRUSH CANOPY COVER AND LESS THAN 5 PERCENT TREE COVER DROPS 5 PERCENT OR MORE IN ONE YEAR IN THE SAGEBRUSH CAPABLE AREA OF AN OREGON PAC**

POPULATION TRIGGERS

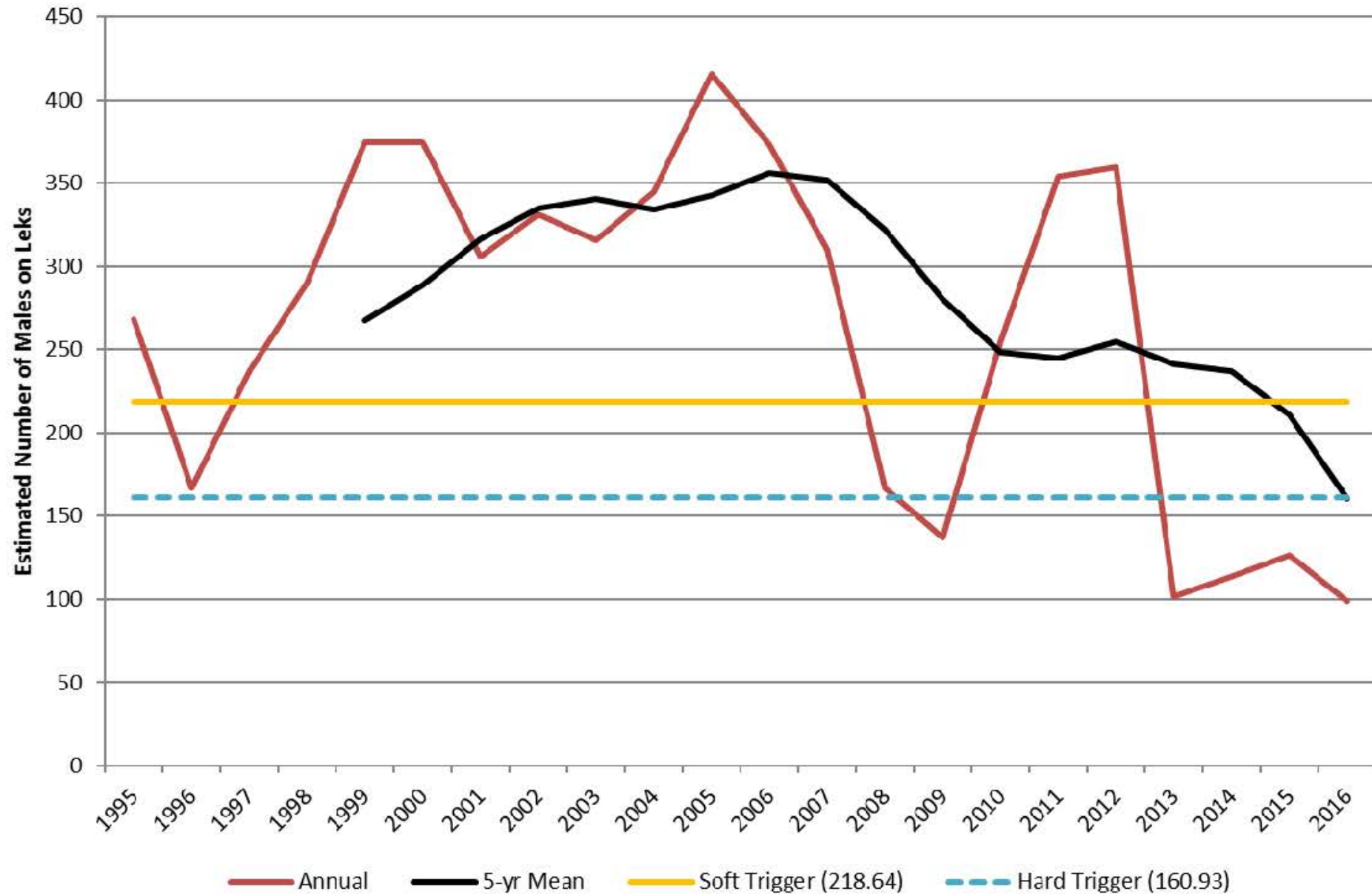
SOFT TRIGGER

- ANNUAL POPULATION DROPS BY 40 PERCENT OR GREATER IN A SINGLE YEAR OR
- ANNUAL POPULATION DROPS BY 10 PERCENT OR GREATER FOR THREE CONSECUTIVE YEARS OR
- THE FIVE-YEAR RUNNING MEAN POPULATION DROPS BELOW THE LOWER 95 PERCENT CONFIDENCE INTERVAL VALUE

HARD TRIGGER

- FOR PACS WITH ADEQUATE POPULATION DATA, THE FIVE-YEAR RUNNING MEAN POPULATION DROPS BELOW THE LOWER STANDARD DEVIATION VALUE
- FOR PACS WITH INADEQUATE POPULATION DATA (LOUSE CANYON AND TROUT CREEKS), THE ANNUAL POPULATION DECLINES BY A TOTAL OF 60 PERCENT OR MORE OVER TWO CONSECUTIVE YEARS
- WHEN SOFT TRIGGERS FOR BOTH POPULATION AND HABITAT ARE MET WITHIN THE SAME PAC

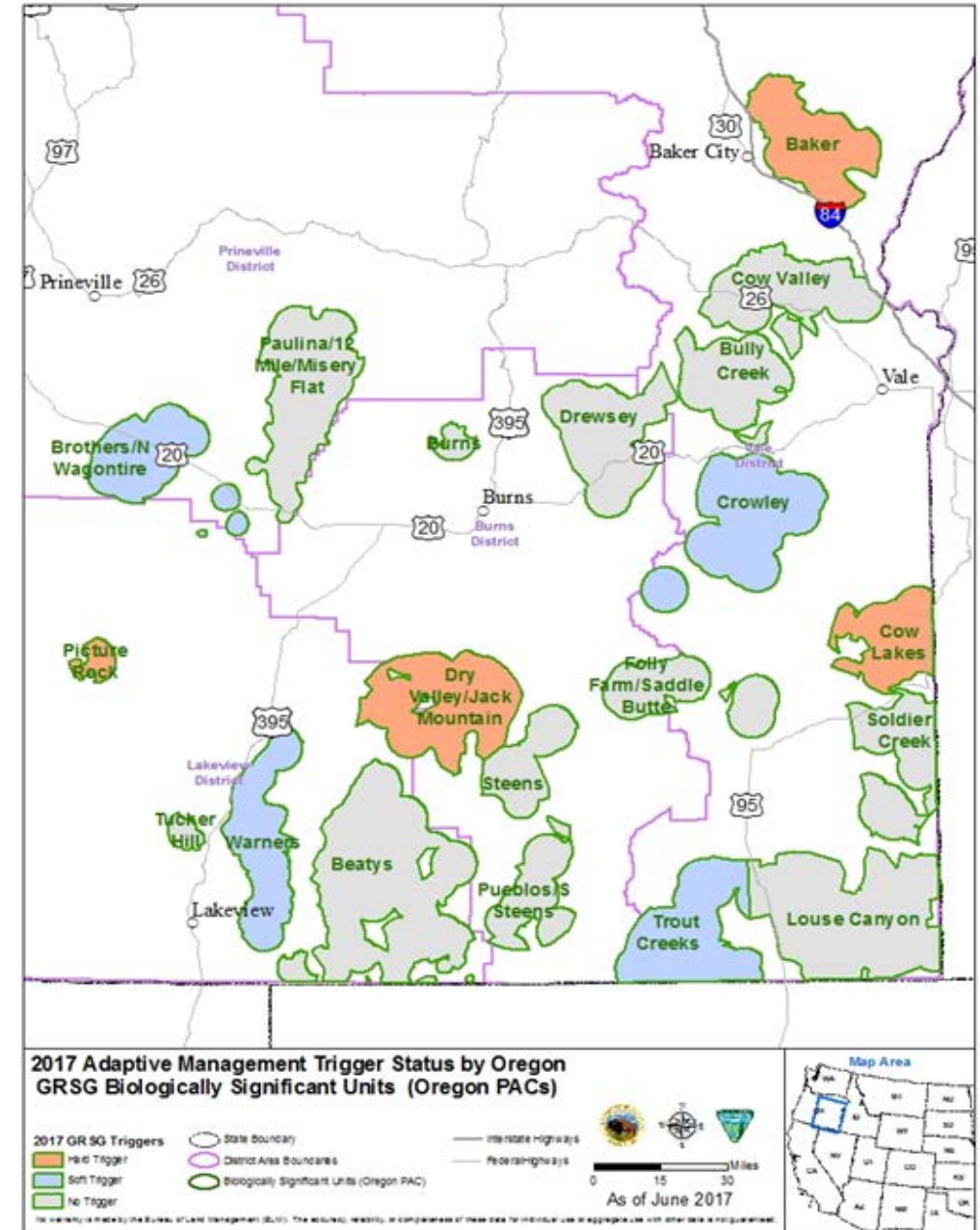
Dry Valley - Jack Mountain



2017 TRIGGER STATUS

Habitat Triggers	
Cow Lakes	Soft*
Trout Creeks	Soft
Population Triggers	
Baker	Hard
Brothers/N. Wagontire	Soft
Cow Lakes	Soft*
Crowley	Soft
Dry Valley/Jack Mountain	Hard
Picture Rock	Hard
Warners	Soft

*Two soft triggers equals a hard



IMMEDIATE REQUIRED HARD TRIGGER RESPONSES

- Nine Hard Trigger responses are identified in the ARMPA
- Required responses to hard triggers tripped in Baker and Cow Lakes PACs in 2016 have been in effect since April 4, 2017
- All required hard trigger responses will remain in place until the habitat or population trigger that is tripped rises above the trigger threshold:
 - Baker – 5 year running mean sage-grouse population must exceed 246 males
 - Cow Lakes – 5 year running mean must exceed 291 males AND at least 65% of the area of the PAC capable of supporting sagebrush must have at least 5% sagebrush cover and less than 5% tree cover
 - Dry Valley/Jack Mountain – 5 year running mean must exceed 219 males
 - Picture Rock – 5 year running mean must exceed 25 males

2016 CAUSAL FACTOR ANALYSIS RESULTS

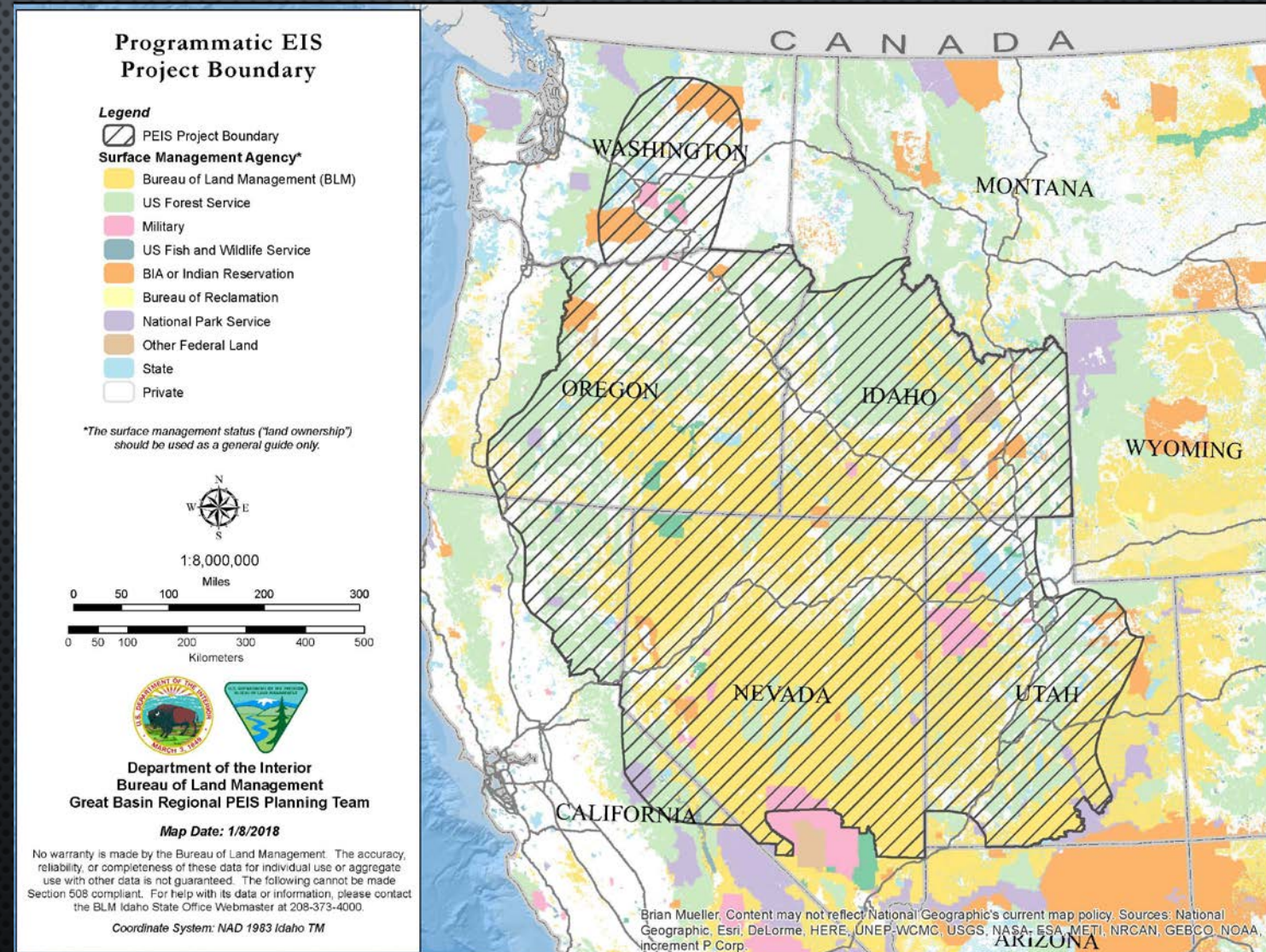
- Causal Factor Analysis reports are complete for 8 of the 9 PACs tripped in 2016
- Reports for triggers tripped in 2017 will be prepared in 2018

Possible Causes or Factors	Baker ^a	Crowley	Cow Lakes ^a	Trout Creeks	Dry Valley-Jack Mtn (draft)	Warners (draft)	Picture Rock	Brothers-Wagontire
Isolated/small size	X						X	
Conifer encroachment						X	X	
Energy Development								
Infrastructure	Unclear	Unclear	Localized					Unclear
Energy development								
Wild horses		X						
Urbanization								
Sagebrush Elimination			X					
Fire	Localized	X	X	X	X			
Invasive plants	X	X	X	X	X			
Mining								Localized
Livestock grazing	Unclear	Unclear	Unclear	X				Unclear
Recreation	Localized	Unclear						Unclear
Predator populations	X	X	Unclear			Localized		Unclear
Native understory condition	X	Unclear	X	X				
Drought	X	X			X	X	X	
West Nile Virus	Unclear	Unclear	Localized					Unclear
Habitat fragmentation	X	X	X					
Fence collisions		X	Localized			X	X	
Hunting								X
Crested wheatgrass seedings								Unclear
Sage-grouse translocations						X		
Research						X		

^a Hard trigger in 2016. All others were soft triggers.

REGIONAL PROGRAMMATIC EIS(S)

- 2 PEIS(S): Fuel Breaks and Fuels Treatment & Rangeland Restoration
- Project led by the Boise BLM team
- Scoping period ended March 2
 - 80 total submissions west-wide
 - Public meetings were held in Burns and Lakeview
 - Contractor & Boise team currently analyzing comments
- Cooperating agency letters are out



INTEGRATED PROGRAM OF WORK

- What is IPOW?

BLM's approach to evaluate and rank projects within Greater sage-grouse states that protect restoration investments, maintain and improve quality habitat, and increase habitat extent and/or connectivity.

Projects are first prioritized by District; then by State Office; and then the top 10-20 projects will go forward to the regional level for final prioritization.

- FY18 funding levels: \$1.5 million (50% of FY17 funding levels) in fuels and \$3.4 million (75% of FY17 funding levels) in wildlife funding for project work. No indication of what FY19 funding levels will be.

IPOW: STATE PRIORITY CRITERIA & AREAS

Priority Criteria:

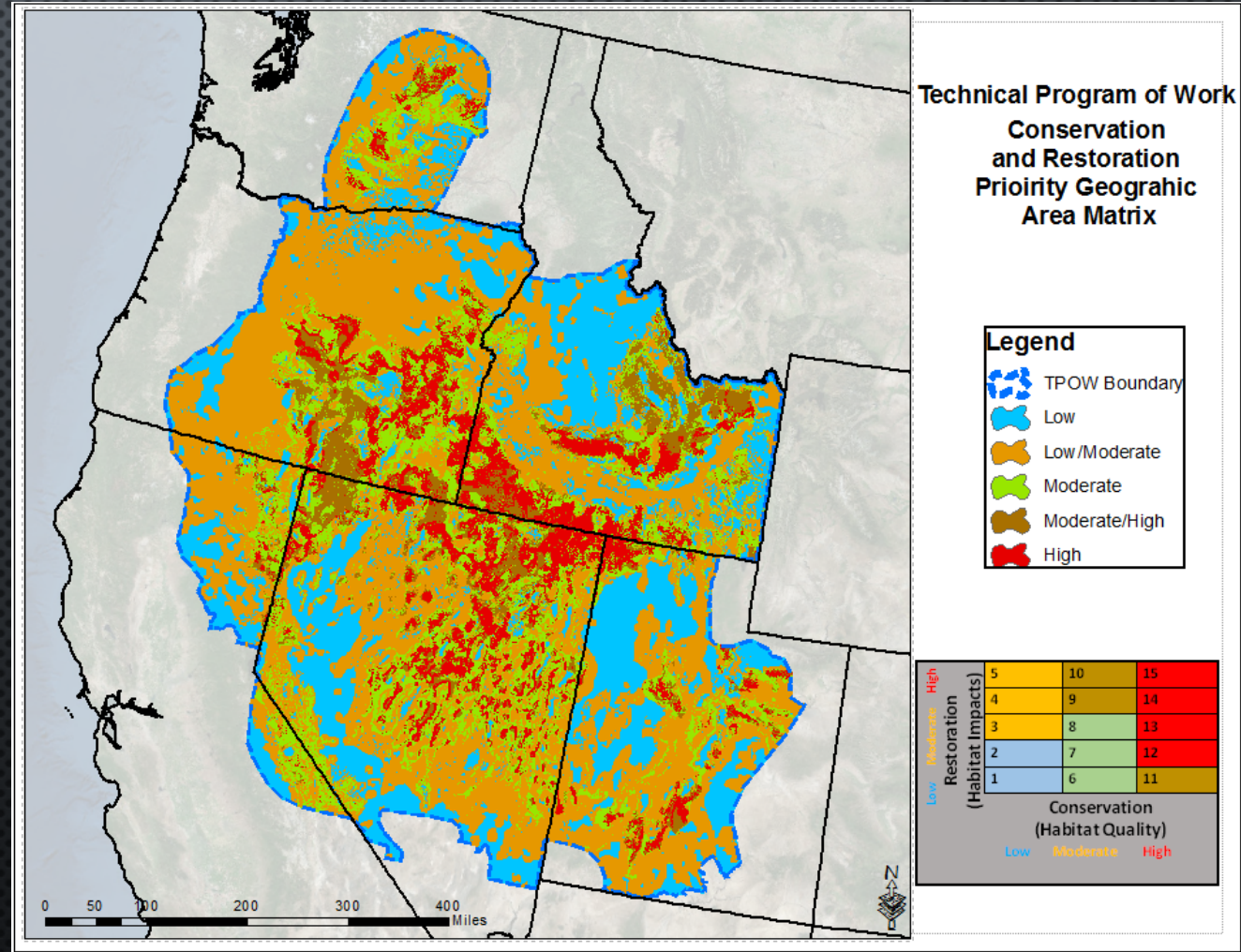
On-going projects, FIAT, NRCS focus areas, adaptive management

Priority Areas:

Baker, Bully Creek/Drewsey, Warner/Beatys Butte, Dry Valley/Jack Mountain, Cow Lakes/Soldier Creek, Paulina/12 Mile, Trout Creeks/Louse Canyon

REGIONAL PRIORITIZATION TOOL

- The tool uses inputs to assist in assessing and ranking projects
- Spatial criteria:
 - Conservation of Habitat Quality
 - Restoration of Habitat Impacts
- Non-Spatial Criteria:
 - Adaptive Management Triggers



BACKGROUND: SAGE-GROUSE PLANNING STRATEGY

- In June 2017, DOI Secretary Ryan Zinke directed BLM to enhance cooperation with eleven western states in managing and conserving greater sage-grouse and its habitat. Specifically, DOI agencies were instructed to “... improve collaboration and integration of State and local concerns ... into sagebrush management and conservation ...”
- In response to Secretary Zinke’s direction, BLM began a scoping process on October 11, 2017, to determine whether “some, none or all” of the 2015 sage-grouse plans should be amended.
- State sage-grouse plans vary from one state to another. That will not change as a result of the plan amendment process. Amendments will be tailored to the specific habitat, threats, populations and needs between – and sometimes within – each state.

THE FINAL SCOPING REPORT

- BLM received about 175,000 submissions
 - 94,000 were electronic petition submissions
 - 80,000 were form letter submissions
 - 1,041 unique written submissions
- The unique written submissions contained 4,691 substantive comments
- The issues identified west-wide included boundaries of sage-grouse habitat management areas; development in or near sage-grouse habitat; caps on allowable disturbances; wildfire and invasive species; conformance of federal plans with state plans for sage grouse; and others

OREGON'S PLANNING STRATEGY

- Some states wanted significant changes to bring state and federal plans into closer alignment. Other states, such as Oregon, were generally satisfied with the federal plans and sought fewer changes.
- In response to the October 2017 NOI the Oregon Governor's Office identified important consistencies between the ARMPA and the State of Oregon's 2015 Action Plan.
- Through further collaboration with the Governor's office, Oregon BLM State Director has determine that the scope of the proposed action is to evaluate whether the ARMPA decision to make portions of the key research natural areas unavailable to livestock grazing is a necessary component of sage-grouse conservation.

OREGON'S PLANNING STRATEGY CONTINUED

Other issues raised by the Governor's Office will be addressed through other policy, implementation, and administrative mechanisms:

- Develop state IM to address consistent implementation with state on mitigation
- Plan maintenance action to address cancellation of mineral withdrawal from SFA complete
- Plan maintenance action to clarify appropriate use and interpretation of Table 2-2 complete
- Discussions will continue surrounding reserve common allotments, waivers, exceptions, and modifications, and other plan maintenance actions identified internally by BLM Districts

TIMELINE AND NEXT STEPS

- BLM has notified Tribes and partners of an upcoming conference call to explain the proposed planning strategy and solicit interest in becoming formal cooperating agency
- The Department of Interior has set a deadline of February 14, 2019 for all states to be completed with plan amendments
- Jim Regan-Vienop is the planning lead for this effort

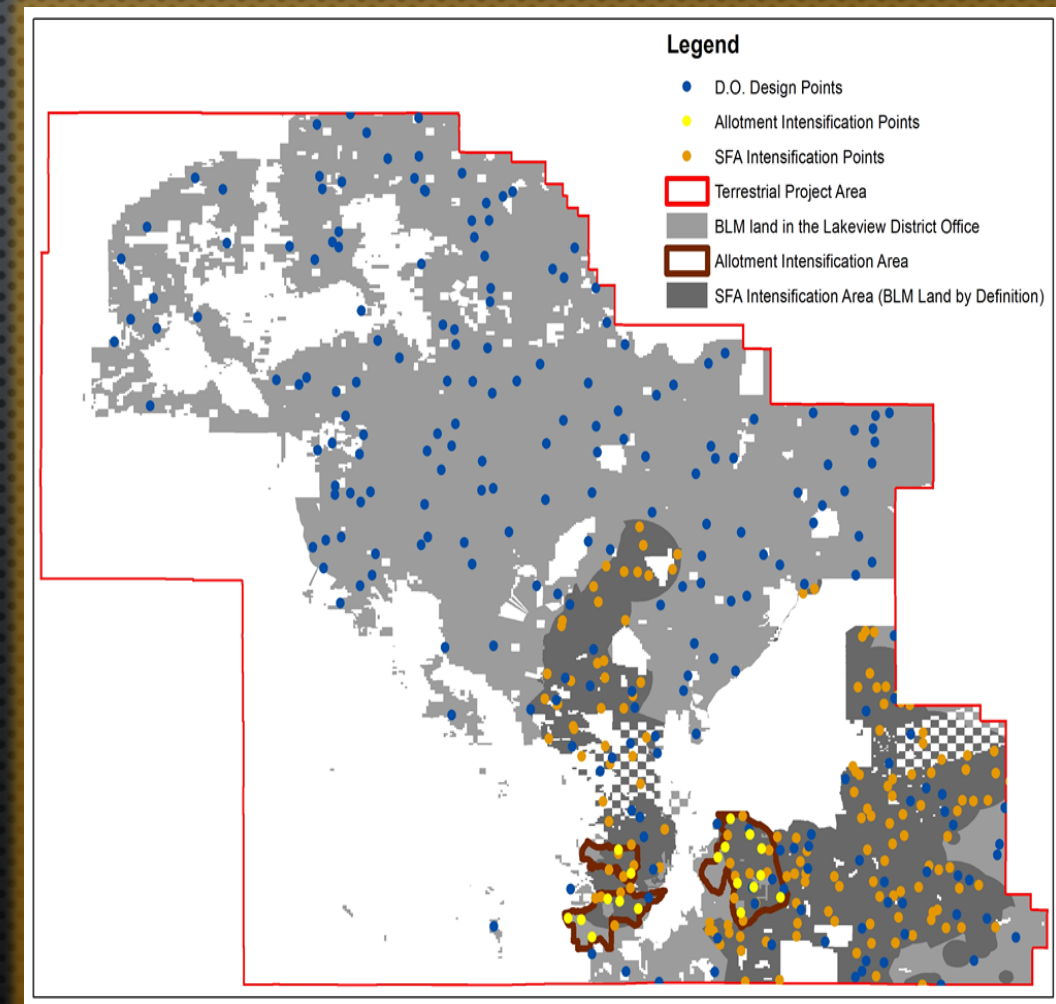
NEW 2018 INSTRUCTION MEMORANDA

*Six new IMs released in January 2018 to revise and/or replace existing sage-grouse IMs issued in September 2016. IM 2018-025 is a new IM and did not have a 2016 counterpart.

- [IM 2018-021](#) Gunnison and Greater Sage-Grouse (including the Bi-State Distinct Population Segment) Habitat Assessment Policy
- [IM 2018-022](#) Process for Evaluating Greater Sage-Grouse Land Use Plan Adaptive Management Hard and Soft Triggers
- [IM 2018-023](#) Incorporating Thresholds and Responses into Grazing Permits/Leases
- [IM 2018-024](#) Setting Priorities for Review and Processing of Grazing Authorizations and Related Livestock Grazing Monitoring
- [IM 2018-025](#) Implementation of the Habitat Objectives Table from the 2015 Greater Sage-Grouse Approved Resource Management Plans and Amendments
- [IM 2018-026](#) Implementation of Greater Sage-Grouse Resource Management Plan Revisions or Amendments - Oil & Gas Leasing and Development Prioritization Objective

AIM DATA COLLECTION & HAF

- Over 1,200 AIM plots sampled during the 2016 and 2017 field season
- Over 600 more plots will be sampled during 2018 field season
- AIM data, along with supplemental sage-grouse indicators, are used to complete the site-scale analysis for the Habitat Assessment Framework (HAF)
 - HAF assessments are required by policy and are being conducted throughout BLM Districts in Oregon



National Historic Preservation Act of 1966 as Amended
Section 106/110 Regulations and Tribal Consultation
Bonus Topic!!! – 2015 Protocol Between the Oregon SHPO and Oregon BLM

Purpose of the National Historic Preservation Act of 1966 as amended (NHPA):

- Create a process for Federal agencies to take into consideration historic, prehistoric and traditionally used (by Indian Tribes) properties.
- Insure that such properties are avoided or evaluated for their significance prior to being affected by ground disturbing Federal actions.
 - What this means is that before a project can be implemented, no matter what NEPA (National Environmental Policy Act) is required, qualified cultural resources staff need to systematically look within the project area for cultural resources and document them. If cultural sites can be avoided by slightly altering the original project boundary or treatment areas, no further cultural resource work is required besides documentation of the site. The reality is that 99% of sites found on Burns BLM managed land can be avoided during project implementation.
 - If a site cannot be avoided, it has to be evaluated. Evaluation, especially with prehistoric sites usually means excavation which leads to lengthy reporting and expensive storage of recovered artifacts. In other words, evaluation = time and money. For this reason, it is almost always more cost effective to avoid sites and, because of this, the majority of our 3800 sites found on Burns District lands are unevaluated and have to be avoided every time they are within a project area.
 - Why is it so expensive and time consuming? Because for years our watchdog organization, the Oregon State Historic Preservation Office (SHPO), has demanded an inordinate amount of testing, excavation and documentation to establish a site's significance or lack thereof.

Who is the Oregon SHPO?

- The Oregon SHPO was created by the NHPA (along with a SHPO in every other state) to act as an advisor to various Federal agencies in complying with regulations under the NHPA. For many years the SHPO was more of a watchdog than an advisor and the relationship today, though much more collegial than former times, is still somewhat adversarial to the BLM. They are funded partly by the Department of Interior and partly by the State of Oregon.
- Their attitude still seems to be that all cultural resources sites have some degree of significance and the BLM should protect them from ground disturbing activity or spend considerable money and time proving they are not significant.
- The National Register was created by the Act to be a list of properties that are significant at the local, regional or national level. I estimate that of the 3800 sites on Burns BLM land, no more than 10% are significant enough to be eligible for nomination to the National Register. The Oregon SHPO has a different attitude about significance and, though I don't know what their percentage would be, their estimate would be probably much higher. What that means is that this BLM District practices site avoidance for many sites that would not need to be protected from project impacts if the evaluation process was less expensive and less time consuming.

To the Rescue: 2015 Oregon BLM – SHPO Protocol

In 2015, Oregon BLM and the SHPO signed an agreement that continued and improved our Section 106 process in relation to how we work with the SHPO. Improvements to the typical Section 106 process are as follows.

- BLM acts as its own SHPO on projects where sites (significant or not) are avoided.
- Documentation of these “No Effect” cultural inventories can be delayed to the winter months for submission by May of the following year. The old process, before the Protocol, required BLM to wait 30 days for SHPO “concurrence” and project implementation was not allowed before concurrence.
- BLM now can make what are called “eligibility determinations” for sites that do not have the data potential for eligibility for nomination to the National Register. This aspect of our Protocol allows us to once and for all take sites out of active management and reduce the number of sites we protect from project impacts.
- The bottom line is this saves the taxpayers money and saves the BLM and project proponents time. It clearly is an improvement over our former process and allows us more time to focus on the more significant sites.

Tribal Consultation

Note: One of the most important things to remember about Tribal Consultation is that many tribal members don't separate everyday tasks from the sacred. They could be out digging roots in the Stinkingwater Mountains but they aren't just digging roots. In many cases, their way of life is not a separation between the secular and sacred. These two concepts, for them, are a whole. The other thing to remember is that most of our laws and regulations are written as if the sacred and secular were separate and this separation can lead to mis-understandings when tribal governments work with the Federal government.

Tribal consultation: means determining, through dialogue between tribal and Federal leaders, the various Indian tribes' comments, questions, suggestions and objections to proposed BLM projects. Tribal consultation is not new and is linked to cultural resources legislation. It is required by the NHPA of 1966 as amended and, theoretically, is required for every project the BLM proposes, regardless of the NEPA documentation required to implement the project. Practical reasons why we consult with tribes are as follows:

- We consult the Tribes because all of the Burns BLM public land was once in the hands of the Tribes. Some Tribes "ceded" their land in treaties with Congress. Others, like the Burns Paiute Tribe, were not granted a treaty and, therefore, did not cede their land to the US government.
- We consult with the Tribes because they are a separate government, for all intents and purposes outside the control of the US government.
- We consult the Tribes because they have a good knowledge of our public lands and have a very deep history with the land.
- We consult the Tribes because they usually have a different perspective on how to manage public lands that were formerly their home.
- We consult the Tribes because they continue to use public lands for various tasks such as root and plant gathering, hunting, fishing, fire wood gathering, etc.

Tribal Consultation, continued

- For consultation to actually happen it has to be a dialogue between Tribal leaders and Federal government leaders, leaders who have had decision making authority delegated to them through the cabinet level secretaries from the President.
- Tribal consultation is between leaders of one government entity (the Tribal Chairperson/Council) and another (BLM Line Managers) and is not valid when staff members of the two governments meet to exchange information or discuss projects or cultural matters.
- Tribal consultation is not valid when the BLM writes a letter to the Tribal Chairperson/Council and does not receive a reply from the Chairperson. Our Managers make follow-up emails and phone calls to make sure the Tribe received our correspondence and whether or not they are interested in consulting. Only with follow-up is consultation considered valid.
- Without knowing what the Tribe has to say about a certain project or resource, we risk damaging one of their resources and, potentially, dealing with a law suit.

So, in other words, if we occupied a perfect world, where Indian tribal leaders and BLM managers had all of the time in the world, we could probably meet and discuss every project with the Tribal leaders. But, we don't live in a perfect world... So, there are three pieces of advice I would give any BLM manager to solve this dilemma.

1. Ask the tribe to answer letters with a yes (they want to consult) or no (they don't want to consult). If we could get Tribes to do this, we could spend time working on issues that are more important to both governments.
2. Meet with Tribal government several times a year and discuss multiple projects to determine which projects are important to the Tribe. Our District attempts to do this.
3. Find out from Tribal government which geographic areas within your District are high priority with the Tribe, then with their agreement, consult on projects that fall in those high priority areas.

Traditional Cultural Properties (TCPs)

Indian tribes use Federal land for many traditional activities and usually have some geographic feature within the local area that is considered special to them. When they identify an area that is special to them they have the opportunity to nominate them to the National Register of Historic Places. So, when nominated, a TCP is treated similarly to an archaeological site or historic building that has been nominated.

- This Stinkingwater Mountains, 25 miles east of Burns, is one such location. The Burns Paiute Tribe uses this geographic area for digging roots, hunting marmots, collecting fruit and many other activities that BLM may or may not know about. In former days (probably up until the 1970s, they camped in the area in family groups. The camping tradition seems to have died out since then but they continue to make day-trips to the area every year. Other Indian Tribes, aware that the Stinkingwaters is a premier root gathering area, travel from their reservations to dig roots in the spring. Burns District has set aside about 6,000 acres in this area in the Biscuitroot Area of Critical Environmental Concern (ACEC) to manage the area for root gathering.
- Although an ACEC is a BLM designation and the Biscuitroot ACEC is much smaller than the entire Stinkingwaters use area, it is a way to shift management in an area to a more singular focus. It doesn't have the teeth that a TCP does because the protection in an ACEC is more voluntary whereas the protection to a TCP is statutory and regulatory.
- Many times Tribes refer to a specific area as a TCP but it has to go through the nomination to the National Register process in order to have the protection a nominated TCP affords. Until it is nominated, the BLM can manage such an area with their multiple-use mandate, with obviously more consultation and consideration to tribal wishes. But, the nomination process can be time consuming and expensive and that is why there aren't many nominated TCPs. Until a funding mechanism is established for financing the nomination of TCPs, the number will continue to be small.

NHPA Section 110 Regulations

Section 110 regulations of the NHPA are not as well known as the Section 106 regulations. Although we have found many important sites during our archaeological surveys for BLM projects, we have many more important places on the District that haven't been surveyed.

Section 110 regulations mandate that we form partnerships with universities, avocational groups and volunteers to study the archaeological sites we want to study. They also require us to be active in the public education realm, not only giving papers at archaeological conference but talking and writing for school kids, historical societies, videographers and the general public. Here's some examples of how Burns BLM will respond to these regulations in this fiscal year.

- Two day set of presentations on Science in Archaeology to Halfway, Oregon middle and high school students and one to the general public.
- Presentation to local rural school about Rimrock Draw Rockshelter.
- Evening presentation at Archaeological Society of Central Oregon in Bend and an "Archaeology on Tap" presentation in Lebanon, Oregon.
- In late March, I will be giving a presentation at the Northwest Anthropology Conference in Boise, Idaho.
- Presentations and field tours at up-coming Migratory Bird Festival.
- I will be leading a two-day field tour for Archaeological Society of Central Oregon members.
- 2nd annual Harney County Archaeology Roadshow in June with two lecture events at the Harney County library and Chamber of Commerce.
- Texas A & M archaeology field school will be the month of June. The students and their leader will be working on three very old (11,000+ years) sites near Harney Lake.
- In mid-June, Burns BLM will sponsor its 15th year of two-week volunteer archaeological surveys named "Clovis Quest". The survey is focused on finding Clovis era (13,000+ years old) artifacts and sites on the District.
- In late June the University of Oregon Archaeological field school will return for the 7th year to Rimrock Draw Rockshelter, one of the oldest archaeological sites in the western hemisphere. Our most recent radiocarbon results indicate the site is at least 18,000 years old.
- I'm retiring in May but plan on being a volunteer involved in all of these activities this summer. I also have a research project I have been working on since 2012 that will include some field work this summer and presentations during the year.

Southeast Oregon Resource Advisory Council

Don Gonzalez
District Manager
Vale District, Bureau of Land Management
100 Oregon Street
Vale, Oregon 97918

March 16, 2018

Dear Mr. Gonzalez:

As you recall, between 2006 and 2012 the BLM Vale District completed an inventory update and determined that certain lands located in the Vale District outside of existing designated Wilderness Study Areas also contain wilderness characteristics (LWC units). Subsequently, BLM requested the Southeastern Oregon Resource Advisory Committee's (SEORAC) consideration of management approaches for these LWC units as a part of the ongoing Southeastern Oregon Resource Management Plan (SEORMP) Amendment. In June 2014 the SEORAC provided BLM with a recommendation for a means of considering future management of the LWC units. The 2014 SEORAC recommendation suggests the use of a set of three criteria that could be considered as BLM works to identify management approaches for LWC units, while also taking into account other resource management factors.

Following our 2014 recommendation, the SEORAC accepted an additional, related task requested by BLM. In this second phase of consideration, a RAC subcommittee was established to develop specific land use allocation and management recommendations for LWC units consistent with the criteria in our 2014 recommendation. Between Fall 2016 and Spring 2018, the SEORAC subcommittee on lands with wilderness characteristics met several times and considered a wide array of land use planning allocations, allowable uses and management actions that might vary according to the specific circumstances and resource considerations of LWC units. The subcommittee then brought a set of recommendations to the full SEORAC for further deliberation.

The attached Table 1 records SEORAC recommendations for land use allocations in SEORMP LWC units. The table was brought to the RAC by the subcommittee and the SEORAC subsequently discussed, made modifications and we recommend that BLM incorporate this set of land use allocations as part of the management approach for LWC units in at least one alternative in the SEORMP amendment.

Table 2 reflects an issue where the SEORAC could not reach consensus or pass a recommendation. The SEORAC notes differing views among RAC members regarding Off-Highway Vehicle land use allocations within LWC units. Discussion of OHV land use allocations and additional project level management approaches identified by the SEORAC is provided in the attached Table 2. The SEORAC recommends that BLM utilize the interdisciplinary, NEPA and public review processes to develop a reasonable range of feasible alternatives to determine future OHV land use allocations and management approaches for LWC units.

Table 3 records the SEORAC lands with wilderness characteristics subcommittee's discussion of project level management that we felt will be important to BLM in the development of SEORMP alternatives and in analysis of effects to wilderness characteristics. We provide Table 3 for BLM's information. Discussion points are noted and the SEORAC recommends that BLM consider these issues and ideas in reaching the final Proposed Alternative in the Final EIS and ultimately, the Record of Decision for the SEORMP.

If there are questions regarding this recommendation, please contact the SEORAC at any time.

Sincerely,

A handwritten signature in blue ink that reads "Jason M. Kesling". The signature is written in a cursive style with a large initial "J" and "K".

Jason Kesling, Chair

Southeast Oregon Resource Advisory Council