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**Proposed
Three Rivers
Resource Management Plan
and Final Environmental Impact Statement**

Volume II - Appendices



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

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**Cover Photo — Federal Land Office - Temporary Headquarters
in the Burns Hotel building from 1889-1891. Predecessor to
the Taylor Grazing Service and Bureau of Land Management.**

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

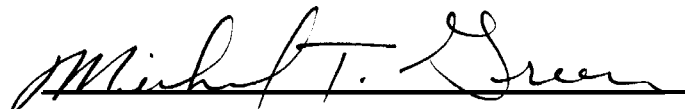
**Proposed
Three Rivers
Resource Management Plan**

**Final
Environmental Impact
Statement**

**Prepared by
Burns District Office**



State Director, Oregon/Washington



District Manager, Burns

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Appendix I



Table 1. General Best Forest Management Practices

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

Road System

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

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

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

Keep stream disturbance to an absolute minimum.

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

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

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

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

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

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

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

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

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

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

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

Table 1. General Best Forest Management Practices (continued)

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

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

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

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

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

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

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

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

Obtain all necessary permits for stream crossings before beginning activities.

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

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

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

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

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

Soil Protection and Water Quality

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

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

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

Avoid trapping and turning small streams out of their natural beds into tractor trails and landings.

Table 1. General Best Forest Management Practices (continued)

Generally, confine tractor skidding operations to slopes of less than 35 percent. Leave appropriate snags and/or large dead trees for wildlife, as per current BLM Snag Management Policy Guidelines and Agriculture Handbook No. 553 (USDA, 1979).

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

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

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

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

Silvicultural

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

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

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

Yarding practices to be employed during the planning period consist of tractor systems, ground and partial suspension cable systems and full suspension systems which include cable and aerial. Each system impacts ground vegetation to different degrees relative to the soil disturbance resulting from the harvest system used. For example, the tractor system would cause the greatest impact to existing vegetation and an aerial full suspension system would cause the least disturbance.

Table 2. Summary of Recommended Practices for Stream Protection

Guidelines for protection of fish habitat and water quality in logging operations have been developed as a result of the Alsea watershed research program and related studies. They include the following:

1. Extremely small headwater streams can be important spawning and rearing areas for salmon and trout and need protection. Even streambeds that are dry in the summer can be valuable spawning tributaries at other times of the year. Also, logging activities in headwaters can affect downstream areas.
2. A formal procedure for reviewing timber harvest operations, in the planning stages as well as during logging, entered into by participating private, State and Federal groups should be an integral part of any logging program.
3. Stream clearance requirements, and their enforcement, are essential.
 - (a) Every effort should be made to prevent logging debris from falling into stream channels. If any debris does get into a channel, the fishery biologist or hydrologist should determine which debris will be removed to maintain adequate dissolved oxygen levels in surface water and keep migration routes open.
 - (b) The method of stream clearance and timing of the operation are also important. Heavy equipment should not normally be used in a stream, and the channel should not be altered. Consultation with the focal State fishery biologist can aid in determining what material should be removed from a stream, and the best time for removal.
4. Streamside vegetation should be protected and remain standing in all logging operations where fish, wildlife and water quality considerations are involved or can be affected in downstream areas.
 - (a) Streamside vegetation provides shade to the stream and minimizes water temperature increases.
 - (b) Commercial conifers do not necessarily have to be left. Shrubs and other less valuable species can, in many cases, provide adequate shade if the conifers can be removed without destroying such vegetation or damaging streambanks. In some areas, commercial timber may have to remain to protect other watershed values or await the technological development of other removal methods.
 - (c) Areas of vegetation left along a stream do not have to be a certain width. Often a relatively narrow vegetative unit will provide the necessary fish habitat protection unless other factors such as wildlife habitat enhancement and scenic corridors are involved.
 - (d) Protecting streamside vegetation serves many purposes. Maintaining a vegetation unit requires care in falling and yarding timber away from the stream, and will reduce stream clearance needs and dissolved oxygen problems in surface and subgravel waters.
5. Avoid falling trees into or across streams.
6. Logs should not be yarded through streams.
 - (a) Yarding logs through streams deposits organic and inorganic debris and sediment in the channel, breaks down streambanks and streamside vegetation, and contributes to dissolved oxygen and sediment changes in surface and subgravel environments.
 - (b) Use yarding methods that minimize soil disturbance in the watershed.
 - (c) Landings should not be located in the stream channel.
 - (d) Logs should be yarded uphill and away from the stream.

Table 2. Summary of Recommended Practices for Stream Protection (continued)

The Society of American Foresters¹, Columbia River Section, Water Management Committee² has developed a list of recommended logging practices for watershed protection in western Oregon. The recommendations reflect concern for the impact of roads on stream sediment levels and emphasize proper road location, construction and maintenance. Although available in the Journal of Forestry for more than 10 years, many logging operations have not incorporated the practices into their programs. Therefore, in an attempt to get wider distribution of the Water Management Committee's suggested practices, most of its recommendations follow verbatim.

Road Location and Design

1. Where possible, locate roads on benches and ridges to minimize erosion; except under special circumstances such as occurrence of rock bluffs, keep roads out of stream courses. Roads should be high enough to prevent sifting to the stream.
2. Keep road gradients low except where short, steep sections are needed to take advantage of favorable topography and to avoid excessive cut and fill. Minimize the effect of higher gradients by reducing the distance between culverts to prevent the accumulation of water in the ditches.
3. Roads leaving landings should have short lengths of slightly adverse grade if possible. They should not have steep pitches of favorable grade which might drain off mud from the landings into streams.
4. Allow flexibility in road design so that in construction a minimum of soil is moved. Adjust the radius of curves in critical areas to achieve this objective.
5. Take advantage of well-drained soils and horizontal rock formations for greater stability, and avoid areas where seeps, clay beds, concave slopes, alluvial fans and steep dipping rock layers indicate the possibility of slides.
6. Consider the proper angle of repose for cuts and fills in designing roads on varying types of soils and rock materials. Consistent with these demands, make road cuts reasonably steep in order to minimize surface exposed to erosion.
7. In bridge location plan to avoid relocation of the stream channel. Where the stream must be changed³, use riprap, vegetative cover or other means to reduce soil movement into stream.
8. Install culverts at crossings of all drainage ways except small streams⁴ and seeps which can be safely diverted to ditches. Use culverts with sufficient capacity to carry the largest flow expected.
9. Route the road drainage (whether from culverts, cross drainage or ditches) onto the forest floor, preferably on benches so that sediment can settle out before drainage water reaches stream channels.
10. Take drainage water out of ditches at intervals short enough to prevent ditch erosion. Detour it from above unstable areas to avoid saturation, slumping and erosion.

Road Construction

1. Plan the pioneering stage of road construction to avoid soil erosion and slumpage. As an example, cull log crossings⁵ can be provided where culverts will be placed on the completed road. Avoid pioneering too far ahead of final construction.
2. Uncompleted road grades which may be subject to considerable washing before final grading should be outsloped or cross-drained.
3. Hold wet-weather road building to a minimum, particularly on poorly drained, erodible soils which may drain mud directly to streams.

Table 2. Summary of Recommended Practices for Stream Protection (continued)

4. Build fills in lifts to ensure optimum compaction and minimize slumpage. Avoid the inclusion of slash, logs and other organic debris in fills.
5. Excess fill material should not be dumped within the high-water zone of streams where floods can pick it up where it will flow immediately into the stream; end-haul such material.
6. Where slide areas can be predicted from past experience, their effects should be minimized by such measures as flatter backslopes and deeper ditches. On slopes gentle enough to hold the fill, avoid disturbance of underground water courses by building on the fill and providing adequate subdrainage.
7. On primary roads with steep slopes and full benching, consider the use of cribbing to avoid severe disturbance to unstable slopes.
8. On primary roads wherever serious erosion is likely, large cut-and-fill slopes should be stabilized with plant cover as soon as possible. Local experience will indicate the best practices and species to use.
9. Avoid channel changes or disturbance of stream channels. Where necessary complete the channel change and riprap the sides before turning water into the new channel.
10. In building bridge footings and abutments, limit machine work as much as possible to avoid disturbing the stream. This initial work often greatly increases turbidity and sediment movement. The toes of fills on larger creek crossings should be protected above the high-water line to prevent soil movement.
11. Unless no other source is available, gravel should not be taken from streambeds except from dry gravel bars⁶. Washing of gravel into streams will normally cause sedimentation and should be avoided.
12. Culverts should be properly installed in the stream channel allowing for suitable bed, adequate size, frequency and grade'. Inlets and outlets should be protected. Aprons should be installed where needed.
13. Where necessary, protect the upper ends of culverts to prevent fill erosion into them. On erodible soil materials, extend culverts beyond the fills or install permanent aprons below them to disperse flows and prevent gullyng.
14. Ditches should be of adequate depth and side slope to carry all water and to prevent sloughage.

Road Maintenance

1. Keep roads well crowned ahead of wet weather so they will drain properly and not become waterways.
2. During current operations, roads should be graded and ditched to avoid interruption to drainage from road centers to the ditches.
3. After the first rain in the fall, check roads to reduce drainage problems.
4. During periods of heavy rainfall, examine road surfaces to assure that drainage from wheel ruts is properly diverted to drainage ditches. During such periods it may be worthwhile to provide personnel to patrol the roads and to do hand drainage work.
5. Provide frequent cross-drains on all temporary roads in the fall to prevent erosion of road and fill.
6. Generally, berms should be removed or at least broken frequently to allow lateral drainage to nonerodible areas. Berms are desirable on large erodible fills to prevent drainage from the road crown down the center of the fill section.

Table 2. Summary of Recommended Practices for Stream Protection (continued)

7. In using graders to clean out drainage ditches, avoid undercutting the side slopes.
8. Culvert inlets should be inspected and cleaned prior to the rainy season and periodically during that season. For at least 50 feet above culverts the streamchannels should be cleared of wood materials that might clog the culverts. The outflow should be kept clear also.
9. Install trash racks well above inlets to culverts where experience shows the necessity. Keep the racks cleaned out.

¹Written permission to reprint this material has been granted by the editorial staff of the Journal of Forestry.

²A complete copy of the article and qualifying statements by the Committee is available in the Journal of Forestry, Vol. 57, No. 6, June 1959. Portions of the article not included in this pamphlet relate to introductory statements, logging operations and post-operational cleanup and maintenance. The Committee is currently revising and updating its recommendations, which will reflect increased concern about the effects of logging on fish habitat and water quality.

³Timing of bridge construction and culvert installation is important. During the summer, streamflows are low and impacts on fishery resources can be minimal and localized. At that time migration of juveniles to the ocean and adults returning to spawn would thus not be disrupted. (Author's footnote.)

⁴Until recently the importance of small streams was not fully documented. Culverts should be installed on all small streams supporting anadromous fish. (Author's footnote.)

⁵Cull log crossings placed in a stream in the spring can eliminate the downstream migration of fingerlings to the ocean. (Author's footnote.)

⁶A permit is now required to remove more than 50 yards of gravel from the bed or bank of any water in Oregon (O.R.S. 541.605 to 541.660). Permits are issued under the authority of the Director of the Division of State Lands and coordinated with a number of other State agencies. (Author's footnote.)

⁷Culvert gradient curves and stream velocity requirements for salmon and trout are available from the Oregon Department of Fish and Wildlife. (Author's footnote.)

Table 3. Stream Segments Proposed for Livestock Removal¹

Stream Name	Allot	Miles	Acres	Cond.	Trend	Allot. No.	Special Status Species
Claw Creek	Claw Creek	2.30	12.0	Poor	Static	7010	RB/MS ²
Skull Creek	Skull Creek	3.50	23.5	Poor	Static	7030	RB
Buzzard Creek	W.Warm Springs	1.50	14.0	Poor	Static	7002	—
Alder Creek	Alder Creek	4.80	15.0	Poor	Static	5536	RB
Bluebucket Cr.	Moff et Table	1.05	3.0	Poor	Static	5511	RB
Coleman Creek	Alder Creek	4.35	24.0	Poor	Static	5536	RB
Stinkingwater Creek	Dawson Butte	0.50	3.0	Poor	Static	5524	RB
	Stinkingwater	1.25	5.0	Poor	Static	5531	RB
	Mountain	0.50	3.0	Poor	Static	5532	RB
Smyth Creek	Smyth Creek	2.30	10.0	Poor	Static	5307	RB/MS
Warm Sprgs Cr.	Mountain	3.00	12.0	Poor	Downward	5532	RB
	Texaco Basin	1 .00	4.0	Poor	Static	5566	RB

¹This table pertains to Management Actions WL 6.1, SSS 2.1 (Table 2.12), WQ 1.4 and AH 1.2.

²RB indicates Redband Trout, MS indicates Malheur Mottled Sculpin.

Table 4. Riparian Areas Grazing Systems and Inventory

Several riparian pastures within the planning area have exhibited "speedy" riparian recovery with a short duration (less than 30 days) early (prior to June 1) grazing system (see glossary for definition of "speedy" riparian recovery). However, in some instances an early turn out riparian pasture or pastures within an allotment is not practical or may be cost prohibitive.

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

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

Inventory

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

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

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

Table 5. Stream Segments Proposed for Immediate Grazing System Implementation

Stream Name	Allot	Miles	Acres	Cond.	Trend	Allot. No.	Special Status Species
Devine Creek	Unallotted	3.00	12.0	Good	Static	—	RBIMS
Silvies River	Silvies River	1.50	17.4	Fair	Static	7033	RB
	Silvies Meadow	0.50	4.0	Fair	Static	7035	RB
	Silvies Canyon	2.25	26.2	Fair	Static	7053	RB
Landing Creek	East Silvies	0.75	10.0	Fair	Down	7041	RB
	Landing Creek	3.00	24.0	Fair	Down	7040	RB
Hay Creek	Hay Creek	2.00	35.0	Fair	UP	7031	RB
Silver Creek	Packsaddle	1.10	7.0	Good	Static	7012	RB/MS
	Claw Creek	0.45	32.0	Poor	Upward	7010	RBIMS
		2.00	15.2	Good	Static	7010	RBIMS
	Dry Lake	1.50	17.5	Good	Down	7009	RBIMS
Upper Valley	1.10	7.0	Good	Static	7011	RB/MS	
Wickiup Creek	Packsaddle	1.25	18.0	Good	Upward	7012	RB/MS
Mineral Canyon	Packsaddle	0.60	1.0	Poor	Upward	7012	RBIMS
Dairy Creek	Claw Creek	1.20	8.2	Fair	Down	7010	RB/MS
Sawmill Creek	Upper Valley	0.75	3.0	Good	Static	7011	RBIMS
Rough Creek	Claw Creek	0.25	2.0	Good	Static	7010	RBIMS
		0.75	15.0	Poor	Upward	7010	RB/MS
Nicoll Creek	Dry Lake	0.75	3.0	Good	Static	7009	RB/MS
Emigrant Creek	Emigrant Creek	0.50	3.0	Good	Static	7027	RB
Varien Creek	Varien Canyon	0.40	1.0	Good	Static	7048	—
Buzzard Creek	W.Warm Springs	0.50	5.0	Poor	Upward	7002	—
Bluebucket Cr.	Moffet Table	1.85	4.0	Fair	Static	5511	RB
Coleman Creek	Alder Creek	1.35	4.0	Fair	Static	5536	RB
Cottonwood Cr.	Cottonwood Creek	0.50	2.0	Fair	Upward	5522	RB
		1.35	6.0	Fair	Static	5522	RB
M.F. Malheur River	Moffet Table	2.30	8.0	Fair	Downward	5511	RB
	River	0.80	5.0	Fair	Upward	5530	RB
Paul Creek	Riddle Mountain	0.60	4.0	Fair	Upward	5310	RBIMS
Deep Creek	Deep Creek	1.30	6.0	Good	Static	5330	RB/MS
S.Fk.Malheur River	Venator	1.25	6.0	Fair	Static	5205	RB
	Stockade	1.35	4.0	Fair	Static	5206	RB
Rattlesnake Cr.	Camp Harney	2.70	16.0	Good	Upward	5105	RB

Table 5. Stream Segments Proposed for Immediate Grazing System Implementation (cont.)

Stream Name	Allot	Miles	Acres	Cond.	Trend	Allot. No.	Special Status Species
Stinkingwater Creek	Dawson Butte	0.75	5.0	Fair	Upward	5524	RB
	Mountain	1.00	5.0	Fair	Downward	5532	RB
		0.60	4.0	Good	Static	5532	RB
Smyth Creek	Smyth Creek	0.40	2.0	Good	Static	5307	RB/MS
		1.50	5.0	Fair	Downward	5307	RB/MS
Riddle Creek	Happy Valley Riddle Mountain	2.00	8.0	Fair	Static	5309	RB/MS
		1.20	5.0	Fair	Downward	5310	RB/MS
	Riddle Coyote Hamilton Ind.	3.30	12.0	Fair	Downward	5329	RBIMS
		2.50	10.0	Fair	Downward	5327	RB/MS
Warm Sprgs Cr.	Buck Mountain	3.00	12.0	Poor	?	5537	RB
Coffeepot Creek	Camp Harney	0.75	3.0	Fair	Static	5105	RB/MS
Coyote Creek	Riddle Mountain	2.00	6.0	Fair	Improving	5310	RB/MS
	Riddle Coyote	2.20	7.0	Fair	Static	5329	RB/MS
Little Pine Cr.	Pine Creek	2.00	8.0	Fair	Improving	5503	—

*This table pertains to Management Actions WL 6.2, SS 2.1 (Table 2.12), WQ 1.5 and AH 1.3.

Table 6. Stream Segments Proposed for Case-by-Case Grazing System Implementation

Stream Name	Allot	Miles	Acres	Cond.	Trend	Allot. No.	Special Status Species
Poison Creek	Lone Pine	0.25	1.0	Poor	Static	7043	RBIMS
Landing Creek	Silvies Meadow	0.25	5.0	Poor	Static	7035	RB
Claw Creek	Upper Valley	0.25	4.0	Poor	Down	7011	RB/MS
Beaver Cam Cr.	Sawtooth (MNF)	0.30	1.0	Fair	Static	7051	RB
Coleman Creek	Coleman Creek	0.25	1.0	Poor	Static	5201	RB
Lee Creek	Moff et Table	0.30	1.0	Poor	Static	5511	RB
Paul Creek		0.30	2.0	Poor	Static	5310	RB/MS
Silvies River	Silvies	0.20	1.0	Fair	?	4143	RB
Flat Creek	Silvies	0.40	2.0	Fair	?	4143	RB
Mountain Creek	Silvies	0.50	5.0	Fair	Static	4143	RB
Poison Creek	Silvies	0.25	2.0	Fair	Static	4143	
	Poison Creek	0.25	3.0	Fair	Static	4040	—

*This table pertains to Management Actions WL 6.3, SS 2.1 (Table 2.12).

Table 7. Stream Segments Which Lack Sufficient Data for Grazing System Implementation

Stream Name	Allot	Miles	Acres	Cond.*	Trend	Allot No.
Skull Creek	Hotchkiss	0.5	2.0	?	?	7032
Emigrant Creek	Hay Creek	1 .00	4.0	?	?	7031
	Sawtooth (MNF)	0.20	1.0	?	?	7051
Yellowjacket Creek	Hay Creek	0.40	0.5	?	?	7031
Spring Creek	Spring Creek	0.50	3.0	?	?	7029
Ltl Muddy Cr.	Little Muddy Cr.	1.50	6.0	?	?	5505
Mahon Creek	Mahon Creek	1.50	6.0	?	?	5534
Warm Sprgs.Cr.	Mill Gulch	1.25	5.0	?	?	5525
Mule Creek	Mule Creek	1.25	8.0	?	?	5515
Riddle Creek	Unallotted	0.50	2.0	?	?	5303
	Dry Lake	0.75	2.0	?	?	
Newell Creek	Lamb Ranch FFR	1.25	6.0	?	?	5571
Cow Creek	Cow Creek	0.50	2.0	?	?	5106
Mill Creek	Camp Harney	2.50	10.0	?	?	5105
Crane Creek	Alder Creek	5.00	20.0	?	?	5536
Dog Creek	Silvies	0.75	3.0	?	?	4143
East Creek	East Creek- Pine Hill	0.75	3.0	?	?	4098
Prather Creek	Prather Creek	1.50	5.0	?	?	5102
	Devine	2.25	7.0	?	?	5101
Swamp Creek	Kiger	0.5	2.0	?	?	5308
	Smyth Creek	1.5	5.0	?	?	5307

. Riparian condition and trend are unknown for these segments.

Table 8. Actions Proposed in the Three Rivers Portion of the Burns District Wetlands HMP.

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

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

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

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

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

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

Allotment Name: Poison Creek		Allot. No.: 4040	Mgmt. Category: C
Public Acres:	1,237	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	248	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	248	Antelope:	
Average Actual Use:	248	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
Wetlands habitat in less than satisfactory condition.		Improve wetlands habitat condition to satisfactory or better.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

Allotment Name: Hi Desert **Allot. No.: 4096** **Mgmt. Category: C**

Public Acres: 400 **Other Acres:**

Grazing Administration Info. (AUMs)

Active Preference: 80

Suspended Nonuse: 0

Total Preference: 80

Average Actual Use: 80

Other Forage Demands (AUMs)

Deer:

Elk:

Antelope:

Horses:

Total:

**Identified Resource
Conflicts/Concerns**

**Management
Objectives**

CONSTRAINTS

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

Allotment Name: Trout Creek **Allot. No.: 4097** **Mgmt. Category: I**

Public Acres: 2,839 **Other Acres:**

Grazing Administration Info. (AUMs)

Active Preference: 568

Suspended Nonuse: 0

Total Preference: 568

Average Actual Use: 309

Other Forage Demands (AUMs)

Deer:

Elk:

Antelope:

Horses:

Total:

Table 9. Allotment Management Summaries (continued)

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

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

Allotment Name: East Cr.-Pine Hill		Allot. No.: 4098	Mgmt. Category: M
Public Acres:	1,840	Other Acres:	

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	374	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	374	Antelope:	
Average Actual Use:	349	Horses:	
		Total:	

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Abraham's Draw		Allot. No.: 4126	Mgmt. Category: C
Public Acres:	40	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	8	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	8	Antelope:	
Average Actual Use:	8	Horses:	
		Total:	

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Allotment Name: White		Allot. No.: 4138	Mgmt. Category: C
Public Acres:	80	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	10	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	10	Antelope:	
Average Actual Use:	10	Horses:	
		Total :	

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Silvies		Allot. No.: 4143	Mgmt. Category: M
Public Acres:	11,035	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,500	Deer:	75
Suspended Nonuse:	0	Elk:	75
Total Preference:	2,500	Antelope:	
Average Actual Use:	1,642	Horses:	
		Total:	150
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
Wetlands habitat in less than satisfactory condition.		Improve wetlands habitat condition to satisfactory or better.	
At this time, the following special status species or its habitat is known to exist within the allotment: redband trout, Allium campanulatum		Protect special status species or its habitat from impact by BLM-authorized actions.	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: King Mountain		Allot. No.: 4180	Mgmt. Category: C
Public Acres:	160	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	16	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Unallotted grazing area.		Issue temporary nonrenewable license unless allotted.	

CONSTRAINTS

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

Allotment Name: Harney-Crane		Allot. No.: 5001	Mgmt. Category: C
Public Acres:	480	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	34	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	34	Antelope:	
Average Actual Use:	34	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
At this time, the following special status species or its habitat is known to exist within the allotment: <i>Rorippa columbiae</i> , long-billed curlew.		Protect special status species or its habitat from impact by BLM-authorized actions.	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Silvies		Allot. No.: 4143	Mgmt. Category: M
Public Acres:	11,035	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,500	Deer:	75
Suspended Nonuse:	0	Elk:	75
Total Preference:	2,500	Antelope:	
Average Actual Use:	1,642	Horses:	
		Total:	150
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
Wetlands habitat in less than satisfactory condition.		Improve wetlands habitat condition to satisfactory or better.	
At this time, the following special status species or its habitat is known to exist within the allotment: redband trout, <i>Allium campanulatum</i>		Protect special status species or its habitat from impact by BLM-authorized actions.	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	
CONSTRAINTS			
Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			

Table 9. Allotment Management Summaries (continued)

Allotment Name: Catterson Sec. 13		Allot. No.: 5002	Mgmt. Category: C
Public Acres:	160	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	9	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	9	Antelope:	
Average Actual Use:	9	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Malheur Slough		Allot. No.: 5003	Mgmt. Category: C
Public Acres:	799	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	66	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	66	Antelope:	
Average Actual Use:	66	Horses:	
		Total :	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Withers' FFR		Allot. No.: 5005	Mgmt. Category: C
Public Acres:	190	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	22	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	22	Antelope:	
Average Actual Use:	22	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Devine Ridge		Allot. No.: 5101	Mgmt. Category: M
Public Acres:	8,642	Other Acres:	1,914
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,307	Deer:	43
Suspended Nonuse:	0	Elk:	16
Total Preference:	1,307	Antelope:	1
Exchange of Use:	44	Horses:	
Average Actual Use:	993	Total:	60
Identified Resource Conflicts/Concerns		Management Objectives	

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

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

Allocate forage to meet elk forage demands.

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

Table 9. Allotment Management Summaries (continued)

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

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

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

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

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

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

CONSTRAINTS

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

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

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

Allotment Name: Prather Creek

Allot. No.: 5102

Mgmt. Category: M

Public Acres: 1,025

Other Acres: 763

Grazing Administration Info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 41

Deer: 8

Suspended Nonuse: 13

Elk:

Total Preference: 54

Antelope: 1

Average Actual Use: 76

Horses:

Total: 9

Identified Resource Conflicts/Concerns

Management Objectives

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

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

Table 9. Allotment Management Summaries (continued)

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

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

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

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

CONSTRAINTS

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

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

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

Allotment **Name: Lime Kiln/Sec. 30**

Allot. No.: 5103

Mgmt. Category: M

Public Acres: 3,314

Other Acres: 141

Grazing Administration Info. (AUMs)

Active Preference: 224
Suspended **Nonuse**: 161
Total Preference: 385
Average Actual Use: 193

Other Forage Demands (AUMs)

Deer: 4
Elk:
Antelope: 1
Horses:
Total: 5

Identified Resource Conflicts/Concerns

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

Management Objectives

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Soldier Creek		Allot. No.: 5104	Mgmt. Category: M
Public Acres:	2,673	Other Acres:	2,290
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	102	Deer:	15
Suspended Nonuse:	98	Elk:	8
Total Preference:	200	Antelope:	1
Exchange of Use:	163	Horses:	
Average Actual Use:	275	Total:	24

Identified Resource Conflicts/Concerns

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

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Camp Harney		Allot. No.: 5105	Mgmt. Category: I
Public Acres:	13,423	Other Acres:	3,342
Grazing Administration Info. (AUMs)		ther Forage Demands (AUMs)	
Active Preference:	953	Deer:	71
Suspended Nonuse:	639	Elk:	52
Total Preference:	1,592	Antelope:	2
Average Actual Use:	973	Horses:	
		Total:	125

Identified Resource Conflicts/Concerns

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

Active erosion occurs in the allotment.

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

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

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

Management Objectives

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

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

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Cow Creek		Allot. No.: 5106	Mgmt. Category: I
Public Acres:	2,024	Other Acres:	2,009
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	230	Deer:	8
Suspended Nonuse:	0	Elk:	12
Total Preference:	230	Antelope:	1
Exchange of Use:	240	Horses:	
Average Actual Use:	359	Total:	21

Identified Resource Conflicts/Concerns

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

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

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

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

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Manning Field		Allot. No.: 5107	Mgmt. Category: C
Public Acres:	120	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	10	Deer:	2
Suspended Nonuse:	0	Elk:	
Total Preference:	10	Antelope:	
Average Actual Use:	10	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Purdy FFR		Allot. No.: 5109	Mgmt. Category: C
Public Acres:	104	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	15	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	15	Antelope:	
Average Actual Use:	15	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Reed FFR		Allot. No.: 5110	Mgmt. Category: C
Public Acres:	255	Other Acres:	

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

Active Preference:	18	Deer:
Suspended Nonuse:	0	Elk:
Total Preference:	18	Antelope:
Average Actual Use:	18	Horses:
		Total:

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Allotment Name: Temple FFR		Allot. No.: 5111	Mgmt. Category: C
Public Acres:	350	Other Acres:	

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)
Active Preference:	28	Deer:
Suspended Nonuse:	0	Elk:
Total Preference:	28	Antelope:
Average Actual Use:	28	Horses:
		Total:

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Smith FFR		Allot. No.: 5112	Mgmt. Category: C
Public Acres:	120	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	15	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	15	Antelope:	
Average Actual Use:	15	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Rattlesnake FFR		Allot. No.: 5113	Mgmt. Category: C
Public Acres:	60	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	6	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

Unallotted grazing area.

Issue temporary nonrenewable license unless allotted.

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Coleman Creek		Allot. No.: 5201	Mgmt. Category: M
Public Acres:	2,766	Other Acres:	3,133
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	424	Deer:	9
Suspended Nonuse:	101	Elk:	12
Total Preference:	525	Antelope:	1
Average Actual Use:	248	Horses:	
		Total :	22
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout		Protect special status species or its habitat from impact by BLM-authorized actions.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			
Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.			
Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.			

Table 9. Allotment Management Summaries (continued)

Allotment Name: Hunter		Allot. No.: 5202	Mgmt. Category: M
Public Acres:	2,778	Other Acres:	3,777
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	453	Deer:	10
Suspended Nonuse:	0	Elk:	12
Total Preference:	453	Antelope:	1
Exchange of Use:	56	Horses:	
Average Actual Use:	405	Total :	23

Identified Resource Conflicts/Concerns

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

Management Objectives

Allocate forage to meet elk forage demands.

CONSTRAINTS

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

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

Allotment Name: Catterson		Allot. No.: 5203	Mgmt. Category: C
Public Acres:	640	Other Acres:	640
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	125	Deer:	3
Suspended Nonuse:	0	Elk:	12
Total Preference:	125	Antelope:	1
Average Actual Use:	125	Horses:	
		Total:	16

Identified Resource Conflicts/Concerns

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

Management Objectives

Allocate forage to meet elk forage demands.

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

Allotment Name: Slocum	Allot. No.: 5204	Mgmt. Category: M
Public Acres: 1,912	Other Acres:	3,593

Grazing Administration Info. (AUMs)	Other Forage Demands (AUMs)
Active Preference: 300	Deer: 3
Suspended Nonuse: 0	Elk: 12
Total Preference: 300	Antelope: 1
Exchange of Use: 560	Horses:
Average Actual Use: 487	Total: 16

Identified Resource Conflicts/Concerns

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

Management Objectives

Allocate forage to meet elk forage demands.

CONSTRAINTS

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

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

Allotment Name: Venator	Allot. No.: 5205	Mgmt. Category: M
Public Acres: 2,589	Other Acres:	4,942

Grazing Administration Info. (AUMs)	ther Forage Demands (AUMs)
Active Preference: 320	Deer: 3
Suspended Nonuse: 0	Elk:
Total Preference: 320	Antelope: 1
Exchange of Use: 480	Horses:
Average Actual Use: 655	Total: 4

Table 9. Allotment Management Summaries (continued)

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

CONSTRAINTS

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

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

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

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

Table 9. Allotment Management Summaries (continued)

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

CONSTRAINTS

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

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

Allotment Name: Coyote Creek		Allot. No.: 5207	Mgmt. Category: M
Public Acres:	1,077	Other Acres:	100

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	110	Deer:	5
Suspended Nonuse:	14	Elk:	
Total Preference:	124	Antelope:	1
Average Actual Use:	144	Horses:	
		Total:	6

Identified Resource Conflicts/Concerns	Management Objectives
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CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Emmerson		Allot. No.: 5208	Mgmt. Category: M
Public Acres:	1,850	Other Acres:	1,667
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	258	Deer:	17
Suspended Nonuse:	0	Elk:	
Total Preference:	258	Antelope:	
Exchange of Use:	147	Horses:	
Average Actual Use:	346	Total:	17
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

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

Allotment Name: Crane		Allot. No.: 5209	Mgmt. Category: M
Public Acres:	1,935	Other Acres:	2,786
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	236	Deer:	5
Suspended Nonuse:	0	Elk:	
Total Preference:	236	Antelope:	3
Exchange of Use:	113	Horses:	
Average Actual Use:	376	Total:	8
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Beckley Home		Allot. No.: 5211	Mgmt. Category: C
Public Acres:	1,814	Other Acres:	1,811
Grazing Administration Info. (AUMs) Other Forage Demands (AUMs)			
Active Preference:	113	Deer:	3
Suspended Nonuse:	0	Elk:	
Total Preference:	113	Antelope:	2
Average Actual Use:	113	Horses:	
		Total:	5

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

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

Allotment Name: Mahon Ranch		Allot. No.: 5212	Mgmt. Category: M
Public Acres:	4,577	Other Acres:	5,244
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	329	Deer:	3
Suspended Nonuse:	0	Elk:	
Total Preference:	329	Antelope:	3
Average Actual Use:	313	Horses:	
		Total :	6

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Beaver Creek		Allot. No.: 5213	Mgmt. Category: M
Public Acres:	8,812	Other Acres:	6,789
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,018	Deer:	9
Suspended Nonuse :	206	Elk:	
Total Preference:	1,224	Antelope:	3
Exchange of Use:	970	Horses:	
Average Actual Use:	1,474	Total:	12

Identified Resource Conflicts/Concerns

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

Management Objectives

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

CONSTRAINTS

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

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

Allotment Name: Hamilton		Allot. No.: 5214	Mgmt. Category: I
Public Acres:	2,437	Other Acres:	1,320
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	245	Deer:	2
Suspended Nonuse :	0	Elk:	
Total Preference:	245	Antelope:	3
Exchange of Use:	245	Horses:	
Average Actual Use:	722	Total:	5

Table 9. Allotment Management Summaries (continued)

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

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

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

Allotment Name: Davies		Allot. No.: 5215	Mgmt. Category: I
Public Acres:	3,442	Other Acres:	3,500

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	253	Deer:	2
Suspended Nonuse:	0	Elk:	
Total Preference:	253	Antelope:	3
Exchange of Use:	234	Horses:	
Average Actual Use:	451	Total:	5

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Quier FFR		Allot. No.: 5216	Mgmt. Category: C
Public Acres:	150	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	5	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Unallotted grazing area.		Issue temporary nonrenewable license unless allotted.	

CONSTRAINTS

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

Allotment Name: Thompson FFR		Allot. No.: 5217	Mgmt. Category: C
Public Acres:	471	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	77	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	77	Antelope:	
Average Actual Use:	54	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

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

CONSTRAINTS

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

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

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

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Princeton		Allot. No. : 5301	Mgmt. Category: M
Public Acres:	17,528	Other Acres:	4,260
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,532	Deer:	6
Suspended Nonuse:	0	Elk:	
Total Preference:	2,532	Antelope:	5
Exchange of Use:	124	Horses:	
Average Actual Use:	5,515	Total:	11

Identified Resource Conflicts/Concerns

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

Management Objectives

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

CONSTRAINTS

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

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

Allotment Name: Big Bird		Allot. No. : 5302	Mgmt. Category: M
Public Acres:	2,567	Other Acres:	418
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	418	Deer:	3
Suspended Nonuse:	0	Elk:	
Total Preference:	418	Antelope:	4
Average Actual Use:	947	Horses:	
		Total:	7

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns

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

Management Objectives

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

CONSTRAINTS

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

Allotment Name: Dry Lake

Allot. No.: 5303

Mgmt. Category: M

Public Acres: 37,949

Other Acres: 5,848

Grazing Administration Info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 5,228

Deer: 37

Suspended Nonuse: 0

Elk:

Total Preference: 5,228

Antelope: 5

Average Actual Use: 11,421

Horses:

Total: 42

Identified Resource Conflicts/Concerns

Wetlands habitat in less than satisfactory condition.

Management Objectives

Improve wetlands habitat condition to satisfactory or better.

Playa habitat occurs in the allotment.

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

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Crow's Nest		Allot. No.: 5305	Mgmt. Category: M
Public Acres:	2,921	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	2
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	4
Average Actual Use:	1,307	Horses:	
		Total:	6
Identified Resource Conflicts/Concerns		Management Objectives	
At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew		Protect special status species or its habitat from impact by BLM-authorized actions.	

CONSTRAINTS

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

Allotment Name: Rocky Ford		Allot. No.: 5306	Mgmt. Category: M
Public Acres:	4,457	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	900	Deer:	1
Suspended Nonuse:	0	Elk:	
Total Preference:	900	Antelope:	4
Average Actual Use:	1,607	Horses:	
		Total :	5
Identified Resource Conflicts/Concerns		Management Objectives	
At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, Ferruginous hawk		Protect special status species or its habitat from impact by BLM-authorized actions.	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Smyth Creek		Allot. No.: 5307	Mgmt. Category: I
Public Acres:	20,417	Other Acres:	3,622
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,919	Deer:	61
Suspended Nonuse :	0	Elk:	104
Total Preference:	1,919	Antelope:	5
Average Actual Use:	1,988	Horses:	492
		Total:	794
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
Limiting big game habitat in unsatisfactory habitat condition.		Improve and maintain big game habitat in satisfactory habitat condition.	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
Playa habitat occurs in the allotment.		Incorporate playa management objectives into allotment management as such objectives are developed.	
The Kiger Mustang Area of Critical Environmental concern occurs within allotment.		Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.	
The allotment contains all or a portion of the Kiger Wild Horse Herd Management Area.		Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin		Protect special status species or its habitat from impact by BLM-authorized actions.	

Table 9. Allotment Management Summaries (continued)

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

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

CONSTRAINTS

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

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

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

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

Identified Resource Conflicts/Concerns

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

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

Table 9. Allotment Management Summaries (continued)

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

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

CONSTRAINTS

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

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

Allotment Name: Happy Valley		Allot. No.: 5309	Mgmt. Category: M
Public Acres:	17,356	Other Acres:	560
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,107	Deer:	25
Suspended Nonuse:	291	Elk:	88
Total Preference:	2,398	Antelope:	4
Exchange of Use:	52	Horses:	132
Average Actual Use:	2,146	Total:	117
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, Ferruginous hawk, redband trout, Malheur mottled sculpin		Protect special status species or its habitat from impact by BLM-authorized actions.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	

Table 9. Allotment Management Summaries (continued)

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

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

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

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

CONSTRAINTS

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

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

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

Allotment Name: Riddle Mountain Allot. No.: 5310

Mgmt. Category: I

Public Acres:

20,228

Other Acres:

4,053

Grazing Administration Info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 3,095

Deer: 177

Suspended Nonuse: 291

Elk: 188

Total Preference: 3,386

Antelope: 6

Exchange of Use: 248

Horses:

Average Actual Use: 3,026

Total: 371

Identified Resource Conflicts/Concerns

Management Objectives

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

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

Limiting big game habitat in unsatisfactory habitat condition.

Improve and maintain big game habitat in satisfactory habitat condition.

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

Allocate forage to meet elk forage demands.

Playa habitat occurs in the allotment.

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

Table 9. Allotment Management Summaries (continued)

<p>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin</p>	<p>Protect special status species or its habitat from impact by BLM-authorized actions.</p>
<p>Riparian or aquatic habitat is in less than good habitat condition.</p>	<p>Improve and maintain riparian or aquatic habitat in good or better habitat condition.</p>
<p>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</p>	<p>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</p>

CONSTRAINTS

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

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

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

Allotment Name: Virginia Valley FFRA Allot. No. : 5311

Mgmt. Category: C

Public Acres: 160

Other Acres:

Grazing Administration Info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 0

Deer:

Suspended Nonuse: 0

Elk:

Total Preference: 0

Antelope:

Average Actual Use: 0

Horses:

Total:

Identified Resource Conflicts/Concerns

Management Objectives

Unallotted grazing area.

Issue temporary nonrenewable license unless allotted

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Burnt Flat		Allot. No. : 5313	Mgmt. Category: I
Public Acres:	30,388	Other Acres:	4,580
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	3,863	Deer:	83
Suspended Nonuse:	0	Elk:	64
Total Preference:	3,863	Antelope:	15
Exchange of Use:	571	Horses:	672
Average Actual Use:	3,676	Total:	834

Identified Resource Conflicts/Concerns

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

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

Playa habitat occurs in the allotment.

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Baker FFR		Allot. No.: 5314	Mgmt. Category: C
Public Acres:	360	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	0
Suspended Nonuse:	0	Elk:	0
Total Preference:	0	Antelope:	0
Average Actual Use:	24	Horses:	0
		Total:	0
Identified Resource Conflicts/Concerns		Management Objectives	
Unallotted grazing area.		Issue temporary nonrenewable license unless allotted.	

CONSTRAINTS

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

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

Allotment Name: Virginia Valley		Allot. No.: 5316	Mgmt. Category: M
Public Acres:	16,263	Other Acres:	1,993
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	3,640	Deer:	20
Suspended Nonuse:	0	Elk:	
Total Preference:	3,640	Antelope:	8
Exchange of Use:	155	Horses:	
Average Actual Use:	4,747	Total:	28
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Hatt Butte		Allot. No.: 5317	Mgmt. Category: C
Public Acres:	1,560	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	103	Deer:	8
Suspended Nonuse:	0	Elk:	
Total Preference:	103	Antelope:	
Average Actual Use:	103	Horses:	
		Total:	8

Identified Resource Conflicts/Concerns

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

Management Objectives

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

CONSTRAINTS

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

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

Allotment Name: Black Butte		Allot. No.: 5318	Mgmt. Category: C
Public Acres:	760	Other Acres:	120
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	95	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	95	Antelope:	
Exchange of Use:	10	Horses:	
Average Actual Use:	85	Total:	

Identified Resource Conflicts/Concerns

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Driveway		Allot. No.: 5319	Mgmt. Category: C	
Public Acres:	1,680	Other Acres:		
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)		
Active Preference:	0	Deer:	0	
Suspended Nonuse:	0	Elk:	0	
Total Preference:	0	Antelope:	0	
Average Actual Use:	0	Horses:	0	
		Total:	0	
Identified Resource Conflicts/Concerns		Management Objectives		
		Trailing use only.		

CONSTRAINTS

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

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

Allotment Name: Kegler FFR		Allot. No.: 5320	Mgmt. Category: C	
Public Acres:	160	Other Acres:	600	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)		
Active Preference:	16	Deer:	0	
Suspended Nonuse:	0	Elk:	0	
Total Preference:	16	Antelope:	0	
Average Actual Use:	16	Horses:	0	
		Total :	0	
Identified Resource Conflicts/Concerns		Management Objectives		

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Hamilton Ind. Allot. No.: 5321		Mgmt. Category: I
Public Acres:	1,122	Other Acres:
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)
Active Preference:	150	Deer:
Suspended Nonuse:	0	Elk:
Total Preference:	150	Antelope:
Average Actual Use:	150	Horses:
		Total:
Identified Resource Conflicts/Concerns		Management Objectives
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin		Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Driveway		Allot. No.: 5319	Mgmt. Category: C
Public Acres:	1,680	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	0
Suspended Nonuse:	0	Elk:	0
Total Preference:	0	Antelope:	0
Average Actual Use:	0	Horses:	0
		Total:	0
Identified Resource Conflicts/Concerns		Management Objectives	
		Trailing use only.	

CONSTRAINTS

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

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

Allotment Name: Kegler FFR		Allot. No.: 5320	Mgmt. Category: C
Public Acres:	160	Other Acres:	600
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	16	Deer:	0
Suspended Nonuse:	0	Elk:	0
Total Preference:	16	Antelope:	0
Average Actual Use:	16	Horses:	0
		Total:	0
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Riddle FFR	Allot. No.: 5324	Mgmt. Category: C
Public Acres: 160	Other Acres:	

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

Identified Resource Conflicts/Concerns	Management Objectives
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CONSTRAINTS

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

Allotment Name: Marshall Diamond FFR	Allot. No.: 5325	Mgmt. Category: C
Public Acres: 320	Other Acres:	

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

Identified Resource Conflicts/Concerns	Management Objectives
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CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Jenkins N.Lake FFRA		Allot. No.: 5326		Mgmt. Category: C	
Public Acres:	80	Other Acres:			
Grazing Administration Info. (AUMs)			Other Forage Demands (AUMs)		
Active Preference:	30	Deer:			
Suspended Nonuse:	0	Elk:			
Total Preference:	30	Antelope:			
Average Actual Use:	30	Horses:			
		Total :			
Identified Resource Conflicts/Concerns			Management Objectives		

CONSTRAINTS

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

Allotment Name: Jenkins B.Flat FFRA		Allot. No.: 5327		Mgmt. Category: C	
Public Acres:	1,480	Other Acres:			
Grazing Administration Info. (AUMs)			Other Forage Demands (AUMs)		
Active Preference:	283	Deer:			
Suspended Nonuse:	0	Elk:			
Total Preference:	283	Antelope:			
Average Actual Use:	283	Horses:			
		Total:			
Identified Resource Conflicts/Concerns			Management Objectives		

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Fisher FFR		Allot. No.: 5328	Mgmt. Category: C
Public Acres:	320	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	46	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	46	Antelope:	
Average Actual Use:	46	Horses:	
		Total:	

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Allotment Name: Riddle-Coyote		Allot. No.: 5329	Mgmt. Category: I
Public Acres:	446	Other Acres:	1,998
Grazing Administration Info. (AUMs) ¹		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	

¹Newly acquired allotment. Insufficient data to determine forage availability

Identified Resource Conflicts/Concerns

Management Objectives

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

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

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

Allocate forage to meet elk forage demands.

Table 9. Allotment Management Summaries (continued)

Riparian or aquatic habitat is in less than good habitat condition.	Improve and maintain riparian or aquatic habitat in good or better habitat condition.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin	Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

Allotment Name: Deep Creek		Allot. No.: 5330	Mgmt. Category: I
Public Acres:	648	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	128	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	128	Antelope:	
Average Actual Use:	128	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM-authorized actions are having a negative effect on water quality.	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

Table 9. Allotment Management Summaries (continued)

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

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

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

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

CONSTRAINTS

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

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

Allotment Name: East Cow Creek Allot. No.: 5501		Mgmt. Category: M	
Public Acres:	5,641	Other Acres:	2,603
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	809	Deer:	10
Suspended Nonuse:	32	Elk:	12
Total Preference:	841	Antelope:	2
Exchange of Use:	294	Horses:	
Average Actual Use:	856	Total:	24
Identified Resource Conflicts/Concerns		Management Objectives	
Active erosion occurs in the allotment.		Improve and maintain erosion condition in moderate or better erosion condition.	
Limiting big game habitat in unsatisfactory habitat condition.		Improve and maintain big game habitat in satisfactory habitat condition.	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse		Protect special status species or its habitat from impact by BLM-authorized actions.	

Table 9. Allotment Management Summaries (continued)

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

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

CONSTRAINTS

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

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

Allotment Name: Rock Creek		Allot. No.: 5502	Mgmt. Category: M
Public Acres:	4,849	Other Acres:	2,322

Grazing Administration Info. (AUMs)

Active Preference:	568
Suspended Nonuse:	184
Total Preference:	702
Average Actual Use:	501

Other Forage Demands (AUMs)

Deer:	8
Elk:	
Antelope:	1
Horses:	
Total:	9

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

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

Management Objectives

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Pine Creek		Allot. No.: 5503	Mgmt. Category: I
Public Acres:	21,930	Other Acres:	13,406
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,410	Deer:	84
Suspended Nonuse:	971	Elk:	68
Total Preference:	3,381	Antelope:	7
Average Actual Use:	1,421	Horses:	
		Total:	159

Identified Resource Conflicts/Concerns

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

Active erosion occurs in the allotment.

Limiting big game habitat in unsatisfactory habitat condition.

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

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

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

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

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

Management Objectives

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

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

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

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

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

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

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

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: State Field		Allot. No.: 5504	Mgmt. Category: C
Public Acres:	568	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	98	Deer:	1
Suspended Nonuse:	0	Elk:	
Total Preference:	98	Antelope:	
Average Actual Use:	98	Horses:	
		Total:	1
Identified Resource Conflicts/Concerns		Management Objectives	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse		Protect special status species or its habitat from impact by BLM-authorized actions.	
The Biscuitroot Cultural Area of Critical Environmental Concern occurs within allotment.		Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			
Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.			
Allotment Name: Little Muddy Creek		Allot. No.: 5505	Mgmt. Category: M
Public Acres:	7,261	Other Acres:	4,492
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	962	Deer:	88
Suspended Nonuse:	262	Elk:	40
Total Preference:	1,224	Antelope:	
Exchange of Use:	143	Horses:	
Average Actual Use:	536	Total:	128

Table 9. Allotment Management Summaries (continued)

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

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

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

Allotment Name: Muddy Creek		Allot. No.: 5506	Mgmt. Category: M
Public Acres:	4,298	Other Acres:	1,121

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	504	Deer:	38
Suspended Nonuse:	0	Elk:	20
Total Preference:	504	Antelope:	
Exchange of Use:	52	Horses:	
Average Actual Use:	530	Total:	58

<p>Identified Resource Conflicts/Concerns</p> <p>Water quality does not currently meet DEQ water quality standards for beneficial uses.</p>	<p>Management Objectives</p> <p>Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.</p>
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Table 9. Allotment Management Summaries (continued)

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

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

Allotment Name: Wolf Creek

Allot. No.: 5507

Mgmt. Category: M

Public Acres: 830

Other Acres: 600

Grazing Administration Info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 136

Deer: 20

Suspended Nonuse: 0

Elk: 12

Total Preference: 136

Antelope: 3

Average Actual Use: 293

Horses:

Total: 35

Identified Resource Conflicts/Concerns

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Baker-Knowles		Allot. No.: 5508	Mgmt. Category: M
Public Acres:	845	Other Acres:	11
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	58	Deer:	7
Suspended Nonuse:	82	Elk:	8
Total Preference:	140	Antelope:	
Exchange of Use:	3	Horses:	
Average Actual Use:	53	Total:	15
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse		Protect special status species or its habitat from impact by BLM-authorized actions.	

CONSTRAINTS

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

Allotment Name: Williams Dripp Spring		Allot. No.: 5509	Mgmt. Category: M
Public Acres:	1,345	Other Acres:	8
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	176	Deer:	7
Suspended Nonuse:	67	Elk:	8
Total Preference:	243	Antelope:	
Exchange of Use:	64	Horses:	
Average Actual Use:	272	Total:	15
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

Table 9. Allotment Management Summaries (continued)

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

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

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

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

CONSTRAINTS

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

Allotment Name: Jones Dripp Spring

Allot. No.: 5510

Mgmt. Category: M

Public Acres: 757

Other Acres: 245

Grazing Administration Info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 120

Deer: 7

Suspended Nonuse: 0

Elk: 8

Total Preference: 120

Antelope:

Exchange of Use: 33

Horses:

Average Actual Use: 121

Total: 15

Identified Resource Conflicts/Concerns

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Moffet Table		Allot. No.: 5511	Mgmt. Category: I
Public Acres:	16,412	Other Acres:	2,817
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,885	Deer:	202
Suspended Nonuse:	1,273	Elk:	172
Total Preference:	3,158	Antelope:	3
Exchange of Use:	23	Horses:	
Average Actual Use:	1,238	Total :	377

Identified Resource Conflicts/Concerns	Management Objectives
Water quality does not currently meet DEQ water quality standards for beneficial uses.	Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
River segment nominated for inclusion in the Wild and Scenic River system.	Adjust livestock grazing management within river corridor to conform with study report and/or river management plan upon Congressional approval of river segment for inclusion in Wild and Scenic River system.
Limiting big game habitat in unsatisfactory habitat condition.	Improve and maintain big game habitat in satisfactory habitat condition.
No forage allocations for elk use in the allotment have been made.	Allocate forage to meet elk forage demands.
Riparian or aquatic habitat is in less than good habitat condition.	Improve and maintain riparian or aquatic habitat in good or better habitat condition.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout	Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

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

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

Allotment Name: Clark's River		Allot. No.: 5512	Mgmt. Category: C
Public Acres:	318	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	40	Deer:	18
Suspended Nonuse:	0	Elk:	
Total Preference:	40	Antelope:	1
Exchange of Use:	40	Horses:	
Average Actual Use:	40	Total :	19
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Shelley		Allot. No.: 5513	Mgmt. Category: M
Public Acres:	5,199	Other Acres:	620
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	600	Deer:	15
Suspended Nonuse:	0	Elk:	4
Total Preference:	600	Antelope:	1
Average Actual Use:	555	Horses:	
		Total:	20

Table 9. Allotment Management Summaries (continued)

<p>Identified Resource Conflicts/Concerns</p> <p>No forage allocations for elk use in the allotment have been made.</p> <p>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse</p>	<p>Management Objectives</p> <p>Allocate forage to meet elk forage demands.</p> <p>Protect special status species or its habitat from impact by BLM-authorized actions.</p>
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CONSTRAINTS

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

Allotment Name: Coal Mine Creek		Allot. No.: 5514	Mgmt. Category: I
Public Acres:	5,217	Other Acres:	54
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	452	Deer:	19
Suspended Nonuse:	54	Elk:	
Total Preference:	506	Antelope:	1
Average Actual Use:	198	Horses:	
		Total:	20

<p>Identified Resource Conflicts/Concerns</p> <p>Active erosion occurs in the allotment.</p> <p>At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse</p> <p>Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.</p>	<p>Management Objectives</p> <p>Improve and maintain erosion condition in moderate or better erosion condition.</p> <p>Protect special status species or its habitat from impact by BLM-authorized actions.</p> <p>Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)</p>
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CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Mule Creek		Allot. No.: 5515	Mgmt. Category: I
Public Acres:	5,604	Other Acres:	1,591
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	411	Deer:	42
Suspended Nonuse:	527	Elk:	28
Total Preference:	938	Antelope:	2
Average Actual Use:	333	Horses:	
		Total:	72

Identified Resource Conflicts/Concerns

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

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

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

Identified Resource Conflicts/Concerns

Limiting big game habitat in unsatisfactory habitat condition.

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

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

Management Objectives

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Conflicts/Concerns

Limiting big game habitat in unsatisfactory habitat condition.

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

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

Objectives

improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

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

CONSTRAINTS

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

Allotment Name: Newell Field

Allot. No.: 5518

Mgmt. Category: C

Public Acres: 990

Other Acres: 800

Grazing Administration info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 155

Deer: 3

Suspended Nonuse: 0

Elk:

Total Preference: 155

Antelope:

Average Actual Use: 155

Horses:

Total: 3

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Big Upson		Allot. No.: 5519	Mgmt. Category: C
Public Acres:	220	Other Acres:	
Grazing Administration info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	42	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	42	Antelope:	
Average Actual Use:	42	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Little Upson		Allot. No.: 5520	Mgmt. Category: C
Public Acres:	100	Other Acres:	520
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	24	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	24	Antelope:	
Average Actual Use:	24	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Rocky Basin		Allot. No.: 5521	Mgmt. Category: M
Public Acres:	3,775	Other Acres:	
Grazing Administration info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	467	Deer:	8
Suspended Nonuse:	0	Elk:	12
Total Preference:	467	Antelope:	
Average Actual Use:	416	Horses:	
		Total:	20

Identified Resource Conflicts/Concerns

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

CONSTRAINTS

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

Allotment Name: Cottonwood Creek		Allot. No.: 5522	Mgmt. Category: M
Public Acres:	8,397	Other Acres:	1,285
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	996	Deer:	42
Suspended Nonuse:	186	Elk:	36
Total Preference:	1,182	Antelope:	
Exchange of Use:	143	Horses:	
Average Actual Use:	227	Total:	78

Table 9. Allotment Management Summaries (continued)

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

CONSTRAINTS

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

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

Allotment Name: Tub Spring/Hart	Allot. No.: 5523	Mgmt. Category: M
Public Acres: 5,478	Other Acres:	215

Grazing Administration Info. (AUMs)	Other Forage Demands (AUMs)
Active Preference: 1,002	Deer:
Suspended Nonuse: 53	Elk:
Total Preference: 1,055	Antelope:
Average Actual Use: 919	Horses:
	Total:

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

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

Allotment Name: Dawson Butte		Allot. No.: 5524	Mgmt. Category: I
Public Acres:	3,837	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	614	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	614	Antelope:	6
Average Actual Use:	555	Horses:	
		Total:	6

Identified Resource Conflicts/Concerns

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

Active erosion occurs in the allotment.

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

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

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

Management Objectives

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

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

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

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Mill Gulch		Allot. No.: 5525	Mgmt. Category: M
Public Acres:	2,281	Other Acres:	640

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	525	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	525	Antelope:	
Exchange of Use:	67	Horses:	
Average Actual Use:	563	Total:	

Identified Resource Conflicts/Concerns

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

Active erosion occurs in the allotment.

Substantial surface acreage within allotment affected by mineral development activities.

Management Objectives

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

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

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

CONSTRAINTS

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

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

Allotment Name: Chalk Hills		Allot. No.: 5526	Mgmt. Category: M
Public Acres:	9,262	Other Acres:	1,130

Grazing Administration info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	936	Deer:	54
Suspended Nonuse:	762	Elk:	
Total Preference:	1,698	Antelope:	
Exchange of Use:	87	Horses:	
Average Actual Use:	850	Total:	54

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

Substantial surface acreage within allotment affected by mineral development activities.

Management Objectives

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

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

CONSTRAINTS

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

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

Allotment Name: Riverside FFR

Allot. No.: 5527

Mgmt. Category: C

Public Acres: 255

Other Acres:

Grazing Administration info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 35

Deer: 6

Suspended Nonuse: 0

Elk:

Total Preference: 35

Antelope:

Average Actual Use: 35

Horses:

Total: 6

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Cooler		Allot. No.: 5528	Mgmt. Category: M
Public Acres:	5,020	Other Acres:	250
Grazing Administration info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	530	Deer:	11
Suspended Nonuse:	0	Elk:	
Total Preference:	530	Antelope:	1
Average Actual Use:	531	Horses:	
		Total:	12

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

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

Management Objectives

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

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

CONSTRAINTS

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

Allotment Name: House Butte		Allot. No.: 5529	Mgmt. Category: M
Public Acres:	22,857	Other Acres:	2,645
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,085	Deer:	107
Suspended Nonuse:	912	Elk:	
Total Preference:	2,997	Antelope:	6
Exchange of Use:	93	Horses:	
Average Actual Use:	2,219	Total:	113

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns	Management Objectives
The Biscuitroot Cultural Area of Critical Environmental Concern occurs within allotment.	Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse	Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

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

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

Identified Resource Conflicts/Concerns	Management Objectives
Water quality does not currently meet DEQ water quality standards for beneficial uses.	improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
Active erosion occurs in the allotment.	improve and maintain erosion condition in moderate or better erosion condition.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, bighorn sheep, redband trout, <i>Trifolium leibergii</i> , <i>Lupinus biddlei</i>	Protect special status species or its habitat from impact by BLM-authorized actions.
Riparian or aquatic habitat is in less than good habitat condition.	Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

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

Allotment Name: Stinkingwater		Allot. No.: 5531	Mgmt. Category: I
Public Acres:	23,461	Other Acres:	1,413
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,857	Deer:	23
Suspended Nonuse:	1,659	Elk:	28
Total Preference:	4,516	Antelope:	15
Exchange of Use:	37	Horses:	240
Average Actual Use:	3,137	Total:	306

Identified Resource Conflicts/Concerns

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

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

Limiting big game habitat in unsatisfactory habitat condition.

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

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

Management Objectives

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

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

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

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

Table 9. Allotment Management Summaries (continued)

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

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

Allotment Name: Stinkingwater (Con't)

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

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

CONSTRAINTS

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

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

Allotment Name: Mountain		Allot. No.: 5532	Mgmt. Category: I
Public Acres:	37,811	Other Acres:	5,585
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	3,374	Deer:	166
Suspended Nonuse:	1,567	Elk:	352
Total Preference:	4,941	Antelope:	10
Exchange of Use:	298	Horses:	620
Average Actual Use:	3,059	Total:	1,148

Identified Resource Conflicts/Concerns

Management Objectives

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

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

Limiting big game habitat in unsatisfactory habitat condition.

Improve and maintain big game habitat in satisfactory habitat condition.

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

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

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

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

Table 9. Allotment Management Summaries (continued)

No forage allocations for elk use in the allotment have been made.	Allocate forage to meet elk forage demands.
Riparian or aquatic habitat is in less than good habitat condition.	Improve and maintain riparian or aquatic habitat in good or better habitat condition.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout	Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

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

Allotment Name: Buchanan		Allot. No.: 5533	Mgmt. Category: M
Public Acres:	2,328	Other Acres:	2,698

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	152	Deer:	2
Suspended Nonuse:	131	Elk:	
Total Preference:	283	Antelope:	2
Exchange of Use:	160	Horses:	
Average Actual Use:	368	Total :	4

Identified Resource Conflicts/Concerns

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

Management Objectives

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

Table 9. Allotment Management Summaries (continued)

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

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

CONSTRAINTS

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

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

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

Identified Resource Conflicts/Concerns

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Miller Canyon		Allot. No.: 5535	Mgmt. Category: I
Public Acres:	6,198	Other Acres:	850
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	450	Deer:	51
Suspended Nonuse:	153	Elk:	12
Total Preference:	603	Antelope:	
Average Actual Use:	330	Horses:	
		Total:	63

Identified Resource Conflicts/Concerns

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

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Alder Creek		Allot. No.: 5536	Mgmt. Category: I
Public Acres:	29,809	Other Acres:	2,201
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,584	Deer:	225
Suspended Nonuse:	0	Elk:	196
Total Preference:	2,584	Antelope:	13
Exchange of Use:	337	Horses:	
Average Actual Use:	3,015	Total:	434

Identified Resource Conflicts/Concerns

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

Limiting big game habitat in unsatisfactory habitat condition.

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

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

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

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

Management Objectives

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

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

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

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

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

CONSTRAINTS

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

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Buck Mountain		Allot. No.: 5537	Mgmt. Category: M
Public Acres:	14,849	Other Acres:	1,992
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,515	Deer:	25
Suspended Nonuse:	421	Elk:	164
Total Preference:	1,936	Antelope:	20
Exchange of Use:	175	Horses:	
Average Actual Use:	1,852	Total:	209

Identified Resource Conflicts/Concerns

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

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Riverside		Allot. No. : 5538	Mgmt. Category: M
Public Acres:	15,588	Other Acres:	4,884
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,949	Deer:	27
Suspended Nonuse:	807	Elk:	
Total Preference:	2,756	Antelope:	11
Exchange of Use:	728	Horses:	
Average Actual Use:	2,514	Total:	38

Identified Resource Conflicts/Concerns

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

Intensive recreation use occurs within the allotment.

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

Management Objectives

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

Incorporate recreation management objectives into overall allotment management system.

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: W&C Blaylock FFR		Allot. No.: 5539	Mgmt. Category: C
Public Acres:	410	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	30	Deer:	26
Suspended Nonuse:	0	Elk:	
Total Preference:	30	Antelope:	
Average Actual Use:	30	Horses:	
		Total:	26

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

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

Allotment Name: Luce Field		Allot. No.: 5540	Mgmt. Category: C
Public Acres:	225	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	13	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	13	Antelope:	
Average Actual Use:	13	Horses:	
		Total:	

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Home Ranch Exclosure		Allot. No.: 5541	Mgmt. Category: C	
Public Acres:	1,233	Other Acres:		
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)		
Active Preference:	100	Deer:		
Suspended Nonuse:	0	Elk:		
Total Preference:	100	Antelope:		3
Average Actual Use:	100	Horses:		
		Total:		3
Identified Resource Conflicts/Concerns		Management Objectives		

CONSTRAINTS

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

Allotment Name: Marshall FFR		Allot. No.: 5542	Mgmt. Category: C	
Public Acres:	302	Other Acres:		
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)		
Active Preference:	13	Deer:		
Suspended Nonuse:	0	Elk:		
Total Preference:	13	Antelope:		
Average Actual Use:	13	Horses:		
		Total:		
Identified Resource Conflicts/Concerns		Management Objectives		

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Devine Flat Field	Allot. No.: 5543	Mgmt. Category: C
Public Acres: 788	Other Acres:	

Grazing Administration Info. (AUMs)	Other Forage Demands (AUMs)
Active Preference: 118	Deer:
Suspended Nonuse: 0	Elk:
Total Preference: 118	Antelope:
Average Actual Use: 118	Horses:
	Total:

Identified Resource Conflicts/Concerns	Management Objectives
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CONSTRAINTS

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

Allotment Name: Brooks Field	Allot. No.: 5544	Mgmt. Category: C
Public Acres: 520	Other Acres:	

Grazing Administration Info. (AUMs)	Other Forage Demands (AUMs)
Active Preference: 50	Deer: 42
Suspended Nonuse: 0	Elk:
Total Preference: 50	Antelope: 1
Average Actual Use: 50	Horses:
	Total: 43

Identified Resource Conflicts/Concerns	Management Objectives
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CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Sunshine Field		Allot. No.: 5545	Mgmt. Category: C
Public Acres:	463	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	52	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	52	Antelope:	
Average Actual Use:	52	Horses:	
		Total:	

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

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

Allotment Name: Druitt Field and FFRA		Allot. No.: 5546	Mgmt. Category: C
Public Acres:	746	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	30	Deer:	15
Suspended Nonuse:	0	Elk:	
Total Preference:	30	Antelope:	1
Average Actual Use:	30	Horses:	
		Total:	16

Identified Resource Conflicts/Concerns

Management Objectives

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

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

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Lake Field		Allot. No.: 5547	Mgmt. Category: C
Public Acres:	30	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	3	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	3	Antelope:	
Average Actual Use:	3	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Substantial surface acreage within allotment affected by mineral development activities.		Adjust allotment capacities and management system, as needed, to address minerals development impacts.	

CONSTRAINTS

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

Allotment Name: Griffin FFR		Allot. No.: 5548	Mgmt. Category: C
Public Acres:	450	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	56	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	56	Antelope:	
Average Actual Use:	56	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Howards FFR	Allot. No.: 5549	Mgmt. Category: C
Public Acres: 392	Other Acres:	

Grazing Administration Info. (AUMs)	Other Forage Demands (AUMs)
Active Preference: 30	Deer:
Suspended Nonuse: 0	Elk:
Total Preference: 30	Antelope:
Average Actual Use: 30	Horses:
	Total:

Identified Resource Conflicts/Concerns	Management Objectives
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CONSTRAINTS

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

Allotment Name: Jordan's FFR	Allot. No.: 5550	Mgmt. Category: C
Public Acres: 60	Other Acres:	

Grazing Administration Info. (AUMs)	Other Forage Demands (AUMs)
Active Preference: 6	Deer:
Suspended Nonuse: 0	Elk:
Total Preference: 6	Antelope:
Average Actual Use: 6	Horses:
	Total:

Identified Resource Conflicts/Concerns	Management Objectives
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CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Lillard's FFR **Allot. No.: 5551** **Mgmt. Category: C**

Public Acres: 40 **Other Acres:**

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	7	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	7	Antelope:	
Average Actual Use:	17	Horses:	
		Total:	

Identified Resource Conflicts/Concerns **Management Objectives**

CONSTRAINTS

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

Allotment Name: Miller FFR A **Allot. No.: 5552** **Mgmt. Category: C**

Public Acres: 320 **Other Acres:**

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	20	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	20	Antelope:	
Average Actual Use:	20	Horses:	
		Total:	

Identified Resource Conflicts/Concerns **Management Objectives**

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Miller FFR B		Allot. No.: 5553	Mgmt. Category: C
Public Acres:	40	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	5	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	5	Antelope:	
Average Actual Use:	5	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: J.Fran Miller FFR		Allot. No.: 5554	Mgmt. Category: C
Public Acres:	049	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	25	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	25	Antelope:	
Average Actual Use:	25	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Ott FFR		Allot. No.: 5555	Mgmt. Category: C
Public Acres:	64	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	5	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	5	Antelope:	
Average Actual Use:	5	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Pine Creek FFR		Allot. No.: 5556	Mgmt. Category: C
Public Acres:	1,298	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	180	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	180	Antelope:	
Average Actual Use:	180	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: J&G Kane FFR		Allot. No.: 5557	Mgmt. Category: C
Public Acres:	110	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	5	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	5	Antelope:	
Average Actual Use:	5	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: J&G FFR		Allot. No.: 5558	Mgmt. Category: C
Public Acres:	130	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	33	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	33	Antelope:	
Average Actual Use:	33	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Sword's FFR		Allot. No.: 5559	Mgmt. Category: C
Public Acres:	172	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	32	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	32	Antelope:	
Average Actual Use:	32	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Vicker's FFR		Allot. No.: 5560	Mgmt. Category: C
Public Acres:	1,740	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	191	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	191	Antelope:	
Average Actual Use:	191	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Wilber FFR		Allot. No.: 5561	Mgmt. Category: C
Public Acres:	1,335	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	125	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	125	Antelope:	
Average Actual Use:	125	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Williams' FFR		Allot. No.: 5562	Mgmt. Category: C
Public Acres:	200	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	24	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	24	Antelope:	
Average Actual Use:	24	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Arnold's FFR		Allot. No.: 5563	Mgmt. Category: C
Public Acres:	230	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	23	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	23	Antelope:	
Average Actual Use:	23	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: Wheeler Basin		Allot. No.: 5564	Mgmt. Category: M
Public Acres:	4,981	Other Acres:	230
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	618	Deer:	14
Suspended Nonuse:	342	Elk:	
Total Preference:	960	Antelope:	
Average Actual Use:	737	Horses:	
		Total:	14
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Wilber FFR		Allot. No.: 5561	Mgmt. Category: C
Public Acres:	1,335	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	125	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	125	Antelope:	
Average Actual Use:	125	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			

Allotment Name: Williams' FFR		Allot. No.: 5562	Mgmt. Category: C
Public Acres:	200	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	24	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	24	Antelope:	
Average Actual Use:	24	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			

Table 9. Allotment Management Summaries (continued)

Allotment Name: Upton Mountain		Allot. No.: 5565	Mgmt. Category: I
Public Acres:	13,761	Other Acres:	354
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,615	Deer:	6
Suspended Nonuse:	771	Elk:	
Total Preference:	2,386	Antelope:	
Average Actual Use:	1,404	Horses:	
		Total:	6

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

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

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

Management Objectives

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

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

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

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Texaco Basin		Allot. No.: 5566	Mgmt. Category: I
Public Acres:	10,714	Other Acres:	440
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,900	Deer:	
Suspended Nonuse:	900	Elk:	
Total Preference:	2,800	Antelope:	9
Exchange of Use:	22	Horses:	100
Average Actual Use:	2,525	Total:	109

Identified Resource Conflicts/Concerns

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

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

Wetlands habitat in less than satisfactory condition.

Intensive recreation use occurs within the allotment.

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

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

Management Objectives

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

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

Improve wetlands habitat condition to satisfactory or better.

Incorporate recreation management objectives into overall allotment management system.

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Miler FFR		Allot. No.: 5567	Mgmt. Category: C
Public Acres:	160	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	16	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	16	Antelope:	
Average Actual Use:	16	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			

Allotment Name: Bryon's FFR		Allot. No.: 5568	Mgmt. Category: C
Public Acres:	40	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	6	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	6	Antelope:	
Average Actual Use:	6	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			

Table 9. Allotment Management Summaries (continued)

Allotment Name: Floyd's FFR		Allot. No.: 5569	Mgmt. Category: C
Public Acres:	40	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	2	Antelope:	
Average Actual Use:	2	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Allotment Name: River FFR		Allot. No.: 5570	Mgmt. Category: C
Public Acres:	290	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	60	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	60	Antelope:	
Average Actual Use:	60	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Lamb Ranch		Allot. No.: 5571	Mgmt. Category: I
Public Acres:	2,246	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	246	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	246	Antelope:	
Average Actual Use:	246	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse		Protect special status species or its habitat from impact by BLM-authorized actions.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Krueger FFR		Allot. No.: 5572	Mgmt. Category: C
Public Acres:	80	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	8	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	8	Antelope:	
Exchange of Use:	4	Horses:	
Average Actual Use:	12	Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Unallotted grazing area.		Issue temporary nonrenewable license unless allotted.	

CONSTRAINTS

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

Allotment Name: East Warm Springs		Allot. No.: 7001	Mgmt. Category: I
Public Acres:	181,390	Other Acres:	17,547
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	8,225	Deer:	80
Suspended Nonuse:	0	Elk:	
Total Preference:	8,225	Antelope:	99
Exchange of Use:	40	Horses:	1,200
*Carrying Capacity:	12,292	Total:	1,379
Average Actual Use:	12,989		
Identified Resource Conflicts/Concerns		Management Objectives	
Limiting big game habitat in unsatisfactory habitat condition		Improve and maintain big game habitat in satisfactory habitat condition.	
Playa habitat occurs in the allotment.		Incorporate playa management objectives into allotment management as such objectives are developed.	

Table 9. Allotment Management Summaries (continued)

At this time, the following special status species or its habitat is known to exist within the allotment: long-billed curlew, snowy plover, Malheur wirelettuce, sage grouse	Protect special status species or its habitat from impact by BLM-authorized actions.
The South Narrows Area of Critical Environmental Concern occurs within allotment.	Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by activity plans associated with <i>Stephanomeria malheurensis</i> .
The allotment contains all or a portion of the Warm Springs Wild Horse Herd Management Area.	Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.
Water quality does not currently meet DEQ water quality standards for beneficial uses.	Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
The Foster Flat RNA/ACEC occurs within the allotment.	Adjust allotment management including levels and areas of authorized use, seasons of use and grazing system as required by ACEC Management Plan.
Active erosion occurs in the allotment.	Improve and maintain erosion condition in moderate or better erosion condition.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: West Warm Springs		Allot. No.: 7002	Mgmt. Category: I
Public Acres:	295,549	Other Acres:	11,119
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	11,167	Deer:	116
Suspended Nonuse:	0	Elk:	
Total Preference:	11,167	Antelope:	38
Exchange of Use:	110	Horses:	1,224
Average Actual Use:	5,114	Total:	1,378
Identified Resource Conflicts/Concerns		Management Objectives	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
Playa habitat occurs in the allotment.		Incorporate playa management objectives into allotment management as such objectives are developed.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, snowy plover		Protect special status species or its habitat from impact by BLM-authorized actions.	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
The allotment contains all or a portion of the Warm Springs Wild Horse Herd Management Area.		Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: East Wagontire		Allot. No.: 7003	Mgmt. Category: I
Public Acres:	118,232	Other Acres:	80,962
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	8,281	Deer:	86
Suspended Nonuse:	0	Elk:	
Total Preference:	8,281	Antelope:	7
Exchange of Use:	518	Horses:	
Average Actual Use:	6,913	Total:	93
Identified Resource Conflicts/Concerns		Management Objectives	
Limiting big game habitat in unsatisfactory habitat condition.		Improve and maintain big game habitat in satisfactory habitat condition.	
Playa habitat occurs in the allotment.		Incorporate playa management objectives into allotment management as such objectives are developed.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse		Protect special status species or its habitat from impact by BLM-authorized actions.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: West Wagontire		Allot. No.: 7004	Mgmt. Category: I
Public Acres:	66,718	Other Acres:	3,929
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	7,493	Deer:	73
Suspended Nonuse:	0	Elk:	
Total Preference:	7,493	Antelope:	9
"Carrying Capacity:	4,648	Horses:	
Average Actual Use:	5,682	Total:	82

Identified Resource Conflicts/Concerns

Management Objectives

Limiting big game habitat in unsatisfactory habitat condition.

Improve and maintain big game habitat in satisfactory habitat condition.

Playa habitat occurs in the allotment.

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

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

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

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

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

CONSTRAINTS

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

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

* Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Glass Butte		Allot. No.: 7005	Mgmt. Category: I
Public Acres:	7,613	Other Acres:	953
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,058	Deer:	12
Suspended Nonuse:	0	Elk:	
Total Preference:	1,058	Antelope:	5
Exchange of Use:	84	Horses:	
*Carrying Capacity:	518	Total:	17
Average Actual Use:	791		

Identified Resource Conflicts/Concerns

Limiting big game habitat in unsatisfactory habitat condition.

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

Substantial surface acreage within allotment affected by mineral development activities.

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

Management Objectives

Improve and maintain big game habitat in satisfactory habitat condition.

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

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

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

CONSTRAINTS

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

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

* Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Rimrock Lake		Allot. No.: 7006	Mgmt. Category: I
Public Acres:	21,815	Other Acres:	
		619	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,775	Deer:	25
Suspended Nonuse:	32	Elk:	
Total Preference:	1,807	Antelope:	4
*Carrying Capacity:	1,308	Horses:	
Average Actual Use:	1,345	Total:	29
Identified Resource Conflicts/Concerns		Management Objectives	
Limiting big game habitat in unsatisfactory habitat condition.		Improve and maintain big game habitat in satisfactory habitat condition.	
Playa habitat occurs in the allotment.		Incorporate playa management objectives into allotment management as such objectives are developed.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse		Protect special status species or its habiiat from impact by BLM-authorized actions.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Hat Butte		Allot. No.: 7007	Mgmt. Category: I
Public Acres:	18,338	Other Acres:	681
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,209	Deer:	27
Suspended Nonuse:	101	Elk:	
Total Preference:	2,310	Antelope:	5
Average Actual Use:	1,586	Horses:	
		Total:	32
Identified Resource Conflicts/Concerns		Management Objectives	
Limiting big game habitat in unsatisfactory habitat condition.		Improve and maintain big game habitat in satisfactory habitat condition.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	
CONSTRAINTS			
Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			
Allotment Name: Sheep Lake-Shields		Allot. No.: 7008	Mgmt. Category: I
Public Acres:	13,202	Other Acres:	600
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,685	Deer:	46
Suspended Nonuse:	72	Elk:	21
Total Preference:	1,757	Antelope:	
Exchange of Use:	54	Horses:	
Average Actual Use:	1,166	Total:	67

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns	Management Objectives
No forage allocations for elk use in the allotment have been made.	Allocate forage to meet elk forage demands.
Playa habitat occurs in the allotment.	Incorporate playa management objectives into allotment management as such objectives are developed.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse	Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

Allotment Name: Dry Lake		Allot. No.: 7009	Mgmt. Category: I
Public Acres:	20,249	Other Acres:	6,337
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	3,099	Deer:	74
Suspended Nonuse:	102	Elk:	25
Total Preference:	3,201	Antelope:	8
Exchange of Use:	116	Horses:	
*Carrying Capacity:	2,638	Total:	107
Average Actual Use:	2,158		

Identified Resource Conflicts/Concerns	Management Objectives
Limiting big game habitat in unsatisfactory habitat condition.	Improve and maintain big game habitat in satisfactory habitat condition.
No forage allocations for elk use in the allotment have been made.	Allocate forage to meet elk forage demands.

Table 9. Allotment Management Summaries (continued)

Riparian or aquatic habitat is in less than good habitat condition.	Improve and maintain riparian or aquatic habitat in good or better habitat condition.
Wetlands habitat in less than satisfactory condition.	Improve wetlands habitat condition to satisfactory or better.
Playa habitat occurs in the allotment.	Incorporate playa management objectives into allotment management as such objectives are developed.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, bald eagle, redband trout, Malheur mottled sculpin	Protect special status species or its habitat from impact by BLM-authorized actions.
Water quality does not currently meet DEQ water quality standards for beneficial uses.	Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.
Active erosion occurs in the allotment.	Improve and maintain erosion condition in moderate or better erosion condition.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Claw Creek		Allot. No.: 7010	Mgmt. Category: I
Public Acres:	24,244	Other Acres:	9,313
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,962	Deer:	160
Suspended Nonuse:	141	Elk:	96
Total Preference:	3,103	Antelope:	
Exchange of Use:	131	Horses:	
*Carrying Capacity:	1,241	Total:	256
Average Actual Use:	1,175		

Identified Resource Conflicts/Concerns

Limiting big game habitat in unsatisfactory habitat condition.

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

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

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

Dry Mountain RNA/Area of Critical Environmental Concern Extension occurs within allotment.

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

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

Management Objectives

Improve and maintain big game habitat in satisfactory habitat condition.

Allocate forage to meet elk forage demands.

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

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

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

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Allotment Name: Upper Valley		Allot. No. : 7011	Mgmt. Category: M
Public Acres:	1,745	Other Acres:	5,155
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	254	Deer:	3
Suspended Nonuse:	11	Elk:	3
Total Preference:	265	Antelope:	
Average Actual Use:	265	Horses:	
		Total:	6
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout, Malheur mottled sculpin		Protect special status species or its habitat from impact by BLM-authorized actions.	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Packsaddle		Allot. No.: 7012	Mgmt. Category: I
Public Acres:	2,366	Other Acres:	647
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	316	Deer:	10
Suspended Nonuse:	16	Elk:	22
Total Preference:	332	Antelope:	8
Average Actual Use:	239	Horses:	
		Total:	40

Identified Resource Conflicts/Concerns

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

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

Active erosion occurs in the allotment.

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

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

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

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

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

'Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Allotment Name: Upper Valley	Allot. No.: 7011	Mgmt. Category: M
Public Acres: 1,745	Other Acres:	5,155

Grazing Administration Info. (AUMs)	Other Forage Demands (AUMs)
Active Preference: 254	Deer: 3
Suspended Nonuse: 11	Elk: 3
Total Preference: 265	Antelope:
Average Actual Use: 265	Horses:
	Total: 6

Identified Resource Conflicts/Concerns

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

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

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Packsaddle		Allot. No.: 7012	Mgmt. Category: I
Public Acres:	2,368	Other Acres:	647
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	316	Deer:	10
Suspended Nonuse:	16	Elk:	22
Total Preference:	332	Antelope:	8
Average Actual Use:	239	Horses:	
		Total:	40

Identified Resource Conflicts/Concerns

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

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

Active erosion occurs in the allotment.

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

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

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Zoglmann		Allot. No.: 7013	Mgmt. Category: C
Public Acres:	2,240	Other Acres:	1,600
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	160	Deer:	10
Suspended Nonuse:	1	Elk:	12
Total Preference:	161	Antelope:	
Exchange of Use:	173	Horses:	
Average Actual Use:	155	Total:	22
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

CONSTRAINTS

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

Allotment Name: Badger Spring		Allot. No.: 7014	Mgmt. Category: M
Public Acres:	11,043	Other Acres:	920
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,048	Deer:	68
Suspended Nonuse:	55	Elk:	92
Total Preference:	1,103	Antelope:	
Exchange of Use:	93	Horses:	
Average Actual Use:	629	Total:	160

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns	Management Objectives
No forage allocations for elk use in the allotment have been made.	Allocate forage to meet elk forage demands.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

Allotment Name: Second Flat		Allot. No.: 7015	Mgmt. Category: I
Public Acres:	8,921	Other Acres:	1,281
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	622	Deer:	45
Suspended Nonuse:	32	Elk:	35
Total Preference:	725	Antelope:	11
Exchange of Use:	30	Horses:	
Average Actual Use:	429	Total:	91

Identified Resource Conflicts/Concerns	Management Objectives
No forage allocations for elk use in the allotment have been made.	Allocate forage to meet elk forage demands.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse	Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Zoglmann		Allot. No.: 7013	Mgmt. Category: C
Public Acres:	2,246	Other Acres:	1,600
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	160	Deer:	10
Suspended Nonuse:	1	Elk:	12
Total Preference:	161	Antelope:	
Exchange of Use:	173	Horses:	
Average Actual Use:	155	Total:	22
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

CONSTRAINTS

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

Allotment Name: Badger Spring		Allot. No.: 7014	Mgmt. Category: M
Public Acres:	11,043	Other Acres:	920
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,048	Deer:	68
Suspended Nonuse:	55	Elk:	92
Total Preference:	1,103	Antelope:	
Exchange of Use:	93	Horses:	
Average Actual Use:	629	Total:	160

Table 9. Allotment Management Summaries (continued)

Allotment Name: Cluster		Allot. No.: 7017	Mgmt. Category: M
Public Acres:	7,843	Other Acres:	13,697
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	548	Deer:	5
Suspended Nonuse:	0	Elk:	
Total Preference:	548	Antelope:	1
*Carrying Capacity:	317	Horses:	
Average Actual Use:	315	Total:	6

Identified Resource Conflicts/Concerns

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

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

Management Objectives

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

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

CONSTRAINTS

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

. Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Allotment Name: Silver Lake		Allot. No.: 7018	Mgmt. Category: I
Public Acres:	16,933	Other Acres:	978
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,755	Deer:	5
Suspended Nonuse:	0	Elk:	
Total Preference:	1,755	Antelope:	2
Exchange of Use:	36	Horses:	
Average Actual Use:	1,406	Total:	7

Table 9. Allotment Management Summaries (continued)

Allotment Name: Juniper Ridge		Allot. No.: 7016	Mgmt. Category: I
Public Acres:	26,784	Other Acres:	2,412
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,041	Deer:	34
Suspended Nonuse:	0	Elk:	
Total Preference:	2,076	Antelope:	4
Exchange of Use:	30	Horses:	
*Carrying Capacity:	1,102	Total:	38
Average Actual Use:	1.073		
Identified Resource Conflicts/Concerns		Management Objectives	
Limiting big game habitat in unsatisfactory habitat condition.		Improve and maintain big game habitat in satisfactory habitat condition.	
Playa habitat occurs in the allotment.		Incorporate playa management objectives into allotment management as such objectives are developed.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, <i>Allium brandegei</i>		Protect special status species or its habitat from impact by BLM-authorized actions.	
Current range <i>condition, level</i> or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Cluster		Allot. No.: 7017	Mgmt. Category: M
Public Acres:	7,843	Other Acres:	13,697
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	548	Deer:	5
Suspended Nonuse:	0	Elk:	
Total Preference:	548	Antelope:	1
*Carrying Capacity:	317	Horses:	
Average Actual Use:	315	Total:	6

Identified Resource Conflicts/Concerns

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

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

Management Objectives

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

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

CONSTRAINTS

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

"Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation."

Allotment Name: Silver Lake		Allot. No.: 7018	Mgmt. Category: I
Public Acres:	16,933	Other Acres:	978
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,755	Deer:	5
Suspended Nonuse:	0	Elk:	
Total Preference:	1,755	Antelope:	2
Exchange of Use:	36	Horses:	
Average Actual Use:	1,406	Total:	7

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns	Management Objectives
Wetlands habitat in less than satisfactory condition.	Improve wetlands habitat condition to satisfactory or better.
Playa habitat occurs in the allotment.	Incorporate playa management objectives into allotment management as such objectives are developed.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, snowy plover	Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

Allotment Name: Palomino Buttes		Allot. No.: 7019	Mgmt. Category: I
Public Acres:	48,266	Other Acres:	1,734
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,806	Deer:	264
Suspended Nonuse:	89	Elk:	
Total Preference:	2,895	Antelope:	28
Exchange of Use:	24	Horses:	480
*Carrying Capacity:	3,041	Total:	772
Average Actual Use:	3,280		

Identified Resource Conflicts/Concerns	Management Objectives
The allotment contains all or a portion of the Palomino Buttes Wild Horse Herd Management Area.	Maintain healthy populations of wild horses and burros at appropriate management levels which will achieve a thriving natural ecological balance.

Table 9. Allotment Management Summaries (continued)

Limiting big game habitat in unsatisfactory habitat condition.	Improve and maintain big game habitat in satisfactory habitat condition.
Playa habitat occurs in the allotment.	Incorporate playa management objectives into allotment management as such objectives are developed.
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, Ferruginous hawk, <i>Eriogonum cusickii</i>	Protect special status species or its habitat from impact by BLM-authorized actions.
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

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

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

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

- *Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Allotment Name: Sand Hollow		Allot. No.: 7020	Mgmt. Category: M
Public Acres:	10,240	Other Acres:	5,650

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	532	Deer:	33
Suspended Nonuse:	0	Elk:	
Total Preference:	532	Antelope:	9
Average Actual Use:	512	Horses:	
		Total:	42

Identified Resource Conflicts/Concerns

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

Management Objectives

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

Table 9. Allotment Management Summaries (continued)

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

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

CONSTRAINTS

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

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

Allotment Name: Weaver Lake		Allot. No.: 7021	Mgmt. Category: I
Public Acres:	23,323	Other Acres:	880

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,396	Deer:	68
Suspended Nonuse:	73	Elk:	
Total Preference:	1,469	Antelope:	17
Average Actual Use:	1,595	Horses:	288
		Total:	373

Identified Resource Conflicts/Concerns

Management Objectives

Playa habitat occurs in the allotment.

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

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

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

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

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

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

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

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

Allotment Name: Dog Mountain		Allot. No.: 7022	Mgmt. Category: I
Public Acres:	5,120	Other Acres:	735
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	176	Deer:	27
Suspended Nonuse:	0	Elk:	
Total Preference:	176	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	27

Identified Resource Conflicts/Concerns

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

Management Objectives

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: West Sagehen		Allot. No.: 7023	Mgmt. Category: I
Public Acres:	13,461	Other Acres:	495
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	1,911	Deer:	64
Suspended Nonuse:	70	Elk:	32
Total Preference:	1,981	Antelope:	7
Exchange of Use:	77	Horses:	
*Carrying Capacity:	1,010	Total:	103
Average Actual Use:	1,120		

Identified Resource Conflicts/Concerns

Management Objectives

Limiting big game habitat in unsatisfactory habitat condition.

Improve and maintain big game habitat in satisfactory habitat condition.

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

Allocate forage to meet elk forage demands.

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

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

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

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

CONSTRAINTS

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: East Sagehen		Allot. No.: 7024	Mgmt. Category: I
Public Acres:	23,796	Other Acres:	5,033
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,510	Deer:	105
Suspended Nonuse:	108	Elk:	22
Total Preference:	2,618	Antelope:	4
Exchange of Use:	15	Horses:	
*Carrying Capacity:	1,791	Total:	131
Average Actual Use:	1,596		

Identified Resource Conflicts/Concerns

Management Objectives

Active erosion occurs in the allotment.

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

Limiting big game habitat in unsatisfactory habitat condition.

Improve and maintain big game habitat in satisfactory habitat condition.

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

Allocate forage to meet elk forage demands.

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

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

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

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

CONSTRAINTS

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Horton Mill		Allot. No.: 7026	Mgmt. Category: I
Public Acres:	3,520	Other Acres:	810
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	503	Deer:	15
Suspended Nonuse:	200	Elk:	
Total Preference:	703	Antelope:	1
Exchange of Use:	17	Horses:	
Average Actual Use:	305	Total:	16

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

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

Management Objectives

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

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

CONSTRAINTS

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

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

Allotment Name: Emigrant Creek		Allot. No.: 7027	Mgmt. Category: C
Public Acres:	225	Other Acres:	1,360
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	112	Deer:	1
Suspended Nonuse:	0	Elk:	
Total Preference:	112	Antelope:	
Average Actual Use:	250	Horses:	
		Total:	

Table 9. Allotment Management Summaries (continued)

Allotment Name: Gouldin		Allot. No.: 7025	Mgmt. Category: I
Public Acres:	4,091	Other Acres:	2,350
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	567	Deer:	43
Suspended Nonuse:	28	Elk:	
Total Preference:	595	Antelope:	
Exchange of Use:	189	Horses:	
*Carrying Capacity:	501	Total:	43
Average Actual Use:	432		

Identified Resource Conflicts/Concerns

Management Objectives

Active erosion occurs in the allotment.

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

Intensive recreation use occurs within the allotment.

Incorporate recreation management objectives into overall allotment management system.

Limiting big game habitat in unsatisfactory habitat condition.

Improve and maintain big game habitat in satisfactory habitat condition.

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

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

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

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

CONSTRAINTS

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Horton Mill		Allot. No.: 7026	Mgmt. Category: I
Public Acres:	3,520	Other Acres:	810
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	503	Deer:	15
Suspended Nonuse:	200	Elk:	
Total Preference:	703	Antelope:	1
Exchange of Use:	17	Horses:	
Average Actual Use:	305	Total:	16
Identified Resource Conflicts/Concerns		Management Objectives	
Active erosion occurs in the allotment.		Improve and maintain erosion condition in moderate or better erosion condition.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

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

Allotment Name: Emigrant Creek		Allot. No.: 7027	Mgmt. Category: C
Public Acres:	225	Other Acres:	1,360
Grazing Administration info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	112	Deer:	1
Suspended Nonuse:	0	Elk:	
Total Preference:	112	Antelope:	
Average Actual Use:	250	Horses:	
		Total:	

Table 9. Allotment Management Summaries (continued)

**Identified Resource
Conflicts/Concerns**

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

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

**Management
Objectives**

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

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

CONSTRAINTS

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

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

Allotment Name: Stinger Creek

Allot. No.: 7028

Mgmt. Category: C

Public Acres: 50

Other Acres: 265

Grazing Administration Info. (AUMs)

Other Forage Demands (AUMs)

Active Preference: 3

Deer: 1

Suspended Nonuse: 0

Elk:

Total Preference: 3

Antelope:

Average Actual Use: 3

Horses:

Total: 1

**Identified Resource
Conflicts/Concerns**

**Management
Objectives**

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Spring Creek		Allot. No.: 7029	Mgmt. Category: C
Public Acres:	1,509	Other Acres:	990
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	51	Deer:	13
Suspended Nonuse:	0	Elk:	
Total Preference:	51	Antelope:	
*Carrying Capacity:	100	Horses:	
Average Actual Use:	32	Total:	13

Identified Resource Conflicts/Concerns

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

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

Management Objectives

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

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

CONSTRAINTS

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Allotment Name: Skull Creek		Allot. No.: 7030	Mgmt. Category: I
Public Acres:	27,500	Other Acres:	10,414
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,458	Deer:	354
Suspended Nonuse:	1,130	Elk:	24
Total Preference:	3,588	Antelope:	8
*Carrying Capacity:	2,871	Horses:	
Average Actual Use:	1,823	Total:	386

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns

Management Objectives

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

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

Active erosion occurs in the allotment.

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

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

Allocate forage to meet elk forage demands.

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

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

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

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

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

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

CONSTRAINTS

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

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Hay Creek		Allot. No.: 7031	Mgmt. Category: I
Public Acres:	5,754	Other Acres:	5,639
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	585	Deer:	29
Suspended Nonuse:	0	Elk:	20
Total Preference:	585	Antelope:	
Average Actual Use:	540	Horses:	
		Total:	49
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
At this time, the following special status species or its habitat is known to exist within the allotment: redband trout		Protect special status species or its habitat from impact by BLM-authorized actions.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Hotchkiss		Allot. No.: 7032	Mgmt. Category: C
Public Acres:	415	Other Acres:	335
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	26	Deer:	3
Suspended Nonuse:	0	Elk:	
Total Preference:	26	Antelope:	
Average Actual Use:	22	Horses:	
		Total:	3

Identified Resource Conflicts/Concerns

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

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

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

Management Objectives

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

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

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

CONSTRAINTS

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

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Silvies River		Allot. No.: 7033	Mgmt. Category: I
Public Acres:	1,044	Other Acres:	699
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	245	Deer:	4
Suspended Nonuse:	0	Elk:	24
Total Preference:	245	Antelope:	
Exchange of Use:	309	Horses:	
*Carrying Capacity:	301	Total:	28
Average Actual Use:	189		

Identified Resource Conflicts/Concerns

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

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

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

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

CONSTRAINTS

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Scat Field		Allot. No.: 7034	Mgmt. Category: C
Public Acres:	837	Other Acres:	1,826
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	96	Deer:	4
Suspended Nonuse:	0	Elk:	8
Total Preference:	96	Antelope:	5
Average Actual Use:	181	Horses:	
		Total:	17
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			
Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size, Maintain browse on at least 85 percent of the winter range currently supporting browse.			
Allotment Name: Silvies Meadows		Allot. No.: 7035	Mgmt. Category: M
Public Acres:	1,356	Other Acres:	3,150
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	158	Deer:	10
Suspended Nonuse:	0	Elk:	8
Total Preference:	158	Antelope:	
Average Actual Use:	411	Horses:	
		Total:	18
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEC! water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality,	

Table 9. Allotment Management Summaries (continued)

Allotment Name: Scat Field		Allot. No.: 7034	Mgmt. Category: C
Public Acres:	837	Other Acres:	1,826
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	96	Deer:	4
Suspended Nonuse:	0	Elk:	8
Total Preference:	96	Antelope:	5
Average Actual Use:	181	Horses:	
		Total:	17
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

CONSTRAINTS

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

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

Allotment Name: Silvies Meadows		Allot. No.: 7035	Mgmt. Category: M
Public Acres:	1,356	Other Acres:	3,150
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	158	Deer:	10
Suspended Nonuse:	0	Elk:	8
Total Preference:	158	Antelope:	
Average Actual Use:	411	Horses:	
		Total:	18
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	

Table 9. Allotment Management Summaries (continued)

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

Allocate forage to meet elk forage demands.

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

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

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

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

CONSTRAINTS

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

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

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

Allotment Name: Hayes		Allot. No.: 7036	Mgmt. Category: I
Public Acres:	5,400	Other Acres:	560
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	329	Deer:	68
Suspended Nonuse:	761	Elk:	
Total Preference:	1,090	Antelope:	
Exchange of Use:	77	Horses:	
Average Actual Use:	262	Total:	68

Identified Resource Conflicts/Concerns

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

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

Management Objectives

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

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

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

Allotment Name: Coal Pit Springs		Allot. No.: 7037	Mgmt. Category: C
Public Acres:	2,895	Other Acres:	6,890

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	370	Deer:	29
Suspended Nonuse:	105	Elk:	
Total Preference:	475	Antelope:	
Average Actual Use:	265	Horses:	
		Total:	29

Identified Resource Conflicts/Concerns

Active erosion occurs in the allotment.

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

Management Objectives

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Curry Gordon		Allot. No.: 7038	Mgmt. Category: C
Public Acres:	729	Other Acres:	340
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	72	Deer:	10
Suspended Nonuse:	31	Elk:	
Total Preference:	103	Antelope:	
Exchange of Use:	18	Horses:	
Average Actual Use:	69	Total:	10

Identified Resource Conflicts/Concerns

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

Management Objectives

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

CONSTRAINTS

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

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

Allotment Name: Cave Gulch		Allot. No.: 7039	Mgmt. Category: M
Public Acres:	2,004	Other Acres:	35
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	210	Deer:	30
Suspended Nonuse:	140	Elk:	
Total Preference:	350	Antelope:	
Average Actual Use:	144	Horses:	
		Total:	30

Identified Resource Conflicts/Concerns

Management Objectives

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

Allotment Name: Landing Creek		Allot. No.: 7040	Mgmt. Category: I
Public Acres:	3,614	Other Acres:	189
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	740	Deer:	43
Suspended Nonuse:	0	Elk:	32
Total Preference:	740	Antelope:	
*Carrying Capacity:	310	Horses:	
Average Actual Use:	172	Total:	75
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	
Riparian or aquatic habitat is in less than good habitat condition.		Improve and maintain riparian or aquatic habitat in good or better habitat condition.	
At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse, redband trout		Protect special status species or its habitat from impact by BLM-authorized actions.	
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.		Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)	

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

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

†Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.

Allotment Name: East Silvies		Allot. No.: 7041	Mgmt. Category: I
Public Acres:	4,294	Other Acres:	965

Grazing Administration Info. (AUMs)

Active Preference:	594
Suspended Nonuse:	0
Total Preference:	594
Average Actual Use:	712

Other Forage Demands (AUMs)

Deer:	50
Elk:	32
Antelope:	
Horses:	
Total:	82

Identified Resource Conflicts/Concerns

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

Active erosion occurs in the allotment.

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

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

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

Management Objectives

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

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

Allocate forage to meet elk forage demands.

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

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

Table 9. Allotment Management Summaries (continued)

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

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

CONSTRAINTS

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

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

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

Allotment Name: Dole Smith		Allot. No.: 7042	Mgmt. Category: C
Public Acres:	445	Other Acres:	1,565

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	25	Deer:	3
Suspended Nonuse:	0	Elk:	6
Total Preference:	25	Antelope:	
Average Actual Use:	53	Horses:	
		Total:	9

Identified Resource Conflicts/Concerns

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

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Lone Pine		Allot. No.: 7043	Mgmt. Category: I
Public Acres:	15,131	Other Acres:	370
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,137	Deer:	135
Suspended Nonuse:	0	Elk:	20
Total Preference:	2,137	Antelope:	8
Exchange of Use:	20	Horses:	
*Carrying Capacity:	1,854	Total:	163
Average Actual Use:	1,585		

Identified Resource Conflicts/Concerns

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

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

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

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

CONSTRAINTS

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

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

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

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

CONSTRAINTS

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

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

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

Allotment Name: Dole Smith		Allot. No.: 7042	Mgmt. Category: C
Public Acres:	445	Other Acres:	1,565

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	25	Deer:	3
Suspended Nonuse:	0	Elk:	6
Total Preference:	25	Antelope:	
Average Actual Use:	53	Horses:	
		Total:	9

Identified Resource Conflicts/Concerns

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

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

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

Management Objectives

Allocate forage to meet elk forage demands.

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

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

CONSTRAINTS

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

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Lone Pine		Allot. No.: 7043	Mgmt. Category: I
Public Acres:	15,131	Other Acres:	370
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	2,137	Deer:	135
Suspended Nonuse:	0	Elk:	20
Total Preference:	2,137	Antelope:	8
Exchange of Use:	20	Horses:	
*Carrying Capacity:	1,854	Total:	163
Average Actual Use:	1,585		

Identified Resource Conflicts/Concerns

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

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

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

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

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

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

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

CONSTRAINTS

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

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

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

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Cowing		Allot. No.: 7044	Mgmt. Category: C
Public Acres:	260	Other Acres:	1,490
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	20	Deer:	1
Suspended Nonuse:	0	Elk:	4
Total Preference:	20	Antelope:	
Average Actual Use:	20	Horses:	
		Total:	5
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

CONSTRAINTS

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

Allotment Name: Whiting		Allot. No.: 7045	Mgmt. Category: C
Public Acres:	399	Other Acres:	3,403
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	46	Deer:	3
Suspended Nonuse:	0	Elk:	1
Total Preference:	48	Antelope:	
Average Actual Use:	48	Horses:	
		Total:	4
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

CONSTRAINTS

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

Table 9. Allotment Management Summaries (continued)

Allotment Name: Baker Hill Field		Allot. No.: 7046	Mgmt. Category: C
Public Acres:	188	Other Acres:	522
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	20	Deer:	1
Suspended Nonuse:	0	Elk:	1
Total Preference:	20	Antelope:	
Average Actual Use:	10	Horses:	
		Total:	2
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

CONSTRAINTS

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

Allotment Name: Peabody		Allot. No.: 7047	Mgmt. Category: C
Public Acres:	268	Other Acres:	1,514
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	60	Deer:	1
Suspended Nonuse:	0	Elk:	2
Total Preference:	60	Antelope:	1
Average Actual Use:	67	Horses:	
		Total:	4
Identified Resource Conflicts/Concerns		Management Objectives	
No forage allocations for elk use in the allotment have been made.		Allocate forage to meet elk forage demands.	

Table 9. Allotment Management Summaries (continued)

CONSTRAINTS

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

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

Allotment Name: Varien Canyon		Allot. No.: 7048	Mgmt. Category: C
Public Acres:	317	Other Acres:	2,696
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	14	Deer:	6
Suspended Nonuse:	0	Elk:	4
Total Preference:	14	Antelope:	
Average Actual Use:	14	Horses:	
		Total:	10

Identified Resource Conflicts/Concerns

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

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

Management Objectives

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

Allocate forage to meet elk forage demands.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Forks of Poison Creek Allot. No.: 7049		Mgmt. Category: I	
Public Acres:	3,431	Other Acres:	178
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	648	Deer:	31
Suspended Nonuse:	0	Elk:	13
Total Preference:	648	Antelope:	
Average Actual Use:	340	Horses:	
		Total:	44

Identified Resource Conflicts/Concerns

No forage allocations for elk use in the allotment have been made.

At this time, the following special status species or its habitat is known to exist within the allotment: sage grouse

Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.

Management Objectives

Allocate forage to meet elk forage demands.

Protect special status species or its habitat from impact by BLM-authorized actions.

Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Clemens		Allot. No.: 7050	Mgmt. Category: C
Public Acres:	466	Other Acres:	429
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	57	Deer:	4
Suspended Nonuse:	0	Elk:	
Total Preference:	57	Antelope:	
Average Actual Use:	67	Horses:	
		Total:	4
Identified Resource Conflicts/Concerns		Management Objectives	
CONSTRAINTS			
Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.			
Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.			
Allotment Name: Sawtooth MNF		Allot. No.: 7051	Mgmt. Category: M
Public Acres:	535	Other Acres:	5,170
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	32	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	32	Antelope:	
Average Actual Use:	25	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
Water quality does not currently meet DEQ water quality standards for beneficial uses.		Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.	

Table 9. Allotment Management Summaries (continued)

Riparian or aquatic habitat is in less than good habitat condition.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment: redband trout

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in **any one year**.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Lone Pine Field	Allot. No.: 7052	Mgmt. Category: C
Public Acres: 160	Other Acres:	320

Grazing Administration Info. (AUMs)

Active Preference:	6
Suspended Nonuse:	0
Total Preference:	6
Average Actual Use:	30

Other Forage Demands (AUMs)

Deer:	1
Elk:	
Antelope:	
Horses:	
Total:	1

Identified Resource Conflicts/Concerns

Management Objectives

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Silvies Canyon		Allot. No.: 7053	Mgmt. Category: M
Public Acres:	925	Other Acres:	15
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	100	Deer:	10
Suspended Nonuse:	0	Elk:	
Total Preference:	100	Antelope:	
Average Actual Use:	112	Horses:	
		Total:	10

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

Riparian or aquatic habitat is in less than good habitat condition.

At this time, the following special status species or its habitat is known to exist within the allotment:
redband trout

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Improve and maintain riparian or aquatic habitat in good or better habitat condition.

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Cricket Creek		Allot. No.: 7054	Mgmt. Category: C
Public Acres:	970	Other Acres:	480
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	40	Deer:	6
Suspended Nonuse:	0	Elk:	
Total Preference:	40	Antelope:	
Average Actual Use:	156	Horses:	
		Total :	6
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Double "O"		Allot. No.: 7056	Mgmt. Category: M
Public Acres:	4,317	Other Acres:	3,236
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
*Carrying Capacity:	1,320	Horses:	
Average Actual Use:	847	Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

At this time, the following special status species or its habitat is known to exist within the allotment:
long-billed curlew

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

**Indicates an allotment where carrying capacity has been determined in a completed allotment evaluation.*

Table 9. Allotment Management Summaries (continued)

Allotment Name: Wright's Point		Allot. No.: 7057	Mgmt. Category: M
Public Acres:	590	Other Acres:	80
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	40	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	
No management system established in the allotment.		Establish management system.	
Unallotted grazing area.		Issue temporary nonrenewable license unless allotted.	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Narrows		Allot. No.: 7058	Mgmt. Category: I
Public Acres:	1,876	Other Acres:	910
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	82	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	82	Antelope:	
Average Actual Use:	449	Horses:	
		Total:	

Table 9. Allotment Management Summaries (continued)

Identified Resource Conflicts/Concerns	Management Objectives
Current range condition, level or pattern of utilization may be unacceptable, or carrying capacity (under current management practices) may be exceeded.	Maintain or improve rangeland condition and productivity through a change in management practices and/or reduction in active use. (Note: Upon completion of the Ecological Site Inventory on the Three Rivers RA, ecological status objectives will be developed.)

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Carp	Allot. No.: 7059	Mgmt. Category: C
Public Acres: 646	Other Acres:	

Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	21	Horses:	
		Total:	

Identified Resource Conflicts/Concerns	Management Objectives
Unallotted grazing area.	Issue temporary nonrenewable license unless allotted.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Castle		Allot. No.: 7060	Mgmt. Category: C
Public Acres:	751	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	5
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	7	Horses:	1
		Total:	6
Identified Resource Conflicts/Concerns		Management Objectives	
Unallotted grazing area.		Issue temporary nonrenewable license unless allotted.	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Allotment Name: Bulger		Allot. No.: 7061	Mgmt. Category: C
Public Acres:	320	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	0
Suspended Nonuse:	0	Elk:	0
Total Preference:	0	Antelope:	0
Average Actual Use:	0	Horses:	0
		Total:	0
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Devine Canyon		Allot. No.: 7080	Mgmt. Category: C
Public Acres:		Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	5
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	5

Identified Resource Conflicts/Concerns

Water quality does not currently meet DEQ water quality standards for beneficial uses.

At this time, the following special status species or its habitat is known to exist within the allotment: **redband** trout, Malheur mottled sculpin

No authorized grazing use.

Management Objectives

Improve surface water quality on public lands to meet or exceed quality standards for all beneficial uses as established by the DEQ, where BLM authorized actions are having a negative effect on water quality.

Protect special status species or its habitat from impact by BLM-authorized actions.

CONSTRAINTS

Area influencing perennial water occurs within the allotment. Limit treatment of this area by mechanical or prescribed fire means to less than 20 percent of area in any one year.

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Harney Basin		Allot. No.: 7081	Mgmt. Category: C
Public Acres:	640	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	1
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Allotment Name: Hines Field		Allot. No.: 7082	Mgmt. Category: C
Public Acres:		Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	3
Suspended Nonuse:	0	Elk:	7
Total Preference:	0	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	10
Identified Resource Conflicts/Concerns		Management Objectives	

No forage allocations for elk use in the allotment have been made.

No authorized livestock use.

Allocate forage to meet elk forage demands.

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Rainbow Creek		Allot. No.: 7085	Mgmt. Category: C
Public Acres:	160	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	1
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	1
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Allotment Name: Silver Creek Valley		Allot. No.: 7087	Mgmt. Category: C
Public Acres:	40	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 9. Allotment Management Summaries (continued)

Allotment Name: Sunset Valley		Allot. No.: 7088	Mgmt. Category: C
Public Acres:	5360	Other Acres:	
Grazing Administration Info. (AUMs)		Other Forage Demands (AUMs)	
Active Preference:	0	Deer:	
Suspended Nonuse:	0	Elk:	
Total Preference:	0	Antelope:	
Average Actual Use:	0	Horses:	
		Total:	
Identified Resource Conflicts/Concerns		Management Objectives	

CONSTRAINTS

Ensure that substantial vegetation conversions (burning, spraying, chaining, seeding, etc.) do not reduce the variety of plant species or communities in abundances necessary for their continued existence and normal functioning.

Deer winter range occurs in allotment. Vegetation conversions must be limited to less than 400 acres in size. Maintain browse on at least 85 percent of the winter range currently supporting browse.

Table 10. Allotment Categories

Allot. Number	Allotment Name	Range Condition			Allotment Potential			Present Productivity			Resource Conflicts			Controversy			Present Mgmt		Prudent Investor's Willingness To Invest			Crit. Allot. Char.	Selectiv Mgmt Category I, M, or C
		Sat	Unsat	Undef	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Sat	Unsat	Yes	Maybe	No		
4097	Trout Creek		X			X		X		X		X		X		X		X		X			
5106	Cow Creek		X			X		X		X		X		X		X		X		X			
5214	Hamilton	X				X		X		X		X		X		X		X		X		I	
5215	Davies		X			X		X		X		X		X		X		X		X		I	
5307	Smyth Creek	X				X		X		X		X		X		X		X		X		I	
5308	Kiger	X				X		X		X		X		X		X		X		X		I	
5310	Riddle Mountain	X				X		X		X		X		X		X		X		X		I	
5313	Burnt Flat		X			X		X		X		X		X		X		X		X		I	
5321	Hamilton Ind.	X				X		X		Unknown		X		X		X		X		X		I	
5329	Riddle/Coyote		X			X		X		Unknown		X		X		X		X		X		I	
5330	Deep Creek	X				X		X		Unknown		X		X		X		X		X		I	
5503	Pine Creek	X				X		X		X		X		X		X		X		X		I	
5511	Moffet Table		X			X		X		X		X		X		X		X		X		I	
5514	Coal Mine Creek	X				X		X		X		X		X		X		X		X		I	
5515	Mule Creek	X				X		X		X		X		X		X		X		X		I	
5517	Otis Mountain	X				X		X		X		X		X		X		X		X		I	
5524	Dawson Butte		X			X		X		X		X		X		X		X		X		I	
5530	River	X				X		X		X		X		X		X		X		X		I	
5531	Stinkingwater	X				X		X		X		X		X		X		X		X		I	
5532	Mountain		X			X		X		X		X		X		X		X		X		I	
5535	Miller Canyon		X			X		X		X		X		X		X		X		X		I	
5536	Alder Creek		X			X		X		X		X		X		X		X		X		I	
5565	Upton Mountain		X			X		X		X		X		X		X		X		X		I	
5566	Texaco Basin	X				X		X		X		X		X		X		X		X		I	
5571	Lamb Ranch			X		X		X		X		X		X		X		X		X		I	
7001	East Warm Springs	X				X		X		X		X		X		X		X		X		I	
7002	West Warm Springs	X				X		X		X		X		X		X		X		X		I	
7003	East Wagontire		X			X		X		X		X		X		X		X		X		I	
7004	West Wagontire		X			X		X		X		X		X		X		X		X		I	
7005	Glass Butte	X				X		X		X		X		X		X		X		X		I	
7006	Rimrock Lake		X			X		X		X		X		X		X		X		X		I	
7007	Hat Butte		X			X		X		X		X		X		X		X		X		I	
7008	Sheep Lake Shields		X			X		X		X		X		X		X		X		X		I	
7009	Dry Lake		X			X		X		X		X		X		X		X		X		I	
7010	Claw Creek		X			X		X		X		X		X		X		X		X		I	
7012	Packsaddle	X				X		X		X		X		X		X		X		X		I	
7014	Badger Spring	X				X		X		X		X		X		X		X		X		I	
7015	Second Flat		X			X		X		X		X		X		X		X		X		I	
7016	Juniper Ridge	X				X		X		X		X		X		X		X		X		I	
7018	Silver Lake		X			X		X		X		X		X		X		X		X		I	
7019	Palomino Butte		X			X		X		X		X		X		X		X		X		I	

Table 10. Allotment Categories (continued)

Allot. Number	Allotment Name	Range Condition			Allotment Potential			Present Productivity			Resource Conflicts			Controversy			Present Mgmt		Prudent Investor's Willingness To Invest			Crit. Allot. Char.	Selectiv Mgmt Category I, M, or C
		Sat	Unsat	Undef	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Sat	Unsat	Yes	Maybe	No		
7021	Weaver Lake	X			X			Unknown		X			X			X			X				
7022	Dog Mountain	X					X	Unknown		X			X				X		X				
7023	West Sagehen		X		X			X		X			X				X						
7024	East Sagehen		X		X			X		X			X			X							
7025	Gouldin		X		X			X		X			X			X			X				
7026	Horton Mill	X			X			X		X			X			X							
7030	Skull Creek	X			X			X		X			X			X			X				
7031	Hay Creek	X			X			X		X			X			X			X				
7033	Silvies River	X			X			X		X			X		X				X				
7036	Hayes	X			X			X		X			X		X				X				
7040	Landing Creek	X			X			X		X			X			X			X				
7041	East Silvies	X			X			X		X			X			X			X				
7043	Lone Pine		X		X			X		X			X			X			X				
7049	Forks of Poison Creek		X		X			X		X			X			X			X				
7058	Narrows		X		X			X		X			X			X			X				
4098	East Creek-Pine Hill	X			X			X		X			X		X			X				I M	
4143	Silvies	X			X			X		X			X		X				X			M	
5101	Devine Ridge	X			X			X		X			X		X				X			M	
5102	Prather Creek		X				X		X	X			X		X				X			M	
5103	Lime Kiln/Sec. 30	X					X		X		X			X		X			X			M	
5104	Soldier Creek	X					X		X		X			X		X			X			M	
5105	Camp Harney	X			X			X		X			X		X				X			M	
5201	Coleman Creek	X			X			X		X			X		X				X			M	
5202	Hunter	X			X			Unknown		X			X		X				X			M	
5204	Stocum	X			X			X		X			X		X				X			M	
5205	Venator	X			X			X		X			X		X				X			M	
5206	Stockade			X			X	Unknown		X			X		X				X			M	
5207	Coyote Creek	X			X			X		X			X		X				X			M	
5208	Emmerson	X			X			X		X			X		X				X			M	
5209	Crane	X			X			X		X			X		X				X			M	
5212	Mahon Ranch	X				X		X		X			X		X				X			M	
5213	Beaver Creek	X			X			X		X			X		X				X			M	
5301	Princeton	X			X			X		X			X		X				X			M	
5302	Big Bird	X			X			X		X			X		X				X			M	
5303	Dry Lake	X			X			X		X			X		X				X			M	
5305	Crows Nest	X			X			X		X			X		X				X			M	
5306	Rocky Ford	X			X			X		X			X		X				X			M	
5309	Happy Valley	X			X			X		X			X		X				X			M	
5316	Virginia Valley	X			X			X		X			X		X				X			M	
5501	East Cow Creek	X			X			X		X			X		X				X			M	
5502	Rock Creek	X			X			X		X			X		X				X			M	

Table 10. Allotment Categories (continued)

Allot. Number	Allotment Name	Range Condition			Allotment Potential			Present Productivity			Resource Conflicts			Controversy			Present Mgmt		Prudent Investor's Willingness To Invest			Crit. Allot. Char.	Selectiv Mgmt Category I, M, or C
		Sat	Unsat	Undef	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Sat	Unsat	Yes	Maybe	No		
5505	Little Muddy Creek	X			X			X			X				X	X			X			M	
5506	Muddy Creek	X				X		X				X			X	X			X			M	
5507	Wolf Creek	X			X			Unknown			X			X	X	X			X			M	
5508	Baker-Knowles	X				X	X	Unknown			X			X	X	X				X		M	
5509	Williams Dripp Spring	X				X		X			X				X	X			X			M	
5510	Jones Dripp Spring	X			X			X				X			X	X			X			M	
5513	Shelley	X				X		X	X		X			X	X	X			X			M	
5516	Birch Creek	X			X			X	X		X			X	X	X			X			M	
5521	Rocky Basin	X			X			X			X	X		X	X	X			X			M	
5522	Cottonwood Creek	X			X					X				X	X	X			X			M	
5523	Tub Spring-Hart	X			X			X			X			X	X	X			X			M	
5525	Mill Gulch	X			X			X			X			X	X	X			X			M	
5526	Chalk Hills	X			X			X			X			X	X	X			X			M	
5528	Cooler	X				X		X			X	X		X	X	X			X			M	
5529	House Butte	X				X		X			X			X	X	X			X			M	
5533	Buchanan	X				X		X			X	X		X	X	X			X			M	
5534	Mahon Creek	X				X		X			X			X	X	X			X			M	
5537	Buck Mountain	X				X		X		X				X	X	X			X			M	
5538	Riverside	X				X		X			X			X	X	X			X			M	
5564	Wheeler Basin	X			X			X			X	X		X	X	X			X			M	
7011	Upper Valley	X			X			X			X			X	X	X				X		M	
7017	Cluster		X			X			X		X			X		X	X		X			M	
7020	Sand Hollow	X				X		X			X			X	X	X			X			M	
7035	Silvies Meadows	X				X		X			X			X	X	X			X			M	
7039	Cave Gulch	X				X		Unknown			X			X	X	X			X			M	
7051	Sawtooth-MNF	X				X		X			X	X		X	X	X			X			M	
7053	Silvies Canyon	X				X		X			X			X	X	X			X			M	
7056	Double "O"	X				X		X			X	X		X	X	X			X			M	
7057	Wrights Point	X				X			X				X	X	X	X			X	X		M	
4040	Poison Creek			X		X		Unknown			X			X		X			X			C	
4096	Hi Desert			X		X		Unknown			X			X	X	X				X		C	
4126	Abrahams Draw			X		X		Unknown			X			X	X	X				X		C	
4138	White			X		X		Unknown			X			X	X	X				X		C	
4180	King Mountain			X		X		Unknown		X				X	X	X				X		C	
5001	Crane FFR			X		X		Unknown			X			X	X	X			X			C	
5002	Catterson Sec. 13			X		X		Unknown			X			X	X	X			X			C	
5003	Malheur Slough			X		X		Unknown			X			X	X	X			X			C	
5005	Withers FFR			X		X		Unknown			X			X	X	X			X			C	

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Table 10. Allotment Categories (continued)

Allot. Number	Allotment Name	Range Condition			Allotment Potential			Present Productivity			Resource Conflicts			Controversy			Present Mgmt		Prudent Investor's Willingness To Invest			Crit. Allot. Char.	Selectiv Mgmt Category I, M, or C
		Sat	Unsat	Undef	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Sat	Unsat	Yes	Maybe	No		
5107	Manning Field			X			X			Unknown	X			X		X			X			C	
5109	Purdy FFR			X			X			Unknown			X			X		X			X	C	
5110	Reed FFR			X	X					Unknown	X			X		X				X		C	
5111	Temple's FFR			X	X					Unknown	X			X		X				X		C	
5112	Smith FFR			X	X					Unknown	X			X		X		X				C	
5113	Rattlesnake FFR			X			X			Unknown	X			X		X				X		C	
5203	Catterson			X	X					Unknown	X			X		X			X			C	
5211	Beckley Home	X					X			Unknown		X		X		X		X				C	
5216	Quier FFR			X			X			Unknown	X			X		X						C	
5217	Thompson FFR			X	X					Unknown	X			X		X						C	
5218	Bennett FFR			X			X			Unknown	X			X		X				X		C	
5219	Hamilton FFR			X	X					Unknown	X			X		X				X		C	
5311	Virginia FFR			X		X				Unknown	X			X		X				X		C	
5317	Hatt Butte			X			X			Unknown	X			X		X				X		C	
5318	Black Butte	X					X			Unknown		X		X		X		X				C	
5322	Briggs FFR			X			X			Unknown	X			X		X		X				C	
5323	Clemens FFR			X			X			Unknown	X			X		X				X		C	
5324	Riddle FFR			X			X			Unknown	X			X		X				X		C	
5325	Marshall Diamond FFR			X			X			Unknown	X			X		X				X		C	
5326	Jenkins N. Lake FFR			X		X				Unknown	X			X		X				X		C	
5327	Jenkins B. Flat FFR			X			X			Unknown	X			X		X				X		C	
5328	Fisher FFR			X			X			Unknown	X			X		X				X		C	
5504	State Field	X			X					Unknown		X		X		X		X				C	
5512	Clarks River	X					X			Unknown	X			X		X				X		C	
5518	Newell Field	X			X					Unknown	X			X		X				X		C	
5519	Big Upson			X	X					Unknown	X			X		X				X		C	
5520	Little Upson			X			X			Unknown	X			X		X				X		C	
5527	Riverside FFR	X				X				Unknown	X			X		X				X		C	
5539	W & C Blaylock FFR			X			X			Unknown	X			X		X				X		C	
5540	Luce Field			X	X					Unknown	X			X		X				X		C	
5541	Home Ranch Enclosure			X	X					Unknown	X			X		X				X		C	
5542	Marshall FFR			X			X			Unknown	X			X		X				X		C	
5543	Divine Flat Field			X			X			Unknown	X			X		X				X		C	
5544	Brooks Field			X			X			Unknown	X			X		X				X		C	
5545	Sunshine Field			X			X			Unknown	X			X		X				X		C	
5546	Druitt Field			X			X			Unknown	X			X		X				X		C	
5547	Lake Field			X			X			Unknown	X			X		X				X		C	
5548	Griffin FFR			X			X			Unknown	X			X		X				X		C	

Table 10. Allotment Categories (continued)

Allot. Number	Allotment Name	Range Condition			Allotment Potential			Present Productivity			Resource Conflicts			Controversy			Present Mgmt		Prudent Investor's Willingness To Invest			Crit. Allot. Char.	Selectiv Mgmt Category I, M, or C
		Sat	Unsat	Undef	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Hi	Med	Low	Sat	Unsat	Yes	Maybe	No		
5549	Howards FFR			X		X		Unknown		X			X		X					X		C	
5550	Jordans FFR			X		X		Unknown		X			X		X					X		C	
5551	Lillards FFR			X		X		Unknown		X			X		X					X		C	
5552	Miller FFR A			X		X		Unknown		X			X		X					X		C	
5553	Miller FFR B			X		X		Unknown		X			X		X					X		C	
5554	J. Francis Miller FFR			X		X		Unknown		X			X		X					X		C	
5555	Ott FFR			X		X		Unknown		X			X		X					X		C	
5556	Pine Creek FFR			X		X		Unknown		X			X		X					X		C	
5557	J & G Kane FFR			X		X		Unknown		X			X		X					X		C	
5558	J & G FFR			X		X		Unknown		X			X		X					X		C	
5559	Swords FFR			X		X		Unknown		X			X		X					X		C	
5560	Vickers FFR			X		X		Unknown		X			X		X					X		C	
5561	Wilber FFR			X		X		Unknown		X			X		X					X		C	
5562	Williams FFR			X		X		Unknown		X			X		X					X		C	
5563	Arnold FFR			X		X		Unknown		X			X		X					X		C	
5567	Miler FFR			X		X		Unknown		X			X		X					X		C	
5568	Byrons FFR			X		X		Unknown		X			X		X					X		C	
5569	Floyds FFR			X		X		Unknown		X			X		X					X		C	
5570	River FFR			X		X		Unknown		X			X		X					X		C	
5572	Krueger FFR			X		X		Unknown		X			X		X					X		C	
7013	Zoglmann	X					X	Unknown			X				X					X		C	
7027	Emigrant Creek	X					X	Unknown		X				X						X		C	
7028	Stinger Creek	X					X	Unknown		X				X						X		C	
7029	Spring Creek	X				X		Unknown	X				X		X					X		C	
7032	Hotchkiss Ind.			X		X		Unknown		X				X						X		C	
7034	Scat Field	X				X		Unknown		X				X						X		C	
7037	Coal Pit Spring	X				X		Unknown	X					X						X		C	
7038	Curry Gordon	X				X		Unknown		X				X						X		C	
7042	Dole Smith	X				X		Unknown			X			X						X		C	
7044	Cowing			X		X		Unknown		X				X						X		C	
7045	Whiting			X		X		Unknown		X				X						X		C	
7046	Baker Hill Field	X				X		Unknown			X			X						X		C	
7047	Peabody	X				X		Unknown			X			X						X		C	
7048	Varien Canyon			X		X		Unknown		X				X						X		C	
7050	Clemens	X				X		Unknown		X				X						X		C	
7052	Lone Pine Field	X				X		Unknown			X			X						X		C	
7054	Cricket Creek	X				X		Unknown			X			X						X		C	
7059	Carp			X		X		Unknown		X				X						X		C	
7060	Castle			X		X		Unknown		X				X						X		C	
7080	Devine Canyon	X				X		Unknown			X			X						X		C	
7081	Harney Basin			X		X		Unknown			X			X						X		C	
7082	Hines Field			X		X		Unknown			X			X						X		C	
7085	Rainbow Creek			X		X		Unknown			X			X						X		C	
7087	Silver Creek Valley			X		X		Unknown			X			X						X		C	
7088	Sunset Valley			X		X		Unknown		X				X						X		C	

Table 11. Rangeland Monitoring and Evaluation

Purpose of Monitoring

- 1) To determine the effects of management actions on the rangeland resources.
- 2) To determine the effectiveness of on-the-ground management actions in achieving resource management objectives within planned timeframes.
- 3) To provide quantifiable data to identify and support needed management actions.
- 4) To provide quantifiable data for the periodic review of management objectives.

Monitoring Methods

Monitoring methods must be suitable for the vegetation types and resource conditions that will be encountered. The capability of the methods to detect subtle changes due to management over short periods of time must be carefully considered.

For monitoring data to be meaningful and useful over time, there must be consistency in the kinds of data that are collected and the manner in which they are collected. However, the need for changes in sampling may occasionally arise when problems are detected during a cursory review of the collected data, when analyzing and interpreting the data, or when conducting an evaluation. Serious consideration must be given to the effect changes will have on the historical value of existing data.

The methods discussed here are the methods currently in use in the Three Rivers RA. These methods are consistent with the District Monitoring Plan, State Monitoring Guidance and Bureau Policy.

Actual Use

Actual use monitoring provides information concerning the actual amount of grazing use occurring on an area of rangeland during a specific time period. It is a record of livestock and wild horse use in each pasture of an allotment and represents forage consumed in terms of AUMs. Livestock actual use is provided by the permittees. Data is verified by field checks and occasional counts. The report includes livestock numbers, pasture usage and turn out and gathering dates.

Wild horse actual use is determined by multiplying inventoried numbers by the grazing period on their summer and winter range. This may or may not involve separate pastures.

Actual use is collected in all "M" and "I" category allotments annually.

Utilization

Utilization data are collected to provide information concerning the percentage of forage that has been consumed or destroyed on an area of rangeland during a specific period of time and the grazing pattern on the allotment. Utilization data are important in evaluating the effects of grazing use on specific areas of rangeland and identifying areas of concentrated use that may be dispersed by some form of range improvement.

In the short term, utilization data are considered with actual use and climatic data to determine resource use levels and to identify the need for range improvement projects, adjustment in management actions, and/or adjustments in grazing use levels. These data can be used as the basis for implementing adjustments in grazing use through agreement or by decision.

In the long term, utilization data are considered along with actual use, authorized use, estimated use, trend, climate, and any other data available or necessary for allotment evaluation. Evaluations are conducted to determine if the grazing management actions and/or practices are achieving the long-term management objectives identified in the land-use and activity plans.

The primary method used in the RA is the Key Forage Plant method. The key forage plant method is an ocular estimate method of judging utilization within one of six utilization classes on one or more key herbaceous and/or browse species. Utilization is generally expressed as a percentage of available forage weight or numbers of plants, twigs, etc., that have been consumed or destroyed, and is expressed in terms of the current year's production removed.

Trend

Trend data are important in determining the effectiveness of on-the-ground management actions and evaluating progress toward meeting management objectives. They indicate whether the rangeland is moving toward or away from its potential or from achieving specific management objectives. Trend refers to the direction of change and indicated whether rangeland vegetation is being maintained or is moving toward or away from the desired plant community or toward or away from other specific vegetation management objectives. Trends of rangelands may be judged by noting changes in composition, density, cover, production, vigor, age class, and frequency of the vegetation, and related parameters of other resources.

The trend method used in the RA is the Nearest Plant method, which consists of a minimum of 100 observations along a transect at one pace, or other selected intervals. The observation is the nearest plant within a 180 degree arc from the center of the front of the observer's foot. Close-up and general view photographs are used with this method.

Table 11. Rangeland Monitoring and Evaluation (continued)

This method provides an estimate of relative species dispersion. The indicators of trend monitored with this method are the percentage of occurrence as nearest plant.

The Photo-plot method is also used to measure trend. This method includes taking a close-up photograph of a 3 x 3 foot plot and a general view photograph of the study site.

Climate

Climate studies provide a comparison of grazing season climatic conditions with long-term normals. Crop year (September - June) precipitation accounts for approximately 80 percent of the variation in vegetation production in the Great Basin. The Forage Yield Index developed at the Squaw Butte Experiment Station is used to adjust forage utilization.

Table 11. (continued)

Evaluation

The analysis and interpretation of inventory and monitoring data are extremely important in the evaluation of management actions to determine their progress in meeting resource management objectives. This process must be carefully accomplished to determine if adjustments in grazing use and management actions are needed, and if so, to what extent.

The major steps involved in the evaluation process are as follows:

Assemble and Display Monitoring and Other Data - Review and summarize available data which has been collected from baseline inventories, monitoring studies, supplemental studies and other sources.

Analyze Data - Perform all necessary calculations of data.

Interpret Data - After the data has been analyzed, it is interpreted to determine whether the results show a trend or have remained static over time for each type of study. This includes interpreting individual data sets and examining their interrelationships.

In order to assess proper stocking level or carrying capacity, the following formula may be used.

$$\text{Potential Stocking Level} = \frac{\text{Target Util.} \times \text{Actual Use}}{\text{(Carrying Capacity)} \quad \text{Measured Util.} \times \text{Yield Index}}$$

Evaluate Data- The data is evaluated for consistency, reliability, strong points, weak points, completeness and accuracy. If the results of the interpretation indicate a trend, the evaluation attempts to determine the causes of the trends and establish a course of action for future management.

Review Management Objectives - Management objectives must be evaluated as well as the monitoring data in order to make sure that the objectives are meaningful.

In order for management actions to be monitored and progress to be evaluated, the objectives must be measurable. They must also be reasonably attainable within a reasonable timeframe. In some cases, detection of a trend toward the desired value may be sufficient to justify continuation of the management practice being evaluated, especially on poor condition ranges where vegetation objectives will be attainable only in the long-term. In these cases, intermediate objectives may be useful in evaluating the progress.

Evaluate Progress in Meeting Management Objectives- Determine if management objectives have been met or if adequate progress toward achieving them has occurred or if management objectives or monitoring techniques need redefining.

Summarize Findings and Make Recommendations - The formal evaluation must include concise management recommendations as well as recommendations on changing monitoring techniques, management objectives, key areas, or key species.

Table 12. Standard Procedures and Design Elements for Range Improvements

Range improvements are proposed for several reasons including, but not limited to: to implement more intensive grazing systems; to allow deferment of grazing use on native range during the spring; to improve livestock distribution; and to increase forage production.

The following standard procedures and design elements would be adhered to under the proposed action in constructing range improvements in the EIS area. Design elements have been standardized over time to mitigate adverse effects encountered during range improvement installations.

- Preparation of a site-specific environmental assessment prior to implementation of range improvements is required. Proposed range improvements may be modified or abandoned if this assessment indicates significant adverse environmental impacts cannot be mitigated or avoided.
- A wilderness inventory, required by FLPMA, has been completed in the EIS area. All rangeland management activities in wilderness study areas will be consistent with the IMP and Guidelines for Lands Under Wilderness Review unless and until the area is removed from this category. Impacts will be assessed before implementing management activities to ensure they meet guidelines.
- Every effort would be made to avoid adverse impacts to cultural resources. A cultural resources inventory will be completed on all areas prior to any decision to perform ground-disturbing activities. This would be part of the preplanning stage of a project and the results would be analyzed in the environmental assessment addressing the action (BLM Manual 8100, Cultural Resources Management). If significant cultural values are identified, the project could be relocated, redesigned or abandoned. However, where that is not possible, the BLM would consult with the State Historic Preservation Officer and the Advisory Council on Historic Preservation in accordance with the Programmatic Memorandum of Agreement (PMOA) by and between the Bureau, the Council and the National Conference of State Historic Preservation Officers, dated January 14, 1980, which sets forth a procedure for developing appropriate mitigative measures, in compliance with Section 106 of the National Historic Preservation Act (1966) as implemented by 36 CFR Part 800. Management adherence to agreed upon mitigative measures will be implemented in compliance with these regulations.
- If a project might affect any listed threatened or endangered species or its critical habitat, consultation with the USFWS would be initiated (50 CFR 50 402: Endangered Species Act of 1973, as amended). The project would be modified, relocated or abandoned in order to obtain a no effect determination. If a project may contribute to the need to list a Federal candidate or Bureau sensitive species, a technical assistance request would be made to the USFWS.
- Surface disturbance at all project sites would be held to a minimum. Disturbed soil would be rehabilitated to blend into surrounding soil surface and reseeded as needed with a mixture of grasses, forbs and browse as applicable to replace ground cover and reduce soil loss from wind and water erosion.
- Seeding would only be done to enhance and sustain multiple-use values. Vegetation manipulation projects would be designed using irregular patterns, untreated patches, etc., to provide for optimum edge effect for visual quality and wildlife. Layout and design would be coordinated with local ODFW biologists.
- Seeding would be accomplished by use of the rangeland drill in most cases. Broadcast seeding would occur on small disturbed areas, rough terrain and rocky areas. Brush would be controlled prior to seeding. Some projects would have brush control only. Brush control could employ burning, spraying, chaining, etc.; however, the treatment method has not been determined for individual projects. Generally, areas containing needlegrasses and/or rabbitbrush and areas with sandy soils would not be burned. BLM would determine seeding mixtures on a site-specific basis, at the EA level in accordance with NEPA, using past experience and recommendations of the Oregon State University Extension Service and Experiment Stations and/or ODFW. Anticipated increases in production through vegetation manipulation projects would not be allocated until seedings are established and ready for use. All seedings would be deferred from grazing for at least two growing seasons to allow seedling establishment. Where deep furrow drills are used, slopes would be drilled on the contour to prevent water erosion.
- The seeding policy for the BLM in Oregon is as follows: Seedings to change vegetation composition should be used when it is the most efficient method to accomplish the resource objectives identified through the planning process. The selection of the seeding area and the species to be used should be based on a site-specific evaluation which considers ecologic potential, technical and economic feasibility, location of unique resources, plant diversity and cumulative impacts on the ecosystem. Adapted native species that can enhance vegetative diversity composition must be given consideration in species selection. To insure establishment seedings must be protected for two growing seasons or until the vigorous seedlings produce their first seed crop. Once established, seedings should be properly managed and monitored to ensure that resource objectives are accomplished.
- It is anticipated that the existing road and trail system would provide access for range improvements construction. If needed, unimproved trails and tracks would be created to reach construction sites. These trails would continue to be utilized for maintenance of the projects.

Table 12. Standard Procedures and Design Elements for Range Improvements (continued)

- It is assumed that normal maintenance such as replacement of pipeline sections, fence posts and retreatment of vegetation manipulations would occur.
- VRM procedures would be employed to minimize the adverse visual impacts created by the proposed range improvements.

Additional design features are identified in the following discussion of the individual types of improvements.

Reservoir Construction

Development of reservoirs would involve the construction of pits and dams to impound water for livestock and wildlife use. Pits would be in dry lake beds or other natural depressions. Dams would be constructed in drainages. Water storage capacity would range from 1 .0 to 2.0 acre-feet. Fill material, if needed, would come from the impoundment area and/or a borrow area for dams. Excavated material from pits would be piled adjacent to the pit. Topsoil would be stockpiled and used to rehabilitate the borrow areas.

Wells

Wells would be cased with steel pipe and sealed with concrete to prevent cave-ins and contamination. All State of Oregon **water**-well drilling regulations would be adhered to, both in drilling and equipping. A safety device would be installed on new powerline transformers to prevent electrocution of raptors. Metal storage tanks, painted to blend with the surrounding landscape, would be placed at each well site. Generally, the tanks would be enclosed and would measure 15 to 30 feet in diameter and 6 to 12 feet high.

Springs

The proposed action includes the development of springs. This would involve digging or drilling to intercept naturally occurring water flow, installing perforated pipe or concrete boxes to collect water, and installing pipelines and water troughs. The spring source and trough overflow area would be fenced to prevent livestock grazing and trampling and provide meadow habitat. A small waterhole would be developed inside the fenced overflow area for wildlife use. Ramps, rocks or float boards would be provided in all water troughs for birds and mammals to gain access to and/or escape from the water.

Pipelines

Pipelines are proposed to carry water for livestock from wells to areas that lack an adequate water supply. Generally, 1 to 2-inch diameter plastic pipe would be buried with a pipe-laying device consisting of a modified rippertooth mounted on a tractor. The pipe is normally laid as deeply as possible under the ground but no deeper than 30 inches. Where obstructions prohibit burying, the pipe would be laid on the surface and covered with borrowed soil. Reservoirs would be constructed along the pipeline and fenced to exclude livestock. This would provide ground level water for wildlife, and serve as an emergency water supply in case of equipment failure. Water troughs would be installed approximately every mile along the pipeline. Ramps, rocks or float boards would be provided in all water troughs for birds and mammals to gain access to and/or escape from the water.

Fences and Cattleguards

Fences would be designed to prevent the passage of livestock without stopping the movement of wildlife. All fences would be constructed in accordance with Bureau Manual 1741. The proposed fence lines would not be bladed or scraped. All fences would comply with VRM procedures.

Where fences cross existing roads either gates or cattleguards would be installed.

Table 13. Range Improvement Costs¹

Type of Improvement	Unit	Cost/Unit
Guzzler	Each	\$4,500
Brush Control	Acre	\$10
Cattleguard	Each	\$2,400
Fence	Mile	\$2,500
Juniper Burning	Unit	\$2,800
Pipeline	Mile	\$10,500
Prescribed Burn	Acre	\$10
Reservoir	Each	\$6,700
Road Maintenance	Mile	\$200
Seeding	Acre	\$25
Spring	Each	\$3,000
Trough	Each	\$1,800
Well	Each	\$22,500

¹Based on recent years' experience, figures in 1991 dollars.

Table 14. Potential Range Improvements by Allotment

Allotment No.	Allotment Name	Type of Improvement	Units	Cost/Unit	No.	Cost
	Silver Lake Pond	Fence	Mile	\$3,334	1.5	\$5,001
4098		Nest Islands	Each	\$2,500	2	\$5,000
4143	East Cr.-Pine Hill	Fence	Mile	\$2,500	1	\$2,500
	Silvies	Wetland Improvements	Project	\$21,000	1	\$21,000
5101	Devine Ridge	Fence	Mile	\$2,500	0.75	\$1,875
5102	Prather Creek	Reservoir	Each	\$6,700	1	\$6,700
5105	Camp Harney	Fence	Mile	\$2,500	1	\$2,500
		Spring	Each	\$3,000	1	\$3,000
		Juniper Burning	Units	\$2,800	5	\$14,000
		Cattleguard	Each	\$2,400	1	\$2,400
5201	Coleman Creek	Fence	Mile	\$2,500	2	\$5,000
5205	Venator	Spring	Each	\$3,000	1	\$3,000
5206	Stockade	Fence	Mile	\$2,500	1	\$2,500
5207	Coyote Creek	Fence	Mile	\$2,500	0.5	\$1,250
5218	Bennett FFR	Road Maintenance	Mile	\$200	1.5	\$300
5301	Princeton	Trough	Each	\$1,800	3	\$5,400
		Pipeline	Mile	\$10,500	7	\$73,500
5302	Big Bird	Pipeline	Mile	\$10,500	2	\$21,000
		Trough	Each	\$1,800	1	\$1,800
5303	Dry Lake	Well	Each	\$22,500	1	\$22,500
		Pipeline	Mile	\$10,500	12	\$126,000
		Cattleguard	Each	\$2,400	1	\$2,400
		Trough	Each	\$1,800	5	\$9,000
5305	Crow's Nest	Pipeline	Mile	\$10,500	2	\$21,000
5306	Rocky Ford	Cattleguard	Each	\$2,400	1	\$2,400
		Reservoir	Each	\$6,700	1	\$6,700
		Well	Each	\$22,500	1	\$22,500
		Pipeline	Mile	\$10,500	1	\$10,500
5307	Smyth Creek	Fence	Mile	\$2,500	2.75	\$6,875
		Juniper Burning	Units	\$2,800	6	\$16,800
		Cattleguard	Each	\$2,400	1	\$2,400
		Reservoir	Each	\$6,700	1	\$6,700
5308	Kiger	Cattleguard	Each	\$2,400	1	\$2,400
		Juniper Burning	Units	\$2,800	2	\$5,600
		Reservoir	Each	\$6,700	1	\$6,700
5309	Happy Valley	Fence	Mile	\$2,500	1	\$2,500
		Trough	Each	\$1,800	1	\$1,800
		Juniper Burning	Units	\$2,800	2	\$5,600
		Pipeline	Mile	\$10,500	1	\$10,500
5310	Riddle Mountain	Juniper Burning	Units	\$2,800	8	\$22,400
		Spring	Each	\$3,000	1	\$3,000
		Fence	Mile	\$2,500	1	\$2,500
5315	Virginia Valley	Trough	Each	\$1,800	5	\$9,000
		Pipeline	Mile	\$10,500	7	\$73,500
		Cattleguard	Each	\$2,400	1	\$2,400
		Fence	Mile	\$2,500	3	\$7,500
5321	Hamilton Ind.	Fence	Mile	\$2,500	1	\$2,500
5329	Riddle-Coyote	Fence	Mile	\$2,500	4	\$10,000
5503	Pine Creek	Spring	Each	\$3,000	3	\$9,000
		Fence	Mile	\$2,500	2	\$5,000
		Juniper Burning	Units	\$2,800	7	\$19,600
5506	Muddy Creek	Reservoir	Each	\$6,700	1	\$6,700
5510	Jones Dripp	Reservoir	Each	\$6,700	2	\$13,400
5511	Moffet Table	Prescribed Burn	Acre	\$10	1,560	\$15,600
		Trough	Each	\$800	4	\$3,200
		Fence	Mile	\$2,500	3.5	\$8,750
		Juniper Burning	Units	\$2,800	6	\$16,800
5514	Coal Mine Creek	Trough	Each	\$800	1	\$800
5515	Mule Creek	Fence	Mile	\$2,500	1	\$2,500

Table 14. Potential Range Improvements by Allotment (continued)

Allotment No.	Allotment Name	Type of Improvement	Units	Cost/ Unit	No.	Cost
5517	Otis Mountain	Trough	Each	\$800	2	\$1,600
		Juniper Burning	Units	\$2,800	4	\$11,200
		Prescribed Burn	Acre	\$10	1,440	\$14,400
5522	Cottonwood Creek	Reservoir	Each	\$6,700	2	\$13,400
		Fence	Mile	\$2,500	2.5	\$6,250
5524	Dawson Butte	Trough	Each	\$800	3	\$2,400
5526	Chalk Hills	Well	Each	\$22,500	1	\$22,500
		Pipeline	Mile	\$10,500	2	\$21,000
5528	Cooler	Reservoir	Each	\$6,700	1	\$6,700
5529	House Butte	Spring	Each	\$3,000	2	\$6,000
5531	Stinkingwater	Fence	Mile	\$2,500	3	\$7,500
		Road Maintenance	Mile	\$200	7	\$14,000
		Reservoir	Each	\$6,700	1	\$6,700
5532	Mountain	Fence	Mile	\$2,500	8	\$20,000
		Juniper Burning	Units	\$2,800	15	\$42,000
		Trough	Each	\$800	1	\$800
		Road Maintenance	Mile	\$200	12	\$2,400
5534	Mahon Creek	Road Maintenance	Mile	\$200	2	\$400
		Fence	Mile	\$2,500	1.5	\$3,750
5535	Miller Canyon	Reservoir	Each	\$6,700	3	\$20,100
		Juniper Burning	Units	\$2,800	6	\$16,800
		Road Maintenance	Mile	\$200	5	\$1,000
5536	Alder Creek	Juniper Burning	Units	\$2,800	12	\$33,600
		Road Maintenance	Mile	\$200	10	\$2,000
		Fence	Mile	\$2,500	4.5	\$11,250
		Reservoir	Each	\$6,700	4	\$26,800
5537	Rock Mountain	Spring	Each	\$3,000	1	\$3,000
5538	Riverside	Spring	Each	\$3,000	1	\$3,000
5560	Vickers' FFR	Road Maintenance	Mile	\$200	1.5	\$300
5564	Wheeler Basin	Trough	Each	\$800	1	\$800
		Reservoir	Each	\$6,700	2	\$13,400
5565	Upton Mountain	Seeding	Acre	\$25	2,000	\$50,000
		Pipeline	Mile	\$200	1	\$200
		Trough	Each	\$800	1	\$800
		Brush Control	Acre	\$10	2,000	\$20,000
		Reservoir	Each	\$6,700	1	\$6,700
5566	Texaco Basin	Road Maintenance	Mile	\$200	4.5	\$900
		Fence	Mile	\$2,500	2	\$5,000
5571	Lamb Ranch	Fence	Mile	\$2,500	1.25	\$3,125
7001	East Warm Springs	Pipeline	Mile	\$10,500	4	\$42,000
		Fence	Mile	\$2,500	17	\$42,500
		Trough	Each	\$1,800	4	\$7,200
		Reservoir	Each	\$6,700	6	\$40,200
		Well	Each	\$22,500	1	\$22,500
7002	West Warm Springs	Reservoir	Each	\$6,700	12	\$80,400
		Wetland Improvements	Project	\$40,000	1	\$40,000
		Fence	Mile	\$2,500	2	\$5,000
7003	East Wagontire	Trough	Each	\$800	2	\$1,600
		Brush Control	Acre	\$10	32,665	\$326,650
		Spring	Each	\$3,000	1	\$3,000
		Seeding	Acre	\$25	31,200	\$780,000
		Fence	Mile	\$2,500	42	\$105,000
		Well	Each	\$22,500	2	\$45,000
		Reservoir	Each	\$6,700	8	\$53,600
		Pipeline	Mile	\$10,500	25	\$262,500
7004	West Wagontire	Trough	Each	\$1,800	7	\$12,600
		Reservoir	Each	\$6,700	2	\$13,400
		Pipeline	Mile	\$10,500	7	\$73,500
		Well	Each	\$22,500	1	\$22,500
		Fence	Mile	\$2,500	20	\$50,000
		Big Game Guzzler	Each	\$4,500	2	\$9,000

Table 14. Potential Range Improvements by Allotment

Allotment No.	Allotment Name	Type of Improvement	Units	Cost/Unit	No.	Cost
	Silver Lake Pond	Fence	Mile	\$3,334	1.5	\$5,001
		Nest Islands	Each	\$2,500	2	\$5,000
4098	East Cr.-Pine Hill	Fence	Mile	\$2,500	1	\$2,500
4143	Silvies	Wetland Improvements	Project	\$21,000	1	\$21,000
		Fence	Mile	\$2,500	0.75	\$1,875
5101	Devine Ridge	Reservoir	Each	\$6,700	1	\$6,700
5102	Prather Creek	Fence	Mile	\$2,500	1	\$2,500
5105	Camp Harney	Fence	Mile	\$2,500	1	\$2,500
		Spring	Each	\$3,000	1	\$3,000
		Juniper Burning	Units	\$2,800	5	\$14,000
		Cattleguard	Each	\$2,400	1	\$2,400
5201	Coleman Creek	Fence	Mile	\$2,500	2	\$5,000
5205	Venator	Spring	Each	\$3,000	1	\$3,000
5206	Stockade	Fence	Mile	\$2,500	1	\$2,500
5207	Coyote Creek	Fence	Mile	\$2,500	0.5	\$1,250
5218	Bennett FFR	Road Maintenance	Mile	\$200	1.5	\$300
5301	Princeton	Trough	Each	\$1,800	3	\$5,400
		Pipeline	Mile	\$10,500	7	\$73,500
5302	Big Bird	Pipeline	Mile	\$10,500	2	\$21,000
		Trough	Each	\$1,800	1	\$1,800
5303	Dry Lake	Well	Each	\$22,500	1	\$22,500
		Pipeline	Mile	\$10,500	12	\$126,000
		Cattleguard	Each	\$2,400	1	\$2,400
		Trough	Each	\$1,800	5	\$9,000
5305	Crow's Nest	Pipeline	Mile	\$10,500	2	\$21,000
5306	Rocky Ford	Cattleguard	Each	\$2,400	1	\$2,400
		Reservoir	Each	\$6,700	1	\$6,700
		Well	Each	\$22,500	1	\$22,500
		Pipeline	Mile	\$10,500	1	\$10,500
5307	Smyth Creek	Fence	Mile	\$2,500	2.75	\$6,875
		Juniper Burning	Units	\$2,800	6	\$16,800
		Cattleguard	Each	\$2,400	1	\$2,400
		Reservoir	Each	\$6,700	1	\$6,700
5308	Kiger	Cattleguard	Each	\$2,400	1	\$2,400
		Juniper Burning	Units	\$2,800	2	\$5,600
		Reservoir	Each	\$6,700	1	\$6,700
5309	Happy Valley	Fence	Mile	\$2,500	1	\$2,500
		Trough	Each	\$1,800	1	\$1,800
		Juniper Burning	Units	\$2,800	2	\$5,600
		Pipeline	Mile	\$10,500	1	\$10,500
5310	Riddle Mountain	Juniper Burning	Units	\$2,800	8	\$22,400
		Spring	Each	\$3,000	1	\$3,000
		Fence	Mile	\$2,500	1	\$2,500
5315	Virginia Valley	Trough	Each	\$1,800	5	\$9,000
		Pipeline	Mile	\$10,500	7	\$73,500
		Cattleguard	Each	\$2,400	1	\$2,400
		Fence	Mile	\$2,500	3	\$7,500
5321	Hamilton Ind.	Fence	Mile	\$2,500	1	\$2,500
5329	Riddle-Coyote	Fence	Mile	\$2,500	4	\$10,000
5503	Pine Creek	Spring	Each	\$3,000	3	\$9,000
		Fence	Mile	\$2,500	2	\$5,000
		Juniper Burning	Units	\$2,800	7	\$19,600
5506	Muddy Creek	Reservoir	Each	\$6,700	1	\$6,700
5510	Jones Dripp	Reservoir	Each	\$6,700	2	\$13,400
5511	Moffet Table	Prescribed Burn	Acre	\$10	1,560	\$15,600
		Trough	Each	\$800	4	\$3,200
		Fence	Mile	\$2,500	3.5	\$8,750
		Juniper Burning	Units	\$2,800	6	\$16,800
5514	Coal Mine Creek	Trough	Each	\$800	1	\$800
5515	Mule Creek	Fence	Mile	\$2,500	1	\$2,500

Table 14. Potential Range Improvements by Allotment (continued)

Allotment No.	Allotment Name	Type of Improvement	Units	Cost/Unit	No.	Cost
		Seeding	Acre	\$25	9,000	\$225,000
		Brush Control	Acre	\$10	9,000	\$90,000
7006	Rimrock Lake	Spring	Each	\$3,000	2	\$6,000
		Reservoir	Each	\$6,700	12	\$80,400
		Brush Control	Acre	\$10	3,000	\$30,000
		Fence	Mile	\$2,500	4	\$10,000
7007	Hat Butte	Brush Control	Acre	\$10	2,500	\$25,000
		Reservoir	Each	\$6,700	1	\$6,700
7008	Sheep Lake-Shields	Seeding	Acre	\$25	800	\$20,000
		Reservoir	Each	\$6,700	6	\$40,200
7009	Dry Lake (Rye Grass)	Seeding	Acre	\$25	960	\$24,000
		Juniper Burning	Units	\$2,800	5	\$14,000
		Brood Pond	Each	\$7,500	2	\$15,000
		Brush Control	Acre	\$10	1,800	\$18,000
		Reservoir	Each	\$6,700	1	\$6,700
7010	Claw Creek	Fence	Mile	\$2,500	8	\$20,000
		Reservoir	Each	\$6,700	2	\$13,400
		Fence	Mile	\$2,500	2.25	\$5,625
7013	Zoglmann	Spring	Each	\$3,000	1	\$3,000
7014	Badger Spring	Reservoir	Each	\$6,700	2	\$13,400
7015	Second Flat	Big Game Guzzler	Each	\$4,500	2	\$9,000
		Big Game Guzzler	Each	\$4,500	2	\$9,000
		Spring	Each	\$3,000	2	\$6,000
		Fence	Mile	\$2,500	3	\$7,500
7016	Juniper Ridge	Reservoir	Each	\$6,700	2	\$13,400
		Seeding	Acre	\$25	3,000	\$75,000
		Fence	Mile	\$2,500	9	\$22,500
		Pipeline	Mile	\$10,500	8	\$84,000
		Trough	Each	\$1,800	8	\$14,400
		Reservoir	Each	\$6,700	1	\$6,700
		Well	Each	\$22,500	1	\$22,500
		Prescribed Burn	Acre	\$10	5,260	\$52,600
7017	Cluster	Brush Control	Acre	\$10	2,000	\$20,000
7018	Silver Lake	Fence	Mile	\$2,500	1	\$2,500
		Brush Control	Acre	\$10	4,500	\$45,000
		Pipeline	Mile	\$10,500	4	\$42,000
7019	Palomino Buttes	Reservoir	Each	\$6,700	3	\$20,100
		Fence	Mile	\$2,500	7	\$17,500
		Reservoir	Each	\$6,700	1	\$6,700
		Wetland Improvements	Project	\$50,000	1	\$50,000
		Well	Each	\$22,500	1	\$22,500
7020	Sand Hollow	Pipeline	Mile	\$10,500	2	\$21,000
		Fence	Mile	\$2,500	6	\$15,000
		Reservoir	Each	\$6,700	1	\$6,700
7021	Weaver Lake	Pipeline	Mile	\$10,500	3	\$31,500
		Fence	Mile	\$2,500	2	\$5,000
7022	Dog Mountain	Reservoir	Each	\$6,700	2	\$13,400
		Fence	Mile	\$2,500	5.5	\$13,750
		Reservoir	Each	\$6,700	1	\$6,700
		Spring	Each	\$3,000	1	\$3,000
7024	East Sagehen	Reservoir	Each	\$6,700	2	\$13,400
7025	Gouldin	Reservoir	Each	\$6,700	1	\$6,700
		Fence	Mile	\$2,500	4	\$10,000
7030	Skull Creek	Brush Control	Acre	\$10	1,600	\$16,000
		Fence	Mile	\$2,500	2	\$5,000
		Juniper Burning	Units	\$2,800	10	\$28,000
7031	Hay Creek	Reservoir	Each	\$6,700	2	\$13,400
		Fence	Mile	\$2,500	4	\$10,000
7033	Silvies River	Fence	Mile	\$2,500	4	\$10,000
7036	Hayes	Fence	Mile	\$2,500	1.5	\$3,750

Table 14. Potential Range Improvements by Allotment (continued)

Allotment No.	Allotment Name	Type of Improvement	Units	Cost/Unit	No.	Cost
7037	Coal Pit Springs	Reservoir	Each	\$6,700	1	\$6,700
		Spring	Each	\$3,000	2	\$6,000
7040	Landing Creek	Fence	Mile	\$2,500	5	\$12,500
7041	East Silvies	Spring	Each	\$3,000	1	\$3,000
		Fence	Mile	\$2,500	3	\$7,500
		Reservoir	Each	\$6,700	1	\$6,700
7043	Lone Pine	Juniper Control	Acre	\$80	1,000	\$80,000
		Reservoir	Each	\$6,700	3	\$20,100
		Juniper Burning	Units	\$2,800	5	\$14,000
		Spring	Each	\$3,000	1	\$3,000
7048	Varien Canyon	Fence	Mile	\$2,500	0.25	\$625
7049	Forks of Poison Cr.	Brush Control	Acre	\$10	530	\$5,300
7058	Narrows	Trough	Each	\$1,800	1	\$1,800
		Reservoir	Each	\$6,700	2	\$13,400
		Well	Each	\$22,500	1	\$22,500

Table 15. Descriptions of Existing and Proposed ACECs

South Narrows ACEC

South Narrows ACEC is an existing ACEC in the Three Rivers RA. It was established June 30, 1983. It is located in Harney County approximately 26 miles south of Burns, Oregon, adjacent to Highway 205. This ACEC is 160 acres in size. It is in East Warm Springs Allotment (No. 7001). The elevation of the site is approximately 4,400 feet.

South Narrows ACEC was established to provide special management attention to the designated Critical Habitat of *Stephanomeria malheurensis*, Malheur wirelettuce, a plant species listed as endangered under the Endangered Species Act of 1973.

The management goal of the South Narrows ACEC is to provide protection in order to preserve the characteristics of the habitat and maintain the suitability of the site to support *Stephanomeria malheurensis*. Actions which have previously been undertaken in support of this goal include fencing a portion of the ACEC, installing informational signs and undertaking studies to aid in understanding the interrelationships between *Stephanomeria malheurensis* and its environment including competition between it and other species. Management of this area is incorporated into the activity plans associated with *Stephanomeria malheurensis*.

Legal Description of Site:

South Narrows ACEC:

Willamette Meridian:

T. 27 S., R. 30 E.,	Sec. 11,	SE1/4NE1/4 and NE1/4SE1/4;
	Sec. 12,	W1/2SW1/4NW1/4, SE1/4SW1/4NW1/4, SW1/4NE1/4SW1/4 and NW1/4SW1/4.

The area described aggregates 160 acres more or less.

Diamond Craters ONA/ACEC

Diamond Craters is an existing ONA/ACEC in the Three Rivers RA. It was established as an ACEC on December 2, 1980, and as an ONA on April 1, 1982. Diamond Craters is located in Harney County, approximately 40 miles southeast of Burns, Oregon, and 4 miles east of Highway 205 adjacent to the eastern boundary of the Malheur National Wildlife Refuge. The existing ONA/ACEC is 16,656 acres in size and the proposed addition is 400 acres. The ONA/ACEC will total 17,056 acres in size. The elevation of Diamond Craters ranges from 4,150 to 4,700 feet.

Diamond Craters ONA/ACEC was established to protect the diversity of geologic features and ecosystems. Diamond Craters is geologically unique because of the great variety of basaltic igneous-volcanic structures representing a complex series of geologic events which are present within a small geographic area. Preservation of the volcanic features is excellent due to a lack of erosion. The geologic features include lava flows, vents, craters, domes, a caldera, a maar and a graben. The diversity of vegetation at Diamond Craters includes both unusual and representative species and communities. The diversity of landforms and vegetation provides habitat for a large variety of wildlife species.

The management goal of the Diamond Craters ONA/ACEC is to preserve the unique assemblage of geologic features and ecosystems so that present and future generations may benefit from its exceptional scientific, educational, scenic and recreational values. Actions which have previously been undertaken in support of this goal include withdrawal of the area from mineral entry, closure of the area to ORV utilization, removal of livestock and wild horses, development of a self-guided tour, and development of the Diamond Craters Recreation Area Management Plan which details procedures for managing the recreational uses of the ONA/ACEC.

Legal Description of Site:

Diamond Craters ONA/ACEC:

Willamette Meridian:

T. 28 S., R. 31 E.,	Sec. 24,	E1/2NE1/4, SW1/4NE1/4, SE1/4NW1/4, E1/2SW1/2 and SE1/4;
	Sec. 25,	E1/2NE1/4, NW1/4NE1/4, NE1/4NW1/4 and NE1/4SE1/4.
T. 29 S., R. 31 E.,	Sec. 1,	E1/2E1/2;
	Sec. 12,	NE1/4NE1/4.

Table 15. Descriptions of Existing and Proposed ACECs (continued)

T. 28 S., R. 32 E.,	Sec. 17, All; Sec. 8, Lot 4, S1/2NE1/4, SE1/4SW1/4, and SE1/4; Secs. 19 through 22, Inclusive; Sec. 23, SW1/4 and S1/2SE1/4; Sec. 24, SW1/4SW1/4; Sec. 25, NW1/4NW1/4, S1/2NW1/4, and SW1/4; Secs. 26 through 35, Inclusive.
T. 29 S., R. 32 E.,	Sec. 1, W1/2NW1/4 and SW1/4; Secs. 2 through 6, Inclusive; Sec. 7, Lot 1, N1/2NE1/4 and NE1/4NW1/4; Sec. 8, N1/2, NE1/4SW1/4, N1/2SE1/4 and SE1/4SE1/4; Sec. 9, All; Sec. 10, N1/2 and SW1/4; Sec. 11, W1/2NE1/4 and NW1/4; Sec. 5, N1/2NW1/4.

The area described aggregates 16,656 acres more or less.

The addition to Diamond Craters ONA/ACEC:

Willamette Meridian:

T. 28 S., R. 32 E., Sec. 16, W1/2.

T. 28 S., R. 31 E., Sec. 36, SE1/4NE1/4 and NE1/4SE1/4.

The areas described aggregate 400 acres more or less.

The total area described aggregates 17,056 acres more or less.

Silver Creek RNA/ACEC Addition

Silver Creek RNA/ACEC and the proposed addition are located in Harney County approximately 35 miles west of Burns and 15 miles north of Highway 20 adjacent to the Ochoco National Forest boundary. The existing RNA/ACEC is 640 acres in size and the proposed addition is 1,280 acres including 640 acres of a private inholding, the acquisition of which through exchange is a prerequisite to the designation of the RNA/ACEC addition. The proposed addition is in the Upper Valley Allotment (No. 7011). The elevation of the site ranges from approximately 4,520 to 4,800 feet.

Silver Creek RNA/ACEC is an established RNA/ACEC within the Three Rivers RA. It was established to fill the aquatic natural area cell in the Ochoco, Blue and Wallowa Mountains Province described in the Oregon Natural Heritage Plan (1988) as:

- 2. First to third order stream system in Blue Mountains originating in ponderosa pine zone, including intermittent streams.

The proposed addition to the Silver Creek RNA/ACEC will provide for a better representation of this cell as it provides a greater elevational gradient along a single drainage. The proposed addition to the Silver Creek RNA/ACEC will also provide representation for an unfilled terrestrial natural area cell in the Blue Mountains Province described as:

- 35. Low sagebrush/bunchgrass community outside the forest zone.

The existing Silver Creek RNA/ACEC in Section 8 consists of ponderosa pine uplands with areas of big sagebrush/bunchgrass as well as an extensive forested riparian zone. The proposed addition, Sections 17 and 20, includes the confluence of Silver Creek and Sawmill Creek with a combined total of approximately 2.5 miles of high quality riparian area. The riparian zone is dominated by mature willows and mountain alder with an understory that is mostly Kentucky bluegrass. The uplands are dominated by low sagebrush and bluebunch wheatgrass. There are also areas of big sagebrush and bluebunch wheatgrass, scattered western juniper and bitterbrush, Idaho fescue and Sandberg's bluegrass. Portions of the existing RNA/ACEC and proposed addition were burned by wildfire in August 1990.

The primary management goal of the Silver Creek RNA/ACEC and proposed addition is to preserve the natural ecosystems and to provide areas for ecological studies, monitoring, and research, and education. The primary management action which will be undertaken to aid in the attainment of this goal will be the construction of perimeter boundary fencing. A high standard gravel road maintained by the county crosses through the southwestern corner RNA/ACEC addition. Coordination with the county will ensure maintenance does not degrade the RNA/ACEC. Two unimproved dirt roads are also present in the RNA/ACEC addition. These roads will remain open to public use. Signing of the RNA/ACEC along the county road may be appropriate. A separate management plan

Table 15. Descriptions of Existing and Proposed ACECs (continued)

will be written for this RNA/ACEC subsequent to the acquisition of the private inholding and the ROD. This management plan will be comprehensive in nature and reflect the allowable uses/use constraints shown in Appendix 1, Table 16 and the procedures and monitoring discussed in the management decision.

Legal Description of Site:

Silver Creek RNA/ACEC:

Willamette Meridian:

T. 21 S., R. 26 E., Sec. 8, All.

The area described aggregates 640 acres more or less.

Silver Creek RNA/ACEC Addition:

Willamette Meridian:

T. 21 S., R. 26 E., Sec. 17, All;
Sec. 20, All.

The area described aggregates 1,280 acres more or less.

Foster Flat RNA/ACEC

The proposed Foster Flat RNA/ACEC is located in Harney County approximately 42 miles south of Burns, Oregon, and 20 miles west of Highway 205 near the Burns District boundary with Lakeview District. The proposed Foster Flat RNA/ACEC is 2,690 acres in size. It is in East Warm Springs Allotment (No. 7001) and in the Warm Springs HMA. The elevation of the RNA/ACEC is approximately 5,000 feet.

Foster Flat RNA/ACEC will be designated to represent one natural **area cell** in the Basin and Range Province described in the Oregon Natural Heritage Plan (1988) as:

19. Silver sagebrush/Nevada bluegrass community

This community is found in **playas** throughout the Great Basin in sites which are flooded for a period of months during the winter and early spring but which dry up rapidly as the weather warms. Foster Flat covers a large area that is essentially devoid of topographic relief and is dominated by silver sagebrush. The silver sagebrush/Nevada bluegrass community covers approximately 800 acres in the central portion of the playa area. At slightly lower elevation on the playa is a silver sagebrush/rush community which stays wetter longer than the Nevada bluegrass association. The slightly higher elevation areas of the **playa** contain silver sagebrush/green rabbitbrush. There are also areas of basin **wildrye**, creeping **wildrye** or silver sagebrush with no understory. It is ringed by a slightly raised rim that is dominated by greasewood and big sagebrush.

The primary management goal of the Foster Flat RNA/ACEC is to manage the area to preserve the characteristics of the ecosystem and to provide areas for ecological studies, monitoring and research, and education. The primary management action which will be undertaken to aid in the attainment of this goal will be the construction of perimeter boundary fencing. The perimeter boundary fence will be constructed to allow livestock and wild horses to access the water source in the northwestern corner of Foster Flat. Access to the unimproved dirt roads within the RNA/ACEC may be limited by construction of this fence. A separate management plan will be written for this RNA/ACEC subsequent to the ROD. This management plan will be comprehensive in nature and reflect the allowable uses/use constraints shown in Appendix 1, Table 16 and the procedures and monitoring discussed in the management decision.

Legal Description of Site:

Foster Flat RNA/ACEC:

Willamette Meridian:

T. 29 S., R. 29 E., Sec. 34, NE1/4SE1/4 and S1/2SE1/4;
Sec. 35, NW1/4SW1/4 and S1/2SW1/4.

Table 15. Descriptions of Existing and Proposed ACECs (continued)

T. 30 S., R. 29 E., Sec. 2, Lots 3 and 4, S1/2NW1/4,
SW1/4, NW1/4SE1/4 and S1/2SE1/4;
Sec. 3, Lots 1 and 2, S1/2N1/2 and S1/2;
Sec. 4, SE1/4NE1/4 and NE1/4SE1/4;
Sec. 10, E1/2 and NE1/4NW1/4;
Sec. 11, All;
Sec. 14, N1/2;
Sec. 15, NE1/4NE1/4.

The area described aggregates 2,690 acres more or less.

Dry Mountain RNA/ACEC Addition

The BLM's proposed Dry Mountain RNA/ACEC is located in Harney County approximately 28 miles west of Burns, Oregon, and 10 miles north of Highway 20 adjacent to the Ochoco National Forest boundary on Dry Mountain. It is in Claw Creek Allotment (No. 7010). The proposed RNA/ACEC is 2,084 acres in size. The elevation of the RNA/ACEC is approximately 4,700 to 5,800 feet.

Ochoco National Forest currently has a Dry Mountain RNA proposed in the draft Forest Plan. The USDA-FS proposed Dry Mountain RNA and the BLM's proposed addition are located in the transition zone between the Ochoco, Blue and **Wallowa** Mountains Province and the Basin and Range Province. The proposed BLM and USDA-FS Dry Mountain RNA/ACEC would fill a number of natural area cells as described in the Oregon Natural Heritage Plan (1988) for the Cchoco, Blue and **Wallowa** Province including:

3. Western juniper/big sagebrush community.
7. Ponderosa pine/bitterbrush-mountain mahogany/sedge community.
33. Big sagebrush/bunchgrass community outside forest zone.
41. Mountain mahogany/bunchgrass.

The proposed RNA/ACEC also fills one natural area cell for the Basin and Range Province described as:

1. Ponderosa pine savanna.

The BLM RNA/ACEC addition contains major portions of the pine-juniper and pine-mahogany types as well as all of the mountain mahogany community and the complete sagebrush steppetransition zone. The Ochoco National Forest's proposed RNA represents a ponderosa pine/bunchgrass type with extensions into western juniper and big sagebrush and mountain mahogany types. The USDA-FS proposed RNA encompasses the higher elevations of the forest-sagebrush transition zone while the BLM proposed RNA/ACEC provides good representation of the lower elevations of the forest-sagebrush steppe transition which creates a total RNA/ACEC with more diversity.

BLM's proposed Dry Mountain RNA/ACEC also contains 180 acres which have been removed from the commercial forest timber base as ponderosa pine old growth management areas. These stands are located in Sections 3 and 10 of the proposed RNA/ACEC. The old growth stands contain an overstory consisting of old and large ponderosa pine trees with a 40-70 percent crown closure. The understory contains smaller ponderosa pine trees, many species of shrubs and other herbaceous species. Management of these areas will be to enhance existing old growth characteristics and to promote continued succession toward old growth. Examples of management actions which may occur to promote old growth characteristics include stand manipulation for the maintenance of stand structure, a desired species composition or a desired snag density. Management of the old growth stands will be in conjunction with the RNA/ACEC if designated.

The primary management goal of the proposed Dry Mountain RNA/ACEC is to manage the area to preserve all the ecosystems in a condition where they can provide areas for ecological studies, monitoring, and research, and education. At the current time, it is felt that perimeter boundary fencing will not be necessary in order to achieve this goal. Utilization of the area by livestock is light due to steepness of terrain and lack of water sources. Water development or timber harvest in adjoining areas may change livestock utilization patterns and necessitate the construction of some boundary fences. Low quality unimproved dirt roads exist within the RNA/ACEC. These will remain open to public use. A separate management plan will be written for this RNA/ACEC subsequent to the ROD. This management plan will be comprehensive in nature and reflect the allowable uses/use constraints shown in Appendix 1, Table 16 and the procedures and monitoring discussed in the management decision. Additionally, allowable uses/use constraints and management goals for old growth areas shown in Tables 2.9 and 2.10 as they are applicable to the Dry Mountain stands will also be incorporated into the RNA/ACEC Management Plan.

Legal Description of Site:

Dry Mountain RNA/ACEC:

Table 15. Descriptions of Existing and Proposed ACECs (continued)

Willamette Meridian:

T. 22 S., R. 26 E., Sec. 3, All;
Sec. 4, SE1/4;
Sec. 9, E1/2 and E1/2SW1/4;
Sec. 10, N1/2;
Sec. 16, E1/2;
Sec. 22, NE1/4, E1/2NW1/4 and NW1/4NW1/4.

The area described aggregates 2,084 acres more or less.

Biscuitroot Cultural ACEC

The proposed Biscuitroot Cultural ACEC of 6,500 total acres is located approximately 27 miles east of Burns, Oregon, and includes two associated parcels, both of which are transected by Highway 20. These two parcels, which aggregate approximately 2,170 acres and 4,330 acres, are in the vicinity of Stinkingwater Pass and are primarily oriented north-south, following major ridgeline trends in the Stinkingwater Mountains. The elevation of the proposed ACEC ranges from 4,280 to 4,995 feet. Access is afforded by high standard gravel roads and by unimproved dirt roads linked to county and state road systems.

The general location of the Biscuitroot Cultural ACEC is on a plateau northeast of Harney Valley. This locality is a fault block mountain near the juncture of three major physiographic provinces, the Blue Mountains, the Owyhee Uplands, and the Basin and Range. The plateau is characterized by basalt flows, rimrock, gentle to steeply sloping uplands, and scablands with bare rock or a thin soil mantle.

Soils in the ACEC are generally shallow, well drained, loams and clayey loams that are stony, frigid, and xeric. The Stinkingwater fault block forms a divide, with runoff to the west draining into the Harney Basin and other waters flowing into the Malheur River system. Generally, the ACEC has little surface water available other than from a few ephemeral drainages, such as Little Pine Creek, McMullen Creek, and other unnamed seasonal streams, although springs are found on sloping rocky uplands above Little Pine Creek.

The ACEC features open, stiff sage/bunchgrass vegetation communities, with scattered juniper groves and perennial forbs that include several edible plants that are culturally valuable to Native American traditionalists.

For generations, Native Americans have used localities in and around the Biscuitroot Cultural ACEC in the Stinkingwater Mountains for harvesting root crops such as Biscuitroot (*Lomatium* spp.), bitterroot (*Lewisia rediviva*), wild onions (*Allium* spp.), and other species (e.g. *Perideridia bolanderi*, *Fritillaria pudica*) during late spring. Indian people from surrounding regions who came here to occupy dry camps among the large juniper trees, dig roots, and socialize included the Harney Valley Paiute, Warm Springs Indians, Bannocks, Shoshones, Umatillas, Yakimas, Surprise Valley Paiutes, and Northern Nevada Paiutes. (Couture, 1978; Couture, Housley, and Ricks, 1986) Root harvesting was an integral feature of aboriginal culture in the Northern Great Basin and Plateau regions (Toepel, Willingham, and Minor, 1979), where roots were intensively exploited during annual root camps of numerous small family-based groups with attendant social interactions.

These plant resources have great value to contemporary Native Americans as a cultural resource because their continued use is one of the few traditional activities that is still practiced. The seasonal and social aspects of this activity persist to this day. The particular localities where the target plant species are harvested provide a significant source of root crops, offering not only nutrition but also an important cash crop for trade among Indian people (Couture, 1978).

Not all "root" fields in the general region are harvested. The high quality and quantity of roots available in these root zones is noteworthy and could not be replaced by shifting use to other less preferred areas, especially since the preferred fields have, in effect, been "cultivated" by the long tenure of aboriginal harvest practices. Moreover, particular campsites here are reutilized by families repeatedly. In recent years, the ACEC area has been utilized by Indian people from Burns, Warm Springs, and Owyhee, Oregon; Yakima, Washington; Fort Hall, Idaho; Fort Bidwell, California and Fort McDermitt, Nevada.

The primary management goal of the Biscuitroot Cultural ACEC is to ensure the opportunity to continue the traditional practices of root gathering by contemporary Native Americans in these localities used by generations of Indian people. This will be accomplished by protecting the habitats of culturally important plants and by minimizing any conflicts posed by competing land uses.

This resource and its cultural use is sensitive to certain other local land uses, primarily gravel pit activities (concurrent use is not desirable; pit expansion is a threat) and livestock grazing (excessive congregation causes soil compaction; drought year foraging on cultural plants). Additionally, the potential for increased Native American use pressure in the future could affect the quality and quantity of the available root crop.

The primary management actions which will be undertaken to attain the management goal will be the cessation of gravel pit activities upon lease expiration, and restrictions on the use of ORVs. New surface disturbances, plant habitat modifications, and cattle-congregating practices (e.g., salting, turning out, etc.) will be prohibited within the ACEC. A separate management plan will be developed for the ACEC subsequent to the ROD. This plan will be comprehensive in nature and reflect the allowable uses and constraints shown in Appendix 1, Table 16 and the procedures noted in the management decision.

Table 15. Descriptions of Existing and Proposed ACECs (continued)

Willamette Meridian:

T. 22 S., R. 26 E., Sec. 3, All;
Sec. 4, SE1/4;
Sec. 9, E1/2 and E1/2SW1/4;
Sec. 10, N1/2;
Sec. 16, E1/2;
Sec. 22, NE1/4, E1/2NW1/4 and NW1/4NW1/4.

The area described aggregates 2,084 acres more or less.

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The proposed Biscuitroot Cultural ACEC of 6,500 total acres is located approximately 27 miles east of Burns, Oregon, and includes two associated parcels, both of which are transected by Highway 20. These two parcels, which aggregate approximately 2,170 acres and 4,330 acres, are in the vicinity of Stinkingwater Pass and are primarily oriented north-south, following major ridgeline trends in the Stinkingwater Mountains. The elevation of the proposed ACEC ranges from 4,280 to 4,995 feet. Access is afforded by high standard gravel roads and by unimproved dirt roads linked to county and state road systems.

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This resource and its cultural use is sensitive to certain other local land uses, primarily gravel pit activities (concurrent use is not desirable; pit expansion is a threat) and livestock grazing (excessive congregation causes soil compaction; drought year foraging on cultural plants). Additionally, the potential for increased Native American use pressure in the future could affect the quality and quantity of the available root crop.

The primary management actions which will be undertaken to attain the management goal will be the cessation of gravel pit activities upon lease expiration, and restrictions on the use of ORVs. New surface disturbances, plant habitat modifications, and cattle-congregating practices (e.g., salting, turning out, etc.) will be prohibited within the ACEC. A separate management plan will be developed for the ACEC subsequent to the ROD. This plan will be comprehensive in nature and reflect the allowable uses and constraints shown in Appendix 1, Table 16 and the procedures noted in the management decision.

Table 15. Descriptions of Existing and Proposed ACECs (continued)

The ACEC's eastern unit is described as follows:

The pasture boundary of the Louie Hughes Pasture and the Oreana Pasture in the Burnt Flat Allotment (No. 5313), excluding the Cold Springs Field and Tommie's Place Pasture.

Excluding all unfenced private lands within the above described areas.

The areas described aggregate 64,639 acres more or less.

Table 16. Recommended Management/Use Constraints in ACECs

Area Title	Acres	Land Tenure Adjustment	Major Rights Of Way	Commercial Timber Harvest	ORV Use	Wild Horses	Fire Livestock Grazing	Suppression Activities	Prescribed Burning	Vegetation Treatment
South Narrows ACEC	160	Z1	R	N/A	L	N/A	P	P	R	R
Diamond Craters ONA/ACEC	17,056	Z1	R	N/A	L	N/A	P	P	P	P
Silver Creek RNA/ACEC	640	Z1	R	P	L	N/A	P	R	R	R
Silver Creek RNA/ACEC Add.	1,280	Z1	R	N/A	L	N/A	P	R	R	R
Foster Flat RNA/ACEC	2,690	Z1	R	N/A	L	P	P	P	R	R
Dry Mountain RNA/ACEC Add.	2,084	Z1	R	P	L	N/A	R*	R	R	R
Kiger Mustang ACEC	64,639	Z1	R	N/A	O	R*	R*	O	R	R
Biscuitroot Cultural ACEC	6,500	Z1	R	N/A	L	R*	R*	P	P	P

Fluid Energy Minerals	Solid Leasable Minerals	Mineral Materials	Locatable Minerals	Camping	Organized Public Activities	Wood Gathering	Plant Collection	Education (Repeated Consumptive)	Rock Hounding
NSO	NL	P	R	P	P	N/A	R	R	R
NSO	NL	P	W	R	R	P	P	R	P
NSO	NL	P	R	P	R	P	R	R	R
NSO	NL	P	R	P	R	P	R	R	R
NSO	NL	P	R	P	R	N/A	R	R	R
NSO	NL	P	R	P	R	P	R	R	R
NSO	R	R	R	O	R	R	O	R	O
NSO	NL	P	R	R	R	R	R	R	R

Z1 = Zone 1, retention and acquisition
P = Prohibited use or action.
R = Restricted use or action.
R* = Restricted to provisions of AMP or HMAP
O = Open to use or activity
N/A = Not applicable
L = Limited to existing roads and trails
NSO = No surface occupancy
NL = No leasing
W = Withdraw from mineral entry

Table 17. Federal Register Notice

[OR-020-07-4333-10: GP7-123]

Oregon; Off-Highway Vehicle Designation

AGENCY: Bureau of Land Management, Interior.

ACTION: Burns District Office: Notice given relating to off-highway motorized vehicle use on public lands.

SUMMARY: Notice is hereby given relating to the use of off-highway vehicles on public lands in accordance with the authority and requirements of Executive Orders 11644 and 11989, and regulations contained in 43 CFR Part 8340.

The following lands under the administration of the Bureau of Land Management are designated as closed, limited, under Interim Management Policy and Guidelines for Lands under Wilderness Review, or open to off-highway motor vehicle use.

The area affected by the designations is the Burns District, which includes 3,544,612 acres of public lands in the Three-Rivers and Andrews Resource Areas located in Grant and Harney Counties, Oregon.

These designations are a result of resource management decisions made in existing Management Framework Plans and analyzed in several grazing Environmental Impact Statements. These designations are published as final until such time that changes in resource management warrant modifications.

A. Closed Designations

Areas which are closed to off-highway motor vehicle use comprise 9,930 acres:

One area, South Narrows (160 acres), has been designated closed prior to this Notice. The following areas are designated closed to motorized vehicle use to protect resource and scenic values:

	Acres
Maiheur River—Blue Bucket Creek	2,080
Squaw Lake	6,500
Hat Butte	30
Windy Point	280
Devine Canyon	1,040

B. Limited Designations

1. Wilderness Study Areas (WSAs)

Wilderness Study Areas, (WSAs) comprising 829,995 acres will be managed in accordance with the nonimpairment criteria of Wilderness Interim Management Policy which allows off-highway vehicle use to

continue in the manner and degree on ways and trails where such use was occurring on October 21, 1976. The only exception to this would be the designation of future cross-country travel in specific sand dune, play and snow areas providing that such use does not impair wilderness character.

The limited vehicle use designation will remain in effect until Congressional release of WSAs, or if actual or unforeseeable use levels cause the nonimpairment criteria to be violated, in which case more restrictive designations may be made.

The following Wilderness Study Areas are designated as limited to off-highway motorized vehicle use under Wilderness Interim Management Policy:

WSA Unit No.	WSA Name	Acres in Burns District
2-14	Malheur River/Blue Bucket Creek	1,348
2-23L	Stonehouse	14,825
2-23M	Lower Stonehouse	0,090
2-72C	Sheepshead Mountains	23,790
2-72D	wildcat canyon	8,730
2-72F	Heath Lake	20,520
2-72I	Table Mountain	40,592
2-72J	West Peak	8,535
2-73A	East Alvord	22,240
2-73H	winter Range	15,440
2-74	Alvord Desert	97,165
2-77	Mahogany Ridge	27,940
2-78	Red Mountain	16,215
2-81	Pueblo Mountains	72,090
2-82	Rincon	100,445
2-83	Alvord Peak	16,825
2-84	Basque Hills	70,600
2-85F	High Steens	57,650
2-85G	South Fork Donner und Blitzen River	37,555
2-85H	Home Creek	26,590
2-86E	Blitzen River	54,280
2-86F	Little Blitzen Gorge	9,400
2-87	Bridge Creek	14,545
2-98A	Pine Creek (Strawberry Mtns)	200
2-98C	Sheep Gulch (Strawberry Mtns)	720
2-98D	Indian Creek (Straw Mtns)	208
2-103	Aldrich Mountain	9,395
1-146	Hawk Mountain	25,380
3-152	Willow Creek	2,140
3-153	Disaster Peak	3,740

¹ WSA Z-14: Additional 2,000 acres dosed by prior management decision.

² WSA 2-23L: Additional 6,500 acres dosed by prior management decision.

³ The following WSAs have acreages within the established boundaries of the Steens Mountain vehicle management designation of September, 1980, which is consistent with Wilderness IMP: 2-85F, 57,650 acres; 2-85 G, 19,005 acres; 2-85H, 22 acres; 2-86E, ALL; 2-86F, ALL; Z-87, 8,585 acres.

2. Lands Other than Wilderness Study Areas (WSAs)

Lands other than WSAs which have some type of limited designation comprise 148,843 acres. These areas are limited, in most cases, to use of motorized vehicles on designated, existing roads and trails. However, other limitations may be imposed, such as use during certain time periods, certain types of vehicles, or certain off-highway vehicle activities.

One area, Steens Mountain Recreation Lands, including a parcel of land adjacent to the west boundary for a total of 184,912 acres, was previously designated in September, 1980, and limits use of motorized vehicles to designated, existing roads and trails. This area is not included in this Notice. The following areas are designated limited to motorized vehicle use on designated, existing roads and trails:

Acres	Area
12,362	Steenr Mountain Recreation Lands additional acreage from land exchanger
2,539	Little Blitzen Research Natural Area (RNA)/Area of Critical Environmental Concern (ACEC)
240	Little Wildhorse RNA/ACEC
228	South Folk Willow Creek RNA/ACEC
720	Rooster Comb RNA-ACEC
1,240	East Kiger Plateau RNA/ACEC
640	Silver Creek RNA/ACEC
2,520	Pueblo Foothills RNA/ACEC
522	Tum Tum Lake RNA/ACEC
440	Long Draw RNA/ACEC
560	Mickey Basin RNA/ACEC
18,700	Alvord Desert ACEC
520	Borax Lake ACEC
14,700	Alvord Peak ACEC
4,000	Picket Rim ACEC
250,500	South Steens ACEC
18,658	Diamond Craters Outstanding Natural Area/ACEC
23,811	Warm Springs Reservoir
49,652	* Oregon Dept. of Fish & Wildlife hunting areas

* All acres are within boundaries of Steens Mountain Recreation Lands vehicle management designation of September 30, 1980.

¹ 45,740 acres are within the boundaries of Steens Mountain Recreation Lands vehicle management designation of September 30, 1980.

C. Open Designations

Areas which are designated open to off-highway motor vehicle use comprise 2,390,772 acres. Much of the district's land topography naturally limits off-highway motor vehicle use. Open designation was determined to be appropriate as off-highway use of motorized vehicles is essential to conduct the management and authorized utilization of resource values.

These designations become effective upon publication in the Federal Register and will remain in effect until rescinded or modified by the Burns District Manager. Information and maps of areas with open, dosed and limited designations are available at the Bureau of Land Management Burns District Office, 74 South Alvord, Burns, Oregon 97720, Telephone (503) 573-5241.

Dated: February 12, 1987.

Joshua L. Warburton,

District Manager.

[FR Doc. 87-3593 Filed 2-9-87; 8:45 am]

BILLING CODE 4310-33-M

Table 18. Calculation of Three Rivers Projected Average Annual Recreation Growth.

RMIS Categories (1)	NORPS	OR Project Activities Reg. 11 (2)	Percent Growth Low Projection (2)		Percent Growth Mod. Projection(2)		1986 Base(2)	2000 Low PProjection	Av. Annual Growth	2010 Low Projection	Av. Annual Growth	2000 Mod. VAv. Annual Projection Growth	2010 MCOodAv. Annual Projection Growth	
			1987-2000	1987-2010	1987-2000	1987-2010								
1	ORV Travel	38 Motorcycle Off-Road	8	20	16	37	21870	23619		26243		25369	29961	
		39 ATV Driving (3 & 4 Whl)	14	31	25	57	47324	53950		61995		59155	74299	
		40 4-WHL Vehicles Off-Road	19	40	34	84	245307	290983	1.23%	342224	1.54%	329790	451292	
						314501	368552		430462		414314	555552	3.19%	
2	Other Motorized	46 Sightseeing/Exploring	11	26	25	61	718009	799706	0.81%	903966	1.08%	896776	1153129	2.53%
3	Nonmotorized	22 Day Hiking/Train	9	21	21	54	43672	47734		52756		52843	67255	
		24 O'night Hiking - on trail	9	21	23	58	89509	97453		108403		109794	141490	
		25 O'night Hiking no trail	14	32	35	96	116523	133184		153943		157670	228816	
		42 Bicycling - on road	33	79	86	262	309154	412100		552920		573839	1119108	
		43 Bicycling - off road	7	15	15	38	57732	61600		66392		66392	79670	
		44 Horseback Riding	10	21	28	61	53193	58512		64364		68087	85641	
		26 Climbing/Mountaineering	8	17	16	37	15728	16923		18323		18244	21547	
						685511	827506	1.48%	1017101	2.02%	1046869	1743527	6.43%	
4	Camping Visits	27 Rec. Vehic. Camping	20	44	44	119	457914	550372		660581		661424	1001177	
		28 Tent Camping/Motor Vehic	16	31	35	77	215959	250618		282107		290927	381644	
		30 Organ. Group Camping	1	3	3	6	26410	26779		27202		27123	28047	
		31 Horse Camping/Packstock	9	22	24	62	19874	21754		24256		24558	32185	
		32 Horse Camping	3	7	8	22	73046	75453		78045		79084	89072	
						793203	924976	1.19%	1072191	1.47%	1083116	1532125	3.88%	
5	Hunting Visits	48 Hunting Big Game	5	11	12	25	61759	64847		68257		68874	77332	
		49 Bow Hunting	1	2	2	5	14980	15145		15309		15339	15774	
		50 Hunting/Unland Game	1	4	5	12	69683	70310		72192		73446	77836	
						146422	150302	0.19%	155758	0.27%	157659	170942	0.70%	
6	Other Land-Based	19 Nature Study/Wldlf. Obs..	21	44	44	106	188177	227694		270975		270975	387644	
		20 Ooutdoor Photo.	21	51	45	135	371712	449772		561713		537645	875123	
		21 Visiting Interp./Displays	5	10	9	24	21473	22482		23684		23491	26562	
		45 Picnicking	8	17	14	34	80300	86564		93951		91542	107602	
						661662	786512	1.35%	950323	1.82%	923653	1396931	4.63%	
7	Fishing Visits	1 Fishing from Boat	12	23	34	74	97375	108838		119783		130516	169229	
		2 Fishing from Bank/Dock	11	23	32	70	208139	231436		255573		273904	354275	
						305514	340274	0.81%	375356	0.95%	404420	523504	2.97%	
8	Boating Visits	13 River - nonmotorized	2	5	8	21	16419	16747		17240		17733	19867	
		14 Lake - nonmotorized	22	50	84	252	28096	34277		42143		51697	59563	
		15 Lake - powerboating	2	5	5	11	38321	39087		40123		40237	42690	
						82836	90111	0.63%	99506	0.84%	109667	122120	1.98%	
9	Other Water-Based	8 Swimming/Wading	2	4	4	9	36231	36956		37753		37716	39637	
		9 Waterskiing	7	16	18	41	46530	49980		53974		54678	65443	
						82761	86936	0.36%	91727	0.45%	92394	105080	1.12%	
10	Winter Sports	36 Cross-Country Skiing	12	26	24	41	14125	15820		17798		17515	19916	
		37 Sledding/Snowplaying	14	30	30	52	64394	73313		84031		83424	97606	
						78519	89133	0.97%	101829	1.24%	100939	117522	2.07%	
11	Snowmobiling Visits	33 Snowmobiling	12	25	21	47	45023	50425	0.86%	56278	1.04%	54477	66183	1.96%

(1) Source - BLM Recreation Management Information System

(2) Source - Activities by Summary Table Number in the Pacific NW Outdoor Recreation Consumption Projection Study, Oregon State University, January 1989.

Table 19. Projected Recreation Visits to BLM Administered Lands in the Three Rivers RA for the Years 2000 and 2010.

RMIS CATEGORIES	NORPS	OREGON PROJECT ACTIVITIES, REG. 11 (1)	1989 BASE PERIOD VISITS (2)	PROJECTED REC. VISITS FOR THE YEAR 2000 (3)		PROJECTED REC. VISITS OR THE YEAR 2010 (3)	
				LOW	MODERATE	LOW	MODERATE
1	ORV TRAVEL	38 MOTORCYCLING OFF-ROAD 39 ATV DRIVING (3 & 4 WHL) 40 4-WHL VEHICLES OFF-ROAD	5300	6017	6623	6944	8742
2	OTHER MOTORIZED	46 SIGHTSEEING/EXPLORING	7650	8332	9148	9232	11435
3	NONMOTORIZED	22 DAY HIKING/TRAIL 24 O'NIGHT HIKING ON TRAIL 25 O'NIGHT HIKING - NO TRAIL 42 BICYCLING - ON ROAD 43 BICYCLING - OFF ROAD 44 HORSEBACK RIDING 26 CLIMBING/MOUNTAINEERING	2120	2465	2999	2962	4927
4	CAMPING VISITS	27 REC. VEHIC. CAMPING 28 TENT CAMPING/MOTOR VEHIC. 30 ORGAN. GROUP CAMPING 31 HORSE CAMPING/PACKSTOCK 32 HORSE CAMPING	34100	38564	43890	44233	61700
5	HUNTING VISITS	48 HUNTING BIG GAME 49 BOW HUNTING 50 HUNTING/ UNLAND GAME	6250	6380	6628	6652	7092
6	OTHER LAND-BASED	19 NATURE STUDY/WLDF. OBS. 20 OUTDOOR PHOTO. 21 VISITING INTERP./DISPLAYS 45 PICNICKING	18600	21362	24390	25207	35609
7	FISHING VISITS	1 FISHING FROM BOAT 2 FISHING FROM BANK/DOCK	16300	17752	20424	19438	26143
8	BOATING VISITS (4)	13 RIVER - NONMOTORIZED 14 LAKE NONMOTORIZED 15 LAKE - POWERBOATING	890	1923	1967	1961	2060
9	OTHER WATER-BASED	8 SWIMMING/WADING 9 WATERSKIING	1010	1050	1102	1097	1225
10	WINTER SPORTS	36 CROSS-COUNTRY SKIING 37 SLEDDING/SNOWPLAY	1700	1881	2081	2114	2518
11	SNOWMOBILING VISITS	33 SNOWMOBILING	1300	1423	1515	1571	1812

(1) SOURCE - ACTIVITIES BY SUMMARY TABLE NUMBER IN THE PACIFIC NW OUTDOOR RECREATION CONSUMPTION PROJECTION STUDY.

OREGON STATE UNIVERSITY, JAN., 1989 FOR SCORP REGION 11 (INCLUDING LAKE, HARNEY AND MALHEUR COUNTIES).

(2) SOURCE - BLM RECREATION MANAGEMENT INFORMATION SYSTEM, BURNS DISTRICT.

(3) CALCULATED FROM THE BASE PERIOD FIGURES USING THE AVERAGE ANNUAL GROWTH RATES FOR EACH RMIS CATEGORY AS SHOWN IN TABLE 18.

(4) PROJECTIONS FOR BOATING VISITS AT CHICKAHOMINY RESERVOIR CALCULATED USING PERCENT CHANGE FOR LAKE, POWER BOATING ACTIVITY ONLY.

BOATING VISITS FOR WARM SPRINGS RESERVOIR ARE COUNTED BY THE BUREAU OF RECLAMATION, THE MANAGING AGENCY FOR THAT AREA.

Table 20. Gold Development Scenarios

With the increased activity associated with gold mining in the Vale District (to the east of the planning area) and in northern Nevada (to the south of the planning area), and with increased claim staking activity in the RA over the past year, it was determined that generalized gold mining scenarios should be included. One such scenario has been previously developed for the Proposed National Historic Oregon Trail Interpretive Center at Flagstaff Hill Decision Record and Environmental Assessment, appendix H (BLM, 1988). Another gold mining scenario that should be considered is one similar to the recently proposed Grassy Mountain Mine in northern Malheur County, Oregon. This scenario would be fairly typical of gold mining operations in eastern Oregon that use cyanide, although it is smaller than most operations in Nevada. While both of these scenarios are based on BLM experience in the field, individual operations would be expected to vary somewhat. Approval of mine development plans would require sufficient mitigation measures to address concerns such as reclamation, neutralization, sensitive resource values protection, etc. Both scenarios have been included for illustrative purposes only.

Mineral Development Scenario for the Flagstaff Hill Mine

The attached scenario is based on the assumption that a potential ore body could be worked by either surface mining and cyanide heap leaching, or by underground mining associated with agitation cyanide milling. Actual extraction might involve elements of both or use of a different milling technology. Open pit mining and heap leaching would permit recovery of a larger low grade (about 0.1 oz gold/ton) deposit assumed to be on the order of 6 million tons (100 feet wide x 500 feet deep x 1,500 feet long), while higher extractive costs of underground recovery would limit mining to a smaller amount of higher grade ore (about 0.3 oz gold/ton) on the order of 400,000 tons (5 feet wide x 1,000 feet deep x 1,000 feet long). These reserve values were chosen to be generally consistent with mineral deposit models described in our July 26, 1988 report on the "Mineral Potential of the Flagstaff Hill Area, Baker County, Oregon."

Economic projections for open pit development are represented as a range bounded by estimates based on the Bureau of Mines IC 9070, "Gold Availability", and the Mining Cost Service 1988 cost model for a 2,000 ton per day mine with a 4:1 stripping ratio. Back calculation of direct employment, based on these sources, agrees fairly well with available information reviewed by the staff for other western U.S. open pit/cyanide leach operations with greater than 5 million tons of reported reserves.

This mineral development scenario was prepared strictly for the benefit of BLM land use planning to assess possible employment association with operation of a mine at Flagstaff Hill and environmental assessment. This scenario should not be used for any other purpose. It is based on possible future discoveries and not on the presence of known deposits. The scenario does not include employment during the development and start up phases of the projected mine(s). It envisions two mine development possibilities or combinations:

1. Open pit-mineable deposit of about 6,000,000 tons (100 feet x 1,500 feet x 500 feet) with a grade of about 0.1 ounce gold per ton to be recovered by heap leach techniques, and
2. Underground-mineable deposit of about 400,000 tons (5 feet x 1,000 feet x 1,000 feet) with a grade of about 0.3 ounce gold per ton to be recovered by agitation cyanide leach milling techniques.

In addition it is important to point out that the chances of any mining operation occurring at the site are in the range of 1 in 5 to 1 in 50, based on our professional judgment and experience in observing the success of similar properties.

Average hourly wage of the labor is taken at \$13.89. The cost of labor to the company including fringe benefits is \$150/day per employee-shift. Mine life is assumed to be 10 years. The mill is operated 300 days per year and the mine 250 days per year.

1. Open pit and Heap Leach Operations.

Mine production	2,400 tons/day
Mill production	2,000 tons/day
Heap leach recovery	75% of contained gold
Stripping ration (tons of waste tons of ore)	4.0:1.0

Employees				Total	Other	Capital
	Mine	Mill	Total	Yearly Payroll (4)	Yearly costs (\$)	costs (\$)
Mine A	133	29	162	5,800,000'	6,600,000	25,000,000
Mine B	64	31	95	3,400,000		33,000,000

Mine A from Mining cost Service Cost Model (1988).

Mine B Primarily from data in U.S. Bureau of Mines IC 9070 (1986).

Table 20. Gold Development Scenarios (continued)

2. Underground Mine and Agitation Leach Mill

Mine production (shrinkage stop)		160 tons/day				
Mill production		133 tons/day				
Employees			Total Yearly Payroll	Other Yearly costs	Capital costs	
	Mine	Mill	Total	(\$)	(\$)	(\$)
Mine A	62	9	71	2,600,000	800,000	12,000,000

Mine A from Mining Cost Service Cost Model (1988)
(projected from 500 m T/D and 1000 m T/D cost models).

Selected data for Western U.S. open pit and underground mines is given in Table 1 for general comparison with projected mine development.

The expected economic impacts to the local community include direct and indirect employment, **nonwage/salary** purchases by the mine, and increases in the assessed property evaluation. The capital cost of construction can be expected to approximate the assessed evaluation of the mine and mill for property tax purposes, but does not include a value for in-place ore reserves. Most of the nonpayroll operating expenses are likely to be spent in the local community. It is assumed that 75 percent of actual **nonpayroll** expenses will be spent in the community. The major economic impacts of the mineral development scenario are summarized below:

Open Pit Mine

Employment, direct	95-162 jobs
Payroll, annual	\$3.4-5.8 million
Purchases in local community, annual	\$5.0 million (assumed 75% of total)
Mine/Mill Property Value	\$25-33 million (not including ore reserves)
employment, secondary	95-234 jobs (assumes factor of 1 .0 to 2.0)

Underground Mine

Employment, direct	71 jobs
Payroll, annual	\$2.6 million
Purchases in local community, annual	\$0.8 million (assumes 75% of total)
Mine/Mill Property Value	\$12 million (not including ore reserves)
Employment, secondary	71-142 jobs (assumes factor of 1 .0 to 2.0)

While the scenario assumes a 10 year-life, it is not an uncommon experience in similar mining districts for additional discoveries to significantly extend mine life.

Mineral Development Scenario for Northern Malheur County

Location	25 miles SW of Vale, Oregon.
Mine Life:	10 years.
Work Force:	150-200 people.
Local Economy:	Projected impact is 400 new jobs (economic multiplier of 2).
Reserves:	30-40 million tons.
Overburden:	60-80 million tons.
Heap Leach Ore:	10-30 million tons.
Production:	1 million ounces of gold and silver.
Disturbance:	1,100 acres.
Ore Processing:	Lower grade to be heap leached. Higher grade to be milled (carbon-in-leach).
Mining Method:	Open pit (2) and possibly underground.
Mining Rate:	65,000 tons/day (ore and overburden).
Operating Hours:	24 hours per day, 7 days per week throughout the year.
Pit Size:	Grassy Mountain pit: 2,300' diameter/1,000' deep (83 acres). Crab Grass pit: 3,000' x 2,000' x 100' deep (110 acres).
Heap Pad Size:	One heap leach pad covering 160 acres.
Tailings Pond:	One pond covering 124 acres to hold 2 to 5 million tons.
Liners:	Heap pad, pregnant pond, and tailings pond will be lined with a synthetic liner.
Neutralization:	Heap pad will be neutralized after mining.
Ground Water:	Water quality monitoring wells will be used to ensure ground water does not become contaminated.
Reclamation:	Buildings will be removed. Waste rock piles, heaps, tailing ponds, and other disturbed areas will be reshaped and then revegetated after topsoil is replaced. Pits will not be backfilled.

Appendix II



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OREGON ENVIRONMENTAL COUNCIL
2637 S W Water Avenue - Portland, Oregon 97201 - 222-1963

1

Joshua L. Warburton
District Manager
U.S. Bureau of Land Management
HC 74-1253 Hwy 20 West
Hines, OR 97738

February 15, 1990

Re: Three Rivers RMP DEIS

Dear Josh:

I have completed my review of the Three Rivers RMP DEIS and would like to congratulate you and your staff for development of a preferred alternative that demonstrates a commitment to balanced multiple use management. The shift in management direction toward greater concern for fish, wildlife, recreation, and cultural resources presents a major departure, and a welcome one, for the Burns District BLM.

I liked the general format of the material, particularly Table 2.1 which facilitated the comparison of the management alternatives. The excellent quality maps were valuable aids. The photographs were a welcome sight. They should be required in all major BLM documents!

My comments, detailed below by management objective, address items that need further clarification and recommendations that would make the preferred alternative acceptable to OEC. Alternatives C and D are totally unacceptable. Alternative A would be acceptable to OEC, but is unlikely to be adopted in place of the preferred alternative. Alternatives B and C are acceptable with clarifications and modifications recommended.

Water Quality (Table 2.1-9). The management objective to meet or achieve state water quality standards is most appropriate and long overdue. However, it is not clear how it could be met under Alternatives C or D.

- 1-1 Item 4, Alternatives B and C: Setting utilization levels is admirable, however, clarification is needed as to whether one or all three utilization criteria need to be met in order to trigger removal of livestock from an allotment which contains all three components. Also, it has been my experience that the most rapid riparian

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- greater use of native species in vegetation treatments. OEC cannot accept either the large acreage destined for conversion or the continued reliance on crested wheat.
- 1-12 Item 4. We recommend grazing also be excluded from Saddle Butte, especially since it is not going to be designated an ACEC. All efforts should be expended to protect native vegetation communities. We do not feel that native plants should be jeopardized by grazing. You should at least consider fencing the adjacent seeding.
- 1-13 Vegetation (Table 2.1-14) Management Objective. OEC recommends inclusion of the word "native" before "plant species". We would like to see the restoration of native range based on site potential as a management objective.
Item 8. Same comments as in Water Quality Item 11 above.
- 1-14 Special Status Species (Table 2.1-17) Item 1. This item appears to refer only to plant species (Group 1). Does it also apply to animal species listed in Table 3.8?
- 1-15 Item 3. Is there research to support the 2 mile standard? Under stipulations for fluid energy mineral development (Appendix 9-12), no surface occupancy is allowed within one-half mile of sage grouse strutting grounds under Alternative C, 1 mile under Alternative B, and 2 miles under Alternative A. These distances seem arbitrary. What are they based on?
- 1-16 Actions to restore special status species habitat are excellent. However Alternative C needs some language to address livestock grazing where special status plant species occur. If not exclusion then how about managing grazing so that it does not hinder recovery or enhancement of special status plant species?
- 1-17 Wildlife Habitat Management (Table 2.1-20) Item 1. The term "blocks" conjures up visions of a checkerboard. I prefer "units". Also, does this action include transportation corridors, such as "stringers"? I would also like to see coordination of big game cover with units designated on the National Forests.
- 1-18 I appreciate the increase in AUM's allocated to big game. However, this entire section seems to focus on big game. What about wildlife habitat management for other species, e.g. cavity nesters and other birds and mammals that don't have special species status? Why doesn't the BLM designate indicator species and develop management objectives for their habitats.

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recovery occurs under exclusion in most cases.

- 1-3 Item 11, Alternatives C: The 20 percent figure could be large or small depending on the size of the area. Where streams or water courses are involved it is more appropriate to speak in terms of subbasins or watersheds. As written, this item does not address cumulative effects of habitat alteration in adjacent areas, or the effects of several projects in a given watershed.
- 1-4 It is not clear on Map WQ-1 in Volume 1 what is meant by the term "Water Quality Areas". Are they water quality limited, areas where water quality is monitored, etc.? Please explain.
- 1-6 In Table 3 in Appendix 1-4 it appears the x's in the three columns from the right are shifted too far to the left. Enclosed is a copy of the beneficial use tables from Oregon Administrative Rules for Malheur River Basin and Malheur Lake Basin. Since most of the RA is in the Malheur Lake Basin the table should include beneficial uses for this basin as well.
- 1-7 Soils (Table 2.1-6). According to Map S-2 in Chapter 3, the majority of soils in the resource area are presently in the moderate to stable categories. The management objective would not change things appreciably. A more appropriate objective would be to achieve stable soil conditions. This would necessitate altering the grazing systems criteria in Item 1 across all alternatives accordingly.
- 1-8 Forestry and Woodlands (Table 2.1-9). Item 6, Alternatives B and C: This item would be improved by adding a qualifier similar to that in Alternative A, such as "consistent with other resource objectives". Also, how did you arrive at the number of average acres (53) for precommercial thinning? It appears somewhat arbitrary.
- 1-9 Appendix 2-3. Table 2 does not mention leaving large woody debris for stream structure or retention of large diameter trees for recruitment of large woody debris.
- 1-10 Livestock Grazing (Table 2.1-11). Item 3. It is not clear why the number of acres proposed for seeding in Alternative C is considerably larger than Alternative D which emphasizes commodity production.
- 1-11 It is discouraging to read in the plan that the Burns BLM continues to rely on crested wheat to improve forage production. While the standard procedures for creating optimum edge effect are commendable, I cannot understand why the BLM doesn't make

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- 1-19 Wetland, Reservoir and Meadow Habitat (Table 2.1-23) Management objectives and actions for this category are commendable. However, I would recommend retaining buffers around plays for those areas proposed for treatment (Chapter 4-29). It is not clear why buffers wouldn't be left, or why you couldn't use a mosaic pattern around plays as you are proposing to use in the guidelines (Appendix 3-177).
- Riparian Habitat and Aquatic Habitat (Table 2.1-22-27) Comments regarding livestock utilization are the same as those given under Water Quality above.
I'm pleased to see inclusion of buffer zones for springs, seeps, and associated meadows in addition to live streams.
- 1-20 Item 8 under Aquatic Habitat. I think you should evaluate streambank condition after 3 years, particularly if the grazing system is changed. You should be able to determine if it is working within that time. Five years is perhaps too long.
Item 10 under Aquatic Habitat. Same as Item 11 under Water Quality discussed above.
- 1-21 Recreation (Table 2.1-31) Item 1, second objective. A brief description of contents of the Federal Register citation would be helpful. It could easily be incorporated into an appendix. I can't imagine where you could have ORV use where vegetation occurs without sustaining resource damage. The Mohave Desert springs to mind, and I would not like to see that kind of degradation occur in Harney County. Any ORV area would have to be closely monitored and I doubt that the Burns BLM has the kind of resources available to do that. Please identify areas proposed for this type of recreation.
- 1-23 Item 2, second alternative. This action is unacceptable for the same reasons stated for Item 1 above. What evidence do you have that there is a direct correlation between distance from population centers and an increase in the number of out-of-county users as your statement suggests? Alternative B is more realistic, particularly since there is a sacrifice area already established for ORV use northwest of Hines.
- 1-24 Item 5. Please identify the Silvies River access trail on the map. I was unaware of its existence.
- 1-25 Item 6. Please explain how management of livestock grazing in riparian areas enhances fishing opportunities. Unmanaged recreation use can be as damaging to riparian zones as unmanaged

livestock.

1-26 Areas of Critical Environmental Concern (Table 2.1-35) I recommend designation of Hatt Butte and Squaw Lake as ACECs. The BLM should provide protective designation for all special and unique areas until such time as more native communities can be restored. Since Hatt Butte and Squaw Lake receive little or no grazing pressure it is difficult to understand why they are not designated. Designation would provide some protection from surface disturbance from mining. Please reconsider.

1-27 Visual Resources This section was rather confusion. Please explain how the Map VRM-1 relates to the VRM classifications found in Appendix 8, Tables 1-4. Is it a representation of the preferred alternative?

Cultural Resources I'm very pleased to see some attention paid to cultural resources. OEC supports Alternatives A, B, and C. Nice work!

1-28 Energy and Minerals (Table 2.1-38) I object to the language in all objectives that intends to maximize energy and mineral development in the RA. A more conservative approach would be preferable, in spite of current federal mining laws. It would help if you deleted the work "maximum" where it occurs in the management objectives.

1-29 Lands and Realty (Table 2.1-42) Item 1 under "Eliminate unauthorized use of public lands". How long is long-term, and how short is short-term?

Item 3. Good show!

1-30 Table 2.1-44, Item 3 under "Acquire public and administrative access...". Add "consistent with other resource values".

On behalf of the Oregon Environmental Council, thank you for the opportunity to comment.

Sincerely,

Mary Hanson

Mary Hanson
1892 W. Pierce
Burns, OR 97720

Malheur Lake Basin

Table 15
(304-1-52)

	Beneficial Uses	Natural Lakes	All Rivers and Tributaries
Public Domestic Water Supply ¹	X		X
Private Domestic Water Supply ¹	X		X
Industrial Water Supply	X		X
Irrigation	X		X
Livestock Watering	X	X	X
Salmonid Fish (Trout) Rearing	X		X
Resident Fish (Trout) Spawning	X		X
Resident Fish & Aquatic Life	X		X
Wildlife & Hunting	X		X
Fishing	X		X
Boating	X		X
Water Contact Recreation	X		X
Aesthetic Quality	X		X

¹ With adequate pretreatment (filtration and disinfection) and natural quality to meet drinking water standards.

OREGON ADMINISTRATIVE RULES
CHAPTER 340, DIVISION 41 - DEPARTMENT OF ENVIRONMENTAL QUALITY

TABLE 15
(304-1-52)

	Malheur R. (North of Malheur Lake)	Malheur R. (South of Malheur Lake)	Malheur R. (Between Malheur Lake and Malheur Reservoir)	Malheur R. (Between Malheur Reservoir and Malheur Lake)	Malheur R. (Between Malheur Lake and Malheur Reservoir)	Malheur R. (Between Malheur Reservoir and Malheur Lake)
Public Domestic Water Supply ¹	X	X	X	X	X	X
Private Domestic Water Supply ¹	X	X	X	X	X	X
Industrial Water Supply	X	X	X	X	X	X
Irrigation	X	X	X	X	X	X
Livestock Watering	X	X	X	X	X	X
Salmonid Fish (Trout) Rearing	X	X	X	X	X	X
Resident Fish (Trout) Spawning	X	X	X	X	X	X
Resident Fish (Non Trout) & Aquatic Life	X	X	X	X	X	X
Wildlife & Hunting	X	X	X	X	X	X
Fishing	X	X	X	X	X	X
Boating	X	X	X	X	X	X
Water Contact Recreation	X	X	X	X	X	X
Aesthetic Quality	X	X	X	X	X	X

¹ With adequate pretreatment (filtration and disinfection) and natural quality to meet drinking water standards.

- 1-1 The intent is that when any utilization criterion is met, removal of livestock from the pasture in question would be triggered. See the Proposed Plan for clarification of riparian utilization criteria.
- 1-2 It is correct that the most rapid riparian recovery occurs under exclusion in most cases. The aquatic habitat management actions in the Proposed Plan are consistent with water quality management actions and riparian habitat management actions. See WL 6.1, 6.2 and 6.3 of the Proposed Plan.
- 1-3 Under the Preferred Alternative, Water Quality Management Objective, Item 11, the intent and purpose was to establish a maximum area that could be treated if treatments were within 1 mile of a perennial stream. This would reduce erosion and runoff from treated areas, and other adverse impacts to aquatic habitats. Due to public concerns with the proposed wording, this objective will be changed to read "... of any area within 1 mile of perennial water to less than 20 percent of that subbasin in any one year."
- 1-4 Though item 11 does not address cumulative effects of habitat alteration in adjacent areas; prior to any mechanical or fire treatment, a prescribed fire plan and an NEPA document would be developed. The NEPA document would address secondary and cumulative impacts associated with the prescribed activity.
- 1-5 The water quality areas identified on Map WQ-1 in Volume 1 of the text are provided to assist the reader in locating particular streams.
- 1-6 In Table 3 of Appendix 1, DRMP/DEIS, the x's in the three columns from the right were shifted too far to the left and have been corrected in the PRMP/FEIS. Additionally, a table identifying beneficial uses of waters in the Malheur Lake Basin was provided in DRMP/DEIS, Appendix 1, Table 2.
- 1-7 The management objectives and actions for soils (Table 2.1-6, DRMP/DEIS) have been rewritten. The management actions target accelerated erosion (erosion due to human activity). The achievement of a stable or no erosion equilibrium across the entire planning area is not an achievable goal, because a certain amount of erosion is naturally occurring. The rate of geologic erosion depends upon factors such as slope, soil, climate and cover. With the exception of cover, these factors cannot be controlled on a large scale. In addition, geologic erosion is important for the proper functioning of fluvial systems. Streams can cut laterally or vertically into their streambanks or beds for several reasons, one of which is the lack of sediment during peak flows, when the amount of energy available to carry sediment is high (Bull 1979). Accelerated erosion on the other hand, may cause problems such as siltation and degradation of fisheries.

Malheur River Basin

- 1-8 The statement "consistent with other resource objectives" will improve Alternatives B and C statements concerning precommercial thinning. The number of acres (53) was derived by correlation. Approximately 27 percent of the commercial forest land identified in the John Day RMP (dated 1985) is included in this RMP; therefore, approximately 27 percent of the acres identified for precommercial thinning in the John Day RMP (200) would be precommercially thinned within this planning area.
- 1-9 Alternatives B, C and D (Item 2 of Minor Forest Products) mentions leaving most dead and down material for enhancement of other resource values. These values include woody debris within stream areas. Also, DRMP/DEIS, Appendix 2, Table 2, items 3 and 4 discuss plans for streamside vegetation protection and enhancement.
- 1-10 Alternative D is a continuation of present management. In this alternative, only the seeding projects proposed in previous land use plans, specifically the Riley EIS, were brought forward into Alternative D. Alternative C proposed acreages not addressed in previous land use plans. Appendix 3, Table 7, DRMP/DEIS, identifies potential projects by allotment.
- 1-11 Crested wheatgrass has not been chosen as the sole species to seed. Appendix 3, Table 8, DRMP/DEIS, Standard Procedures and Design Elements for Range Improvements, states that "BLM would determine seeding mixtures on a site-specific basis, at the EA level in accordance with NEPA, using past experience and recommendations of the Oregon State University Extension Service and Experiment Stations and/or Oregon Department of Fish and Wildlife." Seedings will be designed "using irregular patterns, untreated patches, etc., to provide for optimum edge effect for visual quality and wildlife. Layout and design would be coordinated with local Oregon Department of Fish and Wildlife biologists." Seed mixes used in the Three Rivers Resource Area (RA) in the last 5 years have shifted away from exclusive use of crested wheatgrass to a variety of grass, shrub and forb species.
- The BLM policy on seedings for Oregon and Washington says: "Seedings to change vegetation composition should be used when it is the most efficient method to accomplish the resource objectives identified through the planning process. The selection of the seeding area and the species to be used should be based on a site-specific evaluation which considers ecologic potential, technical and economic feasibility, location of unique resources, plant diversity and cumulative impacts on the ecosystem. Adapted native species that can enhance vegetative diversity composition must be given consideration in species selection. To insure establishment seedings must be protected for two growing seasons or until the vigorous seedlings produce their first seed crop. Once established, seedings should be properly managed and monitored to ensure that resource objectives are accomplished."
- Vegetation manipulation through seeding is only one of the tools the Bureau has at its disposal to resolve resource conflicts and meet multiple-use objectives. Where possible, management facilities such as fences and water developments will be considered first in developing grazing systems and meeting resource objectives, but seedings will also be considered where they meet management objectives. Seedings will be used under a number of conditions including, but not limited to erosion control, wildfire rehabilitation, weed control, increased forage production, and in cooperation with individuals and other agencies.
- Potential seedings will be restricted in deer and elk winter range by the restriction that prescribed fires be no larger than 400 acres and no more than 15 percent of browse would be eliminated. There will be no vegetation treatment within 1 mile of perennial water or aquatic habitat and no detrimental sagebrush removal within 2 miles of sage grouse strutting grounds. See Proposed Plan for water quality and wildlife habitat restrictions.
- 1-12 The Saddle Butte proposed ACEC does not meet ACEC criteria. Analysis of current management indicates that grazing is not causing damage to the site. If future evaluations indicate a change in this situation, management practices can be modified.
- 1-13 The objective and management actions for vegetation have been revised, see the Proposed Plan. Upon completion of the Ecological Site Inventory now underway in the RA, ecological status objectives will be developed. However, when developed these objectives will not always have the potential natural community (PNC) as the desired plant community. Variety and diversity of healthy plant communities is the intent of this objective.
- Because Congress has repeatedly cited livestock grazing as a valid use of the public land through FLPMA, the Taylor Grazing Act, the Public Rangeland Improvement Act, etc., this objective will also meet the needs of all multiple uses, including wildlife habitat, livestock grazing and special status species, among others.
- 1-14 The special status species table has been refined; see Table 2.11 in the Proposed Plan. The management actions in the Proposed Plan which are not species specific refer to all special status species, both plants and animals.
- 1-15 Research does exist to support the 2-mile standard. Wallestad and Pyrah (1974) and others have found that most nests occur within 2 miles of a lek. As the radius from the lek becomes larger, the total acreage involved grows at an increasing rate. Surface occupancy would, therefore, involve less percentage of the total area the farther away from the lek occupancy takes place. It is felt that with seasonal stipulations and these distances from leks, sage grouse nesting and brood rearing habitat will be protected.
- 1-16 Allotment evaluations are being prepared in the RA to assess the effects of livestock grazing (both level and timing) on the public lands. Where it is appropriate, species specific objectives for special status plant species are being incorporated into the allotment evaluation process. Incorporated into these objectives will be monitoring and inventory.
- It does not appear that livestock grazing is adversely impacting special status plant species; however, through inventory and monitoring, the status of each special status plant species can be established and the impacts of livestock grazing on the species can then be evaluated.
- See the Proposed Plan for management actions dealing with special status species.
- 1-17 All timber sale areas will be evaluated on a case-by-case basis to ensure adequate cover for travel, escape and thermal protection purposes remains in any particular sale. During the EA process, ODFW and USDA-FS ranger district personnel are consulted for input into harvest design. The word blocks has been changed to units, see Proposed Plan decision WL 2.3.
- 1-18 Habitat for species not specifically mentioned is treated by habitat types. For instance, good condition riparian areas support a larger diversity of wildlife species than any other type in the planning area. The timber harvest, riparian area, wetland, grazing and vegetation portions of the Proposed Plan are designed to provide habitat for these animals. Data is not available, specific to some of the habitat types in the planning area, to designate indicator species. Also, baseline data on small mammals and songbirds is lacking over most of the planning area. Objective WL 7 shows management actions which are expected to have the highest degree of impact on nongame species.
- 1-19 Buffers will be left and mosaic patterns will be created if treatments are implemented. The guidelines in Appendix 3-177 of the DRMP/DEIS are standard procedures on all types of improvements. Also, playa habitat has been shown to be important for some species of wildlife. Currently, playa conditions and trends are unknown. If during the life of the plan, conditions are found to be unsatisfactory, then actions and objectives will be designed during formulation and evaluation of activity plans.
- 1-20 Streambank conditions are monitored more frequently than 5-year intervals on areas with grazing systems designed to improve riparian and aquatic habitat. The 5-year timeframe refers to stabilization projects. This period was used because in some cases significant improvement may take 5 years to become apparent.
- 1-21 The Federal Register Notice of February 20, 1987, is included in PRMP/FEIS, Appendix 1, Table 17.
- 1-22 A map locating existing and proposed open, closed and limited areas for ORV use has been added to the PRMP/FEIS.
- 1-23 Off-road vehicle/off-highway vehicle use is a valid and accepted use of BLM lands. This use will not be eliminated from the management scheme, but as stated in E.O. 11644, policies and procedures will be established "that will insure the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of these lands." This includes various measures such as establishing boundaries, signing, law enforcement and designations to manage ORV use as stated above.
- E.O. 11644 also mandated that all Bureau land be designated as open, closed or limited. Any open or limited areas where ORV use is causing considerable adverse impacts to resources shall be designated closed until measures are taken to eliminate resource problems and prevent recurrence.
- The only intensive use area for ORVs has been established on Radar Hill near Burns and Hines. There are no other requests for such use nor any other areas planned for designation by the District at this time. Past requests for cross-country ORV use have come from out-of-county users. These are considered on a case-by-case basis with an EA addressing potential impacts. If impacts cannot be eliminated or mitigated to an acceptable level, application is refused and a permit is not issued. This "cross-country" ORV use is relegated to travel on designated roads and trails for point-to-point racing such as the Burns to Bend Race (the only race allowed; twice: 1978 and 1979). It does not include driving off established routes and meandering over the terrain. There are no other known, identified race routes in the RA.
- Off-Road Vehicle Management Directives (1) and (2) under Alternative B, Emphasize Natural Values With Commodity Production, have been adopted in the Proposed Plan. Management Directive 1 also has additional wording and reads as follows: "Implement and manage ORV areas designated in the Federal Register on February 20, 1987, as well as a prior designation for South Warrrows. Exceptions are Warm Springs Reservoir area (23,811 acres), Squaw Lake area (6,500 acres) and Malheur River-Bluebucket Creek (2,080 acres). The open areas may be free of ORV use, but susceptible to ORV damage, will be closed or limited in future designations when a determination is made that the use of ORVs will cause, or is causing, significant adverse impacts on natural, cultural or historical resources of particular areas or trails on public lands."
- 1-24 The trail is noted on the recreation map.
- 1-25 Management Directive 6, under the Preferred Alternative to manage livestock grazing in riparian areas for enhancement of fishing opportunities, is written to note the relationship between improving fish habitat and, potentially, fish populations. This is to be accomplished by managing livestock use to increase vegetative cover over streams, stabilize streambanks, reduce water temperature and any other habitat improvements to increase fish populations and, in turn, increase fishing opportunities.

- 1-26 The interdisciplinary team analysis resulted in the conclusion that Hatt Butte and Squaw Lake do not meet Bureau ACEC criteria for relevance or importance. Neither Hatt Butte nor Squaw Lake clearly or strongly include relevant cell needs that are required by the Oregon Natural Heritage Plan, rather each falls somewhat short of being truly representative (relevance) and truly appropriate (importance). Hatt Butte includes pristine plant communities represented elsewhere in the system, and is a geological feature that is noteworthy but not exceptional. Squaw Lake is not a permanent feature but rather an intermittent pond, and any associated cell needs for plant communities have been nominated or designated at better sites elsewhere. No particular threats are posed to either locality.
- 1-27 Map VRM-1 is the present classification for managing visual resources on Bureau-administered lands in the RA. It denotes the acreages listed in Table 3, Alternative D (Continuation of Present Management) of Appendix 8, DRMP/DEIS.
- 1-28 Where the expression "maximum opportunity" is used, it is in reference to opportunity to explore, lease, develop, etc., mineral resources within constraints imposed by measures to protect sensitive resource values. Such protective constraints have been designed to be the least restrictive necessary to protect the sensitive resource values while avoiding unnecessarily encumbering mineral activity consistent with BLM's multiple-use mission.
- 1-29 The authority to authorize occupancy or agricultural uses on public land is contained in Section 302(b) of the FLPMA. The regulations established under the act limits short-term permits to a maximum period of 3 years. Long-term leases must be issued for a period that is consistent with the time required to amortize the capital investment of the use being authorized. In practical terms, depending on the use, this would range from 3 years to a term of 10, 20 or 50 years or more, as determined by the authorized officer. Perpetual agricultural or occupancy uses would require disposal of the land by sale or exchange.
- 1-30 The statement "consistent with other resource values" has been added to the referenced management objective in the Proposed Plan.

This entire 26 Page Report Entitled:
 "Comments and Response to Draft Three Rivers Resource Management Plan and Environmental Impact Statement" Prepared by Riddle Ranch and Western Range Service, should be considered as Riddle Ranch stockholders comment in addition to our individual comment.

2

RIDDLE RANCH
 HC 72, BOX 55
 PRINCETON, OREGON 97721

January 26, 1990

Joshua L. Warburton
 District Manager
 Burns District
 Bureau of Land Management
 HC 74 - 12533
 W. Highway 20
 Hines, Oregon 97738

COMMENTS TO THE
 DRAFT THREE RIVERS RESOURCE MANAGEMENT PLAN
 AND ENVIRONMENTAL IMPACT STATEMENT

Dear Joshua:

Enclosed is the report entitled "COMMENTS AND RESPONSE TO Draft Three Rivers Resource Management Plan and Environmental Impact Statement" dated January 17, 1990 which will serve as our written comments to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement dated October 1989. This report was cooperatively prepared by Riddle Ranch and Western Range Service, a private range management consulting firm based in Elko, Nevada. Please carefully review and study this document (our comments) in its entirety.

We appreciate the opportunity to review the Draft Three Rivers RMP/EIS. If you have any questions or request any clarifications, please contact us.

Sincerely,

Allan Otley
 Allan Otley

Enclosure

COMMENTS AND RESPONSE
 TO
 "Draft Three Rivers Resource Management Plan
 and Environmental Impact Statement"

Prepared by:
 Riddle Ranch
 and
 Western Range service

January 17, 1990

SUMMARY

- 2-1 The Draft Three Rivers Resource Management Plan and Environmental Impact statement (Draft RMP/EIS) is not needed. For Three Rivers Resource Area, valid land use plans (Drewsey and Riley Mm) were developed and implemented within the last ten years. BLM has reported that there has been considerable progress in achieving multiple use objectives under current management. Most of draft's proposed management objectives were not considered as "planning issues." Most of the alternatives are similar. Even the Emphasize Commodity Production Alternative will have significant adverse impacts upon livestock production. BLM has not considered a variety of alternatives. Although Alternative D comes close, a No Action Alternative was not developed or analyzed. There was no evidence in the Draft RMP/EIS that the proposed planning criteria was available for public comment.
- 2-2
- 2-3 The surface water quality and aquatic and riparian habitat condition ratings appear to be inconsistent and unrealistically restrictive. If water quality conditions are as poor as BLM claims (86% of the streams are reported to have poor surface water quality), we would expect that there would be no fish left in the Resource Area. These Water quality ratings (surface, riparian and aquatic) are the basis for the majority of the adverse impacts to livestock grazing.
- 2-4 All available information indicates that current upland grazing practices are having no significant adverse impact on surface water quality. There is no scientific basis for limiting upland utilization limits to 30%. The 10% utilization limit for woody riparian shrubs is also unreasonable and without scientific basis.
- 2-5 The proposal to remove livestock from streams will disrupt current, successful grazing systems and will have long-lasting adverse impacts on livestock operations. Only a portion of the streams are publicly owned. Therefore, BLM's proposed actions will have very little, if any, effect on overall stream conditions.

2-6 giving wildlife and wild horses priority over cattle in forage allocations is unfair and inconsistent with recent Federal Court decisions. It may well be illegal.

2-7 BLM has failed to address many of the adverse impacts of their preferred alternative on livestock grazing. Funding for the proposed range improvements will probably not be available. The upland 30% utilization limit is not even considered in BLM's analysis of impacts associated with the preferred alternative on livestock grazing. Preliminary analyses indicate that BLM's preferred alternative will result in 30% to 70% reductions in livestock grazing in the resource area. BLM was apparently trying to minimize permittee and community resistance to their preferred alternative. The failure to disclose such impacts is misleading and improper.

INTRODUCTION

This document will serve as the Riddle Ranch comments to the "Draft Three Rivers Resource Management Plan and Environmental Impact Statement" dated October 1989 hereinafter referred to as Draft RMP/EIS. The organization of this report corresponds to the organization of the Draft RMP/EIS. The underlined chapter, page, table or appendix numbers used in this report correspond to the Draft RMP/EIS.

CHAPTER 1

Ch 1, pages 3-4

2-8 We strongly disagree that livestock grazing should be considered an issue and addressed in the current Draft RMP/EIS. The public participated in the Drewsey Final Grazing Management Environmental Impact Statement hereinafter referred to as the Drewsey Grazing EIS. Forage allocations were made for both livestock, wild horses and wildlife in the Drewsey Grazing EIS. Since the implementation of the Drewsey Grazing EIS, BLM has reported that significant progress has been made in obtaining management objectives.

2-9 In the 1981 Rangeland Program summary update for the Drewsey Grazing EIS, Burns District Manager stated:

"To date we have made significant progress in improving the public rangelands through intensive livestock management and rangeland improvements."

In the 1983 Drewsey Rangeland Program Summary update, BLM stated:

"The specific objectives are to: improve waterfowl and fish habitat, increase available forage for wildlife, wild horses and livestock, maintain water quality and

reduce soil erosion, increase recreational opportunities and quality, minimize impacts of the program on visual and wilderness resources, minimize the impacts of the program on visual and wilderness resources, minimize the impact of reductions or changes in use on grazing permittees and protect cultural resources and threatened and/or endangered plant and animal species.

There has been considerable progress in achieving these objectives and this progress will be discussed in following sections."

The objectives stated above (in the 1983 Drewsey Rangeland Program Summary update) address the Planning Issues related to livestock grazing and wildlife. If BLM believed the Drewsey Grazing EIS was successful, there is no reason to change it after only ten years. To quote a famous saying, "If it ain't broke don't fix it."

2-10 BLM has not provided any evidence that forage availability for big game or livestock has changed dramatically since the implementation of the Drewsey Grazing EIS. The Drewsey Grazing EIS and Drewsey Rangeland Program summary addressed the forage requirements of big game. The reported recent increase in elk population levels indicates that current forage availability is adequate. Requiring adequate monitoring and inventory data before changing management objectives and actions is consistent with Planning Criteria 4 listed on Chapter 1 page 5.

2-12 We request that BLM continue to use the Drewsey Grazing EIS until appropriate BLM monitoring data indicates that the current forage allocations are inadequate. Eliminating grazing management from analysis in this Draft RMP/EIS is consistent with BLM's elimination of wilderness and weed and grasshopper control from analysis in the Draft RMP/EIS.

2-1 Water quality, riparian condition and aquatic habitat condition are not listed as planning issues in the Draft RMP/EIS. Initial public participation apparently did not even address water quality and aquatic condition. Yet, BLM bases approximately 1/3 of its management objectives listed in Table 2.1 on water quality, riparian condition and aquatic habitat. Water quality and/or riparian and aquatic condition are addressed in water quality, soils, forestry and woodlands, livestock grazing, special status species, wildlife habitat management, (wetland, reservoir and meadow habitat), riparian habitat, aquatic habitat, and recreation management objective categories in Table 2.1, since riparian and aquatic condition and water quality not considered as planning issues. BLM placed too much emphasis on these factors during the preparation of the Draft RMP/EIS.

Ch. 2, pages 2 - 4

2-14 Alternatives A, B and C are very similar. Even alternatives A and E are similar in many respects. Federal regulations 43 CFR 1610.4 states:

"All reasonable resource management alternatives shall be considered and several complete alternatives developed for detailed study. The alternatives developed shall reflect the variety of issues and guidance applicable to the resource uses. ..."

Some of the more important similarities among the alternatives are listed below:

- 1) The amount of livestock forage to be converted to wildlife is identical in Alternatives A, B, C and E (Table 2.1-22,23). The "emphasize natural values alternative" (A) and the "emphasize commodity production" alternatives reduce currently available livestock forage by the same amount.
- 2) Alternatives A, B, C and E all remove livestock from riparian areas for at least five years.
- 3) Alternatives A, B and C all incorporate the same forage utilization standards for areas exclusive of Horse Management Areas.
- 4) The management objectives and concerns for each allotment are identical under all alternatives (Table 2.1-8,9,10,11).
- 5) There are many other similarities among alternatives in Table 2.1 which are too numerous to mention.

2-1 The Draft RMP/EIS does not provide a variety of alternatives as required by FLPMA and 43 CFR 1610. For livestock grazing, the alternatives in this Draft RMP/EIS are either no change or a reduction in livestock grazing. Alternatives A, B, C and E will all adversely affect livestock grazing. As we will discuss below, forage utilization standards proposed in this Draft RMP/EIS will be the limiting factor for livestock grazing for Alternatives A, B and C. No upland utilization standards are given for Alternative E so the impact of utilization standards cannot be determined. Currently available and legally established livestock forage will be reduced and allocated to wildlife in Alternatives A, B, C and E. Cattle will be excluded from riparian areas in Alternatives A, B, C and E for at least five years which will reduce the amount of high quality forage available to livestock, prevent livestock from obtaining water (especially during droughts) and prevent the enjoyment of private

stock water rights. Livestock watering is considered a beneficial use by the state of Oregon (Appendix 1-3).

2-18 Federal regulations 43 CFR 1610.4-5 (see below) requires that one of the alternatives considered will be "No Action."

43 CFR 1610.4-5 "One alternative shall be for no action, which means continuation of present level or systems of resource use."

Alternative D is considered the "No Action" alternative in the Draft RMP/EIS. However, there are several changes proposed in Alternative D. The initial stocking level will be increased to 161,222 AUM's from current active preference of 150,472 AUM's. The timber base (acres) was changed. Additional range improvements are proposed. The allocation of livestock forage to wildlife was increased from 4,396 AUM's (Appendix 3, Table 4) to 5,278 AUM's (Chapter 4, page 21, Alternative D). Because of these and other proposed changes, Alternative D cannot be considered as the "No Action" Alternative required by law. Perhaps, Alternative D can be renamed as the "minimal action" Alternative and used in any future analyses that are necessary. However, Alternative D cannot be used as the "No Action" Alternative in the planning process. A "No Action" Alternative must be developed, analyzed and presented to the public for comment.

Ch. 2, page 3

2-19 What is the basis for the "criteria for the composition of the Preferred Alternative"? There is no mention of vegetative diversity, wetland systems (riparian, aquatic, wetlands and playa habitats) special species status, habitat and Riger mustang herds in the Planning Issues and Planning Criteria in Chapter 1 of the Draft RMP/EIS. Federal regulations 43 CFR 1610.4 state:

"Proposed planning criteria, including any significant changes, shall be made available for public comment prior to being approved by the District manager for use in the planning process. ..."

2-1 It would have been very helpful to have had the detailed monitoring and evaluation plan incorporated into the Draft RMP/EIS. Our comments may have been different if the monitoring and evaluation plan had been available. We will present our recommendations for a monitoring and evaluation plan below.

Table 2.1

A discussion of Table 2.1 will be given in our comments concerning Chapter 4 and throughout this comment report.

CHAPTER 3

Ch. 3, pages 2 and 27

- 2-21 Why does the number of miles of stream and acres of "flat" water in the Three Rivers Resource Area vary from 126.55 miles of stream and 4,491 acres of flat water in the Surface Water section to 83.65 miles of stream and 4,066 acres of flat water in the Aquatic Habitat section?
- 2-22 Available references or detailed explanation should be provided for the methodology used in determining surface water quality, aquatic habitat condition and riparian condition. Most of the management objectives are based on the surface water quality, aquatic habitat and riparian habitat condition and yet there is no explanation how this information was collected, analyzed and interpreted. What are the differences and similarities among surface water quality, aquatic habitat and riparian habitat condition ratings?
- 2-23 Why is temperature used in surface water quality condition? Isn't water temperature used in determining aquatic habitat condition rating?
- 2-25 In Appendix 6-3, the aquatic habitat condition ratings and we assume riparian and surface water quality condition ratings are based on a percentage of optimum or potential. Are the excellent, good, fair and poor condition ratings based on uniform basis (i.e., 0-25% = poor, 26-50% = fair, 51-75% = good and 76-100% = excellent) similar to that used for range condition ratings?
- 2-26 In Appendices 1, 5 and 6, condition and trend for surface water quality, aquatic habitat and riparian habitat are presented for streams in the Resource Area. Are the condition ratings current? When were the condition ratings last obtained? Were two or more estimates of condition ratings, obtained at different points in time, used to determine trend? If trend was based on a one time reading, the term "apparent trend" rather than "trend" should be used in Appendices 1, 5 and 6.
- 2-27 There appears to be some inconsistencies among the surface water quality, aquatic habitat and riparian habitat condition ratings. For example in Deep Creek, aquatic habitat and riparian habitat condition is good and the trend is static. Apparently there is little livestock use ["poor livestock access" (Appendix 6-2)]. However, the surface water quality is poor and not improving. In the Riddle Mountain allotment, the surface water quality of Riddle Creek is poor and static, aquatic habitat is good and static and the riparian habitat is fair and decreasing. On Rattle Snake Creek, riparian condition is good and improving, aquatic habitat is fair and improving and surface water quality

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Ch. 3, pages 12 and 16

- 2-33 With only 12% of the allotments (24/195) in the Resource Area requiring grazing systems, the implementation of grazing systems should not have been considered as a "Planning Issue" (Chapter 1).
- 2-34 Ch. 3, pages 24-26
Many of the plant and animal species listed in Table 3.8 are not found in the Three Rivers Resource Area (see Map SS-1) and should be eliminated from Table 3.8.
- 2-35 Ch. 3, pages 26
The large increase in big game populations indicate that big game habitat conditions are improving.
- Ch. 3, pages 66-67
With the high levels of unemployment and poor economic conditions in Harney County, BLM should encourage a real increase in commodity production and not try to reduce commodity production. Agriculture contributes significantly to the taxes collected in Harney County. Any reduction in agriculture production as a result of this Draft RMP/EIS will adversely affect the local economy and services provided by Harney County.

CHAPTER 4

Ch. 4, page 2

- 2-37 Ch. 4, pages 2 - 6
A great potential for adverse impacts to commodity production and especially livestock production exists with respect to water quality ratings including the related riparian and aquatic habitat condition ratings as well as the proposed management actions and objectives to improve the ratings.
For Alternatives A, B and C, a 30% upland herbaceous utilization limit is supposed to increase vegetative cover which would in turn lead to decreased sediment loads and water

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is poor and static on 37% of the stream. Could these inconsistencies be a result of differences among observers, natural variation and/or sampling error? Does BLM have any estimates of the variation and associated sampling error associated with these measurements and ratings?

- 2-28 There are no streams in the Resource Area that have good or better surface water quality. Even areas that have been excluded from livestock or have limited livestock use do not have good surface water quality. Does BLM have any evidence to suggest that good or better BLM surface water quality ratings are possible in the Three Rivers Resource Area?
- 2-29 since most of the streams are privately owned or controlled by other agencies, we find it difficult to believe that any proposed BLM alternative will have any effect on current stream conditions. BLM cannot control management practices on privately owned land. Eliminating grazing on public land for five or more years will not prevent grazing on privately owned land unless it is uneconomical to fence it from federal land. (Note: We do not necessarily agree with BLM's contention that current grazing practices are damaging surface water quality and aquatic and riparian habitat condition.) The proposed management actions will affect only a portion of the stream and will therefore have little impact on overall stream condition.
- Ch. 3, page 3
- 2-30 It is very important to note that BLM's best available information indicates that there is very little if any erosion (stable or slight erosion condition class) in the Three Rivers Resource Area (Map S-2).
- If there is so little erosion, why is BLM proposing to dramatically change utilization standards on uplands on at least 3 of their 5 alternatives?
- If there is so little erosion, why is silt listed as a problem in surface water quality in most of the streams (Appendix 1)?
- If there is so little erosion occurring at this time, will changing livestock grazing on uplands have any effect on surface water quality?
- 2-31 BLM data indicates that current grazing practices and grazing systems have been very successful in minimizing erosion.
- 2-32 BLM's surface water quality standards may not accurately reflect the true potential for streams in the Resource Area.

temperatures. We strongly disagree with this BLM supposition. water temperature is dependent primarily upon Woody streamside cover and to some extent streamside herbaceous cover (Clary and Webster 1989). Upland herbaceous cover will have no effect on water temperature.

- 2-38 Most of the allotments in the Resource Area are using grazing systems, such as rest rotation, deferred grazing or some combination. With these types of grazing systems, forage species can withstand 50% or greater utilization of annual forage production during the growing season without any significant changes in basal cover of key forage species. Very little changes in basal cover of key forage species were noted in allotments using three pasture rest rotation grazing systems even with utilization levels of 65% to 80% (Eckert and Spencer 1986, Eckert and Spencer 1987). Hornay and Talbot (1961) recommended 66% utilization levels for rest rotation grazing systems. With a grazing system, forage plants can generally withstand higher utilization levels than season long grazing.
- Researchers have given the following recommendations for proper use factors for intermountain vegetation. Most of the proper use factors are for season long grazing. Pickford and Reid (1948) and Hyder (1958) recommended that utilization of bluebunch wheatgrass (an important key forage species in the Resource Area) should not exceed 55% to 60% during the growing season in Eastern Oregon. Moderate grazing intensity appears to be the most conducive for maintaining vegetative cover for livestock grazing in the Northern Great Plains (Olson et al. 1985). McCarty and Price (1942) recommended grazing mountain forage plants at a moderate level.
- The proposed 30% utilization limit does not consider the season when grazing takes place. The effect of grazing on the vigor (cover is often a measure of vigor) of key forage species depends on the timing of grazing or season of use (Cook 1977 and Laycock 1967).
- The proposed 30% utilization limit in Alternatives A, B and C is especially inappropriate for crested wheatgrass which comprises approximately 6% of the Resource Area (Table 3.7). Crested wheatgrass should provide approximately 23,675 AUM's (conservatively assuming 4.5 acres/AUM) or 16% of active preference (21,300/150,472). Cook (1966) recommended a 55% to 60% utilization level for crested wheatgrass on foothill ranges in Utah. A 65% utilization level was recommended by Frischknecht et al. (1968). Torell and Godfrey (1983) determined that the optimal utilization level for crested wheatgrass was over 70%.
- BLM's erosion condition classes (Map S-2) shows that there is no or only slight erosion in almost all of the Resource Area.

All available information (Map S-2, Rangeland Program Summary updates and literature) indicates that current upland grazing practices are having no significant adverse impacts on surface water quality. There is no basis for limiting upland utilization levels to 30%.

2-39 The 10% utilization standard for woody riparian shrubs (Table 2.1) is also unreasonable. Light to moderate grazing generally has little adverse effect and in some cases will stimulate growth of woody riparian species (Clary and Webster 1989). Hedrick (1958) reported proper use factors of 35% to 70% for browse species including aspen. There is no scientific basis for a 10% utilization standard for riparian woody species.

2-40 The proposal to remove livestock from riparian areas (streams) for five or more years will have very adverse effects on livestock grazing and have little impact on overall stream conditions. Unless additional fencing is constructed, many pastures will be unusable for five or more years. This will require BLM and permittees to modify or eliminate grazing systems that BLM has reported as being successful (see discussion above concerning Chapter 1). Pastures with riparian areas used in rest rotation and deferred grazing systems will not be available. Pastures that currently receive periodic rest or defurment will have to be used continuously or drastic reductions in livestock and difficult livestock movements will be required.

2-41 Most of the allotments contain streams or drain into streams. Only 14% of the streams listed in Appendix 1 do not contain sections with poor surface water quality (BLM estimate). Therefore, many permittees will have to remove livestock from riparian areas for five or more years. Much of the riparian areas in the Resource Area are privately owned. A large portion of the streams that BLM has classified as having poor surface water quality will continue to be grazed on private land. Even if BLM's allegations concerning the adverse effects of livestock on surface water quality are correct, livestock removal from public land will have little effect on overall stream conditions.

2-42 The Draft RMP/EIS suggests that temporary additional feed will be used to mitigate this loss of temporary loss of forage. However with the upland utilization limit of 30%, all allotments in the Resource Area will face drastic reductions in livestock grazing (detailed discussion below). There will be no temporary additional forage in other allotments.

2-43 The Draft RMP/EIS recommends using grazing systems that are "widely recognized" as promoting the most rapidly riparian recovery practicable. WHAT GRAZING SYSTEMS DOES BLM BELIEVE ARE WIDELY RECOGNIZED AS PROMOTING THE MOST RAPIDLY RIPARIAN RECOVERY PRACTICABLE? Although BLM found rest rotation and deferred grazing systems acceptable and successful in the past, apparently

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Ch. 4, page 7

BLM data (Map S-2) indicates that almost all of the Resource Area has little or no erosion. With so little erosion currently occurring, very little change in erosion is expected with any of the alternatives.

Ch. 4, page 7 and 8

Current Oregon Forest Practices Act provides adequate protection to other multiple resources in the Resource Area. Due to the poor economic conditions in Harney County, timber harvest should be set at a level that allows maximum sustained yield of timber under current laws.

Ch. 4, pages 8 to 12

2-48 The high populations of big game in the Resource Area indicate that the restriction in the livestock grazing season proposed for Alternative A is unnecessary. In fact, reduced livestock grazing may very well adversely affect big game habitat and populations.

2-49 The impacts to livestock grazing for Alternatives A, B and C have been grossly underestimated. As discussed above, removing livestock from areas with streams with poor surface water quality will disrupt current grazing systems dramatically. BLM estimates that 28,937 AUM's of livestock forage will be lost for five or more years. Does this figure take into consideration the impact on existing (or proposed) grazing systems? Unless temporary feed is available, the "balance" of livestock operations will be dramatically and adversely affected. If one pasture within a three pasture rest rotation grazing system is excluded from livestock grazing, where will cattle graze while one of the two remaining pastures is being rested? Unless BLM provides temporary forage, the only alternative is to graze the cattle on the permittee's private land base. This will reduce the total number of livestock (from previous levels) that the operation can run on a yearlong basis. An adverse alteration in the livestock balance of a ranch will also reduce the amount of forage harvested in the rest of the allotment (in addition to the amount lost in the excluded pasture).

In Alternatives B and C, the forage loss and the adverse impacts on livestock balance will have long lasting effects upon livestock numbers in the Resource Area. After the five year exclusion of livestock, it will take several years to increase herd size and increase the amount of forage harvested. The economic damage resulting from livestock exclusion will last substantially longer than five years.

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during the development of this Draft RMP/EIS BLM has determined that these systems are not adequate. The only grazing system that we are aware of that is "widely recognized as promoting the most rapid riparian recovery practicable" is an early grazing treatment. This grazing treatment allows riparian vegetation regrowth after livestock removal (generally it is recommended that livestock are removed during May or June). However for the livestock to have forage available during the summer and fall months, only a portion of the allotment can be grazed early. Also, the early grazing treatment may not be compatible with existing grazing systems. Therefore if the Draft RMP/EIS is implemented, a large percentage (if not all) of every allotment will be subject to the arbitrary and unacceptable 30% upland utilization limit.

2-44 If BLM's contention that 86% of the streams in the Resource Area have poor surface water quality, one would expect to find adverse effects on the beneficial uses of the water. Has hay and crop production in Harney County declined because of poor water quality? Have wildlife populations declined? Has domestic water quality declined? Has animal performance and health declined in the Resource Area? Have recreational activities declined (including fishing, rafting and water fowl hunting) as a result of poor surface water quality? Is BLM aware of any streams in Oregon that consistently have good or excellent surface water quality?

2-46 How does BLM propose to continue to provide livestock water from reservoirs after excluding livestock? Fences for water gaps are very difficult to maintain in reservoirs. Pumps and piping are expensive to purchase, install and maintain. If permittees are required to purchase and maintain these improvements, it will be a significant additional economic burden.

2-47 If Alternative D is "no change from current management," how can the predicted improvement be based on the implementation of grazing systems and/or projects not yet approved and/or funded? Currently (no change) only 12% of the allotments in the resource area require grazing systems (Chapter 1-15-16). Alternatives A, B, C and E will require extensive changes in grazing systems and/or fencing. Because of extensive economic loss that will result from alternatives A, B and C, there is a good chance of BLM becoming involved in litigation if any of these alternatives are implemented. Therefore, Alternatives A, B, C and E will require more additional funding than Alternative D. Inconsistently, only Alternative B included the reservation that predicted surface water quality improvement is based on grazing systems and projects not yet approved and/or funded. Apparently, BLM is trying to mislead the public to believe that current management will not result in continued resource improvement and to wrongly justify the proposed changes in management contained in preferred Alternative C.

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2-50 BLM proposes that off site forage would be used to replace the temporary reductions due to livestock exclusion. Using off site forage, if available, would increase the operational costs of livestock operations. Some of the expected extra costs include trucking, vehicle maintenance and labor. Using off site forage would disrupt the current (on site) permittees livestock practices. Some controversy may result from BLM's proposed disruption of established grazing territories and animal husbandry practices. With the proposed 30% upland utilization limit, there will be very little if any "off site" forage available to be used on a temporary basis (see discussion below).

2-51 Most of the proposed additional forage available from range improvements will not be available for several years after funding (if available) and implementation of the projects.

2-52 Very little BLM funding has been available for range improvements in the West during the last five or more years. For example, many range improvements proposed in the Riley EIS have not been implemented (Chapter 4, page 11). The proposed additional forage from range improvements should not be included in calculating the impacts on livestock grazing unless funding is guaranteed.

2-53 The statement that "(livestock) reductions necessary to bring utilizations levels to 30 percent cannot be calculated at this time" is misleading. Apparently, BLM is attempting to minimize resistance by livestock permittees and the public to their preferred alternative. BLM estimated the grazing reductions including utilization restrictions for Alternative B. Alternative B is similar to Alternative C. However, the livestock grazing reductions resulting from Alternative B may be greater than BLM's estimate.

2-54 If Alternatives A, B or C are implemented the utilization limits and livestock exclusions will be the limiting factors for livestock grazing. Grazing systems that are widely recognized as promoting the most rapid recovery possible will probably only have a limited effect on most allotments. Unless riparian areas are fenced separately, the 50% herbaceous riparian and 10% woody riparian utilization limits will allow only limited use of pastures with riparian areas. Therefore, almost all of the usable forage in the resource area will be subject to the 30% upland utilization limit (only very limited use will be allowed in pastures with riparian areas).

2-55 Current utilization limits (from the Drewsey Grazing EIS) in the Drewsey unit are 50% for continuous grazing systems and 70% (80% for crested wheatgrass) for rotation and deferred grazing systems. The proposed changes in utilization standards will have a dramatic adverse effect on BLM calculated desired stocking levels.

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2-56 Currently, BLM's desired stocking levels are based on a formula described in Exhibit I attached herein. The formula uses observed utilization data, desired proper use factor or utilization limits and actual livestock use. Although we do not currently have the information necessary to complete these calculations on a Resource Area basis, we can use the information presented in the EIS and make some assumptions.

The first reduction will result from the exclusion of livestock from streams. BLM estimates that the capacity will be reduced by 28,937 AUM's (19% cut). Additionally, the remaining area will be subject to the 30% upland utilization limit. To achieve this limit, BLM will adjust stocking levels based on their existing utilization data. If we assume that BLM overall utilization data is between the 50% and 70% utilization limits we can estimate the range of impacts of the 30% utilization limit.

Assuming BLM utilization data equals 50%, desired stocking levels will be reduced to 72,921 AUM's to meet the 30% utilization limit. Additional allocations to wildlife will further reduce authorized livestock use to 70,399 AUM's, a 53% cut from active preference. After 6 or more years and after livestock grazing is allowed in exclusion areas, livestock grazing may be increased to 87,761 AUM's, a 42% cut from current active preference. If all range improvements are implemented stocking levels could be increased to 96,667 AUM's, a 36% cut from current active preference. If BLM utilization data equals 70%, corresponding cuts initially, after livestock are allowed in excluded areas and after range improvements are 67%, 59% and 53%. Refer to Exhibit I for formulas, calculations and explanations.

2-58 In the Riddle Mountain allotment, Western Range Service using BLM data methodology (BLM Technical Reference TR 4400-7) and utilization proper use factors (Drewsey Grazing EIS) estimated that a 20% to 25% increase in active preference is indicated. Using the 30% limit in the Draft RMP/EIS, a 50% to 55% decrease in active preference is indicated (Note: this does not include the proposed allocation to wildlife or water quality livestock exclusion). If the allocation to wildlife is included, the decrease in active preference will be 60% to 65%. If livestock exclusion for water quality is included, the reduction in livestock grazing will be approximately 70% to 75%.

2-59 BLM must describe and illustrate the calculations and methodology used to estimate the impacts of the various alternatives on livestock grazing. There are only minor differences between Alternatives B and C and yet BLM predictions on livestock grazing adjustments vary dramatically. Only Alternative D reflects the problems of limited funding for range improvements. Our only conclusion is that BLM is trying to be deceptive and misleading. Why else would BLM ignore the obvious adverse effects of their proposed actions on livestock grazing?

2-60 Utilization standards are not given for Alternatives D and E. The proposed utilization standards for these alternatives should be given.

2-61 The reductions in livestock grazing resulting from BLM proposed alternatives will force many livestock operators out of business. This is contrary to the criteria for the composition of the preferred alternative (Chapter 2 page 3).

2-62 BLM's proposed preferred alternative will reduce the value of the Riddle Ranch base property associated with its BLM grazing permit for the Riddle Mountain. Assuming a value of \$50 per AUM, a 50% to 75% reduction in active preference will result in a loss of \$77,125 to \$115,690. BLM's preferred alternative will cause unreasonable and unacceptable economic damage to our livestock operation and livelihood.

2-63 Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered that prior to issuing the Final Three Rivers Resource Management Plan Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

2-64 BLM's proposed Alternatives A, B or C will result in decreases varying from 45,142 AUM's (30% cut) to 105,330 AUM's (70% cut) in active preference for the Resource Area. Assuming a value \$50 per AUM value, the base property associated with livestock grazing preferences will decrease in value by \$2,257,100 to \$5,266,500. This is a substantial loss to the tax base of Harney County. The tax rates may have to be increased to continue to provide county services.

2-65 Ch. 4, pages 13 - 18

For Alternatives B and C, why should the upland utilization limits for Horse Management Areas be greater than areas exclusive of wild horses (Table 2.1-12, 13)?

2-66 Wild horses should not have higher priority for forage than other multiple uses. Livestock grazing preferences were legally established long before the passage of the Wild Horse and Burro Act (Table 2.1-12, 13).

2-67 Wild horse populations are above appropriate levels throughout much of West. Wild horse populations are not in any environmental danger. Wild horse management areas should not be considered as Areas of Critical Environmental Concern unless BLM

2-68 does not plan to control population levels. If BLM does not control wild horse population levels, there will be critical environmental concerns.

2-69 Ch. 4, pages 20 - 22

In Appendix 3, Table 6, BLM has reallocated forage to wildlife and given priority to wildlife over livestock. For the Riddle Mountain allotment, the Drewsey Grazing EIS wildlife allocation is over 32 times larger than the current allocation. Livestock grazing is facing a 50% to 75% reduction in forage and wildlife forage is being increase by over 3173%.

2-70 We do not believe that one multiple use should have priority over another multiple use. The recent increases in wildlife have occurred after the passage of the Taylor Grazing Act. Federal Judge Roger Foley stated in the recent decision of Fallini et al. vs. Hodel CV-S-86-645 that:

"... Congress by various enactments has declared additional purposes for which Taylor Grazing Act land will be managed by the BLM, there is no indication that Congress has repealed the Act's primary purpose to manage grazing lands so as to stabilize and preserve the livestock industry.

This court has rejected the contention that cattle have an status inferior to wild horses in public lands as a result of congressional enactments after the Taylor Grazing Act of 1934."

The preferred alternative (and Alternatives B and C) in this Draft RMP/EIS substantially reduces livestock grazing in favor of other multiple uses (primarily big game and fisheries).

2-71 The reallocation of 349 AUM's livestock forage to wildlife in Riddle Mountain allotment will reduce the value of our base property by approximately \$17,450 (assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

2-72 Allocations for wildlife should occur after range improvements have been completed and additional forage is available. The increase in recent big game populations indicate that the current allocation to big game is sufficient.

2-73 Why didn't BLM consider maintaining or reducing current big game populations as an alternative during the planning process?

Cattle grazing improves the quality of big game forage on fall and winter range (Anderson and Scherzinger 1975). Cattle grazing also stimulates browse growth by giving a competitive

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advantage of browse seedlings over grass. Without grazing, grasses will out compete browse seedlings and prevent establishment of shrubs.

2-74 Ch. 4, pages 22 and 23

Although the number of raptor prey species may decline after seedings are established, is there any evidence that the biomass or density of prey will decline. We hypothesize that the total amount of available prey and hunting success will improve in the seedings which are more productive.

2-75 Ch. 4, pages 24 to 28

Why are the surface water quality ratings so much lower than the aquatic habitat condition ratings? In the Glossary, water quality is defined as the chemical, physical and biological characteristics of water with respect to its suitability for a particular use. We assume that the designed use for surface water quality ratings is for fisheries. Our reasoning is the references to water temperature and siltation. In Deep Creek, aquatic habitat is good and surface water quality is poor. We would expect that if the aquatic habitat (water, stream bed and banks) is good that the surface Water quality for fisheries should be good.

For additional comments to aquatic and riparian condition see our comments concerning surface water quality above.

2-76 Ch. 4, pages 28 and 29

Playa management objectives referenced in Appendix 3, Table 6 should not be mentioned until they are identified, since BLM has not defined their specific concerns, objectives and management actions and has not allowed the public to comment. Playas should not be addressed in the Draft RMP/EIS.

Ch. 4, pages 30 to 34

After July 31, most forbs will be dormant, and effects of grazing on dormant forbs will be minimal. Eliminating grazing after July 31 should have no effect on the abundance of forbs.

2-77 Prohibiting a conversion of cattle to sheep in bighorn sheep habitat will not benefit sheep habitat because sheep will not be allowed to graze near bighorns (We suggest rewording this particular sentence on Chapter 4, page 30.) Is there any evidence that providing additional water will be detrimental to bighorn sheep or their habitat? Bighorn sheep generally do not graze further than 300 yards from escape cover (cliffs). This means that most bighorn sheep habitat is in steep, rugged terrain where cattle generally graze very little.

2-56 Currently, BLM's desired stocking levels are based on a formula described in Exhibit 1 attached herein. The formula uses observed utilization data, desired proper use factor or utilization limits and actual livestock use. Although we do not currently have the information necessary to complete these calculations on a Resource Area basis, we can use the information presented in the EIS and make some assumptions.

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2-59 BLM must describe and illustrate the calculations and methodology used to estimate the impacts of the various alternatives on livestock grazing. There are only minor differences between Alternatives B and C and yet BLM predictions on livestock grazing adjustments vary dramatically. Only Alternative D reflects the problems of limited funding for range improvements. Our only conclusion is that BLM is trying to be deceptive and misleading. Why else would BLM ignore the obvious adverse effects of their proposed actions on livestock grazing?

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2-68 Ch. 4, pages 20 - 22

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For additional comments to aquatic and riparian condition see our comments concerning surface water quality above.

2-76 Ch. 4, pages 28 and 29

Playa management objectives referenced in Appendix 3, Table 6 should not be mentioned until they are identified. Since BLM has not defined their specific concerns, objectives and management actions and has not allowed the public to comment, playas should not be addressed in the Draft RMP/EIS.

Ch. 4, pages 30 to 34

After July 31, most forbs will be dormant, and effects of grazing on dormant forbs will be minimal. Eliminating grazing after July 31 should have no effect on the abundance of forbs.

2-77 Prohibiting a conversion of cattle to sheep in bighorn sheep habitat will not benefit sheep because sheep will not be allowed to graze near bighorns (We suggest rewording this particular sentence on Chapter 4, page 10.) Is there any evidence that providing additional water will be detrimental to bighorn sheep or their habitat? Bighorn sheep generally do not graze further than 300 yards from escape cover (cliffs). This means that most bighorn sheep habitat is in steep, rugged terrain where cattle generally graze very little.

17

2-79 The BLM proposed livestock area exclusions around reservoirs provide undisturbed nesting areas for the long-billed curlew. Is there any evidence that nesting success for the long-billed curlew is lower in a moderately grazed area than a ungrazed area?

2-80 If redband trout and Malheur mottled sculpin habitat are expected to be impacted positively under current management (Alternative D), why propose to remove livestock from streams and reservoirs and dramatically alter utilization limits?

2-81 Ch. 4, pages 35 to 41

Closing roads will adversely affect livestock operators ability to actively improve livestock distribution. Closing roads will increase the difficulty and cost for placing salt throughout the allotment to improve distribution. In some cases, road closures will make repair to range improvements very difficult and expensive.

2-82 Ch. 4, pages 45 and 46

We are not convinced that removing livestock will improve visual resources unless, of course, BLM considers cattle and sheep unattractive. Please explain how reducing livestock grazing will improve visual resources.

2-83 Ch. 4, pages 46 and 47

Cultural clearances are required prior to the construction of range improvements. Range improvements should have no effect on cultural resources.

2-84 Ch. 4, pages 68 - 69

As stated above, BLM has failed to account for the impacts of the proposal utilization standards in their analysis of Alternative C. These utilization standards will have very adverse effects on livestock grazing. By ignoring the impacts of the 30% upland utilization limit and proposing range improvements which probably will not be funded, BLM has not considered the adverse impacts of their preferred alternative of livestock grazing.

2-85 Recently, very little money has been available for range improvements. For Alternative D, BLM estimates proposed range improvements will cost \$2,287,906. However, BLM implies in Chapter 4, Page 6 that funding is questionable for Alternative D. Many of the range improvements in the Riley EIS (Alternative D) have not been funded. The cost estimate for Alternative C range improvements is even higher than for Alternative D. BLM should consider the impacts to livestock grazing with and without range

improvements. If range improvements are not funded, livestock will be cut drastically in Alternatives A, B and C. NO increase in livestock grazing will be possible in Alternative E without range improvements.

BLM expects that some ranchers will expand their operations and/or base property production after livestock reductions. It is very unlikely that lenders will approve additional loans when the value of the base property will be reduced by approximately \$50 for each AUM that is placed in suspension or eliminated from total preference.

The most likely effect of BLM's proposed alternatives A, B and C is that many ranchers and long term residents of Harney County will be forced out of business.

2-86 BLM should consider the impacts of livestock reductions on the tax base of Harney county (see discussion above).

APPENDIX 3

Appendix 3, pages 52 and 53

We will reiterate our concerns related to Riddle Mountain allotment.

The surface water quality ratings appear unreasonably restrictive. Surface water quality ratings do not appear to correspond to riparian and aquatic habitat condition ratings. We would expect that these ratings would be correlated.

The calculated carrying capacity for Riddle Allotment does not appear to consider BLM's various proper utilization factors, livestock exclusion or disruption in the grazing systems. Our calculations indicated a 20% to 25% increase in active preference under the Drewsey Grazing EIS utilization standards and a 50% to 55% decrease using the Draft RMP/EIS standards, without considering livestock exclusion or proposed wildlife forage calculations. Please provide a detailed explanation of the methodology used for determining estimated capacity and the methodology that will be used in future allotment evaluations under each alternative.

2-87

With the large increases in big game observed in the Riddle Mountain allotment, we must conclude that big game habitat is currently in very satisfactory condition. BLM's big game habitat condition ratings do not reflect the obvious health and vigor of big game animals indicated by their increasing population levels.

2-89 We strongly disagree that wildlife should be given priority over livestock for forage (see discussion above).

2-90 Playa habitat should not be addressed in this Draft RMP/EIS until specific management objectives and alternatives are described and the public is allowed to comment.

2-91 From Map RN-1 and Map SS-1 there does not appear to be any Special Statute species in the Riddle Mountain allotment.

Many of the publicly owned riparian areas in allotment have already been fenced and excluded (or will be excluded) from livestock. Livestock should not be excluded from any pastures in the Riddle Mountain allotment because of riparian or surface water quality ratings.

2-92 Vegetation conversions will have more positive impacts on big game than negative effects. Until snow depth becomes limiting, deer and elk utilize grasses and browse during the fall and winter. For example, deer utilize crested wheatgrass during winter months (Austin et al. 1983). Livestock grazing improves forage quality for fall and winter range (Anderson and Scherzinger 1975). The 10% of current browse in deer winter range limit and 400 acre size limit on vegetation conversions are too restrictive and may reduce big game productivity.

APPENDIX 12

Appendix 12, page 2

Alternatives A, B and C will result in a substantial loss of agriculture productivity in Harney County and other counties in the Three Rivers Resource Area.

RECOMMENDATIONS

For the reasons described above, we believe that Alternatives A, B and C should not be implemented. Current utilization standards and grazing systems should be continued until sufficient and appropriate data is collected and analyzed. A determination can then be made whether range condition and soil stability are declining under current management. All BLM data and analyses in Draft RMP/EIS and Rangeland Program summary updates indicate that current management and stocking rates have been successful and will continue to be successful.

2-93

BLM should begin quadrat frequency (trend) studies to determine the long-term changes in vegetation and range condition. These studies are recommended and described in BLM Technical Reference TR 4400-4 and the Nevada Rangeland Monitoring Handbook (1984). If frequency studies indicate that the trend in range condition is declining, current utilization standards, stocking levels and/or grazing management should be adjusted. Conversely, if trend improves, utilization standards and stocking levels should also be adjusted. Until such a monitoring system

2-94

is implemented and data analyzed, current grazing systems, stocking levels and utilization standards should be continued.

2-95 BLM contends in its discussion of surface water quality that current livestock grazing is lowering vegetative cover and resulting in soil erosion and subsequent siltation of streams. If this continues to be a BLM concern, specific studies should be conducted to monitor vegetative cover and soil erosion. current BLM data indicates that soil erosion is minimal (Map S-2).

These types of monitoring studies were recommended in the Drewsey Grazing EIS.

Range improvements should be developed as funding becomes available. Range improvement recommendations proposed in Alternatives C, D and E will be beneficial to livestock grazing, wildlife and local economic conditions. Brush control and prescribed burning will be very cost effective.

RIDDLE RANCH

WESTERN RANGE SERVICE

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LITERATURE CITED

EXHIBIT 1

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Cook, C. Wayne. 1966. Development and use of foothill ranges in Utah. Utah Agricultural Experiment Station, Utah State University Bulletin 461.

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Frischknecht, Neil C. and Lorin E. Harris. 1968. Grazing intensities and systems on crested wheatgrass in Central Utah: Response of vegetation and cattle. U.S.D.A. Tech. Bulletin NO. 1388.

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Hormay, A.L. and M. W. Talbot. 1961. Rest-rotation grazing: A new management system for perennial bunchgrass ranges. U.S.D.A., Forest Service Production Research Report No. 51.

Laycock, William A. 1967. How heavy grazing and protection affect sagebrush-grass ranges. *Journal of Range Management* 20:206.

McCarty, Edward C. and Raymond Price. 1942. Growth and carbohydrate content of important mountain forage plants in Central Utah as affected by clipping and grazing. U.S.D.A. Tech. Bulletin No. 818.

The proposed stocking level for Alternative C during the first five years given in Chapter 4, page 11, Table 4.6 is 133,208 AUM's. In Table 2.1-11, initial stocking levels are proposed to be 139,851 AUM's. However, if the Draft RMP/EIS (Alternative C) is implemented, livestock stocking levels may be reduced to 50,000 AUM's or less, a 65% or greater cut. This reduction will be based on additional allocations to wildlife, excluding cattle from streams, and the 30% upland utilization limits. Other restrictions on livestock concerning wild horses, reservoirs and areas of critical environmental concern may result in additional cuts.

The first step in the initial reduction will be the exclusion of livestock from streams. BLM estimates that 28,937 AUM's will be lost by excluding livestock from streams. Therefore, authorized grazing will be reduced from the current active preference of 150,472 AUM's by 19% to 121,535 AUM's (150,472 - 28,937).

2-96 The remaining 121,535 AUM's will then be adjusted based on the proposed utilization standards. To simplify the calculations we will only use the 30% upland utilization limit. Most of the remaining areas (not excluded) are uplands. Since cattle water and generally prefer to graze in riparian areas, the 50% herbaceous and 10% woody riparian utilization limits may result in even larger cuts than the 30% upland utilization limit. Livestock use will probably exceed BLM's riparian utilization limits before the 30% utilization limit is reached. Therefore, these estimated livestock adjustments are conservative.

To adjust stocking rate based on utilization data, BLM uses the following formula to adjust stocking rate (BLM Technical Reference TR 4400-7).

$$\frac{\text{ACTUAL USE}}{\text{OBSERVED UTILIZATION}} = \frac{\text{DESIRED STOCKING LEVEL}}{\text{DESIRED UTILIZATION}}$$

This formula can be rearranged to the following form.

$$\text{ACTUAL USE} \times (\text{DESIRED UTILIZATION} / \text{OBSERVED UTILIZATION}) = \text{DESIRED STOCKING LEVEL}$$

BLM has collected utilization data and often three or more years of data for many if not all of the allotments in the Three Rivers Resource Area. Unfortunately, BLM utilization data for the entire Resource Area were not available during preparation of this document. Therefore, the overall average of BLM's utilization data for the entire Resource Area must be estimated.

Nevada Range studies Task Group. 1984. Nevada Rangeland Monitoring Handbook. University of Nevada-Km. Reno, Nevada.

Pickford, G.D. and Elbert H. Reid. 1948. Forage utilization on summer cattle ranges in Eastern Oregon. U.S.D.A. Circular NO. 796.

Torell, L. Allen and E. Bruce Godfrey. 1983. The optimum retreatment schedule for established crested wheatgrass strands, p. 218-285. In: Johnson, K.L. (ed.). 1986. Crested wheatgrass: Its values, problems and myths; symposium proceedings. Utah State Univ., Logan.

Assuming that the overall observed utilization level in the Resource Area falls between the utilization limits in the Dreysey Grazing EIS of 50% and 70%, the utilization based adjustments in stocking levels can be estimated. Using the above formula and BLM supplied information below, the adjustments in the Resource Area stocking rate using an assumed overall observed utilization level of 50% and 70% were calculated.

Current active preference: 150,472 AUM's.
After livestock exclusion (BLM estimate): 121,535 AUM's
Additional allocation of livestock forage to wildlife 2522 AUM's

Overall utilization = 50%	Overall utilization = 70%
Initially	Initially
121,535 X (30%/50%) = 72,921	121,535 X (30%/70%) = 52,086
72,921 - 2,522 = 70,399	52,086 - 2,522 = 49,564
70,399 AUM's (53% cut)	49,564 AUM's (67% cut)

After excluding livestock from streams, 121,535 AUM's will be adjusted based upon BLM utilization data and the 30% utilization limit. After excluding livestock from streams, the actual use value used in the formula will be 121,535 AUM's. If livestock were not excluded from streams, the active preference of 150,472 AUM's or preferably the average licensed use over the past few years would be used for the actual use value in the formula. The desired stocking level from the formula is 72,921 AUM's and 52,086 AUM's for the assumed 50% and 70% overall utilization values, respectively. BLM proposes to reallocate 2,522 AUM's of livestock forage to wildlife. Authorized livestock grazing will be reduced so that the total of livestock grazing and wildlife will not exceed the desired stocking level (from the formula). Therefore, BLM has the potential of initially reducing livestock stocking levels to 70,399 AUM's (53% cut) to 49,564 AUM's (67% cut) or perhaps even lower stocking rates (greater cut).

After 6 or more years without range improvements	After 6 or more years without range improvements
excluded area	excluded area
70,399 + [28,937 X (30%/50%)]	49,564 + [28,937 X (30%/70%)]
= 87,761 AUM's (42% cut)	= 61,966 AUM's (59% cut)

After five or more years of livestock exclusion from streams and allowing at least a year for herd size to rebuild and increase, BLM will allow stocking levels to increase. However, the 28,937 AUM's from the excluded area will be subject to the utilization based adjustment. Previous stocking rates in the excluded area will be reduced. After livestock are returned to the excluded areas and if proposed range improvements were not funded, BLM authorized stocking levels would be roughly 87,761 AUM's (42% cut) and 61,966 AUM's (59% cut) assuming the 50% and 70% overall utilization values, respectively.

After 6 or more years with range improvements	After 6 or more years with range improvements
87,761 + 8,916 =	61,966 + 8,916 =
96,677 AUM's (36% cut)	70882 AUM's (53% cut)

BLM estimates that after range improvements (land treatments, etc.) proposed in Alternative C are implemented an additional 8,916 AUM's will be available. These improvements will require several years to plan, fund, implement and establish. After six or more years, the estimated authorized livestock stocking level is 99,677 and 70,882 assuming an overall utilization level of 50% and 70%, respectively, and assuming that the improvements were funded and successful.

- 2-1 Planning issues and management objectives are not synonymous. Planning issues are generally a matter of controversy or dispute over resource management activities or land uses and are used to focus inventory, interdisciplinary interaction, analysis and documentation efforts. Management objectives, however, are required (BLM Manual 1620-1625) on a resource by resource basis regardless of whether the resource is involved in a planning issue or not. The alternatives presented in the DRMP/DEIS vary significantly as to which objectives are stressed and the degree and extent to which individual objectives would be met.
- 2-2 Alternative D is the "No Action Alternative." In accordance with the Bureau Manual (H1790-1, Chapter V, Alternatives to be Considered), the No Action Alternative reflects continuation of current management practices. This is explained on p. 2-2 of the DRMP/DEIS. A full description of the planning criteria was distributed to the public in a flyer dated February 17, 1989. The mailing list indicates that a flyer was sent to Riddle Ranch.
- 2-3 Water quality and aquatic habitat condition and rating are intrinsically related to condition of the riparian ecosystem. Water quality parameters are the physical and chemical constituents of aquatic systems. Standards for water quality determinations were developed by Federal action under the Clean Water Act (see 40 CFR 131.10). Surface water quality parameters were measured by experienced biologists at predetermined monitoring stations on select streams. If the habitat supported fish fauna, it was evaluated as aquatic habitat. Criteria used in evaluation of aquatic habitats and derivation of condition factors were summed in DRMP/DEIS, Volume II - Appendix 6, Table 2, Criteria for Evaluating Aquatic Habitat. References pertaining to methods of evaluation of aquatic habitats were provided with this table (see Bowers, et al., 1979 and Binns 1982).

Riparian habitats were monitored and evaluated with photo trend plots, 200 pace toe-point transects, color infrared photography and use-utilization studies (see the DRMP/DEIS, Appendix 1, Table 4).
- 2-4 See Proposed Plan management actions WL 6.1, 6.2 and 6.3 for proposed utilization and grazing systems in riparian areas. Many of the references used to help formulate the utilization levels are found in the U.S. Department of the Interior, Bureau of Land Management, Technical Reference 1737-1 and Technical Reference 1737-4. These references are named: Riparian Area Management; A Selected, Annotated Bibliography of Riparian Area Management and Riparian Area Management; Grazing Management in Riparian Areas. Copies are available from: Bureau of Land Management; Service Center; SC-658B; P.O. Box 25047; Denver, Colorado 80225-0047. Additionally, poor water quality does not preclude habitation by fish. Streams with poor water quality experience shifts in species composition, diversity and abundance to species more tolerant of poor water quality.

- 2-5 Temperature, sediment and turbidity can be reduced, or at least not increased, by as little as 0.25-mile of good condition streamside riparian. Effects of these improvements on the entire stream are dependent upon many factors including, but not limited to, size and length of good condition portions, position of the good condition areas along the entire stream and water quality as it enters the good condition areas. Many other Federal, State and private entities are currently working to restore their riparian habitats to better conditions. These efforts, in combination, will result in positive impacts.
- 2-6 Priorities may be set through the land use planning process. Big game population levels are set by management unit by the Oregon Fish and Wildlife Commission. These levels are determined through a public involvement process. Currently, these levels are below the biological carrying capacity of resource base. Appropriate management levels of wild horses and burros were set through previous planning processes. The RMP is not proposing any changes in these herd levels. Section 102(a)(7) and Section 202(c)(1) of FLPMA require that management be on the basis of multiple-use and sustained yield. Wild horse and burro numbers and livestock numbers will be adjusted in accordance with the results of monitoring studies and allotment evaluations. Adjustments in livestock use will be made as provided for in 43 CFR 4110.3 - 4110.3-3. Wild horse and burro levels will not be lower than the established minimum numbers in order to maintain viability.
- 2-7 The 30 percent utilization level will be eliminated. Upland utilization targets are being determined through the allotment evaluation process on an allotment by allotment basis. The general guidelines for utilization levels are 50-60 percent on native range and 60-80 percent on crested wheatgrass. These are guidelines only. Site-specific utilization targets are based on the objectives, grazing treatments and season of use of the allotments. After allotment management is analyzed, target utilization levels can be modified if management objectives are not being met.

Because site-specific evaluations of allotments have not been completed, impacts of these utilization levels cannot be analyzed. However, regardless of the utilization level, carrying capacity cannot be exceeded. Any reductions will be based on the results of the monitoring data and allotment evaluation.
- 2-8 As noted in response 2-1, a planning issue is generally a matter of controversy or dispute over resource management activities or land uses. Public response during ongoing scoping and other public involvement processes have clearly established that substantial controversy and dispute exists over livestock grazing on public lands. The purpose and need for the RMP is presented in the DRMP/DEIS, see p. 1-3.

- 2-9 The Three Rivers RMP addresses both the old Drewsey planning area and the old Riley planning area. While significant progress has been made in some programs through the previous planning (since its approval, over \$1 million have been invested in the Drewsey area - such investments have not been made in the Riley area), significant management problems or concerns remain unresolved. Among these are forage allocations for elk, special management areas, water quality, fire management, etc. Where efforts to resolve these concerns would affect livestock operations, grazing use would be adjusted only on the basis of approved monitoring and evaluation procedures with the opportunity for full participation by affected interests.
- 2-10 The Oregon Fish and Wildlife Commission is responsible for setting big game population levels in Oregon.

These levels, by management unit, were arrived at through a public involvement process. These numbers were set, in most cases, below the biological carrying capacity. Some factors used to set these numbers were private property damage (crops), other economic considerations, hunter demand and multiple-use concerns.

Big game numbers by allotment were arrived at using these management levels and current ODFW census results by season of use. The number was then multiplied by the percent of an allotment administered by BLM. This adjusted number was then divided by 5.3 for deer, 7 for antelope and 2.4 for elk. This is the number of each of these animals (yearlings and adults) that eat 800 pounds of air dry vegetation per month. This number was then multiplied by the number of months the animals are present in a particular season. This is the 800 pound AUM demand for each of these species by allotment. For deer these numbers were then multiplied by .18 to account for an 18 percent dietary overlap between deer and cattle. Antelope numbers were multiplied by .1 for dietary overlap and elk numbers were multiplied by .7 to account for dietary overlap and differences in use areas.
- 2-11 All use adjustments will be based on allotment-specific evaluations. Stocking rates and management treatments will be analyzed on the basis of monitoring done in accordance with Bureau policy and guidance. The AUM figures cited in the RMP are projections only. The allotment evaluations include allotment-specific objectives for resource values such as range condition, riparian and wildlife habitat and special status species, etc. The Oregon Rangeland Monitoring Handbook requires allotment management evaluations be done at intervals of 5 to 10 years.

The RA is currently conducting an Ecological Site Inventory which is planned to be completed by 1994.

See Appendix 1, Table 11 Monitoring Methods.
- 2-12 All grazing use adjustments will be made on the basis of approved monitoring and evaluation procedures with the opportunity for full participation by affected interests. Future monitoring and evaluation activities will be adjusted, where appropriate, to conform with management objectives established through this RMP on an allotment by allotment basis.

- 2-31 Available soils information was not detailed enough to target specific erosion problems within the planning area. While an area may have an overall erosion condition rating of slight or moderate, some sites within the area may exhibit higher erosion rates, contributing greater amounts of sediment to the fluvial system. Land management practices, such as logging or grazing, upstream and outside BLM jurisdiction, also contribute sediment to these systems.
- Upland erosion is not the only source of sediment entering streams. Unstable streambanks can be cut laterally or vertically, adding sediment to the fluvial system. However, proper riparian management has frequently resulted in positive changes in water quality by stabilizing streambanks and channels and providing adequate vegetation for filtering and storing sediment (Elmore and Beschta 1987, Skovlin 1984).
- Changes in current grazing systems should reduce soil erosion and sediment delivery to streams. The type and quantity of vegetative cover affects infiltration which in turn influences soil erosion (Heede 1977). Livestock grazing affects vegetative cover by affecting vigor, production, composition and litter (Jackson et al., 1985), and numerous studies indicate that runoff and erosion are related to grazing intensity (Heede 1977, Gifford and Hawkins 1978, Lusby 1979).
- 2-32 Refer to response 2-25.
- 2-33 The planning issue identified in Chapter 1 was grazing management.
- 2-34 The special status species table and map have been revised. See Table 2.11 and Map SS-1 of the Proposed Plan.
- Those plants with known populations in Three Rivers RA appear on the map. The other plant species are those for which habitat exists in the RA and their presence is suspected within the RA, or alternatively their presence has been documented in areas adjacent to the RA and consequently the plant may also be within the RA.
- Wildlife species listed in the special status species table were provided by the USFWS. The planning area is within previous ranges or habitat may exist for those species not currently known to exist in the area. Management actions have been outlined for those species known to exist or whose recovery is dependant upon reestablishment in the area.
- 2-35 Many factors determine big game population levels at any given time. Some of these factors are harvest levels, sex of animals harvested, climatic conditions and habitat conditions. Rocky Mountain elk and pronghorn antelope populations have increased in the past 10 years while mule deer populations have declined.
- 2-36 The management prescriptions presented in the RMP are objective oriented rather than rangeland improvement project oriented. As such, enhanced management can be implemented even where money for livestock range improvements or other projects is not readily available. This is clearly noted in Table 2.1 (p. 2.1-12, footnote 1) where it states that "Implementation of other management actions such as stocking level adjustments, season of use changes, etc., required under BLM monitoring and evaluation policy would not be forestalled due to lack of funding for these rangeland improvements."
- Additionally, the portion of the grazing fees collected in the District that is returned to the County and the District would be sufficient funding over the life of the plan to support implementation of the Preferred Alternative, if invested in the Three Rivers RA in proportion to the fees collected in the RA. Therefore, the assumption is considered to be reasonable.
- 2-37 The 30 percent upland utilization level has been eliminated. See management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan.
- 2-38 As shown in Appendix 3, Table 3, DRMP/DEIS many of the grazing systems which have been set up in the RA are not operational. The reasons for this include lack of management facilities, uncooperative permittees or failure of the system to meet resource objectives. Refer to response 2-7. Also, see management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan.
- 2-39 See management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan. Also, refer to response 2-4.
- 2-40 Grazing systems which are currently successful in promoting "speedy" riparian recovery will not be modified. Where riparian objectives are not being met, grazing system modification will be accomplished during allotment evaluation and the activity plan process. Also, refer to response 2-5.
- 2-41 Refer to response 2-5.
- 2-42 Refer to response 2-7.
- 2-43 Refer to response 1-2 and 2-7.
- 2-44 In the Three Rivers RA, there were 126.55 miles of perennial streams of which 82.50 miles, or 65 percent, were in poor condition.
- Poor water quality has immediate effects on the beneficial uses of water resources. Degraded water resources are most often associated with adverse impacts in related riparian ecosystems. As riparian cover and associated water quality deteriorate, fish and wildlife diversity, density, health and performance decline. Degradation of riparian cover would increase streambank erosion, instream silt and sediment loads; and adversely impair fish production, feeding, respiration and reproduction.
- 2-13 Refer to response 2-3.
- 2-14 It is correct that a reasonable variety of alternatives must be considered in the DRMP/DEIS and that they must be sufficiently distinct as to represent a clear choice. Such requirements, however, do not preclude having management actions which are common to several or all alternatives (this was noted in the DRMP/DEIS, p. 2-4, Detailed Description of the Alternatives). This is particularly true, for example, where legal requirements (as with air quality, see Table 2.1, p.1) do not provide for varying levels of compliance. The substantial differences between the overall alternatives are presented in PRMP/FEIS summary.
- 2-15 For livestock grazing, the alternatives presented are not limited to either no change or a reduction. Alternative E proposes 14,150 AUMs over active preference available for livestock grazing.
- 2-16 It is correct that no upland utilization standards were identified for Alternative E.
- 2-17 The Bureau is required to periodically review grazing preference under 43 CFR 4110.3, and make changes in grazing preference status where needed. The Bureau is also required to reduce active use if the use exceeds livestock carrying capacity as determined through monitoring. Increases and decreases in active use will be allocated in accordance with 43 CFR 4110.3-1 and -2 and Oregon BLM Manual Supplement 4100.066. Refer to Appendix 3, Table 6, DRMP/DEIS.
- The Bureau will honor any private water rights; however, no private water rights are known for riparian areas on public lands. Private water rights, if any, do not negate BLM's mission to manage the public lands for multiple-use.
- 2-18 Refer to response 2-2.
- 2-19 As noted on p. 2-2, Composition of the Preferred Alternative, the District Manager and the Area Manager placed special emphasis on an integrated systems philosophy in composing Alternative C. As they interacted with the interdisciplinary planning team and others, these were the criteria that they employed in making decisions about which elements to include in the Preferred Alternative.
- 2-20 Refer to the Proposed Plan for monitoring actions.
- 2-21 Not all acres and miles listed in the water quality section currently support fish and, therefore, were not considered aquatic habitat.
- 2-22 Refer to response 2-3.
- 2-23 Refer to response 2-3.
- 2-24 Water temperature is one of the water quality characteristics which may affect fish and is listed as such in DEQ's Nonpoint Sources of Water Pollution Assessments publication. Also, refer to response 2-3.
- 2-25 See Appendix 2 and Appendix 6, Table 2, DRMP/DEIS.
- Also, the BLM's surface water quality conditions were derived from field monitoring 103.15 miles of streams, 82 percent of the RA, and from data published by DEQ in 1988 as a Statewide Assessment of Nonpoint Sources of Water Pollution.
- For consistency between water quality, aquatic and riparian habitat condition classes, DEQ classes of severe, moderate and no problem were converted to BLM classes of poor, fair and good. Streams listed with DEQ as having no data were assessed with BLM data when available, or listed in the tables with a question mark (?) if no data existed.
- The excellent, good, fair and poor condition ratings were developed by Bowers et al., 1979, and Bins 1982 (see Appendix 6, Table 2, DRMP/DEIS); and have no similarity to range condition ratings.
- 2-26 Condition and trend data for surface water quality and aquatic and riparian habitat were collected seasonally from select streams and riparian areas in the RA. Details of riparian inventory methodology were presented in Appendix 2. Data used to develop tables presented in the DRMP/DEIS were collected through 1988.
- 2-27 Instream water quality, aquatic and riparian habitat evaluations were derived differently and would not necessarily coincide (see response 2-3). The BLM does not have any estimates of variance or associated sampling error.
- 2-28 Though there were no streams with good or better water quality ratings in the Three Rivers RA, data indicate good conditions in aquatic habitats with restricted livestock use (see Appendix 6, Table 1, DRMP/DEIS: Aquatic Habitat, i.e., Deep Creek, Stinkingwater Creek - Upper Mountain Allotment, Smyth Creek). BLM - Best Management Practices recognize the importance of protection and restoration of riparian communities and their direct impact on aquatic habitats and water quality. With proper livestock/riparian ecosystem management, surface water quality ratings within the RA are improvable to DEQ standards.
- 2-29 Refer to response 2-5.
- 2-30 The erosion condition classes depicted in Map S-2 are general in nature and do not address specific active erosion problems. Paragraph 1 of the Soil Section on p. 3-3 states: "General soils information has been provided in lieu of specific information." Furthermore, soil erosion was not the only criterion used to develop utilization standards. Refer to the section title Management Conflicts and Concerns on p. 3-16 for more information.

- The Three Rivers interdisciplinary team estimates 70 percent of all wildlife species in the RA are partially or totally dependent upon riparian habitats for food, water and cover.
- Additionally, recreational uses of water resources decrease as beneficial uses of water decline. User days decline as waters are degraded and made unsuitable for human use.
- Given the poor condition of surface flowing waters in the RA, the Preferred Alternative focused on the protection, restoration and enhancement of aquatic and riparian habitats to the extent possible under guidelines promulgated by FLPMA. Additionally, one would not necessarily expect crop production to decline due to poor water quality. Poor water quality and nutrient enrichment may increase hay or other crop production.
- 2-45 Though the Three Rivers RA lacks streams with good or excellent water quality, the Andrews RA has 57 miles of good and 7 miles of excellent water quality.
- 2-46 All reservoirs currently fenced have design features or alternate water sources for livestock watering. This practice will continue in the future. See page 4-4, DRMP/DEIS.
- 2-47 The reservation cited (p. 4-6, DRMP/DEIS) is incorrect as printed. This passage should read as follows: "Much of the above improvement is predicted on the implementation of grazing systems and/or projects which have been analyzed in previous planning, but have not yet been funded." The planning team was instructed to analyze Alternative D as if the previous planning were being fully implemented.
- 2-48 The livestock grazing seasons proposed in Alternative A, DRMP/DEIS, were recommended to improve browse and forb production and availability on mule deer and antelope ranges, respectively.
- 2-49 All livestock grazing use adjustments, both upward and downward, will be made through the monitoring and evaluation process. Such adjustments shall be made with the opportunity for the full participation of established affected interests. The object of such adjustments will be to meet management objectives established for the allotment(s) in question while being responsive to the needs of livestock grazing operations as well as other sensitive resource values.
- 2-50 Permittees using forage in areas away from their usual allotments could incur additional costs if the new area was farther away. Determining what the costs would be is impossible without knowing the number of livestock and the distance they would have to travel. It is possible that existing systems would be modified which could change a permittee's usual system. There is controversy surrounding shifting grazing use between allotments, but the practice is fully supported by the Oregon Manual Supplement on the Allocation of Additional Forage Permanently Available for Livestock Grazing Use.
- 2-51 Refer to response 2-7.
- 2-52 The Burns District has no control over future funding levels appropriated by Congress nor over grazing fee levels.
- See Proposed Plan management action GM-1.1 for a listing of allotment prioritization criteria.
- See also response 2-36.
- 2-53 Refer to response 2-7.
- 2-54 Refer to response 2-7.
- 2-55 Refer to response 2-7.
- 2-56 See Appendix 1, Table 11, PRMP/FEIS for a discussion of the District monitoring methods and evaluation process.
- 2-57 Refer to response 2-7.
- 2-58 Refer to response 2-7.
- 2-59 Refer to response 2-56.
- 2-60 Refer to response 2-7.
- 2-61 The economic analysis presented in the DRMP/DEIS indicates that, under the Preferred Alternative, potential grazing use adjustments in the short-term would have a negative impact on some operations. However, over the long-term, nearly 70 percent of the existing livestock operations currently in effect would receive less than a 10 percent reduction. This is clearly consistent with Socioeconomic Systems criterion number 3, "Provide for the continued opportunities for ranching operations typical of the American western heritage (emphasis added)."
- 2-62 The economic impacts are overstated. See response 2-7.
- 2-63 Takings Implication Assessments are required by E.O. 12630 to assist Federal agencies in evaluating actions which affect, or may affect, the use or value of private property. Private property refers to all property protected by the Just Compensation Clause of the Fifth Amendment to the Constitution. Grazing licenses and permits do not create any right, title or interest in the public lands (43 U.S.C. 315b). The courts have therefore held that grazing licenses and permits may be revoked without payment of compensation. *Osborne v. United States*, 145 F.2d 893 (9th Cir. 1944). In addition, the United States is not required to compensate for any element of value based upon the use of private fee lands in combination with the Government's permit lands. *United States v. Fuller*, 409 U.S. 488, 35 L.Ed.2d 16 (1973). In view of the fact that grazing licenses and permits as well as associated elements of value in base properties are not private property protected by the Just Compensation Clause, it is clear that E.O. 12630 and the requirement for the preparation of Takings Implication Assessments are inapplicable to planning activities involving BLM grazing licenses and permits.
- 2-64 Refer to response 2-7.
- 2-65 Utilization levels will not be greater for HMAs. The levels listed in the alternatives were established to show that use by either livestock or wild horses would not exceed the sustained yield of any of the HMAs. The utilization standard for all uplands has been changed as per response 2-7.
- These utilization levels have been removed from the final proposed action. They were used for analysis purposes only. Actual utilization standards will not be greater in the HMAs.
- 2-66 Refer to response 2-6.
- 2-67 It is correct that wild horse populations are above appropriate levels throughout much of the West. The Seventh Annual Report to Congress in 1988 shows the total population of wild horses and burros to be 43,286 head, while the appropriate management level (AML) is 30,207 head. This report shows horses in Oregon to be 586 head over the AML. However, inventory numbers of wild horse and burro numbers in Oregon as of December 8, 1989, are listed at 1,770 head, which is 900 head below the AML. It is also correct to state that wild horses and burros do not appear to be in any environmental danger. The BLM has been reasonably successful in Oregon in controlling wild horse numbers and plans to continue gathering excess numbers as funding allows.
- 2-68 The BLM does plan and is mandated by the Wild and Free-Roaming Horse and Burro Act to control population levels to maintain a thriving, natural ecological balance with all resources. Wild horse numbers as well as livestock and wildlife numbers may have to be adjusted in some cases to maintain this balance. Any area that has been determined to meet the relevance and importance criteria outlined in FLPMA and BLM Manual 1613.1B.3 may be nominated as an ACEC. Based on staff review, it has been determined the Kiger Mustang ACEC nomination meets these criteria. These wild horses are unique to this area and have received national recognition as being historically significant. It was further determined during review that the entire area of 66,244 acres originally nominated should be managed as the Kiger Mustang ACEC.
- 2-69 Refer to response 2-6.
- 2-70 Refer to response 2-6.
- 2-71 Refer to response 2-63.
- 2-72 Refer to response 2-10.
- 2-73 Refer to response 2-10.
- 2-74 Boula and Sharp (1985) found that the Lone Rabbit crested wheatgrass seeding near Riley yielded fewer species and lower total biomass than the two sampled sagebrush types in the same vicinity. Also, as noted on p. 4-23 of the DRMP/DEIS, hunting may become easier for some species, due to less small mammal hiding cover. The predicted impact from the proposed seedings was negligible. Combined with the other proposed actions of the Preferred Alternative, a low positive impact to raptors was predicted as shown in Table 4.16, p. 4-23 of the DRMP/DEIS.
- 2-75 Refer to response 2-3.
- 2-76 Refer to response 1-19.
- 2-77 The word "respectively" should have been added to these sentences.
- 2-78 The bighorn sheep range outlined on Map SS-1 in both the DRMP/DEIS and PRMP/FEIS, includes the known travelways used by the sheep. The tops and steep side slopes of Bartlett and Upton Mountains and the rough canyons along the Middle Fork of the Malheur River are where the sheep live except for travel between these areas. Currently, no known competition for forage, water, cover or space exists on Bartlett or Upton Mountains or along the Middle Fork. It is felt that competition could result from increased livestock water being developed in these three areas. The Proposed Plan calls for the long-term enhancement of bighorn sheep habitat in these areas. Future projects of all types will be evaluated on a case-by-case basis to ensure the health of the sheep and their habitat are not jeopardized.
- Also, competitive forage was not allocated to bighorn sheep because no competition for forage is suspected or expected.
- 2-79 No grazing exclusions are proposed for improvement of long-billed curlew nesting habitat.
- Allen (1981) found that curlews in southeast Washington chose nest sites which were predominantly cheatgrass/Sandberg's bluegrass fields which did not present visual barriers.
- Most documented long-billed curlew nesting in the planning area takes place in crested wheatgrass seedings. It is felt that grazing up to two-thirds of the area in the seedings will provide the vegetative structure desired by these birds while reducing incidental nest trampling.
- 2-80 Redband trout and Malheur mottled sculpin habitat would not be negatively impacted under Alternative D due to habitat improvements associated with projects already initiated. However, insufficient progress toward restoration of poor and fair aquatic habitats inhabited by these sensitive species would result from selection of Alternative D.

- 2-81 The road closures in the Proposed Plan would be on a case-by-case basis and would be reviewed by an interdisciplinary team and would have public review through the EA process. No roads needed for administration or fire protection would be closed.
- 2-82 Reduction of livestock grazing in certain places will improve visual resources. The amount and degree of grazing is an important consideration when evaluating the visual impacts incurred as well as the development necessary to manage livestock grazing.
- VRM areas represent the relative value of the visual resources, Class I and II being the most valued, Class III representing a moderate value and Class IV being the least value. Often the majority of Bureau-administered lands are managed as Class IV where the objective is to provide for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements of form, line, color and texture which determines how the character of the landscape is perceived.
- Specific places (such as riparian areas, scenic areas, ACECs, Wilderness Study Areas, Scenic Byways and often-viewed areas along highways) which may be visually sensitive can have a management objective to improve or preserve the natural setting. When this is true, reduced livestock grazing and/or removal of livestock for periods of time does improve visual resources. Impacts such as streambank erosion, overgrazed areas, livestock concentration areas and livestock developments in certain places does impact scenic quality.
- 2-83 It is true that cultural resource inventories are conducted during the planning phase prior to the construction of all surface-disturbing projects, which are commonly redesigned to avoid impacts to cultural sites thus found. When projects in the public interest cannot be modified to avoid impacts to cultural sites, they may be impacted upon completion of the comprehensive and, at times, costly procedures detailed in 36 CFR 800.
- 2-84 Refer to response 2-7.
- 2-85 It is true that full funding has not been available for range improvements. Without additional range improvements, grazing levels would be reduced approximately 11 percent. Refer to response 2-52 for information on funding. Also, refer to response 2-9.
- 2-86 Grazing permits are not the real or personal property of the permittee, thus are not assessed for tax purposes. Changes in personal property ownership that would follow implementation of any management alternative, including the No Action Alternative, cannot be specifically identified. BLM payments in lieu of taxes to Harney County are not expected to change substantially.

- 2-87 The RA uses methods approved in Bureau manuals, guidance and policy for determining condition and carrying capacity. The estimated capacity listed in DRMP/DEIS, Appendix 3, Table 6, were projections only. Carrying capacity will be calculated and analyzed in allotment evaluations.
- PRMP/FEIS, Appendix 1, Table 11, has been included to provide an explanation of methodology used to determine carrying capacity as well as an explanation of the allotment evaluation process.
- 2-88 Fifteen hundred acres of big game range in the Riddle Mountain and Smyth Creek Allotments were rated as unsatisfactory due to poor forage conditions related to juniper encroachment and poor interspersions of cover and forage areas. The Proposed Plan, when implemented, would result in all satisfactory condition in these allotments.
- 2-89 Refer to response 2-6.
- 2-90 Refer to response 1-19.
- 2-91 The special status species map has been revised. See Map SS-1 of the Proposed Plan. Also, refer to response 2-34.
- 2-92 The Proposed Plan calls for maintenance of 85 percent of the current browse on winter range (see Table 2.1-21). A cursory literature review did not reveal any evidence that the 400-acre size limit on vegetative conversions would be detrimental to big game productivity.
- 2-93 Refer to responses 2-7 and 2-9.
- 2-94 The Three Rivers RA uses a Nearest Plant trend method as outlined in the Oregon Rangeland Monitoring Handbook. This method is similar in concept to the frequency method. Refer to response 2-87.
- 2-95 Monitoring of sediment, streambank erosion and riparian vegetation will continue. Also, refer to response 2-30.
- 2-96 Refer to responses 2-7 and 2-87.

3



January 12, 1990

Josh Warburton, District Manager
Bureau of Land Management
HC 74-12533, Highway 20W
Hines, Oregon 97738

Dear Josh,

The Nature Conservancy would like to take this opportunity to comment on the Three Rivers Resource Management Plan/DEIS. As you are aware, the conservancy worked under contract for the BLM during the inventory phase of the planning process to identify and evaluate potential Research Natural Areas in the Three Rivers Resource Area. We were quite pleased with this arrangement and the results can be seen in the proposed RNAs found in the various alternatives.

Before we make specific comments about the plan it is important to note we feel that this is the most comprehensible and comprehensive RMP that has come out of the BLM in Oregon. The detailed Table 2.1 incorporates management directives that are easy to identify, understand and compare between alternatives. We think this style of RMP will set a precedent for all other RMPs in this cycle of planning. Congratulations are in order to Jay Carlson and the staff for a job well done.

RNA/ACECS

As noted above we were pleased to see that our RNA/ACEC recommendations were included in the RMP, however, we have some particular issues that need to be discussed about several sites. These sites and related issues are:

- 1) Foster Flat RNA/ACEC--The original nomination included 1870 acres which encompassed the entire playa called Foster Flat. In the preferred alternative the recommended RNA was noted at 720 acres. There was no justification provided for such a reduction in acreage. Furthermore, there is no logical way to design this RNA other than the original proposal of 1870 acres that includes the entire playa. The RNA Committee has worked hard and long insuring that all RNAs have viable, defensible boundaries that will both protect the target resource and integrate the

management of the site and the surrounding public lands. Foster Flat is perhaps the most naturally well-defined RNA imaginable as it is a distinct desert playa. To include less than the entire playa is only inviting continued management problems for the RNA and the surrounding lands. We strongly encourage the District to establish the RNA along the original 1870 acre boundaries. It should also be noted that Foster Flat is also a significant sage grouse site such that protection of the larger site would be very beneficial to this special status species.

- 2) Squaw Lake RNA/ACEC--It was indicated in the EIS that squaw Lake did not meet the relevance and importance criteria for ACEC nomination and thus was not included in the range of alternatives for ACECs. It has been common practice in the BLM to have all nominated RNA/ACECs that fulfill a natural area cell need, as defined in the Oregon Natural Resources Plan, to automatically be considered as meeting these basic ACEC criteria. The Squaw Lake site fulfills the Aquatic cell need #12. Mid to high elevation permanent pond in the Basin & Range Province and also has good representation of two other natural area cells, #15. Low sagebrush/Idaho fescue and #17. Low sagebrush/Sandberg's bluegrass scabland. Therefore, we feel it is incorrect to say that Squaw Lake does not meet the ACEC criteria. In addition, in Table 3.16 (p. 3-48), under Habitat for Species Diversity category, because there is both aquatic habitat and high quality uplands that have big game value it seems that the site should receive at least a Medium ranking. We selected Squaw Lake after careful consideration of existing RNAs in the Steens and felt it still would be a valuable addition to the RNA system. We were not ignorant of the fact that current grazing practices continued to impact the lake or pond but through proper management we believed that the site could be naturally restored. We encourage the District to reconsider the site in the final RMP.
- 3) Biscuitroot Cultural ACEC--We are happy to see this site carried forward in the RMP as we feel that the site not only has undisputed cultural values but also has significant natural values as well. In our inventory for RNAs we evaluated a number of areas in the Stinkingwater Mountains but could not find areas that quite met RNA criteria. However, we felt there was a real need to protect and manage a portion of this area for the natural values present as it is located at the junction of two physiographic provinces--the Basin & Range and the Owyhee Uplands. The ACEC designation should accomplish this with proper management.
- 4) Silver Creek RNA Addition--In Table 2.1 (p.2.1-34-35) it is indicated that designation of the addition will take place after acquisition of the private lands in section 17. Given the time it traditionally takes to complete exchanges we would like to see the District designate or establish the addition (at least the public land portion in section 20) in the RMP process and not wait for the completed transaction. Designation may give needed

emphasis to the exchange process as well.

Wild & Scenic Rivers

3-6 The analysis of Wild & Scenic Rivers in the RMP seems quite short sighted with regards to the Middle Fork of the Malheur River, segment A. This area includes the Malheur-Bluebucket WSA and private lands upstream from the WSA which has outstanding values for both scenery, recreation potential, fisheries including redband trout, and ecological diversity. If one was to include the downstream river canyon (for approximately 1.5 miles on private land) as well as Bluebucket Creek and the river segment noted in the previous sentence, there would be over 7 miles of river that surely qualifies for Wild and Scenic status. The adjacent portion of the Middle fork Malheur River on the Forest service lands upstream is designated Wild such that the total length of designated river would be over 20 miles. This resource deserves a rating of Eligible when the full extent of the stream segment is examined. The private lands should be considered as high priority sites for acquisition at this site as well. The preferred alternative does correctly propose the Middle Fork of the Malheur River for designation as a Wild & scenic river.

Wildlife Habitat

3-7 Wildlife habitat is reliant on grazing management on BLM lands. The preferred alternative's proposal to seed 46,960 acres to crested wheatgrass will have a negative impact on a wide variety of wildlife that rely on natural communities. We cannot support this management action and request that the District utilize native grasses in all seeding projects.

3-8 Grazing management could also be strengthened in the preferred alternative for special wildlife species needs. Alternative A and B have more strict requirements for habitat protection for long-billed curlews nesting habitat and for sage grouse strutting grounds that should also be implemented for the preferred alternative. The efforts made to protect and enhance habitat for redband trout and Malheur sculpin are commendable in the preferred alternative and will have associated benefits to all wildlife species that utilize these habitats.

3-11 There is also a need to specifically identify snowy plover habitat, ie playas, for protection of the species. Playas are highlighted in the vegetation section of Table 2.1 but snowy plovers are not mentioned here nor in the Special St.3tu.s Species section. Grazing should be restricted from plover habitat during the nesting season. There are additional threats to playas from nearby seeding projects. It is detrimental to have seedings near playas as livestock use will increase in these areas. In no case should seedings be allowed near playas.

special status plant species continue to be short changed with respect to grazing restrictions in the preferred alternative.

3-1 The interdisciplinary team determined that the relevant cell needs for Foster Flat could be met in a geographical area of 720 acres. However, it is likely that fewer management conflicts will arise with a larger area designated. It will be necessary to construct the exclusion fence on the uplands beyond the intermittently flooded plays area to avoid excessive fence maintenance problems. Therefore, the interdisciplinary team has subsequently determined that an area of 2,690 acres will need to be designated. This takes into account providing for dependable water sources for livestock and wild horses, reasonable transportation through this locality, allowance for wild horse movement, and enhancement of important habitat for sage grouse.

3-2 Refer to response 3-1.

3-3 Refer to response 1-26.

3-4 The Biscuitroot Cultural ACEC will be designated to afford protection to traditional sociocultural values associated with certain natural floral resources of the area. This will also protect other natural habitats and plant communities that are present at this juncture of major physiographic provinces.

3-5 The integrity of the proposed Silver Creek RNA/ACEC Addition requires the designation of the entire area as a unit. Natural resource values and research designs could be affected by uncontrolled variables originating from or enhanced by private land activities. Protection here, as in the existing Silver Creek RNA/ACEC, would probably be afforded by perimeter boundary fencing. Realistically, excessive fencing and fence removal projects cannot be considered. In order to minimize the resource and management difficulties inherent in designating discontinuous parcels, it is appropriate to successfully acquire the private inholding as the key to establishing the new and larger Silver Creek RNA/ACEC, including Silver Creek RNA/ACEC Addition.

3-6 The planning team conducted a thorough assessment of the rivers in the RA for possible inclusion in the Wild and Scenic Rivers System. Only a portion of this assessment was published in the DRMP/DEIS. To provide a more in-depth presentation of this analysis, details have been drawn from the original background documentation of the study and can be found in the PRMP/FEIS, Tables 2.17 - 2.20 of the PRMP/FEIS. This detailed presentation provides the basis for the BLM recommendation for Segment A, Middle Fork of the Malheur/Bluebucket Creek.

3-7 Refer to response 1-11.

3-8 Refer to response 2-79.

3-9 Crawford and Lutz (1985) found that sage grouse productivity measures (chicks/adult, chicks/brood, and percent of adults with broods) decreased by nearly 80 percent since 1940. Sage grouse chick diets at Hart Mountain National Antelope Refuge were composed chiefly of native forb leaves, flowers and immature fruits (Pyle personal communications). It is felt that nest site protection and improved forb abundance and availability which would result from the Proposed Plan will enhance sage grouse habitat and production. However,

research is currently ongoing in the Jack Creek (East Wara Springs Allotment No. 7001) area and other management strategies may be implemented as research findings become available. Also, refer to response 1-15.

3-10 Actions for inventory and monitoring of special status species, including plant species, are in the Proposed Plan. At this time, these two plant species do not appear to be impacted by livestock grazing.

3-11 Known snowy plover nesting habitat is shown on Map 35-1, of the Proposed Plan. These populations have been discovered and monitored through coordinated inventory and nesting plover counts.

Snowy plovers prefer sparsely or unvegetated playa margins which generally receive little cattle use prior to July 1 yearly. Specific livestock grazing treatments on snowy plover nesting habitat will be developed during the grazing system formulation proposed for the West Wara Springs Allotment. Also, refer to response 1-19.

3-12 Refer to response 1-16.

3-13 Experience on streams with poor condition riparian in the planning area has shown that 5 years of nonuse by livestock results in improved vigor and condition. Some of these riparian areas are currently grazed in the spring. This combination has shown that recovery can continue in a manner that would meet the objective in most cases. Also, see management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan.

3-14 Road construction standards have been added to the Proposed Plan. See Management Action WL 6.6.

3-15 43 CFR 3809.1-4(b)(3) provides for submission and approval of a plan of operations in designated ACECs prior to commencing mining activity. Plans of operations will be modified in accordance with 43 CFR 3809.1-6 if the proposed activity is inconsistent with the purposes for which the ACEC was designated. See the Proposed Plan.

3-16 Emphasis on land exchanges and consolidation would generally occur in areas identified as Zone 1 on Map LR-1. Implementation priorities have been included in the Proposed Plan which establishes general guidelines for land tenure adjustment actions. See Table 2.27. Other management actions including WL 5.3, WL 6.5 direct that emphasis be placed on exchanges and acquisitions which increase the acreage of wetland, riparian and recreational values in public ownership.

3-12 Some very rare species such as Trifolium leiberqii and Eriogonum cusickii need immediate inventory and monitoring programs and their known habitats should be considered for at least temporary exclusion from grazing.

Riparian Habitat

3-13 Riparian habitat is a key component to the health of Three Rivers Resource Area. The preferred alternative does address the riparian needs in the RA correctly but falls short in management actions to improve conditions. Specifically, Table 2.1-22-23 calls for enclosure for 5 years for 81 miles of streams and then returning the streams to somewhat restricted use. It would be better to say that grazing would be allowed after 5 years if the condition of the riparian zone was upgraded from poor to at least fair if not good. Some poor condition riparian zones may not rehabilitate themselves in 5 years, especially if active management funds are not made available. Also in Table 2.1-24-25 there is no mention that roads in riparian zones will be constructed to BLM standards for the preferred alternative. surely this should be corrected in the final RMP.

Lands

3-15 There are two issues that arise under the Lands category that we feel should be included in the preferred alternative. First, we feel that it is imperative that all ACECs should be formally withdrawn from mineral entry to protect habitat values. As mining is incompatible with ACECs and should be prohibited "at the front end" instead of having to be dealt with after a claim is filed. The second issue related to lands is that it would be beneficial to indicate where the emphasis on land exchange or land consolidation is occurring on the RA. There are several sites that warrant realty activities, such as Silver Creek RNA, Diamond Craters ACEC, and the upper Silvies Valley, that immediately come to mind.

This concludes our comments on the RMP for the Three Rivers RA. As indicated at the beginning of our comments we feel that the plan and DEIS is most readable and comprehensive which has resulted in a much more useful document. Thank you for giving us the opportunity to review the plan.

Sincerely,

Dick

Dick Vander Schaaf
Public Lands Coordinator

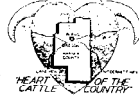
Harney County Stockgrowers Association

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COURTHOUSE
BURNS, OREGON 97701

February 14, 1990

"Call to the Best Government of Oregon is to..."



Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97730

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson,

The Harney County Stockgrowers want to go on record that the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the text only for the reason that it would be an exact duplication of the Riddle Ranch document. There are several other areas of concern that this letter will address.

The Harney County Stockgrowers support a no action plan. This plan would help stabilize a local economy that over the past 10 years has had many negative impacts. The BLM has reported that significant progress has been made in obtaining management objectives under the present plan.

1.) Stated by the Burns District Manager in the 1981 Rangeland Program Summary Update for the Drewsey Grazing EIS:
"To date we have made significant progress in improving the public rangelands through intensive livestock management and rangeland improvements."

2.) BLM stated in the 1983 Drewsey Rangeland Program Summary:
"The specific objectives are to: improve waterfowl and fish habitat, increase available forage for wildlife, wild horses and livestock, maintain water quality and reduce soil erosion, increase recreational opportunities and quality, minimize impacts of the program on visual and wilderness resources, minimize the impact of reductions or changes in use on grazing permittees and protect cultural resources and threatened and/or endangered plant and animal species."

There has been considerable progress in achieving these objectives and this progress will be discussed in following sections."

The objectives stated in the 1983 Drewsey Rangeland Program Summary Update related to all concerns of multiple use. With the BLM stating

sanctions this use then it is a viable use." It goes on to state "...Underfunding may be one reason why there has been no government order construction...But government cannot force some people alone to bear public burden which, in all fairness and justice, should be borne by the public as a whole..." Therefore livestock should have good access to this water at all times, no matter what the drought conditions are. We are not restricting other uses from the reservoirs. There is a need to make sure that livestock access to water is not excluded when range improvement money was used to develop the reservoirs.

4-6 There is no scientific data that indicates that livestock use has any negative effect on the sage grouse population. The restrictions on livestock in the sage grouse strutting grounds are unfounded and should be eliminated. If the sage grouse population is declining, why did the Oregon Department of Fish and Wildlife open a season on these birds this year?

4-7 The air quality restrictions are the same for all alternatives. More alternatives need to be provided. Fire is becoming a very acceptable and economical method of range improvement. To limit this area to 3000 acres a year is unrealistic. More research is needed in this area with Fire Management Specialists. Unless there is valid scientific data to show that limits above this would permanently effect air quality these limitations should be eliminated.

4-8 Fire is nature's way of improving forage by burning juniper and woody shrubs. The proposed limitations on prescribed burnings, as well as limitations and full suppression of natural fires, will continue to increase the trend of sagebrush and juniper encroachment. This will have a negative effect on the vegetation and grasses used by wildlife, wild horses, and livestock. A more open policy on prescribed burns, as well as letting natural fires burn under fire management supervision will help maintain and improve a majority of the existing range. It will also prevent fuel loads building to a point that a major fire would result. It is well known that smaller cooler fires are better for the return of native vegetation than one major hot fire.

4-9 Before any alternative that causes a reduction of AUM's is imposed, no matter what reason, a complete "Takings Implications Assessment" should be completed as authorized by Executive Order 12630.

4-10 The designation of the entire Riger Active Horse Management Area (HMA) (39,619 acres) as an Area of Critical Environmental Concern (ACEC) could have a dramatic economical effect on at least three ranches if AUM's are reduced. Before a reduction of AUM's is even considered a complete "Takings Implication Assessment" should be conducted as authorized by Executive Order 12630. Livestock and wild horses have run together successfully for years. In a recent decision the U.S. District Court for the Southern District of Nevada, Joe B. Fallini, Jr., Susan Fallini and Helen Fallini, Plaintiffs vs Donald P. Hodel, Secretary of the Interior; Robert F. Burford, Director Bureau of Land

Management; Edward F. Spang, Nevada State Director, Bureau of Land Management; Defendants(Fallini vs BLM), the court rejected a contention that cattle grazing on federal lands has an inferior status to wild horses as a result of congressional enactments. The elimination of any livestock grazing is neither justified nor proven necessary, and appears to be illegal. Wild horse and livestock AUM's have been distributed. Any increase or decrease of AUM's due to a change in the resource should be done proportionally to all AUM's involved. The conditions for acquiring the private holds or the authority to impose this on the private holdings is not fully addressed.

that the EIS is successful, the Harney County Stockgrowers see no reason to change something that is working that address all multiple-use concerns.

4-2 Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied, and then are extrapolated to indefensible conclusions. Management objectives, in the absence of AMP's, are documented only in the broadest of terms making them virtually unmeasurable. No factors, other than short term wildlife, wild horse, and livestock utilization are indicated as affecting forage production, ecological status, or potential of the resource. Therefore, reductions in authorized livestock use is the primary, if not the only, remedial action recommended. Before a reduction of AUM's is considered, other management tools such as changing season of use, length of time, and deferred rotation need to be considered. Until proper techniques and accurate information is gathered existing levels of livestock grazing should be maintained. At such time that reliable information shows trend increase or decrease, proper adjustments could then be made. The ratings in the recently published Riley Rangeland Program Summary Update classify range conditions as poor, fair, good, and excellent. The RMP/EIS classifies range conditions as satisfactory and unsatisfactory. Consistent use of evaluation ratings is necessary for accurate evaluation as well as better communication with the permittee.

4-3 Enclosed is a copy of the Bureau of Land Management Riparian Area Management Policy, dated January 22, 1987 signed by BLM Director Robert J. Burford. This policy has never been rescinded. Please note that the definition of a riparian area is an area of land "directly influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence." The definition continues that areas excluded from the definition of a riparian area include "ephemeral streams or washes that do not exhibit the presence or vegetation dependent upon free water in the soil." There are areas classified as riparian that do not meet these criteria. A thorough review of all creeks should be made to ensure they meet the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.

4-4 The continual fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years restrict the amount of available forage and can concentrate cattle more than necessary. Livestock have a biological need for water. Access can be accomplished by building the water gaps at the deep end of the reservoir. If the enclosure is more than one-half mile square, have more than one access point to allow livestock better access to all of the forage available around the reservoir. From the Fallini vs. BLM court case "if water is developed for grazing livestock, and the range improvement permits provides for and the state permit

Management; Edward F. Spang, Nevada State Director, Bureau of Land Management; Defendants(Fallini vs BLM), the court rejected a contention that cattle grazing on federal lands has an inferior status to wild horses as a result of congressional enactments. The elimination of any livestock grazing is neither justified nor proven necessary, and appears to be illegal. Wild horse and livestock AUM's have been distributed. Any increase or decrease of AUM's due to a change in the resource should be done proportionally to all AUM's involved. The conditions for acquiring the private holds or the authority to impose this on the private holdings is not fully addressed.

4-13 The exclusion of cattle on the Biscuitroot Cultural ACEC is not supported. The report states "...these areas to be a high-value resource due to the quality and quantity of roots available." Appendix 7-12, Vol. II Appendicies. Since grazing has been going on in this area for years and the quality and quantity have remained high, even with root harvesting, there is no justification to change the practice.

4-14 The need for public access along the Silvies River and Poison Creek is unjustified. The public has access to over 70% of the county already. These two access routes through private holdings are not needed since the public has several other routes of entering the federal lands.

Sincerely yours,
Mark Doverspike
Mark Doverspike, President
Harney County Stockgrowers
Star Route 1 Box 134A
Burns, Oregon 97720

Enclosures (1)

BACKGROUND

Riparian areas are unique and among the most productive and important ecosystems, comprising approximately 1 percent of the public lands. Characteristically, riparian areas display a greater diversity of plant, fish, wildlife, and other animal species and vegetation structure than adjoining ecosystems. Healthy riparian systems filter and purify water as it moves through the riparian zone, reduce sediment loads and enhance soil stability, provide micro-climate moderation when contrasted to extremes in adjacent areas, and contribute to groundwater recharge and base flow.

DEFINITIONS

Riparian Area - an area of land directly influenced by permanent water. It has visible vegetation or physical characteristics reflective of permanent water influence. Lake shores and stream banks are typical riparian areas. Excluded are such sites as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil.

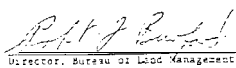
Riparian Area-Dependent Resources - resources such as water, vegetation, fish, and certain wildlife that owe their existence to the riparian area.

The objective of riparian area management is to maintain, restore, or improve riparian values to achieve a healthy and productive ecological condition for maximum long-term benefits.

POLICY STATEMENTS

In order to meet the foregoing objective, the Bureau will to the extent practical:

- o Achieve riparian area improvement and maintenance objectives through the management of existing uses wherever feasible.
- o Ensure that new resource management plans and activity plans, and existing plans when revised, recognize the importance of riparian values, and initiate management to maintain, restore, or improve them.
- o Prescribe management for riparian values that is based upon site-specific characteristics and settings.
- o Give special attention to monitoring and evaluating management activities in riparian areas and revise management practices where site-specific objectives are not being met.
- o Cooperate with and encourage the involvement of interested Federal, State, and local governments and private parties to share information, implement management, coordinate activities, and provide education on the value, productivity, and management of riparian areas.
- o Retain riparian areas in public ownership unless disposal would be in the public interest, as determined in the land use planning system.
- o Identify, encourage, and support research and studies needed to ensure that riparian area management objectives can be properly defined and met.


Director, Bureau of Land Management

JAN 22 1987
Date

4-9 The Bureau has implemented fire management tactics consistent with Departmental, Bureau of Land Management policy in accordance with appropriate State and Federal laws and regulations. Suppression policies are mandated by the Department of the Interior.

The BLM acknowledges only two fire types, wildfire and prescribed fire. Any fire that does not have an approved prescribed fire plan completed prior to ignition is considered a wildfire. Suppression of wildfire is a high priority Bureau activity. A wildfire must have appropriate action taken to suppress it. Appropriate action will be based upon preplanned analysis consistent with land management objectives, including the threat to life and property. Fire suppression actions must be planned and executed to minimize suppression costs plus resource losses, consistent with management objectives. An Escaped Fire Analysis will be prepared to govern suppression actions for all escaped fires (those which exceed initial attack actions).

When multiple large wildfires are experienced, priority will be given to suppressing new fires and those large fires where values at risk are greatest (BLM Manual 9200.06A Protection Policy).

Resource values at risk (see Map FM-1, page 3-37, DRMP/DEIS) are established through an interdisciplinary team effort that considers losses or damage to water resources, soils, wildlife, fisheries, forage, recreation, cultural, botanical, improvements, intangible resources, special use areas and landownership. All of these elements must be considered when developing fire plans.

Prescribed fire under the Preferred Alternative is allowed on 96 percent (1,180,114 acres) of all public lands within the RA. The two major restricting factors of the prescribed fire program are smoke emissions and funding. This alternative also provides for the use of conditional suppression on 462,080 acres of land in value classes 1 and 2. These conditional suppression areas will be managed on a least cost plus resource loss basis. The full spectrum of suppression intensities will be considered and the determination on which level of intensity will be initiated based on the conditions at the time of ignition.

4-10 Refer to response 2-63.

4-11 Refer to response 2-68 and 2-63.

4-12 Refer to response 2-6. Also, the Fallini case dealt with an issue involving the use of water on private land by wild horses. This case has no relevance on the issue of AUM adjustments. Also, there are no proposed reductions in AUMs in the Kiger HMA.

4-13 Refer to response 2-6.

4-14 Section 205 of the FLPMA provides authority to acquire lands by purchase, exchange or donation. It limits the use of eminent domain only to the extent necessary to secure access to public lands.

4-1 Refer to response 2-9.

4-2 The Bureau does recognize implementing grazing systems as a method to balance livestock use with forage production. Establishing grazing management requires a commitment from both the Bureau and the grazing permittee to meeting multiple-use objectives. Refer to response 2-87.

4-3 The Bureau is required to report range conditions in terms of good/fair/poor. The Bureau is also required to rate each allotment to determine "Selective Management Category." The categorization process looks at range condition in terms of satisfactory and unsatisfactory in meeting resource objectives. Although this may be confusing, it aids the Bureau in looking at the rangeland resource in a multiple-use manner.

The Riley RPS Update and the Three Rivers DRMP/DEIS in Chapters 3 and 4 refer to livestock forage condition which is based on livestock forage and soil erosion characteristics. The Bureau is conducting an ecological site inventory which is gathering data in terms of seral stage and range condition as it relates to potential natural community. For the purposes of identifying resource conflicts and concerns and determining management objectives, range condition was considered satisfactory if present conditions were meeting management objectives and unsatisfactory if they were not. See Chapter 4, pp. 8-12 and Appendix 3, pp. 2-5.

4-4 Those streams which do not have a condition listed in Appendix 5, Table 2, DRMP/DEIS, have not been intensively inventoried for riparian or aquatic habitat. If these areas do not meet the definition of riparian when inventoried, they will be dropped from the riparian tables and the riparian objectives will not apply. Also, see PRMP/FEIS, Appendix 1, Table 4.

4-5 Refer to response 2-46.

4-6 Refer to responses 1-15 and 3-9. Also, no livestock grazing restrictions are proposed in sage grouse strutting grounds.

4-7 Crawford (personal communications) found that there was no correlation between limited fall hunts and the following spring breeding population. This suggests that a harvestable surplus of sage grouse is available in the fall. To ensure that this surplus was not exceeded, ODFW limited the number of hunting permits by management area. Also, this was one of only four limited seasons held during the 1980's.

4-8 It is true that air quality restrictions are the same for all alternatives. The DEQ, in accordance with the Federal Clean Air Act, regulates the air quality standards for the state. In the RMP, particulate emissions are limited to a maximum of 31,000 tons of burnable fuel. This figure is derived from the District's baseline data. Plans for using prescribed fire, in the next 10 years, will not exceed those maximum figures. Conditional suppression of natural fires on 462,080 acres will be in addition to the prescribed fire program.

Exchanges will be the primary form of land acquisition occurring in the RA. Purchases normally require a special appropriation and are limited to specific areas with extremely high resource values. To date, no funding has been received for purchases in the Three Rivers RA. If funding becomes available, purchases would be used only if a land exchange or other alternative is infeasible, in accordance with Bureau policy contained in Manual 2100.06. All fee purchases and exchanges would be with willing landowners.

4-15 Livestock grazing will not be prohibited within the Biscuitroot Cultural ACEC. Such use will be "restricted" rather than "prohibited", as was incorrectly shown in the DRMP/DEIS, Appendix 7, Table 1. See Appendix 1, Table 16 of the Proposed Plan for recommended management/use constraints in this ACEC. No structures, salt placement, or livestock loading/unloading will be allowed within the ACEC area. Adjustments to season of use may be considered in a management plan specific to this ACEC, and any such decisions are deferred until the development of that plan.

4-16 Access acquisition in the Silvies River Canyon is being carried forward in the Proposed Plan. The area contains legally inaccessible public lands including several miles of the Silvies River. Legal public access along the river would provide an outstanding recreational opportunity on these public lands, particularly for nearby residents of the Burns-Hines area. Public access along other routes into the canyon is limited by private lands or difficult terrain.

The access portrayed in Poison Creek and the Silvies Valley is along the Oregon and Northwest Railroad Grade. An effort to acquire the grade for a recreational trail was dropped from consideration in April 1989. Since the railroad grade accesses very little adjacent public land it will not be considered further for access acquisition. It has been deleted from Map LR-3 in the Proposed Plan.



February 16, 1990

Jay Carlson, RMP/EIS Team Leader
Bureau of Land Management
Burns District Office
HC 74-12533
Highway 20 W.
Hines, OR 97738

Dear Mr. Carlson:

The National Wildlife Federation (NWF) is the nation's largest conservation organization, with over 5.8 million members and supporters. The NWF's commitment to the Pacific Northwest and to the State of Oregon is evident in the location of its Pacific Northwest Natural Resources Center in Portland. We are vitally interested in the restoration, preservation and protection of Pacific Northwest ecosystems, fish and wildlife habitats, and the natural resource values of its public lands.

The NWF commends the authors' Three Rivers Draft RMP/EIS for its comprehensiveness, and high level of detail. It is one of the best Draft RMPs to come out of the BLM Burns District Office, and one of the better EIS documents to be reviewed by this office. The NWF wishes to thank the BLM for extending the comment period, and the Burns District staff which attended the clarification meeting at the National Wildlife Federation's Portland Resources Center. Notwithstanding the BLM's improved National Environmental Policy Act (NEPA) efforts on this RMP/EIS,

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however, we have serious reservations about many of the assumptions and objectives in the plan. While the preferred alternative is a step in the right direction, significant modifications must be incorporated into the plan if the BLM is to meet its Congressionally mandated duty "to provide for management, protection, development, and enhancement of public lands."

The Federal Land Policy and Management Act (FLPMA) is authorized by public law 94-579 Title I § 102. The legislative history of this law underscores the Congressional intent to protect and perpetuate all the natural resource values of the federal public lands: "[The] underlying mission proposed for public lands is the multiple use of resources on a sustained-yield basis." (emphasis added) The drafters of FLPMA expressly state the management criteria for public lands in the plain language of the statute.

The Congress declares that it is the policy of the United States that the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use.

1 Legislative history, H.R. 94-1163

2 H.R. 94-1163 Mission

3 FLPMA § 1701(8)

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The protection of sustainable resources is a dominant theme throughout FLPMA.

In the development and revision of land use plans, the Secretary shall consider present and potential uses principles of the public lands, give priority to the designation and protection of areas of critical environmental concern, use and observe the principles of multiple use and sustained yield, and consider the relative scarcity of the values involved.

Despite this clear Congressional mandate for protection and preservation of all resource values, the Three Rivers Draft RMP/EIS preferred alternative gives unacceptable and overwhelming preference to livestock grazing. Therefore, the NWF formally requests modification and/or clarification of the following management objectives.

A. Vegetation

5-1

1. Livestock Grazing Preference

While the Draft RMP/EIS pretends to promote a planning process which will integrate all natural resources and their subsequent uses into a balanced approach to multiple use management of the Three Rivers RA, proposals which clearly favor livestock grazing, and not multiple use are made throughout the document. The overall monoculture theme of the RMP/EIS is to provide adequate livestock forage for the ranching permittees. The Plan dedicates 139,851 AUMs to livestock grazing, but only 7,800 AUMs to wildlife needs. Native plant species which provide food and shelter to wildlife, stabilize soils and promote

4 FLPMA § 1712(c)(1-8)

3 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION

biodiversity, are at times overlooked in favor of imported grasses, which primarily provide forage for livestock. The structural, cover, and biodiversity needs of many non-game wildlife species are completely ignored.

5-2

2. Seeding: The NWF is concerned about the proposed conversions of vast acres of native rangelands to monocultures of an introduced grass species. The number of seeded acres under the preferred alternative (46,960) is greater than the no action alternative (42,231). Crested wheat grass is a tough, imported species from the steppes of Russia. While it makes an ideal diet for livestock, it provides no food or shelter to wildlife. When non-native species such as crested wheat grass crowd out and replace the native grasses, mule deer, sage grouse and other

5-3

wildlife habitat is lost. The conversion of native species of grass which increase biodiversity, protect the soil and benefit all users of public lands to a single species of grass designed only to feed domestic livestock, is inconsistent with the Congressional goals of protection and multiple use of federal public lands. Additionally, the plan also fails to list the prioritization or budget constraints regarding seeding projects, or to describe in detail how the seeding project monies will be spent.

5-5

The preferred alternative not only proposes to cut native brush on 15,540 acres of deer winter range, but seed crested wheat grass on 9,460 of those acres. The NWF is extremely concerned about the proposed conversion this wildlife winter

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range from shrub.5 to grasslands, but it cannot adequately respond without more information and a detailed map of where these projects would occur.

5-6 3. Prescribed burning: The 8,260 acres of prescribed burning under the preferred alternative is second only to the proposed 10,000 acres under the emphasized commodity production alternative. Burning vast acres of range will not promote multiple use and sustain the resource. The RMP/EIS must fulfill FLPMA by considering the relative scarcity of resource values involved, weighing long-term benefits to the public against short-term benefits,⁵ and giving justification for its preferred alternative.

B. ORV Policy

5-7 The ORV policy stated under the preferred alternative of Recreation Management objectives, "Maximize the development of usable ORV areas and cross-country routes (including snowmobiles and motorcycles) to increase the number of out-of-town users. . ." is unacceptable. It is inconsistent with the Congressionally mandated policy of placing primary concern on protection of the environment, and fails to adequately discuss the cumulative impacts of ORV use in conjunction with other demands upon the natural resources of the Three Rivers RA. A 5-8 policy of unrestricted ORV use in open areas fails to insure

⁵ FLPMA § 1712(c) (607)

⁶ Three Rivers Draft RMP/EIS Table 2.1, p. 31, item 2

adequate protection of public lands.

The NWF incorporates and supports the comments of the Oregon Department of Fish and Wildlife regarding ORVs in the Three Rivers Resource Area. The NWF is very concerned about the possible negative impacts of encouraging increased ORV use from out-of-county users, and recommends that the BLM take no action to encourage additional ORV use.

Historically, ORV use in the Burns District has been light and broadly distributed. Low usage usually causes little in the way of negative, long term, environmental impacts. However, the high desert environment is fragile, and the balance between negligible and significant damage can be precarious. Even a single incident of intense exposure to ORV use can cause damage that may take years to heal. Continued intensive exposure can easily cause significant environmental damage and displacement of wildlife communities. ORVs are especially destructive to stream and riparian areas since many operators ride their vehicles directly up the stream bed and along the banks (as demonstrated in ORV television commercials). This destructive practice increases erosion and turbidity, and destroys aquatic vegetation as well as polluting the water with oil, gasoline, grease and carbon monoxide.

The BLM's stated goal of soliciting additional ORV use on fragile, high desert ecosystems, which are already severely damaged by overgrazing, is unconscionable. Significant adverse impacts from ORV use are already occurring on the Ochoco National

Forest and in the BLM's Prineville District. The preferred alternative plan to "Maximize the development of usable ORV areas. . ." is unacceptable and demonstrates the agency's utter failure to adequately consider the significant damage to soil stability, vegetation loss, wildlife habitat destruction, wildlife harassment, and visual character damage, which is likely to occur from increased ORV use. The NWF opposes such irresponsible agency action. While current levels of ORV usage may be light and not require restrictive actions, increased usage would almost certainly have a negative effect on indigenous plant and animal communities. More restrictive rules regarding ORV use would have to be implemented to avoid these impacts. This would result in a loss of traditional use and be very difficult to enforce. The NWF therefore urges that the phrase "Maximize ORV use. . ." be replaced by "Minimize ORV use. . ." in the preferred alternative under Recreation Management Objectives.

C. Riparian Habitat

Overgrazing is particularly devastating to the condition and diversity of riparian areas. It is often directly responsible for reduced water quality, the loss of year-long water flows, elimination of streamside shrubs, soil compaction, accelerated erosion, broken down stream banks, and the loss of critical fisheries habitat. The preferred alternative recognizes the serious condition of the riparian areas in the Three Rivers RA,

⁷ Three Rivers Draft RMP/EIS Table 2.1, page 31

and states that livestock will be removed from 80.9 miles of stream with "poor" water quality for five years.

5-10 The NWF supports a preferred alternative which mandates the removal of livestock for five years from streams in poor condition, or in the alternative, until riparian condition improves to a "good" classification. However, it came to our attention in a recent meeting with the Three Rivers Draft RMP/EIS team leader and staff⁸, that the proposed preferred alternative does not guarantee complete rest for damaged riparian areas. The Draft RMP/EIS actually gives the agency discretion to completely rest affected riparian areas by removing livestock for five years or implement "[grazing] systems which are widely recognized as promoting the most rapid riparian recovery practicable". The NWF is sorely disappointed by this change of heart. The arbitrary decision to choose between complete rest of damaged riparian areas and implementation of an undefined grazing system is simply unacceptable.

5-11 In addition, the agency should be closely monitoring riparian areas now in fair condition. If a downward trend begins to develop, immediate corrective action should be taken. In most cases, the poor riparian habitats and/or poor water quality streams must receive complete rest for a minimum of five years. Once full recovery of riparian habitat is achieved, livestock grazing should never be allowed to reduce riparian habitat and

⁸ February 5, 1990 at NWF Pacific Northwest Resource Center

5-12 water quality to less than "good" condition. Under the preferred alternative for Riparian Habitat Management Objectives, the RMP/EIS must clarify the phrase "[S]ystems which are widely recognized as promoting speedy riparian recovery." ⁹ The reliance on inadequately discussed secondary alternatives, such as the undefined "grazing systems," to promote riparian rehabilitation, is a serious breach of NEPA environmental impact statement guidelines. ¹⁰ The reviewer must be provided with a full and accurate picture of all proposed agency actions to restore these critical habitat areas. Any livestock grazing management plan that provides for less than full recovery of riparian habitat is inconsistent with rehabilitation and restoration of these critically important habitats. The agency admits that an estimated 70 percent of all wildlife species in the Three Rivers RA is partially or totally dependent upon riparian habitat for food, water and cover. ¹¹ Additionally, with the preferred alternative under Recreation Management Objectives, "Manage livestock grazing in riparian areas to enhance fishing opportunities." ¹²

5-13 Livestock grazing must also be terminated for the season when any one of the three utilization limits, (woody riparian,

⁹ Three Rivers Draft RMP/EIS Table 2.1, p. 23, item 1

¹⁰ Friends of the Earth v. Hall, 693 F. Supp. 904 (WD Wash, 1988)

¹¹ TR Draft RMP/EIS Vol. 1 at 3-27

¹² Supra, at 33, item 6

current classification of "poor" stream condition is far too broad. It currently includes everything from totally denuded riparian areas to those that are in just slightly less than "fair" condition. The draft RMP/EIS must therefore include an additional category, such as "severe [impact]," to accurately describe the worst areas of riparian destruction. All users of public lands must be assured that these definitions and criteria will be consistent throughout the RA.

D. Water Quality

Current DEQ standards and guidelines state, "In order to improve controls over nonpoint sources of pollution, federal, state, local resource management agencies will be encouraged to regulate and control runoff, erosion, turbidity, stream temperature, stream flow. . . ." ¹⁴

The draft RMP/EIS states that "major impacts to water quality in the planning area are from sedimentation, lack of shade, and concentrations of fecal coliform bacteria." ¹⁵ The reasons for these impacts are no mystery. As the RMP/EIS points out, "Major conflicts with water resources are livestock grazing and timber harvesting." ¹⁶ It is both undesirable and impractical to fence all of the 80.9 miles of stream with poor (or lower) water quality. The RMP must therefore adopt a

¹⁴ OAR 340-41-026(9) (1987)

¹⁵ Supra, at 3-2

¹⁶ Supra, at 3-3

herbaceous riparian, herbaceous upland utilization) listed under the preferred alternative of the Water Quality Management Objectives is reached. "[N]o more than 10 percent livestock utilization on woody riparian shrubs, 50 percent utilization on herbaceous riparian vegetation, and 30 percent utilization on herbaceous upland vegetation. . ." ¹³ This prevents over-utilization of any one component of the grazing system and encourages management of livestock to promote a balanced utilization of the forage available.

Additionally, sensitive aquatic plant species are often the first vegetation taken out by livestock grazing in riparian areas. For example, water weeds provide a vital structural benefit to streams by reducing the formation of anchor ice during the winter. When livestock grazing removes these plants, the streams freeze more readily and essential fish habitat is lost. Since livestock have shown a preference for these and other beneficial aquatic species, they must be prevented from entering the affected riparian areas. The NWF endorses and incorporates the comments of Oregon Trout regarding impacts to aquatic plant species and riparian areas.

5-14 Finally, the Draft RMP/EIS must adequately define the threshold criteria for distinguishing "poor," "fair," and "good" water quality and adequately account for ecological values and functions when describing these stream condition categories. The

¹³ Supra, at 3, item 4

management plan which removes livestock grazing from these riparian pastures, and keeps them off until the riparian areas have recovered to a good condition.

E. Prioritization

5-15 The BLM must provide an adequate scheduling and prioritization of Allotment Management Plans on a year by year basis as part of the Draft RMP/EIS. Without this information, interested parties have no way of knowing how well the proposal and plans described in the RMP/EIS will be implemented. Changes at the time of the "Proposed RMP/Final EIS" are always more difficult to make than for the Draft. In the past large planning 5-16 efforts have not been translated into on-the-ground changes. Without adequately documented implementation plans, utilization management objectives will become just another "plan on the shelf."

F. Monitoring

5-17 The Draft RMP/EIS does not adequately address monitoring of the preferred alternative objectives, nor the constraints placed on monitoring programs by budget limitations. This information is essential to assess the expectations of interested parties, and insure enforcement of the preferred alternative objectives.

G. Energy and Minerals

5-18 None of the alternatives adequately address mining impacts on water quality. Even under the "best" environmental alternative, "Mineral activities have the potential to negatively

affect riparian habitat." ¹⁷

No recovery or rehabilitation of riparian and water quality will be achieved if adverse grazing practices are merely replaced by equally destructive mining practices.

H. Photographs and Maps

The excellent maps included in the Draft RMP/EIS are very helpful. The level of detail shows that a significant amount of time and effort were spent on this part of the document. Unfortunately, the old photographs in the Draft are of no use to planning public land management objectives. While some historical photographs might have been included, the fact that all of the photographs are of the "Old West" only reinforces the perception of many conservation groups that the BLM's overwhelming commitment is to its western ranching constituency. Turn of the century photographs fail to document the poor condition of much of the range and riparian areas in the present day Three Rivers RA. This omission does a significant disservice to the concerned reader who wishes to make relevant comments, and continues to paint the BLM as the government agency essentially concerned with maximizing livestock grazing opportunities, not multiple use of natural resources. Some photographic examples of resource conditions in the present day Three Rivers RA would have been much more useful to concerned reviewers and interested parties.

¹⁷ Three Rivers Draft RMP/EIS Vol.1 at 4-28

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benefits instead of long-term public benefits are inconsistent with sustaining the natural resources of public lands.

Respectfully submitted,
Bruce Apple
Bruce Apple
Director

/bas

[via FAX to 503-573-7600]

15 COMMENTS OF THE NATIONAL WILDLIFE FEDERATION

I. Summary

The NWF supports "management actions which recognize, promote and enhance the integrity of the ecological and socioeconomic systems in the Three Rivers RA." ¹⁸ We are very concerned about the deteriorating health and condition of the range. Deplorable and detrimental grazing practices have been the rule on public lands for too long. More than fifty years have passed since the Taylor Grazing Act was passed in the 1930's, but destructive overgrazing continues to be the norm. A good portion of the natural resource base of Oregon's Great Basin country has been reduced to barren hills and eroded muck due to previous BLM mismanagement.

The BLM has a mandated duty to carefully consider the "relative scarcity of the values involved" ¹⁹ when attempting to balance the one-dimensional demands of 130 livestock owner permittees with the multiple use needs of tens of thousands of hunters, hikers, campers, and other impacted members of the public. Management decisions which emphasize short-term grazing

¹⁸ Three Rivers Draft RMP/EIS Vol. I at 2-3

¹⁹ FLPMA § 1712(c)(6)

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- 5-1 The RMP/EIS is not a document that gives preferential management consideration to single resource values. Through the Preferred Alternative, significant improvements would be realized in water quality, riparian habitat, aquatic habitat, wetland habitat; significant additions would be made to the areas protected under designation as ACECs; explicit management objectives for biodiversity are established for the first time in any eastern Oregon RMP; and utility corridor exclusion/avoidance areas are established for nearly 85,000 acres. The total prorated forage demand of nearly 33,200 AUMs for big game would be provided. Of this amount, 7,800 AUMs are competitive with livestock and would be allocated directly to big game.
- Detailed management objectives for a broad spectrum of resources have been integrated at the ground level on an allotment by allotment basis, thus ensuring long-term interdisciplinary management, monitoring and evaluation.
- 5-2 Refer to response 1-11.
- 5-3 Refer to response 1-11.
- 5-4 Bureau investment policy is clearly established in that I category allotments have highest priority, M category allotments have the next highest, and C category allotments have the lowest priority. Refer to Appendix 3, Table 1, DRMP/DEIS, for allotment categorization in the Three Rivers RA.
- Additionally, Appendix 3, Table 2 of the DRMP/DEIS presents a further delineation of priorities within the I and M category allotments on the basis of an interdisciplinary assessment of resource concerns/problems. Detailed project descriptions necessary to describe how seeding project monies would be spent are not conducted at the RMP level. Such descriptions are made available annually through the EA register/public notification process.
- 5-5 The map of potential treatment areas has been added (see Map RM-3). Refer to response 1-11.
- 5-6 Prescribed burning is a tool the Bureau will employ to improve range condition and increase vegetative diversity. DRMP/DEIS, Appendix 3, Table 8, p. 177, outlines design features for burns. Table 2.1, p. 20-23, discusses actions for wildlife habitat relative to prescribed burning. Site-specific NEPA analysis is always done on prescribed burn projects.
- 5-7 Refer to response 1-23.
- 5-8 Refer to response 1-23.
- 5-9 Refer to response 1-23.
- 5-10 Some enclosures are proposed where conditions will require complete rest to regain vigor and riparian plant species composition. Also, see management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan.

- 5-11 Riparian habitat monitoring has been ongoing since 1981. See RMP/FEIS, Appendix 1, Table 4.
- 5-12 Refer to responses 1-2 and 2-40.
- 5-13 The utilization levels are independent of one another, if one is reached livestock will be moved. Also, refer to response 1-1.
- 5-14 Refer to responses 2-3 and 2-25.
- 5-15 Prioritization is a dynamic process which encompasses multiple-use values, socioeconomic values and the uncertainties of funding support for implementing actions. The Bureau's funding is through annual Congressional appropriations, specific priorities are established annually through budget mechanisms. Since this can be a volatile process, subject to the shifting of national priorities, funding levels, politics, etc., the publication in the RMP of an areawide ranking or scheduling of allotments is not as productive or informative as it may seem.
- BLM is, however, sensitive to the concern that interested parties be able to keep abreast of priorities and implementing actions over the life of the plan. To meet this need, the Burns District is undertaking two specific actions. First, the criteria that will be utilized for periodic prioritization of allotments are defined under Procedures to Implement, for proposed decision GM 1.1 in the Proposed Plan.
- Second, the Burns District has committed to the publication of an annual "District Update" which will contain several sources of information pertinent to the concern that you raise:
1. District workload and major priorities for that year will be presented.
 2. Planning updates will report on actions undertaken to meet management objectives established in the District's land use plans, including the Three Rivers RMP.
 3. A register of the EAs of the on-the-ground projects (usually the implementing actions for the land use plans) that are being undertaken in the District will be published.
- 5-16 Refer to the Proposed Plan for a detailed description of the implementing actions and support actions on a program by program, management directive by management directive basis.
- 5-17 A detailed monitoring and evaluation program has been developed for the Proposed Plan and is keyed to each management action. It is based on three levels of monitoring: 1) tracking of the implementation of the individual management directives; 2) evaluation of the achievement of objectives; and, 3) evaluation of the effectiveness of the overall land use plan. Levels one and two, monitoring and evaluation are to be performed annually. Evaluation of the overall

lan is to be performed at intervals not to exceed 5 years. Reporting of the results of such monitoring and evaluation efforts is to be conducted through the public notification document which shall be distributed annually.

- 5-18 The DRMP/DEIS analyzes the effects of mineral entry on all public lands within the RA. The DRMP/DEIS prescribes appropriate restrictions on mineral exploration in areas where they were found to be necessary to protect other values. Another EIS addressing comprehensive cumulative impacts of mining is unnecessary until plans of operation are filed. (At that time, the appropriate environmental analysis will be prepared.) In accordance with surface management regulations at 43 CFR 3809, a plan of operations must be filed with BLM. The plan must include, among other requirements, measures to be taken to prevent undue and unnecessary degradation; manner in which disturbed areas will be reclaimed; and procedures to be taken to maintain the area in a clean and safe condition including periods of extended nonoperation. Furthermore, it is incumbent on the operator to assure that all tailings, dumps, deleterious materials or substances and other wastes are disposed of in a prudent manner taking into consideration effects on other resources, and complying with all applicable Federal and State permitting requirements. Under the Mining Law of 1872 and regulations in 43 CFR 3809, BLM must act timely on all plans of operation. However, because of the nondiscretionary nature of locatable mineral actions, until an actual notice or plan of operation is filed, discussing the environmental consequences of the generalized gold mining scenario would be highly speculative as the impacts would vary significantly depending on the location of the planned operation. It would be far more relevant to deal with cumulative impacts and reasonably foreseeable development in the NEPA analysis of a proposed operation. To do otherwise would require BLM to fully inventory all potential resources, planning areawide, in order to determine whether hypothetical actions would result in an adverse impact.

County Court for Harney County
P.O. BOX 1147
BURNS, OREGON 97720
February 12, 1990

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February 12, 1990

Mr. Joshua L. Warburton
Burns District Manager
Bureau of Land Management
HC74 - 12533 Hwy 20 West
Hines, Oregon 97738

Re: Three Rivers Resource Management Plan

Dear Josh:

Harney County appreciates the opportunity to comment on the "Draft Three Rivers Resource Management Plan and Environmental Impact Statement" which is so important to the livestock industry in the northern part of Harney County and to the economic vitality of the County.

The major concern of the Harney County Court as we reviewed this document was that it pictures the livestock industry in general and cattle in particular as the cause of all the problems in the Three Rivers Resource Area. That the only solutions that the BLM have considered to resolve these problems is to remove livestock from the range. That there was apparently no effort to consider mitigating alternatives that could permit the ranchers to function as economic units while the land management changes desired by the BLM were implemented.

Harney County would now like to discuss the following items of particular concern with the Draft Three Rivers EIS:

- 6-1 1. In reviewing both Volume I and Volume II of the EIS we find numerous statements as to the condition of the range or carrying capacity. These appear to be statements of fact but we were unable to determine the methodology that the BLM used in arriving at their conclusions. Until we know the methodology used it is impossible for us to verify the accuracy of your conclusions and to determine whether we concur with your findings or not. Please provide documentation of your methodology for us to validate your conclusions before implementing your Resource Management Plan.
- 6-2 2. BLM has stated throughout the Draft that the condition of the range is unsatisfactory or trend is down without any documentation of proof that that is true. Please provide us with a copy of how you reached that decision so that we may verify your findings before you implement the EIS.

- 6-3 3. There are statements that water quality does not currently meet DEQ standards on almost every allotment with water. We understand that DEQ water standards are not always realistic and in many cases water quality would not meet DEQ standards even if all livestock is removed. If this is true, it seems unfair to reduce livestock numbers to meet water quality standards that may never be attainable.
- 6-4
- 6-5 4. Another concern we have with the plan regarding water quality is that BLM ownership of water is so fragmented that even if you were able to meet your goals on the BLM portion of the stream is it going to have any meaningful impact on the stream as a whole. Have you considered that your actions on the public lands may require private land owners to use their section of the stream more intensively and as a result the total effect on the stream will be a negative one.
- 6-6 5. Regardless of water quality concerns we believe that livestock watering is a priority beneficial use of water that is permitted, and indeed required, under Oregon Water Law.
- 6-7 6. Harney County believes that the poor condition of the upland range is due more to BLM's fire control policy than it is to grazing. You are never going to obtain satisfactory range forage conditions on ranges that have been taken over by big sagebrush and juniper because of the active suppression of fire. We would challenge the BLM to seriously reevaluate your policy of initial attack and full suppression of all fires on a majority of the BLM land. We would also request that you consider dramatically increasing the acres of land to be controlled burned each year.
- 6-8 We believe that wildfire cycles of 5 to 25 years was the normal condition in Harney County until the last 80 years or so. We believe the suppression of fire and the resulting big sagebrush and juniper stands have done more to reduce forage production than any other single action.
- 6-9 That removing livestock without removing the big sagebrush and juniper is ecologically unsound and will do little to improve range conditions.
- 6-9 7. We would challenge BLM's plans to fence waterholes that were developed to disperse cattle. The water was created for cattle and water quality and small riparian areas that may have resulted from that creation are secondary to watering livestock and should continue to be used for that purpose.
- 6-10 8. We are very concerned about statements such as identify and pursue land purchase and identify and aggressively pursue

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land purchases. BLM already owns 4,110,077 acres out of Harney County's total of approximately 6,545,920 acres or 63% of the total land area and we strongly object to any efforts on the part of BLM to further erode our limited private land base.

6-11 9. The reduction of AUM numbers by the implementation of Alternative C will have a significant impact on the economy of Harney County. We respectfully request that a full Economic Impact Statement be done on the effects of the proposed reductions on the economy of Harney County.

10. AUM's whether a privilege or a right have an economic value to the ranchers that have them. We have been asked by affected ranchers and do hereby request on their behalf that a "Takings Implication Assessment" be completed before any reductions are made pursuant to the Three Rivers EIS.

6-12 11. We have reviewed the Taylor Grazing Act as Amended and Supplemental which we understand to still be the law of the land. The Act's primary purpose is to manage the grazing lands so as to stabilize and preserve the livestock industry. We find the statement, "Allocate forage in priority order to satisfy demands for 1) wild horses, 2) big game, 3) livestock" to be totally inappropriate and possibly in direct contradiction of the Taylor Grazing Act.

6-13 12. Harney County strongly objects to the proposal to restrict the season of use for the Pine Creek material site and to the plan to close the site in 1992. The conclusion that the site is a threat to the Indian cultural and root gathering activities is without foundation. The added cost to County roads is an economic impact that is not justified and would have a serious impact on future road building in this area.

In conclusion, Harney County is committed to the long term health of the environment and of the livestock industry. In our opinion they are mutually dependent on each other. Our comments are in no way intended to reflect anything other than our interest in a strong and healthy environment.

Our concern is that the Draft Three Rivers EIS has focused only on the livestock industry and has not adequately addressed the other activities occurring on public lands that affect its well-being.

We challenge you to focus more on livestock management techniques, burning of big sagebrush and juniper and other mitigating factors that can result in accomplishing the goals that we are all interested in achieving that can produce the

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amenities that we all desire, including livestock production.

Again, thank you for this opportunity to share our concerns with you and to offer to meet with you at any time to mutually work towards achieving an environment that is both pleasing as well as supporting an economy that will permit us to enjoy it.

Sincerely,

HARNEY COUNTY COURT,

Dale White

Dale White, County Judge

H. Lee Wallace

H. Lee Wallace, County Commissioner

Kenneth J. Bantz

Kenneth J. Bantz, County Commissioner

6-1 Refer to response 2-87.

6-2 Refer to response 2-87.

6-3 Water quality is in poor condition with static or declining trends on 26.55 miles of streams in the planning area. Many of these waters do not meet DEQ standards. Under FLPMA, the BLM is required to coordinate land use planning and management activities with Federal and State agencies, and comply with all applicable State laws (see FLPMA Sec. 202(c)(8) and (9)).

6-4 Additionally, the BLM feels that DEQ water quality standards are fully attainable given proper management of riparian and aquatic ecosystems. Livestock grazing and timber harvest are two major causes of aquatic and riparian habitat degradation. Reduction in numbers of livestock and/or changes in the season of use facilitate regeneration of an area and improve both condition and trend of riparian and aquatic ecosystems.

6-5 Refer to response 2-5.

6-6 Though the BLM acknowledges the importance of watering livestock, FLPMA directs the Bureau to manage public lands and resources under principles of multiple-use and sustained yield (Sec. 102.(a)(7)). Additionally, the law states that those lands be managed in a manner that would protect the quality of ecological, environmental and water resources (Sec. 102.(a)(8)).

6-7 Refer to response 4-8 and 4-9.

6-8 Fire management practices, livestock management practices, as well as climatic conditions are among the factors which have contributed to the expansion of western juniper. Juniper control has been proposed as a method of improving range and wildlife habitat condition as well as to increase vegetative diversity (removal of juniper reduces competition and may result in an increase in diversity of other species, but results in the loss of juniper) as funding and staff are available. If funding and staff are not available, the Bureau is still required to balance authorized use with forage production. See DRMP/DEIS, Table 2.1, pp. 2-5, 11, 20-23 and Appendix 3, Table 7, pp. 172-176 for further information for project proposals and multiple-use restrictions.

6-9 Refer to response 2-46.

6-10 The management action referred to in Table 2.1-22 of the DRMP/DEIS has been modified in the Proposed Plan to read "Place high emphasis on exchanges and acquisitions . . ."

BLM acquisition efforts should not reduce the Harney County tax base. Since 1980, the amount of acreage patented into private ownership in Harney County through BLM land tenure actions has equaled the acreage acquired by the BLM. This acreage includes lands purchased by the BLM in the Steens. It is expected that this balance will continue and swing in favor of private ownership since most of the exchanges

recently completed and those that we expect to pursue, involve acquisition of lands with high resource values. Generally, in these types of exchanges, it takes more public land acres than private land to balance values. Also, refer to response 4-14.

6-11 Refer to response 2-63. See discussion of Economic Impacts in Chapter 4, pp. 68-70, DRMP/DEIS.

6-12 While one of the purposes of the Taylor Grazing Act is to stabilize the livestock industry, the primary purpose of the Act is "to stop injury to the public grazing lands by preventing overgrazing and soil deterioration." FLPMA directs the Bureau to manage the public lands on the basis of multiple-use and sustained yield.

Also, refer to response 2-6.

6-13 Harney County's permit to use the Pine Creek Material Site expires in 1992. This type of land use consumes landforms and transforms surface features, effectively destroying natural habitats and plant communities.

Plant species with edible roots that are important to traditional Native American cultures, such as biscuitroot, bitterroot, and others, grow on scabland lithosol sites (Helliwell, 1988) including the subject material site locality. These plants require some topsoil for essential habitat. At this site, the soil mantle is so thin that stockpiling topsoil is not feasible. As such, reclamation of the quarry will leave bare rock where plant regrowth may not occur for many years. Topsoil from off-site locations is not a viable substitute as it might introduce exotic plant species that could compete with the culturally valuable local species.

The subject gravel pit occurs within an area where generations of Native Americans have traditionally gathered edible roots (Couture, 1978; Couture, Housley, and Ricks, 1986). However, this practice is undermined by the reduction of plant habitat and the undesirability of obtaining roots during gravel crushing and loading operations.

Final rehabilitation of the Pine Creek quarry and stockpile sites are the responsibility of Harney County, in lieu of reclamation fees, and are to be performed at the conclusion of the entry that will occur in February of 1991. This is the last planned entry by the county before their permit expires in 1992. It is likely that county needs for mineral materials can be found at an alternate site.



Department of Fish and Wildlife

OFFICE OF THE DIRECTOR

506 SW MILL STREET, P.O. BOX 59, PORTLAND, OREGON 97207 PHONE (503) 229-5406

January 19, 1990

Joshua L. Warburton
District Manager
HC 74-12533 HWY 20 West
Hines, OR 97738

Dear Mr. Warburton:

The Oregon Department of Fish and Wildlife staff has reviewed the Draft Three Rivers Resource Management Plan

The BLM is to be congratulated for the comprehensive manner in which this plan has been developed. We are pleased to see the obvious commitment to improved riparian habitat and increased forage allocations for big game animals. Though we have areas of concern with the proposed plan, we found the descriptions of the affected environment, environmental consequences, and standards and guidelines to be thorough and conscientious. We did feel, however, that the sections on monitoring were somewhat vague and lacked specificity.

7-1 The Department is concerned about the proposed conversions of extensive acreages of native rangeland to monocultures of an introduced grass species. These conversions, if initiated, should be carefully weighed and monitored, so that conflicts with little known wildlife species do not develop.

Thank you for the opportunity to review and comment on this proposed Resource Management Plan. Additional comments and concerns are attached.

Sincerely,
Nandy Fisher
Director

enclosure

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7-6 4. We have two proposed additions to the BLM priority access map L-1 shown on an enclosed map. Public access is desirable through both of these pieces of private property to improve the general public's opportunity to use BLM land. These areas are popular for deer and elk hunting. Presently, locked gates in these areas hinder hunter use of large blocks of public land.

7-7 5. The preferred Alternative C proposes to control brush on 15,540 acres of deer winter range and seed crested wheatgrass on 9,460 acres of deer winter range. We would like to see a map of where these proposed projects would occur. The conversion of deer winter range from shrubs to grassland is of concern to us. However, we cannot adequately respond to the effects of this proposal on wildlife without more information.

7-8 6. Appendix 5, Table 1 lists proposed wildlife range allocations by allotment. This table shows elk use of forage to be 100% competitive with livestock. Our experience with elk in this area shows some spatial differences in the habitat used by elk and livestock. Elk use is high in areas not favored by livestock, such as steep slopes, dense Mountain Mahogany/Juniper thickets, and dry ridge tops. Limited research data is available to precisely calculate the overlap in forage use between elk and livestock. However, considering the differences in habitat use, we do not believe that 100% of the forage elk consume is competitive with livestock.

7-9 7. Hap 88-1 Special Status species - Chapter 3-28. This rap should show the western snowy plover nesting habitat at Seiloff Lake. We have enclosed a map with the Seiloff Lake habitat delineated.

7-10 8. Chapter 2-3: Monitoring. The detailed monitoring plan should have been part of this plan for all to review. We have no way of knowing how well plans and projects described in the plan will be monitored. Changes at the time of the "Proposed RMP/Final EIS" are always more difficult to make than for the Draft. ODFW will have review comments and specific recommendations when the Monitoring Plan is available.

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Department of Fish and Wildlife

506 SW MILL STREET, P.O. BOX 59, PORTLAND, OREGON 97207

January 19, 1989

Following are review and recommendations pertaining to BLM's Draft Three Rivers Resource Management Plan by Oregon Department of Fish and Wildlife.

7-2 1. Some California bighorn sheep habitat was omitted on map SS-1, chapter 3-29. We have enclosed a map with the additional bighorn habitat in red. This omission was discussed with the Three Rivers Resource Area wildlife biologist and he corrected their master map on 12-1-89.

7-3 2. We also have an addition to the mule deer winter range map WL-1, Chapter 3-30. The corrected deer winter range line comes to the base of Dry Mountain and is shown in red on the accompanying map. This correction was also added to the BLM master overlay on 12-8-89 by their wildlife biologist.

7-4 3. We recommend three changes on the Land Tenure Zone map L-5 for preferred Alternative C. These changes are shown on an enclosed map and are described below. All three of these areas should be in Zone 1 because they are critical winter range.

A. The Dry Mountain area winters approximately 200 elk and 500 deer during portions of the winter and also provides good summer range for these species. The BLM put a guzzler near here in 1989 in cooperation with the Rocky Mountain Elk Foundation to provide water for the deer and elk in this area.

B. This area delineated near the Silves River Canyon has approximately 40 elk at times during the winter.

C. The third area near Coleman Creek had about 200 elk for two months during the severe winter of 1988-89.

7-5 ODFW recommends BLM ownership be retained and private land be acquired, when available, on these important winter ranges.

7-11 9. Chapter 4-25, Aquatic Habitat: We applaud the Bureau's decision to remove livestock from streams in poor condition. However, the decision to replace livestock on those streams once they have improved to fair condition seems to be perilous. ODFW recommends that a qualifying statement be attached. It should stipulate that once livestock are replaced, the stream's continued progress will be closely monitored. If it is found that the streams condition does not improve for two consecutive monitoring periods, livestock will again be removed. In these instances, livestock should not be replaced until the stream's condition improves to good, or a completely new grazing strategy has been developed. Once a stream's condition has been improved to good, condition and trend should be monitored at least every 3 years. If a downward trend begins to develop, immediate corrective action should be taken.

7-12 10. Chapter 4-28, Wetland/Playa/Meadow Habitat: Alternative C states that the Three Rivers portion of the BURNS District Wetlands Habitat Management Plan would not be implemented until 1997. Why wait 7 years to address critical issues, when a habitat management plan has already been completed? We recommend that you give wetlands HMP plan implementation a higher priority.

7-13 11. Chapter 4-29: It is stated that an estimated 1500 acres of playa habitat would be adjacent to crested wheatgrass seedings in Alternative C. It goes on to admit that those acreages of playa adjacent to the seedings would have a downward trend. It is important to recognize that it is not only those acreages of playa that will be impacted. There is an significant habitat component in the edge effect of those playas that will also be lost. Is it necessary that those seedings be placed adjacent to playas? ODFW recommends that a buffer of at least 300m be maintained between crested wheatgrass seedings and any playa, wetland, or meadow. This will help maintain the edge component of those habitats, protect the integrity of fragile environments, and conserve avenues for wildlife to utilize the playas, wetlands, and meadows.

7-14 12. Appendix 2 - Table 2, Item 4b: ODFW recommends the insertion of the word ALL before the word commercial. Also, this section should be more specific in regard to retention criteria. As written, it leaves one with the impression that there is no need to retain conifers within the buffer zone. The retention of conifers is necessary to maintain bank stability, provide replacement snags and perches for raptors, and to furnish a continued source of large woody debris. This section should be re-written to recognize and follow the guidelines provided in the 1979 Interagency Riparian Guide.

7-15 A provision should be made in this section that addresses the retention of snags. All standing snags, within the buffer zone, that can be safely retained, should be. At a minimum, snags should be maintained at level at least 60 percent of potential

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(100% of potential in riparian zones). Additionally, all standing live trees which grade 80 percent cul or greater should be left standing to provide replacement snags.

7-16 **Item 4c:** The statement is made "Areas of vegetation left along a stream do not have to be a certain width". This seems to be a rather significant digression from statements made within the body of the document, and in table 2.1 both places, precise descriptions of the width of buffer strips are provided. The widths of the buffer strips are correlated with the steepness of the slope (e.g. a 40-50 percent slope would have a buffer strip of 125 feet, measured horizontally, on each side of the stream bank, Table 2.1-5). ODFW believes that the establishment and maintenance of defined, delineated buffer strips is a necessary prerequisite to the development of a sound stream protection program. We suggest that you clarify or delete item 4c from appendix 2-4. This would serve to reduce confusion with the document and would provide for a much more sound, comprehensive riparian management plan.

TABLE 2.1: MANAGEMENT DIRECTIVES BY ALTERNATIVES

7-17 **2.1-2 WATER QUALITY:** Overall the standards within this section are excellent. We commend the BLM for the obvious commitment to rehabilitation and protection of the riparian resource and water quality. The five year cessation of grazing on 80 miles of stream in poor condition is a particularly commendable decision. It will provide badly damaged riparian areas with much needed respite so they will truly have the opportunity to begin recovery.

7-18 In reference to the statement: "...implement grazing systems which allow no more than 10 percent livestock utilization on woody riparian shrubs, no more than 50 percent total utilization on herbaceous riparian vegetation, and no more than 30 percent utilization on herbaceous upland vegetation...". Is it intended that each criteria operate as a limiting factor independent of the others? For example, if 50 percent utilization is attained in the herbaceous riparian vegetation, but there has only been 10 percent utilization in the upland herbaceous vegetation, will grazing be terminated for the season because one of the limiting criteria has been met? Any grazing system that is based on constituent monitoring criteria should contain such limitations. A simple qualifying statement should be added which stipulates that the season's grazing will be terminated when maximum utilization is reached in any one of the three constituent monitoring criteria. The benefits of such a stipulation are two fold. It prevents the over-utilization of any one component of the grazing system. It also encourages the stockman to manage livestock in a manner that promotes more even utilization of the forage available.

7-19 How will monitoring sites be distributed along the riparian corridor or pasture management system? A provision should be made so that utilization monitoring is not solely based on an average of that component of the entire pasture management system. That is, without specific provisions, it would still be possible for isolated portions of the management system to be severely overgrazed while the average utilization for that component still fell within the described parameters.

7-20 **2.1-1: ITEM 11:** The statement is made that vegetative conversion will be restricted in any area within 1 mile of perennial water, to less than 20 percent of that area in any one year. Additional verbiage and clarification is needed here. The way that this is written it would be possible to completely convert all lands within 1 mile of perennial water within 5 years. (The reviewer assumes that "vegetative conversion" in this instance, refers to conversion of native rangeland to crested wheatgrass). An upper limit is needed on total acreage, within 1 mile of perennial water, that could be converted. ODFW recommends that not more than 40 percent of the total acreage, within one mile of perennial water, be converted.

7-21 **2.1-9 ITEM 5:** The word THERMAL should be inserted after the words "big game"

7-22 **ITEM 7:** specific direction for the retention of dead and down woody material is needed here. suggest adherence to USDA Handbook 553.

7-23 **2.1-17- Special Status Species.** No mention is made of the western snowy plover. This species is listed as Threatened by the state and is federally listed as a candidate 2 species. Management practices should be designed to protect snowy plover nesting habitat.

7-24 **2.1-19 Item 14 under the preferred alternative is excellent.** ODFW also recommends that domestic sheep be prohibited on all current or proposed bighorn sheep ranges. Their use is not compatible with that of bighorn sheep. Such prohibitions are necessary for the development and maintenance of successful, productive bighorn sheep populations.

7-25 **2.1-21 ITEM 1:** The statement "Maintain 30-60 acre blocks...so that 40 percent of the forest treatment area remains in suitable big game thermal and hiding cover", should be changed to read "...so that 40 percent of the RA that is managed for timber production is retained as suitable big game thermal and hiding cover. Not less than 15 percent of the area should be in a thermal cover condition at any one time". ODFW further recommends that monitoring for the cover retention criteria be tied to sub-watersheds, and not averaged over the entire RA. This provides for a much more manageable and comprehensible land base. Also, should a problem begin to develop, the management area is small enough that it will become evident before the condition deteriorates too far. The buffering effect is simply too great when monitoring for compliance with retention criteria are averaged over a large land area (i.e. the entire RA).

7-26 **2.1-21 ITEM 5:** There should be a time line attached to this statement. Ten years would be reasonable. Also, verbiage should be added which stipulates that all residual metal products, that remain from the old style fences, will be removed.

7-27 **2.1-29 ITEMS 1-5 UNDER WARM-WATER FISH HABITAT:** All of these action criteria should be tied to a time line.

7-28 **2.1-43 ITEM 1:** All applicants for electrical transmission lines should be required to follow criteria outlined in item 1 under alternative B.

Attachments

Prepared by:
Darryl M. Gowan
Forest and Rangeland Staff Biologist
Habitat Conservation Division

7-1 Refer to response 1-11.

7-2 This omission has been corrected (see Map SS-1, PRMP/FEIS).

7-3 This omission has been corrected (see Map WL-1, PRMP/FEIS).

7-4 We are accepting the recommendation to include the referenced lands in Zone 1. Data utilized in the DRMP/DEIS showed these areas bordering elk winter range. This coupled with the unconsolidated public land pattern in the areas, was our rationale not to designate them Zone 1 in the DRMP/DEIS. The new data you have provided has been incorporated and the lands changed to Zone 1 in the Proposed Plan. See Map LR-1.

7-5 All lands included in Zone 1 are considered retention/acquisition areas. The definition of Zone 1 lands in Table 2.27, PRMP/FEIS has been modified to include acquisition.

7-6 The two additions recommended have been included in the Proposed Plan for priority access. See Map LR-3, PRMP/FEIS.

7-7 Refer to response 5-5.

7-8 The proposed big game allocations table has been revised (see WL Table 2.13). Also, refer to response 2-10.

7-9 The map has been revised to reflect this habitat. (See Map SS-1).

7-10 Refer to response 5-17.

7-11 Current riparian pastures and enclosures are monitored no less frequent than 3-year intervals. In all but two cases, this monitoring has been yearly for the first 5 years of exclusion or a change to a system designed to improve riparian areas. See the revised management actions for riparian and Appendix 1, Table 4 in the PRMP/FEIS. Also, when livestock are again permitted in riparian areas, the use will be intensively monitored.

7-12 Full implementation of the Wetlands HMP will be achieved by 1997. Projects within the plan have been implemented from 1976 to the present. The 1997 date was determined based on past and projected funding for wetlands. Nothing in the plan precludes an earlier full implementation date.

7-13 The standard procedures and design elements have been amended to reflect the 300 meter playa buffer. The reference to the seedings being adjacent to playas was not meant to infer that all sagebrush would be removed up to the playa edge. Also, refer to response 1-19.

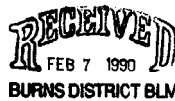
7-14 Adding the word "all" would clarify this statement which is intended to be a minimum requirement statement. In reference to Table 2.1, statement 4, "all streamside vegetation (including conifers) will be protected where fish, wildlife and water quality can be affected." The same applies to the DRMP/DEIS Table 2.1-7, Alternative C, item 4.

- 7-15 Currently, standing snags are only designated to be felled if they present a hazard to timber operation crews. The current practice is to leave commercial sized trees unmarked if they are within a hazardous distance of a standing snag. Current BLM Wildlife Tree (snag)/Down Log Policy is to follow the concept developed by Thomas, et al., in USDA-FS, 1979.
- 7-16 DRMP/DEIS, Appendix 2, Table 2 (4.c) is changed in the PRMP/FEIS, Appendix 1, Table 2 to read: "Areas of vegetation left along a stream are correlated with the steepness of the slope."
- 7-17 No response required.
- 7-18 Refer to responses 1-1 and 2-7. Also, see PRMP/FEIS, Appendix 1, Table 4.
- 7-19 Detailed utilization monitoring for those systems not employing early, short-duration grazing will be implemented on a case-by-case basis through the EA, Allotment Evaluation or AMP process. Also, see PRMP/FEIS, Appendix 1, Table 4.
- 7-20 Upon further review, it has been determined that no vegetative conversions are proposed within 1 mile of perennial streams or reservoirs which support fish.
- 7-21 The word "thermal" has been added. See management action WL 1.1 of the Proposed Plan.
- 7-22 Refer to response 7-15.
- 7-23 Refer to response 3-11.
- 7-24 See Proposed Plan, SSS 2-1. There are no other proposed bighorn sheep release areas in the planning area.
- 7-25 The 40 percent hiding and thermal cover by treatment area is used because the actual cutting units in a particular treatment area are in close proximity to one another. This will result in cover areas being available in each treatment area. It is correct that no less than 15 percent should be in thermal cover condition at any one time. See management action WL 1.1 of the Proposed Plan.
- 7-26 The statement refers to new fences which shall be built to standards during the entire life of the plan.
- 7-27 With reference to warmwater fish habitat management objectives, Table 2.1-29 of the DRMP/DEIS.
- Item 1 would be implemented as new reservoir construction opportunities develop.
- Items 2-5 would be implemented over the life of the planning document.

7-28 The Proposed Plan will remain unchanged. Section 503 of FLPMA states that utilization of rights-of-way in common shall be required to the extent practical. Bureau policy, as expressed in Bureau Manual 2801.13B.1, is to encourage prospective applicants to locate their proposals within corridors. The decision to encourage right-of-way applicants to locate within designated corridors will also provide a valuable tool for right-of-way project planning while allowing for flexibility where collocation is not practical due to environmental, economic, safety, national security or technological reasons. Each right-of-way application, whether proposed within or outside a designated corridor, would be subject to NEPA review and mitigation to reduce or eliminate unacceptable impacts.

January 30, 1990

Bureau of Land Management
Burns District Office
Att. Joshua L. Warburton
HC 74-12533 Hwy 20 West
Hines, Oregon 97738



Mr. Joshua L. Warburton,

Following are my comments concerning "Draft -- Three Rivers Resource Management Plan and Environmental Impact Statement." The Draft inadequately addressed and evaluated a number of natural resource problems, resource use allocations and competitive use determinations. In addition, the analytical techniques used to determine resource condition, potential and trend need reviewed to better reflect field conditions and new research information. BLM range personnel, most knowledgeable about biological conditions in the field, should be given the responsibility to develop progressive AMP's and futuristic improvement plans.

- 8-1 The BLM's management directive of "fostering the wisest use of our land and water resources" and "to effectively manage the basic resources of the public rangelands to improve and maintain economic and environmental needs" (FLPMA, FRIA) emphasizes the need to meet and manage for the basic soil, water and economic needs of the RA. Nonuse and restricted management alternatives will not meet the basic biological and economical needs of the area, therefore alternatives A--D are illegal and alternative E should be rewritten to reflect intensive and progressive management of all of our resources and uses. The RMP unfairly infers intensive management has commodity emphasis.
- 8-2 The RMP unfairly blames livestock grazing for poor watershed conditions ignoring the dramatic influence of ecological succession upon the area due to fire suppression. Recent research by Buckhouse, Gaither, Eddleman, Miller, Angell, Young and Evans clearly shows the need to emphasize and manage for seral successional stages to limit and prevent erosion, manage for water--related needs and provide wildlife needs twenty years and later in the future. A CRMP group of natural resource educational and research specialists reviewing research underway in the area felt very strongly juniper encroachment due to ecological succession was the major watershed and wildlife concern of the area and that the biological changes will become critical within the next twenty to forty years with long term and permanent ramifications.
- 8-3 Vegetative manipulation is necessary to achieve the optimum desired watershed conditions for all resources and uses -- progressive livestock grazing can play a complementary role. Exclusion of livestock without vegetative manipulation will have negligible benefits to longterm watershed needs.
- The described potentials obviously failed to consider intensive management and use of available technologies. Resource areas

inadequately considered are watershed improvements, wildlife habitat enhancement, livestock forage improvement, timber management and recreation development. Prescribed fire, conditional burn designations and individual tree treatment needs to be emphasized to a greater degree in the RMP. The archaic cover requirements listed for big game are ridiculous and ignore the biological realities of the area. In fact, forage quality and predators are the short term limiting factors for deer populations while elk populations are increasing rapidly due to excess forage quantity in the area. Juniper encroachment has attributed to decreased bitterbrush and other preferred deer forage areas. Future habitat requirements need to be readdressed in view of recent research on juniper encroachment. Junipers are increasing at an exponential rate with severe negative impacts to all resources.

Existing resource conditions have improved for a number of years and the RMP ignores this improvement especially in the riparian and upper watershed areas. This does not mean we can not do even better and BLM range personnel and livestock permittees are continually working together for multiple use and resource improvement inspite of internal BLM nonmanagement interests. Five, ten and twenty year ecological trend plots would show improved conditions and allow land managers to separate natural ecological changes from changes caused by resource use.

- 8-4 Proposed livestock grazing reductions are based upon resource data from two drought years and poor growing conditions. A minimum of seven years of trend data is needed to properly reflect resource changes and the causes of change. The stated utilization levels have nothing to do with proper management nor wildlife and watershed needs. Timing and duration of use need to be emphasized in establishing AMP changes and permitted livestock use. For instance, heavy utilization early in the growing season can provide high quality regrowth to meet critical nutritional needs of deer later in the year when quality of forage is normally not available. The same early use of riparian areas can accelerate resource improvement in many areas.
- 8-5 The RMP violates or insufficiently addressed objectives 1, 2, 4, 5 and 7 of FLPMA 202 A. The RMP fails to abide by and manage for sustained use of watershed quantity and quality. Longterm benefits to wildlife from vegetative manipulation through burning, shrub planting and grass seeding outweigh short term impacts. Water development and forage development are also important components to sustained yield, long term needs and diversity of wildlife habitat. The potential benefits to the local economy and the general public were not fully considered.
- 8-6 In addition, the RMP attempts to separate and allocate levels of use to resolve conflicts instead of emphasizing the biological factors causing the problem. Most uses are compatible with each other if properly included in the planning process -- the allocation of resource uses to different areas or land units is unnecessary. Management opportunities received inadequate emphasis in the RMP

which also violates Sec. 302 (b) FLPMA requiring the BLM to prevent unnecessary or undue degradation of the lands (e.g. intensive juniper control to meet watershed needs).

Stated management objectives for the various resources will not be met Preferred alternative amplifies problems and conflicts in the area by failing to fully consider benefits of intensive management alternatives. Apparently, the realities of the field were lost in the state office. The technically inaccurate methodology to describe benefits and impacts for each management alternative are good examples of programed polarization of interests and issues.

8-7 Plans to restore suspended nonuse should be included in the Final RMP with no decreases in permitted AUM's in the area. A CRMP review and a takings implications assessment (TIA) be made of the reduced permit which is required by Presidential Executive Order 12630. It has been brought to my attention that a number of Oregon State grazing leases were voided following the land exchange between the BLM and the State of Oregon. These grazing leases should be reestablished or a TIA be made within six months. For example, the 43 AUM grazing permit on the former State land next to the Diamond Craters Natural Area has a very valuable historic use to the permittee and can not and should not be revoked. This eighty acre area along with the other proposed addition should not be added to the Natural Area for biological, economic and lack of unaltered character reasons.

Horse populations in HMA's should not be allowed to exceed maximum numbers under any conditions. Vegetative manipulation and other management technologies should be fully considered in HMA's to optimize watershed management and wildlife objectives. Forage needs within the area should be met and provided by the HMA -- livestock permits should not be moved to other areas.

8-9 The BLM had no legal authority in moving the Beatty's Butte Cross-bred ranch horses (now known as Kiger mustangs) to the Riddle and Kiger areas. The previous horses in these areas originated from the Smyth herd and outside horses not indigent to area should not be in this area. Furthermore, there is no justification for establishing the HMA's as an ACEC and will face a legal challenge that could move the horses back to their original area.

8-11 The outlined breeding program and bloodlines should be proven genetically by an unbiased research concern and when proven false, the program should be dismantled. The program appears to be competing with private enterprise in addition to lacking scientific validation. Long term land management objectives should be the main RMP consideration. The Deep Creek Allotment (5330) historically had no horses and should not be included in the Kiger HMA and the livestock permittees should be required to put a wire across appropriate gates to keep horses inside HMA's. The Deep Creek Allotment is a small area having a restricted use and trailing area with two and three wire boundary fences. Hunters, fishermen or backpackers are bound to push these horses through the boundary fence causing conflict with adjacent property owners and very expensive horse gathering costs paid by the taxpayer.

8-12

3

8-13 Land tenure adjustments are in the best interest of the public as long as the adjustment is in the form of a land trade or exchange and not in the form of the government purchasing private land. In addition, there must be two willing parties involved in the exchange with no undue pressure exerted (e.g. exclusion of grazing in an area unless....).

Wild and Scenic River Designation will have a negative impact upon future management needs of the area. Watershed needs will not be met so no new designations should be proposed or supported by the BLM.

Many times the worst possible way to protect an area of critical environmental concern is to designate it as such. Some things we advertise to death instead of protecting through management. ACEC's need to be identified and monitored without advertisement and exclusion of use. No new ACEC's should be established under the present system.

In summary, exclusion of use particularly livestock grazing, is not in the best interests of the socioeconomic needs of the area nor is it necessary. Intensive grazing management can accelerate resource improvement in plays, wetlands, reservoirs and riparian areas. The described utilization objectives are not technically sound nor justified -- heavy utilization is very beneficial if for the right duration and at the right time. The technical data supporting grazing decreases appears to be inadequate and based upon utilization instead of long term trend data therefore no grazing reductions should be implemented at this time. In addition, it appears a full range of progressive management practices and technologies were not considered in the planning process. Without question, the main problem of the area negatively impacting all resources and uses is juniper encroachment. Juniper control needs to be more actively pursued and fire allowed to become a part of the system in a prescribed manner.

Thank you for considering the information presented and my concerns. If you have any questions please give me a call.

sincerely,

Fred I. Otley
Fred I. Otley
Diamond, Or 97722
(503) 453-2702 or
(503) 493-2469

cc Bob Smith
Secretary of Interior
Oregon State Director

8-1 The alternatives presented in the DRMP/DEIS meet the legal requirements specified in FLPMA (1976) as defined in 43 CFR 1610, et seq. and Bureau Manual 1601-1625.

8-2 Refer to response 6-8.

8-3 Vegetation manipulation has been considered as one method of improving forage condition (see DRMP/DEIS Table 2.1-11 and Appendix 3, Table 7).

8-4 Use adjustments are based on a minimum of 3 years of actual use, utilization and climate data. The estimated capacities listed in the DRMP/DEIS are projections only. Timing, duration of use and stocking rate will be established through allotment specific evaluations, agreements and AMPs.

See PRMP/FEIS, Appendix 1, Table 11 on methods. Also, refer to response 2-11.

8-5 The entire DRMP/DEIS is based on the principles of multiple-use (see Table 2.1) and sustained yield. The document was prepared by an interdisciplinary staff of 16 different specialists representing over 20 resources (see List of Preparers, p. 6-2, DRMP/DEIS). The interdisciplinary team has relied upon numerous data sources ranging from very recent monitoring and evaluation data (see Appendix 3, Table 6) to historic data dating from the mid-1960's. The interdisciplinary team has considered both present and potential uses of the public lands (for example, refer to the Energy and Minerals sections (pp. 3-49 to 3-56 and 4-48 to 4-54, DRMP/DEIS). Thorough consideration of the potential rangeland and wildlife habitat benefits from various vegetation manipulations, prescribed burns, water developments has been presented in the DRMP/DEIS (see pp. 4-8 to 4-12; Appendix 3, Table 6; and Appendix 3, Table 7).

8-6 Sec. 302(b) of FLPMA requires the Bureau to regulate use of the public land to prevent unnecessary or undue degradation of the lands. This section does not apply to biological processes such as juniper encroachment.

8-7 The Bureau is required to periodically review grazing preference under 43 CFR 4110.3 and make changes in grazing preference status where needed. The Bureau is also required to reduce active use if the use exceeds livestock carrying capacity as determined through monitoring. Increases and decreases in active use will be allocated in accordance with 43 CFR 4110.3-1, 43 CFR 4110.3-2, and Oregon BLM Manual Supplement 4100.06G. Refer to Appendix 1, Tables 9 and 11 in the PRMP/FEIS.

Refer to response 2-63 for TIAs.

8-8 Disposition of State grazing leases on lands acquired by the BLM through State exchanges were handled in accordance with Oregon BLM Manual Supplement 4100.06I. In the majority of cases, State leases on lands acquired by the Bureau were converted to active preference on the permittees license.

Historical use is not relevant to the disposition of former State uses. The permittee in this case will not lose these AUMs; however, final shifts of use cannot be made until the Drewsey reallocation.

8-9 The Wild and Free-Roaming Horse and Burro Act and 43 CFR 4700 group do not prevent the movement of horses from one HMA to another. Returning selected horses to HMAs is an accepted practice of improving the quality of certain herds. Currently, the BLM's main method of disposing of excess horses is through the adoption program. Increasing the quality of the wild horses improves their chances for adoption. The Drewsey, Andrews and Riley Management Framework Plan amendment for management of seven wild horse HMAs was approved on May 29, 1987. This plan amendment addressed this very issue. The single protest was considered and rejected by the Director, as he affirmed the Bureau's legal option to move horses between HMAs.

8-10 Refer to response 2-68.

8-11 The wild horses in the Kiger and Riddle Mountain are of a distinctive color and type in that they have the phenotypical appearance of Spanish Mustangs and by today's standards are a breed of horse. The dun factor color pattern which they possess is that of primitive horses. Blood studies done by equine serology laboratories of the University of California and the University of Kentucky have shown that genetically the Kiger Mustangs most closely resemble equine breeds of Spanish origin. These breeds include the Campolino, Chilean Criollo, Argentine Criollo, Peruvian Paso Fino, American Paso Fino, Puerto Rico Paso Fino, Spanish Mustang Registry, Luistano, Andalusian and Mangalarga Marchador. It is important to manage and preserve this unique kind of horse on the range because they are the best representation of the Spanish Mustang running wild on public lands today.

The main goal in managing every herd is to maintain a thriving herd in balance with other uses in the area. Over time, this results in healthier animals with improved conformation.

Kiger Mustangs do not appear to be competing with private enterprise at this time. Quite the contrary. Members of the public who own Spanish Mustangs are diligently seeking Kiger Mustangs to improve their own animals. Also, the small number of Kiger Mustangs entering the market place, compared to the total market, is negligible.

8-12 There was an error on Map WH-1 in the DRMP which has been corrected; see map of the FEIS/RMP. The suggestion of a horse wire across boundary gates is a practical and viable option and may be incorporated into the Individual Herd Management Activity Plans.

8-13 Refer to responses 4-14 and 6-10. The use of coercive measures in Federal acquisitions is prohibited by the Uniform Relocation Assistance Real Property Acquisition Policies Act of 1970.

14



Oregon Trout 9

Speaking out for Oregon's fish

P.O. Box 19540 • Portland, Oregon • 97219 • (503) 246-7870

February 12, 1990

Cody M. Hanson, Area Manager
Three Rivers Resource Area
U.S.D.I., Bureau of Land Management
Burns District Office
HC 74-12533 Hwy 20 West
Hines, OR 97738

Draft Three Rivers Resource Management Plan (RMP) and
Environmental Impact Statement (EIS)

Dear Mr. Hanson:

Oregon Trout thanks you for this opportunity to assist the
Burns District Bureau of Land Management (BLM) in the
planning process.

Our comments will follow this format: organization
description, discussion of areas of main concern including
comments on the planning documents, and summary.

ORGANIZATION DESCRIPTION

Oregon Trout is a state-wide non-profit conservation
organization focused on restoring, protecting, and
maintaining Oregon's wild (native, indigenous) fish and their
habitats. We are primarily a volunteer group, with only
three full-time paid staff and approximately 1400 members.
Oregon Trout is an advocate for the fish and their habitats;
we are not a fishing club.

DISCUSSION OF CONCERNS

Planning Documents: Content and Style: The planning
documents have noticeably improved in quality, in volume of
detail presented, and in style of presentation. The wealth
of detailed maps together with Table 2.1 Management
Directives by Alternatives were especially helpful. Oregon
Trout also appreciated the concept behind including the
"Summary" information found on pages iii-vii. Several
elements of that information were confusing rather than
helpful: errors in or absence of totals for streamside
riparian habitat, aquatic habitat condition, wetland habitat,
and playa habitat trend.

9-1

9-2 From a fisheries perspective, it would be helpful to include
totals of stream miles/aquatic habitat meeting the various
condition classes defined in "Table 2. Criteria for
Evaluating Aquatic Habitat," Appendix 6-3. Bar graphs
9-3 illustrating the total stream miles in poor, fair, good, and
unknown condition, as well as bar graphs illustrating wetland
habitat condition and current riparian habitat condition and
trend (acres and stream miles) by allotment would also be
helpful. Such graphs would show at a glance the percent of
public riparian and aquatic zones in need of restoration, as
well as those needing to be inventoried and those in
healthier condition according to the Bureau's evaluation
criteria. The style of presentation used in Appendices 5-6,
Tables 2-3 of 5, and 1 of 6, requires the reviewer to select
out, total, and compare this valuable information. Including
the totals and percentages and presenting that information in
simple bar graph form would most clearly and usefully state
riparian/aquatic conditions in the resource area.

9-4 In Appendix 6, Table 1, Aquatic Habitat, it would be helpful
to have the streams listed according to watershed, and in
9-5 order from headwaters downstream. It is helpful having the
allotment listed in which the stream segment is found, having
the allotment numbers would facilitate use of the detailed
9-6 allotment number map. Of the maps provided, the high
contrast F-1 is the easiest to read. Having maps with
streams, lakes, and mountains/buttes shown is very helpful.
It would also be helpful to note the habitat locations of
Oncorhynchus (redband trout) and Cottus bairdi ssp. (Malheur
spotted sculpin) on Map SS-1, "Special Status Species." The
district might also want to superimpose on Map SS-1, "Special
Status Species," those areas in the preferred alternative
which the district is considering to convert to crested
wheatgrass cattle forage (46,960 additional acres or an
additional 2.7% of the 1,709,918 acres of public lands in the
resource area, 5% or 85,496 acres of which are already
seedings for cattle forage). Those acres intended for brush
control (61,275), prescribed burning (8,260), and juniper
burning, control-wood cutting (2,393) also need to be
designated, preferably on Map SS-1.

9-7 Statement of objectives in Table 2.1: For these objectives
to be consistently meaningful, achievable, and capable of
being evaluated, the statements need to include an
implementation (or target) date. Particularly with respect
to water quality and fish habitat objectives, it is desirable
from Oregon Trout's perspective that target dates be set for
varying habitat condition stages rather than setting a single
distant (year 2000, or 2010 for example) target date.

9-8 Aquatic vegetation can return to a degraded stream reach with
one year's full rest. Thus one example of a meaningful,
measurable redband trout objective would be, under "Restore
or enhance habitat of special status species:" (Table 2.1-6)

Restore/protect redband trout habitat
beginning with the 1990 dry season such
that native aquatic vegetation is present
in healthy (reproducing) condition by
cold season weather that year.

9-9 A long term objective for that same species then could be:

Protect/maintain redband trout habitat to
maintain year-round healthy populations of
native aquatic plants from 1990 growing season
throughout the life of the management plan
for the health of the resident fish and to
comply with the Clean Water Act of 1987 and
the requirements of the Oregon Department of
Environmental Quality.

Planning Documents: Issues--Water Quality, et al.: The
district's preferred alternative sends a mixed message to
Oregon Trout on water quality, special status species,
wetland/reservoir and meadow habitat, riparian habitat,
aquatic habitat. The stated objective for water quality is
to

Protect or enhance ground water quality
and improve water quality of streams on
public lands to meet or exceed quality
standards for all beneficial uses as
established (per stream) by Oregon
Department of Environmental Quality (DEQ).
[Table 2.1-2]

The stated management action is to "Remove livestock for five
years from approximately 80.9 miles of stream with poor water
quality." Oregon Trout recognizes that this action will have
the greatest probability for "the most rapid riparian
recovery." Such removal will permit aquatic vegetation to
grow and remain in the streams where such vegetation is
native, thus providing year-round recruitment of fish
"forage" and habitat for aquatic insects and
macroinvertebrates. Native vegetation such as Alisma,
Flodea, Vallisneria, Najas, and members of the
Potamogetonaceae, Juncaceae, Tyrphaceae, and Cyperaceae
families may reestablish populations which will moderate

water and soil temperatures while providing habitat for other
species now absent from these miles of "poor water quality"
streams.

These instream plants are an integral element of healthy
stream systems with water quality conditions meeting or
exceeding DEQ standards. They provide essential fish and
fish prey habitat while moderating flood events and stream
temperatures (maintaining cooler water temperatures with
higher oxygen content in warm weather and warmer water
temperatures preventing "anchor ice" formation in winter).
With streamside vegetation, the aquatic plants filter out
instream debris and sediments, a vital water quality
function.

Even small numbers of livestock (as few as 2 or 3) grazing
aquatic areas can remove instream vegetation in a matter of
days, setting back stream recovery to mere vegetative
expression. Oregon Trout has observed in the Trout Creek
Mountains, the Crooked River National Grassland, and the
Crooked River basin, to name only three examples, that
grazing cattle in riparian zones leads to the removal of
instream vegetation before or simultaneously with the grazing
down of streamside vegetation (riparian). This is
particularly true regarding the "water weeds".

Overhanging banks, like instream vegetation, are early
victims of cattle grazing riparian/aquatic zones. Meaningful
riparian recovery is measured not just in the presence of
some vegetation during some months of the year, but in terms
of stream morphology and water quality year-round. Resident
fish require such year-long habitat (which comprises less
than 1% of the public lands east of the Cascades in Oregon).

Special Status Species and Habitat: Protection, Restoration,
Enhancement (emphasis on fish, their habitat including water
quality): In determining which management actions to
implement (including system rest from consumptive use) to
achieve riparian/fisheries/aquatic/wetland objectives, it is
important to remember the obvious: fish are limited to
9-10 aquatic habitat and are extremely vulnerable to habitat
degradation. Restoring fish habitat to support viable native
populations and protecting and maintaining that restored
system requires regular, intensive monitoring of the effects
of management actions. That restoration, protection, and
maintenance may or may not require human physical
intervention (instream structures, pool construction, etc.).
Such labor and funds may be better spent hiring personnel to

serve as fish habitat "watchdogs" (rangers) to guarantee compliance with management plans focused on fish habitat recovery and protection, and to ensure adequate monitoring and data collection.

What Oregon Trout is hopefully conveying to its public lands managers in the Three Rivers Resource Area is this:

Management contemplating or planning to restore aquatic/riparian areas to alter existing native plant communities deemed to be in "poor" or early seral condition, OR to be in need of "rehabilitation"; need to consider then manage to provide what the native fish, mammals, birds, insects, and plant species, etc., inhabiting or migrating through that acreage need to maintain viable (capable of sustaining healthy, reproducing) populations. At the same time, those managers need to manage to implement management actions which will result in DEQ-approved water quality and in healthy, stabilized soils. These need to be the driving focus for the Bureau.

9-11 It is Oregon Trout's understanding that compliance with the 1976 Federal Land Planning and Management Act (FLPMA) requires the Bureau to elevate to equal management standing and consideration (with traditional consumptive values such as grazing) those resource values previously relegated to secondary consideration or worse. Oregon Trout is aware of the role of Bureau range conservationists in land management planning. Since Ron Wiley's departure, how involved have fisheries biologists with specific expertise in the needs of the native fishes of the resource area been in the process which produced the draft RMP/EIS?

9-12 How involved were native plant botanists and hydrologists throughout the process? What did they have to say about giving redband trout/Malheur spotted sculpin habitat a brief rest from grazing until the habitat reaches "fair" condition, which is minimal fish habitat condition, then resuming grazing? Is this the preferred management action for special status fish species' habitat? How does such action meet the needs of those species and comply with the Endangered Species Act of 1973? Such professionals need to be actively consulted and involved throughout the planning process to insure that the needs of the area's native fish and plants, songbirds and waterfowl, small mammals and big game species, aquatic insects and reptiles, etc., will be met by the Bureau's preferred alternative.

9-18 Juniper removal, for example, needs to be viewed from this perspective. Where juniper provides the only or major cover for wildlife, or the major or only remaining stream shading then cutting or removal needs to be delayed until stream and riparian vegetation has recovered to provide the cover and habitat now provided by the juniper. Juniper (*Juniperus occidentalis*) is native in the West. The spread of juniper has been tied to conditions resulting from nearly a century and a half of overgrazing in Oregon. Caution should be exercised when considering removing all or the majority of juniper in any one watershed--phreatophyte is not a term automatically designating an undesirable, or "bad" plant species. Juniper are a native and important element in healthy watersheds.

9-13 Oregon Trout raises these questions because it is our understanding, since the February 5, 1990, Portland meeting with several of the planning team members, that the actual preferred action is to temporarily remove cattle from an unspecified number of stream miles OR to employ unspecified grazing systems "which are widely recognized as promoting the most rapid riparian recovery practicable..." (Table 2.1-3, 4.) Early spring and/or late winter grazing were mentioned in this context. This is not what Table 2.1-3, 4. states.

9-14 Oregon Trout is not aware of any grazing system which promotes "the most rapid riparian recovery practicable." In riparian/aquatic recovery of a degraded, or "poor" condition stream system, the importance of an initial period (several to 15 or more years) of complete rest has been recognized by government resource managers such as Oregon's Wayne Elmore of Prineville, as well as by conservation groups such as Oregon Trout. Examples of improved stream conditions, including

Biodiversity and Interdependency: Speakers at the February, 1990 American Fisheries Society conference (Welches, OR) included many who spoke in recognition of the values of biodiversity. The speakers came from a variety of disciplines including social and biological sciences, but did not limit their focus to their own disciplines. The interdependency of all components of any given ecosystem was emphasized again and again. Oregon Trout has often cautioned resource managers to consider this interdependency and the values of biodiversity (genetic and species diversity).

9-20 Oregon Trout asks now what specific effects are anticipated from altering vegetation? How are brush control and water quality linked? What effects on water quality does research show will result from 61,275 acres (3.6% of the Three Rivers

water quality, native fish populations, and fish habitat can be found around the state. Removing livestock is effective in the rapid recovery of riparian and aquatic zones. Oregon Trout would like to know (specific and complete references) what scientific studies identify cattle grazing as "promoting the most rapid riparian recovery practicable..."

RA Public lands) receiving brush control actions? What effects on groundwater and area surface water will result from developing 21 springs, 96 reservoirs, and 10 wells? Will these developments decrease surface flows in already poor water quality condition streams, aggravating known annual climatic "stresses" (hot, dry summers; below-freezing winter temperatures) on these streams? Specifically, how will these developments result in compliance with Oregon DEQ's water quality standards? How will they result in meeting or exceeding these standards? How will altering present vegetation achieve these results?

Whether the livestock are effectively removed through fencing or through intensive herding with daily supervision, the results can be similar if the livestock operator is dedicated and committed to complying with livestock exclusion from the recovery area. It is also important in establishing the removal of livestock from the miles of poor water quality stream that the recovery area acreage be removed from computations determining the number and type of livestock to be permitted in the affected allotment.

Off-Road Vehicles (ORVs) Management: Oregon Trout is also concerned with the effects of Off-Road Vehicles on the public lands, and especially on aquatic/riparian/wetland zones. Oregon Trout is aware of compliance and enforcement problems in south central, northeast, southeast, and central Oregon with ORV operators who refuse to keep their vehicles out of streams, riparian zones, wet meadows, and other sensitive areas. Native fish, wildlife, and plant species suffer from this abuse. Once an area becomes known to some ORV operators, it is nearly impossible to prevent continued abuse. One stream area in south central Oregon, the Klamath Basin, has been repeatedly fenced and posted. Yet ORVs continue to violate the designated management efforts by driving through the fencing, after cutting the fencing. These violators use the riparian zone and stream bed for their purposes with no regard for the values they are destroying.

9-15 Oregon Trout would like to receive information on the specific literature and studies which prove and/or support the utilization percentages (10% on woody riparian, 50% on herbaceous riparian, and 30 percent on herbaceous upland vegetation) referred to in the planning documents. We do not understand how these levels will result in "poor" condition stream miles achieving the stated Bureau water quality objective. Also, Oregon Trout does not understand, from the information provided, how the upland utilization level will result in desirable soil and water conditions.

9-21 How will allowing or permitting ORV use to increase comply with FLPMA's strictures for multiple use? How will ORV use of public lands achieve compliance with Oregon DEQ's water quality standards, with the Clean Water Act of 1987? How will ORV use on the public lands of the Three Rivers Resource Area achieve sustained yield of native fish species, of riparian plant species? Of native songbirds, small mammals, big game, reptiles, amphibians, insects (especially aquatic macroinvertebrates)? Will such use help maintain visual resource values? How?

9-16 Vegetation Manipulation/Alteration other than Grazing: Regarding any wildfire rehabilitation done, Oregon Trout would recommend that any species planted be limited to those native to the specific affected area. Also, fire rehabilitation should not become an excuse to seed crested wheatgrass, which already comprises 5 percent of the public lands in the Three Rivers Resource Area. Oregon Trout is concerned with what soil, hydrologic, and native plant and animal effects result from seeding crested wheatgrass.

9-17 Biodiversity and the health of native species is not served by seeding non-native plant species. The cost in dollars to seed native species has been argued to be uneconomical by the Bureau. However, the real cost in ecosystem biodiversity (number of native plant and animal species present and/or using the seeded area, number of populations and of diverse native plant and animal communities present) and in water/soil system health (quality, quantity, and composition) is incalculable--and should not be dismissed merely because no specific dollar amount can be attached to these important values.

9-22 FLPMA mandates the protection of a variety of land resource values. The Act speaks to the prevention of undue and unnecessary degradation of those resource values. How will ORV use accomplish or comply with this stricture?

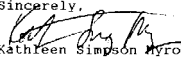
COMMENT SUMMARY

Oregon Trout's concerns in brief are:

1. Riparian and Aquatic Habitat Protection, Restoration, and Maintenance
2. Fish Species Protection, Restoration, and Maintenance
3. Compliance with FLPMA, the Clean Water Act, Oregon DEQ's Water Quality Standards, the Endangered Species Act, the Bureau of Land Management's Riparian Policy (1987 national and state of Oregon), the Bureau of Land Management's Fish Habitat Management Plan (1989), and all other applicable laws, regulations, policies, and rules
4. Active Consideration of Biodiversity (species, communities, and individual populations)
5. Active Consideration of Interdependency (species, et al., and actions)
6. Strict Control of Off-Road Vehicles on Public Lands
7. Regular Scientific Monitoring of Results of Management Actions, Particularly with Regards to Oregon's Native Fish and Their Habitats

Please contact Oregon Trout if you have any questions concerning these comments. Thank you again for the opportunity to participate in the planning process. We look forward to your response.

Sincerely,


Kathleen Simpson Myron
Associate Director, At-Large
158 SW 11th Avenue
Canby, OR 97013

Ph: 503 266-1263

pc: Bill Bakke, Executive Director
Mike Crouse/Chad Bacon, Oregon State Office, BLM
file

for fish populations (see PRMP/FEIS, Table 2.1, notes and Appendix 1, Table 4).

Restoration and protection of redband trout and Malheur mottled sculpin habitat is implicit in the selection and implementation of the Preferred Alternative. With the removal of livestock from 38.8 miles of riparian habitat presently in poor condition, and implementation of grazing systems along 30.4 miles of fish habitat that restrict utilization of riparian vegetation, short-term objectives of restoration of fish habitat would be reduced.

9-9 With selection and implementation of the Preferred Alternative, the realization of long-term objectives of protection and maintenance of restored habitats, and compliance with State and Federal water quality laws are fully attainable within the life of the management plan.

9-10 Refer to the Proposed Plan for monitoring actions delineating methods of data collection and evaluation. Funding and workmonths for these activities will be allocated through the District's Annual Work Plan submitted to the Washington Office.

Information concerning development and evaluation of a monitoring plan was included in Volume I, Chapter 2-3 of the DRMP/DEIS.

The BLM does monitor use and utilization on grazing allotments. Range conservationists evaluate site potential, develop grazing methodology, evaluate seasons of use and visit sites prior to and after the period of use to assess utilization. Any unauthorized activity is noted and duly reported to management, where it becomes a management decision to act upon those activities.

9-11 The production of the RMP has been an interdisciplinary effort throughout. Individual sections have been prepared by the appropriate specialists and those specialists interacted directly with management in the process of compiling the Preferred Alternative. In addition, the document was extensively reviewed by District and State Office program leads and other specialists at several stages of development prior to final printing. Ron Wiley's departure occurred shortly before preparations for printing, so he was involved in all substantive analysis, interaction and composition. The position has since been filled with a professional fisheries biologist.

9-12 Refer to response 9-11.

9-13 Management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan are the revised management actions. Also, refer to response 5-10.

9-14 The wording in the management actions has been revised; however, the riparian objectives have not been changed, and riparian habitat in poor condition with the potential for water quality to reach fair or better will be excluded for 5 years or until fair is reached at which time a grazing system would be implemented. See management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan.

9-1 Information displayed in the DRMP/DEIS summary table was incomplete. This has been corrected in the summary in the PRMP/FEIS.

9-2 Streams and stream miles that met various condition classes were presented in the DRMP/DEIS, Appendix 6, Table 1, p. 6-2. Additionally, Volume I, Chapter 3-27, Table 3.10, presented a summary of streams in each condition class. For additional information on derivation of condition classes, refer to response 2-25 and Appendix 2, DRMP/DEIS.

9-3 It is acknowledged that, for some individuals, a graphical presentation of data is more effective than a tabular display. However, the most pertinent information necessary to support factual analysis and decision-making processes is provided in tabular form. With limited staff, time, and budget for document preparation, it was determined by the Planning Team Leader that the staff's efforts would be better expended on concerns of a more primary nature in the PRMP/FEIS.

DRMP/DEIS, Appendix 5, Tables 2 and 3 and Appendix 6, Table 1 have been modified to facilitate interpretation.

9-4 The BLM provided Map WQ-1/Water Quality, in Volume I of the DRMP/DEIS, to facilitate identification and location of important streams and their tributaries. To facilitate coordination of Map WQ-1 with Appendix 6, Table 1, stream names were reorganized and listed according to DEQ Nonpoint Source Assessment of drainage basins within the Three Rivers planning area.

9-5 To facilitate comparison of data in DRMP/DEIS, Appendix 6, Table 1, with allotment management summaries in the text, allotment numbers were added to allotment names in the PRMP/FEIS.

9-6 The redband trout and Malheur mottled sculpin habitat have been added to the Special Status Species Map (see Map SS-1, PRMP/FEIS). A map of the potential brush controls and seedings has been added (see Map RM-3, PRMP/FEIS). The prescribed burns, juniper burns and control-wood cutting areas have only been proposed for general areas at this time (see Appendix 3, Table 7, DRMP/DEIS). These projects will be designed on a case-by-case basis through the interdisciplinary NEPA process.

9-7 Based upon public input and interaction with the interdisciplinary team and to the extent practicable, management has established management priority criteria, and a method of reporting implementation status regularly. Refer to Appendix 1, Table 10, PRMP/FEIS.

9-8 Aquatic and riparian habitats were evaluated through water quality monitoring, benthic macroinvertebrate analysis, traditional fish population assessment, photo trend studies, color infrared photography and vegetative utilization studies. The collection, analyses and interpretation of these data provide qualitative and quantitative information concerning habitat condition and suitability

9-15 Refer to response 2-4.

9-16 Refer to response 1-11.

9-17 Refer to response 1-11.

9-18 Juniper removal will not be done within riparian areas where the trees are providing necessary shade or where they are necessary for soil stability. Each proposed juniper removal or controlled wood cutting area will be reviewed by an interdisciplinary EA team.

9-19 Refer to response 6-8.

9-20 The potential rangeland improvement projects discussed in the DRMP/DEIS (see Table 4-9 and Appendix 3, Table 7, DRMP/DEIS) are considered tentative. The detailed analyses that are requested are better suited to the project planning level where the actual project design is developed. Where appropriate, such analyses are performed in the EA for specific projects. Such projects would be subject to compliance with DEQ water quality standards.

9-21 Refer to response 1-23.

9-22 Refer to response 1-23



Executive Department

155 COTTAGE STREET NE SALEM OREGON 97310

10



PARKS AND RECREATION DEPARTMENT

525 TRADE STREET SE, SALEM, OREGON 97310 PHONE (503) 378-6305 FAX (503) 378-6447

January 30, 1990

Joshua L. Warburton
District Manager
Bureau of Land Management
Burns District Office
HC 74-12533,
Highway 20 W.
Hines, OR 97738

Subject: Draft Three Rivers
Resource Management Plan and EIS
PNRS #OR891108-012-4

Thank you for submitting your Draft Resource Management Plan and
Environmental Impact Statement for State of Oregon review and comment.

Your draft was referred to the appropriate state agencies for review.
The Parks Department and the State Historic Preservation Office have
offered the enclosed comments which should be addressed in preparation
of the Final Environmental Impact Statement. The Department of Land
Conservation and Development's comments will be forwarded as soon as
they are received.

We will expect to receive copies of the final statement as required by
Council of Environmental Quality Guidelines.

Sincerely,

INTERGOVERNMENTAL RELATIONS DIVISION

Dolores Streeter

Dolores Streeter
Clearinghouse Coordinator

Attachments

2121T

DATE: January 26, 1990

TO: State Clearinghouse

FROM: Don Eixenberger
Research Analyst

SUBJECT: Comments: Draft Three Rivers Resource Management
Plan, Proj. No. OR 891108-012-4

Recreational Assessment

10-1 The draft Three Rivers Resource Management Plan contains no
analyses of current or projected future recreational use in
the planning area. Lacking such analyses, it is difficult
to see how recreational needs, both current and future, can
be planned for and met. Provision of such data is crucial
in the assessment of management alternatives. The Pacific
Northwest Outdoor Recreation Consumption Projection Study
indicates substantial growth in a variety of activities in
southeastern Oregon. For example, by the year 2000, nature
viewing and study are projected to grow by 41%, RV camping
(42%), tent camping (42%), 4-wheel off-road driving (33%)
backpacking on trails (20%), and fishing (20%).

According to the 1988 SCORP, recreationists visiting
southeastern Oregon show diverse preferences in the setting
for their activities. For example, in terms of
Recreational Opportunity Settings, of those engaged in
hunting, 32.6% preferred a Primitive setting, 25.6% a Semi-
Primitive Setting, among campers, 7.7% preferred a
Primitive setting, 42.3% preferred a Semi-Primitive setting.
Other than potential wilderness areas the draft management
plan provides no analyses of the recreational opportunities
(in terms pertinent to the ROS) available in the area.

10-2 Similarly the plan provides no analyses of other existing
or planned for developed recreational facilities (e.g.
campsites, trails). Mention is made of Special
Recreational Management areas, but no information is
provided as to their capacities, their use, or how they
might accommodate growth in recreation.

In summary, we suggest the following be included in the
final RMP.

I.R.D.



OREGON INTERGOVERNMENTAL PROJECT REVIEW

State Clearinghouse
Intergovernmental Relations Division
155 Cottage Street N. E.
Salem, Oregon 97310
373-7652

STATE AGENCY REVIEW

Project Number OR891108-012-4 Return Date: JAN 26 1990

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to
arrange an extension at least one week prior to the return date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

- [] This project has no significant environmental impact.
[] The environmental impact is adequately described.
[X] We suggest that the following points be considered in the
preparation of a Final Environmental Impact Statement.
I 1 No comment.

REMARKS

See attached comments

Agency Parks By Don Eixenberger
IPR #5 Phone Number 378-6597

state Clearinghouse
January 26, 1990
Page 2

- 10-3 1. an assessment of current and projected recreational
use by activity type in the Three Rivers Management
Area.
10-4 2. an analyses of the diversity of recreational
opportunity offered by the area in terms of the ROS
and formation of alternatives which would offer
supplies of these opportunities commensurate with use
levels identified in the 1988 SCORP.
10-5 3. a recreational facility development plant o
accommodate projected increase in use.
10-6 4. fuller description of existing SRMA'S including their
capacity and projected use.
10-7 5. identification of existing and potential recreational
conflicts in the area and management options to
resolve them. This should include both those
conflicts with other resource uses and those among
competing recreational uses.
10-8 6. rationale and criteria for ORV limitations should also
be presented.

(Note: The State Parks and Recreation Department is
available to provide certain types of data from the SCORP
to assist in developing several of the above items.)

Wild and scenic River Designation

- 10-9 segments of three rivers were assessed for eligibility and
potential classification. All but one segment were deemed
ineligible. However, no description of the criteria and
processes used to deem these segments ineligible is given.
I This should be provided in the Final RMP.
10-10 Segment A of the Middle Fork of the Malheur/Blue Bucket
Creek was determined to be eligible. On page 4-41, it is
stated that the recommended classification is "wild" in
preferred Alternative C. Yet in the summary 0" page VI, no
stream miles are allocated for Wild and scenic Rivers under
I Alternative C. This should be corrected in the final.
10-11 I" two alternatives, recommendations for designation would
not be in effect or pursued. In other alternatives,
recommended classification are either wild or scenic.
No rationale or criteria are provided for these differences.
Our feeling is that designation and classification

questions should be independently decided and not be contingent on large land management alternatives.

Historically, once a river has been determined to be eligible, the next step is to conduct a suitability study to determine the appropriate classification. Before a decision is made regarding designation, interim management would entail protecting existing values within the potential corridor. This interim management should be the same across all land management alternatives.

Visual Resource Management

visual management areas are mapped, but again, criteria and overall management goals are not provided. The plan should illustrate how visual resource management complements recreational byways and areas. How would visual management relate to the issues raised by the section under recreational assessment?

For example, it appears that an extensive section of the Desert Trail route is to be managed as Class IV, modification of the landscape character. Is a higher class, such as Class III, partial retention, possible through this area? What would be the resource trade offs of such upgrading?

Summary

In closing, the present range and content of management alternatives provided do not offer a discernable range of options, especially with regard to recreation. Provision of more data and analyses, as suggested, would allow some focus on recreational issues and resources in the area. From these, it would be possible to reshape the scope of alternatives in ways which would allow the public some definition of choice with regard to recreational resources.

DE: jn
CLEARING.MMO

cc: Dave Talbot
Gail Achterman

- 10-1 Analysis of current and recreation use in the RA has been noted in the Proposed Plan utilizing both the Statewide Comprehensive Outdoor Recreation Plan 1988-1993 (SCORP) and the Pacific Northwest Outdoor Recreation Consumption Projection Study: Oregon Project (NORPS-ORP). However, the Recreation Opportunity Spectrum (ROS) inventory has not been completed for the RA and current visitor use data is lacking in some instances.
- 10-2 Analysis of Special Recreation Management Areas (SRMAs) and recreational facilities has been added to the Proposed Plan where information is available as well as the items noted in your summarization. Please note that Item No. 3 is an activity planning action which is more detailed in scope and is scheduled for intensive use areas after the RMP is finalized. Activity plans will be written for SRMAs (Chickahominy Reservoir and Diamond Craters) to address recreation and interpretation. Please refer to response 1-23 which discusses off-road vehicle management directives.
- 10-3 Refer to response 10-2.
- 10-4 Refer to response 10-2.
- 10-5 Refer to response 10-2.
- 10-6 Refer to response 10-2.
- 10-7 Refer to response 10-2.
- 10-8 Refer to response 10-2.
- 10-9 Refer to response 3-6, and to PRMP/FEIS, Tables 2.17, 2.18, 2.19, 2.20 and 2.21 which address your comment. The Wild and Scenic Rivers Inventory for the Three Rivers RA is available for inspection at the Burns District Office.
- 10-10 Refer to response 9-1.
- 10-11 Designation and classification of proposed Wild and Scenic Rivers will not be independently decided from land management alternatives. When displaying the range uses of natural and commodity resource values by alternatives, there are publics who see Wild and Scenic River designations having a great influence on what is allowed or restricted on river reaches and are aware that management actions of rivers designated wild, scenic or recreational can be quite different from each other. Some publics note the cumulative effects of management recommendations for Wilderness, Wild and Scenic Rivers, RNAs, ACECs and SRMAs on large land areas. Therefore, we will continue to have proposals for the Middle Fork as either Wild, Scenic or no proposal at all in the way of alternatives.
- 10-12 Interim management is an integral part of the Wild and Scenic River designation process and will be the same across all land management objectives.

I.R.D.

NOV 13



OREGON INTERGOVERNMENTAL PROJECT REVIEW

State Clearinghouse
Intergovernmental Relations Division
155 Cottage Street N. E.
Salem, Oregon 97310
373-7652

RECEIVED

NOV 09 1989

STATE AGENCY REVIEW

Project Number OR 891103-012-4 Return Date: JAN 26 1990

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the return date.

Harry Grant / Dale / Evelyn / Malheur

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

- [] This project has no significant environmental impact.
- [X] The environmental impact is adequately described.
- [] We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.
- [] ND comment.

REMARKS

These Review Input Plan Draft EIS BHM

10-16 While the RMP appears to manage some allotments for grazing or wild life ... why not set aside others for cultural resources or historic interpretation? Or whether cultural & wild life were applicable as limited set-aside?

Agency SHSO By FOR FURTHER INFORMATION PLEASE CONTACT BUREAU GILSEN AT 578-5023
IPR #5 Phone Number

- 10-13 Visual Resource Management (VRM) objectives for the four VRM classes are noted in the PRMP/FEIS glossary of terms (VRM Class I-IV). The objectives have been added to the management actions for VRM in the Proposed Plan. As yet, there are no designated back country byways in the RA, but other special management areas (Map ACEC-1) such as Malheur River-Bluebucket WSA, Stonehouse WSA, Diamond Craters ONA/ACEC, Silver Creek RNA/ACEC and Middle Fork Malheur River and Bluebucket Creek primitive management area, as well as Appendix 8, DRMP/DEIS note areas which are also given VRM classifications of I or II. It can be illustrated how VRM complements these areas by comparing maps of existing designated areas. The potential areas are often not in the protective classes, but will be when designated if the special feature(s) warrants it.
- 10-14 It is possible that the visual foreground of the Desert Trail be managed as Class III rather than Class IV where the trail traverses the latter management class. However, portions of the trail route established in the RA are within livestock seedings which contain roads, pipelines, troughs wells and tanks. These human developments were in place before the Desert Trail route was established. Proponents of the trail consider this visual environment as much a part of the hiker's experience as the less impacted high country and mountainous sections.

There is a portion of the trail route yet to be established through the RA and, when it is completed, a proposal to change VRM can be made where the trail is on Bureau-administered land and developments are not in place.
- 10-15 Reshaping the scope of alternatives would not produce a setting other than that already shown by the document. The majority of recreational opportunities will not be affected to any degree by any of the alternatives and a statement is made that the overall changes to the recreation activity are not considered to be significant (DRMP/DEIS, Chapter 4-35 through 4-41). Intensive use areas are few in this RA and the Bureau does not intend on enhancing intensive use by construction of developments other than Chickahominy, Diamond Craters and several small proposals such as viewing areas and trails. Extensive recreation and unstructured uses are the main recreational pursuits in the RA and will continue without major impacts from any of the issues brought forth in the RMP process.
- 10-16 Various opportunities to protect particular cultural resource properties and values are presented in the Proposed Plan. Traditional Native American sociocultural use areas, certain historic sites and particular prehistoric sites are proposed for interpretation or conservation.



11

February 10, 1990

Mr. Craig M. Hansen
Area Manager, Three Rivers Resource Area
BLM
HC 74-12533 Hwy. 20 West
Hines, Oregon 97738

Dear Mr. Hansen:

The Audubon Society of Portland (PAS) is an organization of some 6,000 members who are interested in wildlife and protection of natural ecosystems and wildlife habitat. Many of our members use the Three Rivers Area for recreation and wildlife viewing. The Conservation Committee of PAS speaks for the Society on conservation issues. We have commented on BLM management plans and recommendations for a number of years, and are pleased to have an opportunity to make some suggestions for the Three Rivers Draft RMP.

We've organized these comments as follows:

- I. General comments on organization and adequacy of the draft.
- II. Specific page by page comments, suggestions, and corrections.
- III. Comments on the Preferred Alternative as described in Table 2.1.

I. General comments on the draft.

We appreciate the level of detail and specificity you have written. We are pleased that Burns management is making this level of commitment to planning, and that you have written an RMP which you intend to be a meaningful document for its life. We also want to compliment you on Table 2.1. It is easy to use and will continue to be useful for following implementation and tiered planning.

The draft contains a number of management objectives and actions in the preferred alternative that we support: for example, positive actions to protect special status species and designation of some new ACECs/RNAs. We have three major suggestions for improvement, however.

- 11-1 a. We propose that you strengthen the document as an EIS. The analysis of potential environmental impacts is, at times, incomplete and superficial. It won't be adequate for tiering, and your future EA's will come under more criticism as a result. Areas that particularly concerned us will be mentioned in the page-by-page suggestions below.

Page 2

- 11-2 b. You have an opportunity, not taken in the Draft, to strengthen your wildlife and recreation programs in the Burns District. More and more people use the public lands for values other than traditional commodities, and your program should grow and change accordingly. We checked with the Malheur National Wildlife Refuge and found that they recorded 35,000 visits during 1988. More than 32,000 visits have been recorded each year for the last 15. With the exception of perturbations from the flooding, the number of visitors grows each year. The Malheur Field station reports that they hosted 8,500 visitor nights during 1989. These people are coming to see birds and other wildlife, and they are looking on BLM lands as well as on the refuge. The RMP doesn't mention birding and wildlife viewing as a recreation use, or factor in its value to the local economy.

- 11-3 c. The Plan proposes extensive range developments, and says that the projects are needed in order to meet both your objectives for natural resource improvement and your proposed number of AUMs. If the Conflict between AUMs and other objectives can only be resolved by such extensive development, the number of AUMs exceed the carrying capacity of the land.

- 11-3 Some of the range developments are no longer acceptable to much of the public (e.g., seedings to nonnative species, pipelines to ungrazed grasslands), and others won't be funded. If the range developments don't proceed, what assurance does the Plan offer that natural resource objectives will be met? We'd like to see a stronger, more convincing commitment to restoring degraded riparian systems, wetlands, and grasslands.

We believe that the Plan needs to be more realistic about the livestock grazing carrying capacity of the land in both the short and long term. The difference between 50,000 AUMs in Alternative A and 162,000 AUMs in Alternative C is too large.

II. Specific page-by-page comments.

- 11-4 iii. Summary. Some of the data in Alternative D did not seem consistent with this being the No Change alternative. Water Quality (Stream miles) improving, for example, seems inconsistent with miles deteriorating on Table 3.1. We couldn't trace the initial stocking levels to other numbers provided in the Draft. Is the improvement in Livestock forage condition consistent with trend? Aquatic habitat condition (stream miles) doesn't tie to Table 3.1. etc. In the Alt. C, is Wild and Scenic River Designation to be 0 as in the Summary or 5.4 as in Table 2.1? We didn't check all of the numbers, but these few errors suggest that there may be others.

p. 1-5. Grasshoppers. APHIS does an EIS for their program, and area-specific EA's are done by the BLM for the grasshopper

Page 3

- 11-5 control program, but no one does an analysis of how grazing programs affect grasshoppers. There is a well-documented relationship between grasshopper infestations and bare ground. We believe that this EIS should consider the impact of the grazing program on the likelihood of grasshopper control problems.

p. 1-8. Management Objectives. The objectives seem reasonable, but we question whether the natural resource objectives set in the Plan can be met without a long term reduction in AUMs. We support the natural resource objectives, and ask that AUMs be reduced.

p. 2-3. Criteria. We are pleased to see your criteria for vegetative diversity and water quality for the preferred alternative. Although wildlife diversity is closely tied to vegetative diversity, it is also a useful criterion. Perhaps the criterion could be more broadly stated as ecosystem diversity.

We are also pleased to see that you want to provide for public enjoyment of a broad spectrum of recreation opportunities on BLM land. See the birding/wildlife viewing point above.

- 11-6 p. 2-3. Monitoring. Monitoring is extremely important. We are sorry that you did not provide a draft monitoring plan in the Draft so that we could comment. Five years is too long an interval for monitoring in an RMP with a life of possibly no more than 10 years. We suggest that budgeting, available funding, and how money is spent be an important part of monitoring the RMP and that the Area Manager review progress on management objectives and spending every two years.

- 11-7 p. 3-2. Ground water quality. Although data are not now available, the RMP and EIS are not complete without management objectives and analysis dealing with the issue. We suggest that the final propose a plan for gathering data in cooperation with other appropriate agencies. Similarly, data on ground water quantity should be gathered as well.

- 11-8 You should also start a program to measure and monitor surface water quantity at all seasons over time. We know that livestock grazing changes the level of water tables and rate of run off. An appropriate measure of improved rangeland condition would be data showing a trend toward year round flows on streams now intermittent and greater flows in the summer and fall for larger streams.

- 11-9 p. 3-3. We'd like to see you quantify the data on Map S-2 and monitor progress toward reducing soil erosion.

Page 4

- 11-10 p. 3-16. Rangeland development projects. Interesting data would be a five-year report on range projects completed, cost, and funding source. What percentage of Range Betterment Funds have been spent for riparian improvement and wildlife habitat enhancement? What percentage of these funds do you intend to spend for these uses during the life of the RMP?

Regarding maintenance, from our point of view all enclosures and riparian zone fences are livestock management fences. Why else would they be needed? Maintenance has been a serious problem, and we'd like to see more resources dedicated to maintaining these kinds of projects once the investment has been made, and stronger enforcement of maintenance agreements.

A useful table would add the proposed projects in the preferred alternative to the existing projects in Appendix 3, Table 5. If the names mean the same thing, you propose to increase seedings by 37%, miles of pipeline by 56%, and acres of brush control by 400%. Our organization values the public land in a natural condition: you cause us a lot of grief with this proposal. The EIS should address cumulative impacts.

- 11-11 p. 3-17. Wild horses. Wild horses and burros are not natural, and management that increases their numbers does not belong in Alternative A. Alternative A should settle resource conflicts between wild horses and burros and native wildlife in favor of native wildlife and ecosystems. We would prefer that Alternative C minimize numbers of wild horses and burros where there are conflicts with native ecosystems.

p. 3-21. We appreciate your support for the Oregon Natural Heritage Plan.

- 11-12 p. 3-25. Special status species. We are pleased that you have incorporated concern for these species into management, but we would like to see more detail on how these species are doing in the Three Rivers Area. Ferruginous hawk and Western sage grouse are two species that need more attention in your management plans. Map SS-1 shows LeKS and Ferruginous nests. Is your inventory complete? What data do you need to collect? We'd like to see protection for these species strengthened in the Preferred Alternative.

- 11-13 p. 3-26. Raptor habitat. An inventory of raptor nests and habitat in the Three Rivers Area would be a useful goal in the RMP. You have proposed certain management actions around raptor nests. Good data would enhance your management and allow better monitoring.

- 11-14 p. 3-34. Nongame species. Oregon Department of Fish and Wildlife has data available on which species would be expected in the Three Rivers Area (The Nongame Wildlife Plan). The U.S. Fish and Wildlife Service has been monitoring trends in bird populations (The Breeding Bird Survey: Its First Fifteen Years, 1965-1979, Resource Publication 157). These documents would give you guidance on likely habitat problems and population trends. We would urge you to incorporate their data into the final RMP and to address the needs of nongame species in management.
- We believe that you should conduct an inventory of these species on the Three Rivers Area so that you can monitor the effects of management on them. Could the Portland Audubon Society be of help in planning how data might be collected?
- 11-15 p. 3-34. Recreation. The text here and map on p. 3-39 should include birding and wildlife viewing as the major recreation use that it is in the Three Rivers. (See 1. above.) Please call on us for further information if you need help with identifying specific areas.
- 11-16 p. 3-48. The text in the appendix did not support the table data of "L" for "Vulnerable to Adverse Change" for Squaw Lake and Saddle Butte. Livestock or wild horse grazing may threaten both, since other criteria for designation seem to have been met, we request that you reconsider recommending these two sites. You would also support your designating Hatt Butte as an RNA because ungrazed native range is so rare. We do commend you for including six new areas as RNA's or ACEC's and prohibiting livestock grazing on them. We would like to see the larger area designated for Foster Flat.
- 11-17 p. 3-49. We suggest that all RNA's, ACEC's, sage grouse leks, and WSA's be withdrawn from mineral entry and ORV use.
- 11-18 Because Burns District has not yet experienced the extensive claim staking for gold happening in Vale, we request that you withdraw from mineral entry any areas where special cultural or natural resources would be destroyed by mining. Also, please refer to Rick Parrish's more specific letter on our behalf suggesting appropriate analyses for the gold mining potential.
- 11-19 p. 3-59. Map M-2 is hard to use because private land looks like moderate potential. Can you show it another way?
- p. 3-67. Economic conditions. Again, birding is ignored or its contribution to the economy. The Burns Chamber of Commerce has found otherwise with its waterfowl festival!

- p. 4-2. Assumptions. Assumptions 1, 2, and 4 have not been true in the past. Because they have not, we would prefer that the RMP include a buffer for lack of funding, maintenance, and monitoring by reducing AUM's to a manageable level without the extraordinary measures proposed in this Plan. How will the Plan be affected if these assumptions don't hold true? What are your management alternatives?
- 11-21 p. 4-7. Soils. Alternatives A, B, and C should not be combined for an EIS. Alternative C, with 100,000 more AUMs, crested wheat, pipelines extending grazing further from water, etc. will likely cause significantly more soil erosion than would Alternative A.
- 11-22 p. 4-7. Forestlands. Alternative A, last sentence. "The significance of this reduction would be very high" ... on what?
- 11-23 p. 4-8. Livestock grazing. Alternative A language should be revised to be more scientifically based. The choice of adverse effects suggests that the evaluation of this alternative was not impartial. Changes in condition class are not so slow compared to the 140+ years it has taken us to get the range into the poor shape it is in. We disagree that the "only objective that would be met would be to maintain the good condition range."
- 11-24 In other parts of the Plan, you discuss that Alternative A is beneficial for wildlife, recreation, soils, water quality, water quantity, special status species, cultural resources, etc.
- 11-25 Whose objective is it to provide approximately 160,000 AUMs for livestock? If that is an assumed, unstated objective in the RMP, we protest. This document is supposed to analyze the environmental impacts and reach an independent conclusion about how many AUMs the land can support.
- 11-26 p. 4-9. Table 4.4 needs a more complete heading for condition class. This is Livestock Forage Condition Class.
- 11-27 p. 4-13. What type of brush control do you propose in Alternative C? 61,275 acres is a lot! This document does not adequately assess the environmental impacts of either the brush control or the seeding. Both kinds of actions influence wildlife (including winter browse and cover for all animals, nesting and feeding habitat for nongame birds, herptiles, small mammals, etc.), water tables, soil erosion, etc. No analysis is provided if you are suggesting use of any chemicals.
- 11-28 Are you proposing to alter a total of 61,275 acres or 107,000 acres? (Seeding included in brush control or separately stated?)

- 11-29 Many species of wildlife are dependent on vegetative diversity and shrub browse or cover. The Portland Audubon Society is strongly opposed to seeding with nonnative species and to chemical means of brush control.
- Much of the RMP text and our conversations with Three Rivers employees suggest that this Plan is a balanced approach to resource management. Table 4-9 documents the lack of balance. Alternative C is far closer to the alternatives emphasizing commodity production than it is to those emphasizing natural values, while the draft may represent an improvement over historical management practices, in our opinion, it does not yet approach a balanced multiple use management scheme required in FLPMA.
- 11-30 p. 4-19. Vegetation. Alternatives A, B, and C will certainly not have the same effect on vegetation. This portion of the environmental analysis is not adequate.
- 11-31 p. 4-21. Big Game Habitat. Are different areas proposed for seeding between Alternatives B and C? Why are 12,500 seeded acres unsatisfactory in Alternative B and 5,500 acres unsatisfactory in Alternative C.
- 11-32 p. 4-23. Raptors. The document understates the environmental impact on raptors from seeding crested wheat. ODF & W's Nongame Wildlife Plan documents that virtually no native species nest and feed on crested wheat grass. This comment applies to the nongame paragraph and table on page 4-30 and 4-31 as well. Table 4.21 suggests a moderately positive effect on bunchgrass dependent species from seeding crested wheat and a moderately negative effect on sagebrush dependent species. In extensive literature searches on this subject, we have found no literature that supports this conclusion.
- 11-33 p. 4-26. Riparian habitat. Again, the document groups Alternatives with very different effects on riparian habitat. Although we have seen evidence that riparian systems can improve with grazing systems, streams with no grazing improve more. Grazed streams are never like ungrazed streams for wildlife and fish habitat or water quality.
- 11-34 p. 4-28. Wetland/Playa/Meadow Habitat. Alternatives A, B, and C should not be grouped. You describe differences in the text. Each alternative should be separately analyzed. Why will playa habitat be grazed prior to July 31? I recognize that you are trying to provide forbs for sage grouse, but doesn't grazing then conflict with nesting birds of other species? Playas should not be grazed at all.

- 11-35 p. 4-30. Special status species. Management proposed in Alternative C is not adequate to protect sage grouse. Grazing should be prohibited in meadows where chicks forage. Brush control and crested wheat destroy sage grouse habitat.
- 11-36 p. 4-34. We support the occasional use of prescribed fire, and allowing natural fires to burn where possible, but fires are not adequate justification for seeding crested wheat. The Agricultural Research Service in Reno is reporting good success with getting Indian rice grass to germinate if seeding is necessary, but seeding should be a last resort. Erosion is a poor excuse for seeding crested wheat; there is usually more bare ground between crested wheat plants after a few years grazing than there is with native, even degraded range.
- 11-37 p. 4-68. Economic Conditions. This analysis is incomplete because it doesn't consider the steadily increasing visits by people for wildlife viewing and nonmotorized recreation. If livestock grazing were decreased, fishing, hunting, wildlife viewing, and recreation would probably increase. The economy of rural counties is changing, and the RMP ignores looking at trends in the data.
- III. Comments on the Preferred Alternative.
- 11-38 I. II above, we have made some comments about actions we would like to see added to or removed from the preferred alternative, Alternative C. We've used Table 2.1 to organize the following suggestions. The Table, a useful addition to the RMP as it is, would be even more useful if you would add a Table of Contents so that sections could be easily found.
- Water Quality. 10. Burned areas within one mile of perennial water may well successfully rehabilitate themselves. We prefer that you don't alter native vegetation unless unusual circumstances warrant action.
- Forestry and Woodlands. 5. We are pleased to see that you will exclude forest management activities near raptor nests and retain nest trees and provide perch trees.
- Juniper--1. Although we agree that some stands of juniper should be removed or thinned to increase diversity, more species of birds use juniper/sage communities for nesting and foraging than any other eastern Oregon community type. Please assess the value of stands for wildlife habitat before treatment.

Grazing. 2. We support your reducing grazing in the short term to improve riparian, wetland, and range condition. We think the reduction should be greater and permanent.

3. We do not support range projects which change native vegetation into nonnative vegetation nor water development projects which alter natural drainages or allow livestock to move to new areas.

4. We support your removing livestock from these areas.

Your footnote. We are pleased that you are committed to riparian and wetland improvement even if funding isn't available for fences.

Special status species. We are pleased to see that you will actively work on Recovery Plans and HMPs.

Wetland, reservoir, and meadow habitat. 1. Table 2.1 says you will complete implementation of the Wetlands HMP by 1992. The text, p. 4-28, says 1997. We hope it is 1992.

11-40 Playas--we are pleased to see the plan for collecting data on 10 playa lakebeds. We'd like to see your study and implementation schedule move up in time.

11-41 Riparian--We would prefer you follow Alternative A, but if C is the choice, 50% utilization of herbaceous vegetation in the riparian area seems high. Can you get adequate recovery in riparian systems with 50%? We're pleased that your target is no more than 30% in the uplands.

Raptors. 3. Pesticides shouldn't be used for rodent control on public lands anyway, but many raptors hunt much further than two miles from nests.

11-42 Recreation. 2. Do not maximize the development of ORVs. That is a very harmful use of the public lands. There are more than 35,000 visitors per year, probably mostly from out-of-county, to see birds and other wildlife. Encouraging them is far less destructive to other resources.

11-43 ACEC's. We are pleased that you plan to retain existing designations and name new RNA's and ACEC's. We also support your designating Hatt Butte and Squaw Lake as RNA's and Saddle Butte as an ACEC. Increase the size of the Foster Flat RNA/ACEC.

11-1 The DRMP/DEIS is designed to give comprehensive management direction on an areawide basis. Detailed analyses of specific actions are performed through EAs and are required to be in conformance with the land use plan. As such, the linkage between future on-the-ground projects and the RMP will be through the analysis of the conformance of these projects with the management objectives, directives and resource or land use allocations made in the RMP.

11-2 Your comment on watchable wildlife is a valid one and a management directive will be developed to address the opportunities available on Bureau-administered lands to enhance this use of wildlife resources. A publication, Oregon Wildlife Viewing Guide, Oregon Wildlife, 1987, shows areas in the RA and a new BLM publication for 1991 will also highlight areas to view wildlife.

11-3 Refer to responses 5-16 and 5-17.

11-4 Refer to response 9-1.

11-5 As range conditions improve through implementation of grazing systems, bare ground should decrease through improved plant vigor, increased ground cover and litter deposition. As these components improve, the likelihood of grasshopper infestations is reduced. The Bureau has no control over the climate which also plays a large part in grasshopper infestations.

11-6 Refer to response 5-17.

11-7 The BLM recognizes the importance of collection and interpretation of data on ground water; however, under the Clean Water Act and State Water Law, DEQ has administrative responsibility for development and implementation of a ground water monitoring plan. Though no plan presently exists for Harney County, the BLM would cooperate with DEQ and other appropriate agencies on plan development.

11-8 Vegetation composition, distribution and abundance have immediate effects on rates of runoff, sediment deposition, instream flows and level of ground water tables. Though the BLM recognizes the importance of monitoring surface water quantity during all seasons, our fiscal and manpower limitations prohibit this type of activity.

11-9 The soil surface factor method (BLM Form 7310-12), which was used to determine erosion condition classes, assigns a numerical rating to an area. Erosion indicators such as soil movement, rills, gullies, surface litter, pedestalling and surface rock are scored depending on visual evidence and the scores summed to produce the numerical rating. These ratings do not quantify the amount of soil loss in terms of tons/acre, and at the present time there is no information on the quantity of soil lost from the planning area. However, the ratings do provide a general guide as to the severity of erosion. The numerical breakdown for erosion condition classes are stable (0-20), slight (21-40), moderate (41-60), critical (61-80) and severe (81-100). Addition of this numerical breakdown to the RMP would provide no useful information beyond what is already furnished in the document.

Please feel free to telephone if you have questions about our comments. We appreciate the amount of time you have put into this draft, and hope that our comments help you with your goal of improving the final RMP.

Sincerely,



Linda S. Craig
for the Conservation Committee
Audubon Society of Portland

The soils management objectives (DRMP/DEIS Table 2.1-6) have been expanded to provide a basis from which progress can be evaluated. The objectives target accelerated (human influenced) erosion as opposed to total (geologic and human) erosion. Refer to the Proposed Plan for a detailed monitoring program. Also, see "Monitoring The Three Rivers Resource Management Plan" on page 2-3 of the DRMP/DEIS.

11-10 Bureau directives have required that 30 percent of Range Betterment Funds (\$100) be spent on riparian projects. The Three Rivers RA has been in compliance with this requirement. This directive has not been rescinded, therefore, the RMP area will continue to spend at least 30 percent of the Range Betterment Funds allotted to the RA by the District prioritization process on riparian improvement projects.

Also, see RPS Updates (available for inspection at the Burns District Office).

11-11 Section 1 of the Wild and Free-Roaming Horse and Burro Act states ". . . wild free-roaming horses and burros . . . are to be considered in the area where presently found, as an integral part of the natural system of the public lands." Furthermore, there are no proposed increases under any alternative, in either numbers or size of area in which horses will be managed. No alternative on DRMP/DEIS Table 2.1-12 and 13 showed or proposed an increase in wild horse numbers. The numbers shown on Table 3.6 have not been changed from previous planning documents.

Also, refer to response 2-6.

11-12 Inventory data are incomplete on sage grouse strutting ground locations, sage grouse brood rearing habitat, sage grouse wintering area locations, ferruginous hawk nest sites and ferruginous hawk nest success. Inventory of new areas and monitoring of existing habitat are ongoing. As sites are discovered, they will be managed under the management actions described for the particular type of habitat. Also, refer to response 3-9.

11-13 Ongoing raptor inventory will continue. Also, all types of projects are subject to the NEPA process. During this process, on-the-ground site-specific investigations are conducted. In the past, several nest sites have been discovered during this process and these investigations will continue.

11-14 Refer to response 1-18. Also, monitoring of habitats will require an initial inventory as the monitoring plan is being implemented. Anyone interested in the wildlife habitat program is encouraged to offer assistance in the formulation of data collection and monitoring methods.

11-15 The text will be changed to include wildlife viewing as a recreation activity. Bird and other wildlife watching in the Three Rivers RA is a major recreation use. However, past inventories of which we are aware indicate that the major concentrations of birds and animals viewed by visitors to the area are in Harney and Blitzen Valleys on

lands administered by the U.S. Fish and Wildlife Service (Malheur Refuge) and the surrounding private lands.

There is viewing of big game (specifically deer and antelope) and nongame birds and animals in various widespread areas during certain seasons of the year, on Bureau-administered lands. Areas of bird and animal habitats are made known to the public through various means (such as brochures, talking with groups interested in certain kinds of fauna and participating in locally sponsored activities promoting visitor interest in watchable wildlife). We will continue to promote wildlife viewing on Bureau lands where it is environmentally and economically feasible.

11-16 The interdisciplinary team analyzed the text and other information to conclude that the "L" as shown in Table 3.16, DRMP/DEIS is appropriate. Saddle Butte did not meet relevance criteria, such that importance criteria is not an issue. Please note there are only five new areas being designated as ACECs. See Appendix 1, Table 16 in the Proposed Plan for use restrictions in these areas. The Poster Flat RNA/ACEC has been expanded to 2,690 acres. Also, refer to responses 1-26 and 3-1.

11-17 Regulations are in effect which provide greater consideration to RNAs, ACECs and WSAs when mineral activities are proposed than such areas would otherwise have as public lands. The cost to automatically withdraw such areas from mineral entry, when valid existing rights or claims are present, would be prohibitive. Sage grouse can be afforded consideration for protection from potentially impactful agents by means of mitigating measures that minimize any detrimental effects upon their habitat requirements.

ORV use has been "limited" to designated roads and trails within existing RNAs and WSAs already. ACECs and such resources as sage grouse are considered on a case-by-case basis given the specific requirements of the resource at a given site.

11-18 It is not Bureau policy to withdraw areas where special values may be protected through surface management such as special stipulations or through mitigation in mining plans of operation.

11-19 Map M-2 has been revised to reflect updated information; however, the geologic information presented is general in nature and no attempt has been made to delineate different levels of potential by landownership. All lands within a given potential class on the map are projected to have that potential, regardless of ownership.

11-20 Refer to response 2-36.

11-21 The statement that Alternative C, with a significant increase in AUMs, seedings and pipelines will cause more erosion compared with Alternative A is correct. However, the soil section was set up to anticipate positive and negative trends when compared with the current management scenario. The environmental consequences discussion for Alternatives A, B and C were combined for soils on p.

4-7, because all three should have a positive overall effect compared with current management on the planning area. It would be impossible to quantify actual differences in the rates of soil loss between scenarios using available data for the area.

11-22 The "very high" term refers to the 45 percent reduction in the annual allowable sale volume (from 621 Mbf/year to 341 Mbf/year). Therefore, the significance to the existing program is very high, reduced by almost one-half.

11-23 Refer to p. 4-8 of the DRMP/DEIS for a discussion of the impacts on livestock grazing. As the life of this plan is 10 years, changes taking longer than this are termed very slow. In this section, range condition is the only livestock grazing objective that would be met.

11-24 Refer to response 11-23.

11-25 The citation of an objective to provide 160,000 AUMs (DRMP/DEIS, p. 4.8) was in error. AUM levels were removed from livestock grazing objectives to allow the carrying capacity of the land to determine stocking levels.

11-26 This has been corrected in the PRMP/FEIS.

11-27 The method of brush control to be used will be determined by the objective of the project. There are a variety of methods which can be applied. The acres of potential brush control are approximately 5.6 percent of the big sagebrush type in the RA. A site-specific EA will be prepared for each brush control project to assess impacts. At this time, use of chemicals is prohibited on public lands except for noxious weed control. The BLM has prepared an EIS on vegetation treatment which addresses the herbicide application. Until that EIS is finalized and a Record of Decision approved for BLM-administered lands in Oregon, chemical application is not a viable option as a method of brush control.

See DRMP/DEIS Table 2.1 pp. 5, 15, 17, 21, 23 and 29; and Appendix 3, Table 7, p. 3-177, for management directives and standard design features regarding brush control.

11-28 A total of 61,275 acres are listed for potential brush control. This figure includes seeded preparation for seeding, as well as areas for potential brush control only. Seeding acres are included in brush control acres. This overlap in acreage will be clarified in the PRMP/FEIS.

11-29 Refer to responses 1-11 and 11-27.

11-30 Alternatives A, B and C do all have the same overall, long-term impacts on the vegetation. Specifically, a positive effect on overall vegetative diversity in the RA. However, the analysis of the impacts of Alternatives A, B and C on vegetation did not adequately differentiate among them. The objective and management actions for

vegetation have been revised. See Vegetation in the Proposed Plan. The Environmental Consequences section has also been revised, see Chapter 3, Vegetation. See also response 1-13.

11-31 Different areas are proposed for seeding in Alternatives B and C.

11-32 The predicted impacts on p. 4-23 of the DRMP/DEIS were not intended to represent individual actions but implementation of the entire plan. Littlefield et al. (1984) concluded that while abundance and biomass may be highest in good condition range, the increased cover may contribute to lessened availability of small mammals to avian predators. Also, refer to response 2-74.

11-33 Refer to response 3-13.

11-34 Refer to response 1-19.

11-35 Refer to response 3-9.

11-36 Refer to responses 1-11 and 6-8.

11-37 A discussion of recreation growth has been added, see Chapter 3, Recreation, PRMP/FEIS.

Table of Contents for Table 2.1

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11-39 Refer to response 9-18.

11-40 The basis for this timeframe is the Burns District Wetlands HMP implementation schedule. Refer to response 7-12.

11-41 See management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan. Also, the utilization levels are independent, meaning if one is reached the livestock are removed. Also, see response 2-7.

11-42 Refer to response 1-23.

11-43 Refer to responses 1-26, 3-1 and 11-16.

District Manager
BLM Burns District Office
HC 74-12533 Hwy. 20 West
Hines, Oregon 97738

Dear Sir:

We would like to express our concerns with the Draft Three Rivers Resource Management Plan and Environmental Impact Statement.

Presently, most of the range land is in only fair to poor condition and will remain so under all alternatives and your preferred alternative (C) is an ecological disaster. The immediate goal should be to return all lands to excellent condition. The construction of fences, pipelines, troughs, wells, reservoirs and the planting of habitat sterile crested wheatgrass at taxpayer expense, when grazing fees are dropping is unacceptable.

Nearly all riparian and aquatic habitat is presently in fair to poor condition. Returning and maintaining all water quality to an excellent condition should be an immediate goal. Your Alternative C provides only token protection or restoration.

- 12-1 Your draft does not identify the extent of remaining ancient forests and does not explain how many miles of logging roads it expects to construct.
- 12-2 Bighorn sheep habitat protection methods and impacts are not addressed. Deer and elk receive a token (3%) forage allocation while the balance goes to cattle. This is unacceptable.
- 12-3 The following are our recommendations:
 - 1) Develop an alternative to restore and maintain range land in excellent, natural condition. Cattle grazing should be reduced or eliminated where appropriate.
 - 2) At a minimum adopt Alternative A (the Natural Values alternative) until such time as an alternative is developed which allows for full range land, riparian and stream recovery. The Alternative A would at least allow for token recovery of these values.
 - 3) Water quality, riparian and aquatic habitat must be improved and maintained in excellent condition.
 - 4) All ancient forest must be identified and protected.
 - 5) Include all costs of construction of new roads and other range land projects under the various alternatives along with their environmental impacts.
 - 6) Eliminate all crested wheatgrass seeding project.
 - 7) Bighorn sheep habitat protection and impacts must be addressed in the plan and the forage allocations within natural bighorn range must go to bighorn sheep entirely (no other grazing).
 - 8) Designate the majority of the South Fork and Middle Fork Malheur Rivers, all of Bluebucket Creek, and all of the Silvies River as Wild and Scenic.
 - 9) Wildlife winter range forage allocations should have priority over livestock allocations.

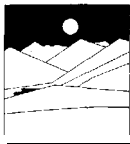
Yours truly
Robert Jensen
Carol Jensen
Robert Jensen
Carol Jensen

- 12-1 In accordance with provisions of the Bureau Manual (Section 1622.21), the Proposed Plan provides for the protection of 482 acres of selected Ponderosa Pine Old Growth Forests within the RA. Maps F-3, 4, 5 and 6 display the locations of the forest tracts; Tables 2.4, 2.9 and 2.10 address various aspects of Ponderosa Pine Old Growth Forest management.

The Draft does not address the construction of logging roads in miles. The forested areas within this RA have all previously been logged and new road construction would be very minimal. Historically, only short spur roads or road extensions have been necessary to accomplish timber management activities. An average of approximately 30 stations (3000 feet) per year has been necessary over the past 8 years and new construction is expected to be the same or less for future activities. Costs have averaged \$76 per station (\$2,280 per year) in the past and this cost is expected to rise in correlation with future inflation rates. This increased cost will, however, be offset due to expected reduction in new road construction.
- 12-2 Refer to responses 2-10 and 2-78.
- 12-3 Refer to response 1-13.
- 12-4 The alternatives presented in the Draft were developed with full public participation and represent a comprehensive and reasonably achievable range of options for meeting the Bureau's full range of multiple-use management responsibilities in the Three Rivers RA. It is not anticipated that additional alternatives will be developed, however, the concerns expressed were considered by management in the development of the Proposed RMP.
- 12-5 Refer to response 2-44.
- 12-6 Refer to response 12-1.
- 12-7 See PRMP/FEIS, Appendix 1, Table 13 for project costs.

Site-specific NEPA documentation is prepared for each project to assess impacts.

See PRMP/FEIS, Appendix 1, Table 12 for Standard Design Features.
- 12-8 Refer to response 1-11.
- 12-9 Refer to response 2-78.
- 12-10 Refer to responses 3-6.
- 12-11 Refer to responses 2-6 and 2-10.



OREGON NATURAL RESOURCES COUNCIL
NORTHWEST FIELD OFFICE
1005 1/2 NW Newport
Bend, Oregon 97701

Joshua Warburton
District Manager
Burns District BLM
HC 74-12533 Hwy 20 West
Hines, OR 97738

1/31/90

Dear Mr. Warburton:

The Oregon Natural Resources Council (ONRC) wishes to present comments on the Three Rivers Resource Management Plan Draft Environmental Impact Statement (TRDEIS).

ONRC opposes the preferred Alternative C and recommends Alternative A with modifications.

Special Management Areas

- 13-1 The TRDEIS recommends few areas for special protection status. ONRC recommends:
 - Maiheur River and Stonehouse WSA's be wilderness.
 - Diamond Craters inventoried roadless areas be wilderness.
- 13-2 Sage proposal areas: Crow Camp Hills, Behu, and Stinking Water Country be backcountry areas (no motorized use, no grazing or restricted grazing, no domestic seeding development, no water developments for domestics) Otis Mountain-Birch Creek area be backcountry. Emigrant Creek and Silvies River Canyon be backcountry. The BLM should consider a backcountry allocation for areas such as the ones above. Backcountry would provide protection for specific areas without wilderness designation.

Mining

- 13-3 The TRDEIS should withdraw all remaining streamsidess, wetlands, springs, aspen and scenic areas from all forms of mineral entry until a comprehensive cumulative impacts EIS on mining is done.

Geothermal

- 13-4 The TRDEIS should withdraw all lands from geothermal entry and issue no leases until a comprehensive cumulative impacts EIS is done.

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- 13-5 **Forest**
No lands should be allocated to timber management or logged until a comprehensive old growth and native forest inventory is done and an old growth forest system allocation is designated, for example old growth and native forests in the Otis Mountain-Birch Creek, Emigrant Creek, and Hay Creek areas. What are the impacts, extent, and costs of planned logging roads?
- 13-6 **Fisheries, Water Quality and Riparian**
Fisheries, concerns including Red Band Trout habitat, are not detailed nor are full impacts disclosed. Current riparian and water quality conditions are mostly "fair to poor" and the TRDEIS does not improve these resources enough. After forty years of "management" with only slight improvements, the management condition goal of fisheries, water quality and riparian must be "good-excellent" within ten years and then all "excellent" after ten years. We do not care what methods of riparian, wetland, and watershed improvements are used, but "excellent" must be the on the ground result of the TRDEIS. A full inventory of aquatic habitat and a detailed enhancement and restoration plan of aquatic habitats, including time and costs schedules should be done in the TRDEIS.
- 13-7
- 13-8
- 13-9
- 13-10 **Crested Wheat Seedings and Range Developments**
All crested wheat seedings should be eliminated and native species used for forage and wildlife projects, except for isolated catastrophic fire cases where severe erosion will occur and native species will not do the job (as generally recommended by Oregon BLM State Director on January 23, 1990). Range developments such as pipelines and fences should be reduced to a minimum so as not to induce cattle into new areas that were tightly grazed in the past. Benefit/cost projections for all range development proposals should be provided.
- 13-11
- 13-12 **Wildlife**
The TRDEIS does not adequately address wildlife resources. Bighorn sheep and antelope should have specific management plans for habitat protection including full and detailed impacts of the proposed action. Bighorn sheep reintroduction plans if any should be analyzed. In bighorn sheep range all forage should be allocated to wildlife. The forage allocation for big game (deer and elk) appears to be only 3% of total forage and yet the TRDEIS claims dramatic improvements in big game habitat condition. What defines "satisfactory" and "unsatisfactory" habitat condition and what detailed management actions will significantly improve big game habitat? Winter range forage should be allocated to wildlife first and then cattle.
- 13-13
- 13-14

- 13-15 **Grazing**
The TRDEIS only shows an immediate 10,600 AUM decrease and then projects increased AUM's in the future. Our experience on the ground, indicates that overgrazing has occurred in many areas and cattle removal in some areas is the only way to improve 988,000 acres of "fair-poor" condition lands. Simple management method changes will not be enough in some areas and it appears unrealistic to not significantly decrease cattle AUM's and still show significant improvements in other resource values such as riparian, wetland, water quality, watershed and wildlife habitat.
- 13-16 **Wild and Scenic Rivers**
The TRDEIS is inadequate in analysis for wild and scenic rivers. The Wild recommendation for the middle fork Malheur River is commendable. Thank you. The following rivers should also be recommended for designation:
Middle Fork Malheur River - segment C
Blue Bucket Creek
South Fork Malheur River
Silvies River Segment A
Emigrant and Hay Creeks should be studied
- 13-17 **ACEC**
We commend the BLM for their ACEC proposals and would like to recommend some changes.
Foster Flat be increased to 1,870 acres
Biscuitroot be increased to 5,260 acres
Obsidian be included at 16,900 acres
Kiger Mustang area be retained as ACEC, but be designated for protection of natural values rather than wild horse values.
- 13-18 **Maps and Allocations**
One comprehensive and detailed map (1/2" scale) should be provided to show all the land allocations together for easy comparison.
- Conclusion**
Oregon Natural Resources Council (ONRC) looks forward to a revised and complete TRDEIS with much more detail and disclosure of impacts.
Thanks for the opportunity to comment.
- Sincerely,
Tim Lillebo
Tim Lillebo
ONRC Eastern Oregon Field Office
- 13-1 The Final Oregon Wilderness EIS containing Bureau recommendations for WSAs has been completed. Therefore, the RMP does not consider wilderness designations or management of the areas as wilderness, other than LMP, to protect and preserve their natural condition, as these considerations are outside the scope of this plan.
- 13-2 The Bureau has no management category for backcountry or unroaded areas in its planning system. Backcountry allocations are not consistent with planning guidance and thus there is no umbrella of protection under a single backcountry designation or management direction. Rather, backcountry becomes established and enhanced by other resource activity recommendations such as off-road vehicle closures, visual resource management classes, mining withdrawals and other actions to provide protection of natural values. Also, refer to response 13-1.
- 13-3 Refer to response 5-18.
- 13-4 Based on the DEIS analysis, there is no reason to withdraw all lands from geothermal entry and leasing. Appendix 9 (Tables 4, 6, 8, 10, 11 and 12) addresses geothermal leasing stipulations and development. No cumulative impacts were forecast for up to 10 scattered temperature gradient holes with no development projected to occur during the life of the plan. Before any production can occur, an EIS is required under NEPA. An EIS would address the cumulative impacts at that time. Also, refer to response 5-18.
- 13-5 Refer to response 12-1.
- 13-6 Redband trout inventories are scheduled to begin during FY 91/92 and would delineate age composition and distribution of the population. These data will contribute to a Redband Trout Habitat Management Plan scheduled for development in Fiscal Year 93. For additional information please refer to responses 2-80, 9-6 and 9-8.
- 13-7 Realistic, achievable goals need to be described when identifying alternatives and selecting a Preferred Alternative. In the Three Rivers RA, many miles of sensitive aquatic and riparian habitats lie adjacent to, but outside of, BLM jurisdiction. Management for restoration to excellent conditions within 10 years was in some cases not achievable.

Restoration of water quality and aquatic habitats were primary goals of the Preferred Alternative. Under the Preferred Alternative, 115 miles, or 90 percent of all stream miles, would be either improved to or maintained at good levels for water quality. Seventy-five percent of all riparian habitat would be in good or better condition by 1997.
- 13-8 Details of BLM aquatic habitat inventories have been discussed in the DRMP/DEIS in Chapter 3-27 and Chapter 4-3 through 4-6. Summaries of data were provided in Tables 3.10, 3.11, 3.12, 4.1 and 4.2. Aquatic habitat summaries were also presented in Volume II - Appendices, 1.
- Additionally, Table 2.1, Management Directives by Alternatives, presented management objectives and discussed impacts associated with each alternative for water quality, aquatic habitat, riparian habitat and special status species, i.e., redband trout and Malheur mottled sculpin.
- 13-9 A full restoration and enhancement plan for aquatic habitats, including costs, workmonths and scheduling was beyond the scope of management directives for the Three Rivers RMP. However, monitoring actions are included in the PRMP/FEIS and will be used to assess RMP plan implementation and attainment of management objectives. A more specific monitoring plan will be developed which will identify types of surveys, parameters to be monitored, funding and staffing to be allocated, and procedures for implementation of results. These data would allow the BLM to make site-specific adjustments in the management plan to attain stated objectives.
- 13-10 Refer to response 1-11.
- 13-11 Range developments are used for a variety of reasons including, but not limited to, improving livestock distribution.

Appendix 1, Table 12, PRMP/FEIS, outlines standard procedures and design elements that will be incorporated into range improvements.

Rangeland developments will continue to be utilized to help resolve resource management problems. Benefit/cost projections are not provided for the potential projects outlined in the RMP because these projects are considered to be tentative at this time. Further refinements in project design at the activity planning level are anticipated. See page 4-69, DRMP/DEIS, for the rangeland improvement investment totals per alternative. See Appendix 1, Table 13, PRMP/FEIS for a general estimate of the cost per unit of the various project types.
- 13-12 There are no proposed bighorn sheep reintroduction sites in the planning area. Table 2.1-21, item 2, and Table 2.1-23, item 1, of the big game section of DRMP/DEIS are proposed, in part, to improve antelope habitat. See DRMP/DEIS pp. 4-20 through 4-22. Also, see responses 2-10 and 2-78.
- 13-13 Refer to responses 2-6, 2-10 and 2-11.
- 13-14 Satisfactory big game habitat and unsatisfactory big game habitat are defined in the DRMP/DEIS, pages 6-11 and 6-13, respectively. Also, see DRMP/DEIS, Table 2.1-20 through 23 and response 2-6.
- 13-15 Refer to response 2-11.
- 13-16 Refer to response 3-6.
- 13-17 See ACECs in the Proposed Plan for ACEC designations and their acreages. Also, refer to responses 2-68 and 3-1.
- 13-18 Because of the many overlapping allocations characteristic of multiple-use management, a visual display of all such allocations on a map becomes uninterpretable. A 1/2" scale map for the Three Rivers RA measures approximately 4 feet by 4 feet and is impractical for this type of document. Refer to the PRMP/FEIS, Table 5.2 for program by program comparisons.

March 17, 1990

Mr. Joshua L. Warburton
District Manager
Burns District Office
HG 74-12533 Hwy 20 West
Hines, Oregon 97738

Dear Josh:

I have been reviewing the Draft Three Rivers RMP/EIS for the past few weeks. From this review I come away with an uneasy feeling and frankly, a low confidence level in the technical analysis of the plan. Let me begin with the Forest Management segment of your plan.

Beginning with a baseline of 13,307 acres of forestland, 3,397 acres were withdrawn because they were not commercial forestland. The definition of commercial forestland is that which will grow 20 cubic feet of wood per acre per year. (With a board foot to cubic foot conversion ratio of 5.0, the commercial threshold is 100 board feet per acre per year.) An additional 619 acres were classified as being "non-operable" due to constraints such as eagle roosts, riparian zones or wildlife habitat and subsequently withdrawn, resulting in a net available timber base of 9,291 acres. From this an additional 418 acres is withdrawn as "Not Currently Available" for production in order to provide cover for big game species, resulting in a total timber base of 8,873 acres.

14-1 This was to have represented the "Preferred" alternative. However it would appear that this is the commodity emphasis alternative, even though it is constrained by several factors. These factors are then ignored in the literature, indicating that only raptor nest trees would be retained; all other commercial forest land (9,900 acres in total) would be intensively managed.

14-2 The Preferred alternative has further acreage and output reductions, although there is no clear indication of need nor of what these reductions will protect or enhance. Cover and riparian protection goals are variously mentioned, but in fact, these goals are already to be met as outlined in your Best Forest Management Practices, which are consistent with State of Oregon rules and regulations.

14-3 Even more disturbing is the derivation of the annual harvest levels. These levels are all predicated on the assumption that when the Allowable Cut was last calculated (about 10 years ago) it turned out to be equal to 70 board feet per acre per year. In effect, the average commercial forest acre was said to be capable of producing 30% less volume per year than the non-commercial threshold of 100 board feet per acre per year.

14-4 I have been told that the 70 bd. ft. production was based upon the actual growth experienced in the eighty inventory plots (covering nearly 50,000 acres) between 1964 and 1974 in the old Burns District. The 1984 inventory nor the site potential under intensively managed stand conditions were taken into consideration in arriving at the 578 MBF harvest level of the Preferred alternative. Indeed, no current allowable cut calculation was run. Using the site class of Fred Hall's Ecoclasses, the average acre of forestland on the Three Rivers is probably capable of growing three times your 70 bd. ft. estimate, thus increasing the allowable cut 300% with no adjustment for inventory or acreage allocations.

14-5 This may appear simplistic. However, logic would indicate tremendous error with your current methodology. For years I have been observing the vast tracts of BLM land in areas like Dry Mountain, Claw Creek, Horton Mill, Emigrant Creek, Silvies River, Silvies Valley and Drawsey with their tremendous mortality. My observations confirmed what I had heard that these stands were being ignored for their timber management potential. When one considers that the trees you are losing are worth \$600 to \$1,000 each in stumpage, you are indeed squandering a tremendous resource. At \$350 per MBF and 1,000 MBF per year that you understate the allowable harvest, the treasury is losing \$350,000 in payments plus untold receipts as a result of the jobs created by the preparation, harvest and processing of this volume.

Let me move now from the timber issue to other resource issues:

14-7 1) Your data indicates that you lack even 1/100 of a mile (52.8 feet) of stream in "Excellent" condition. Nor do you project improving any streams to excellent condition in the preferred plan. Having seen some streams that seldom feel the pressure of one man's boot or one cow's hoof, I must wonder if your standards of excellence are unobtainable or your measurement system somehow faulty.

14-8 2) One of the allotments with poor range condition is Riddle Mountain. Having pursued birds on that mountain, I particularly noted the variety and volume of grasses present which showed little evidence of grazing, other than an occasional deer or elk deposition. Is that poor range?

14-9 3) Considering the forage you propose to remove from livestock and "give" to the elk, you should have nearly 600 elk residing exclusively on BLM lands year round. When one considers the area your ownership covers, the mix of land ownerships and acreage devoid of elk, you could have no more than 10% of the elk residing on your lands. That would mean about 6,000 head within the Three Rivers boundary. While the ODFW is the ultimate authority, I would dare say that 1,500 head in the area is a more accurate estimate, indicating that you are only feeding about 150 head.

14-10 4) While the weight of data involving cattle numbers on the myriad of allotments and AIM's is mind boggling to me, I cannot discern anywhere how conditions will be improved by increasing, decreasing or holding constant the cattle numbers you propose. To me season of use, duration and intensity of

use are far more critical. Utilization of management tools such as prescribed burning, juniper control and favorable forage and browse species plantings are equally if not more important. The BEQ prescriptions on smoke creation (burning) are actually minor to non-existent in this area, contrary to your stated objectives.

I am certain that more specific comments could be made on your plan. That will have to be left for another day. While I realize that the official comment period has elapsed, the points I have raised are nonetheless critical and must be addressed. I have had verbal discussion with some of your staff in which these issues were discussed some time ago.

Please feel free to contact me should you have any questions or wish to discuss some of these issues and concepts personally.

Sincerely,

Xavier Gofritzart
Forester

cc: Robert F. Smith

14-1 Total forestland acres equals 13,307. Discussion in the DRMP/DEIS, Chapter 3-3 indicates only 9,291 acres are commercial forestland by definition (capable of producing 20 cubic feet per acre per year). Therefore, 3,397 acres are classified as noncommercial forestland and 619 acres are closed as nonoperable (withdrawn-fragile site). A further reduction of 418 acres is classified as Not Currently Available (multiple-use constrained for wildlife cover). The remaining 8,873 acres (timber base acres) are multiplied by the factor of 70 which yields the existing 621 Mbf annual allowable harvest. The factor of 70 was erroneously stated in this document and to you personally as being a 8F growth rate per acre per year. This number is in fact nothing more than a factor used to determine allowable cut levels. The old John Day RMP annual harvest of 3,400 Mbf was determined in the BLM's Oregon State Office allowable cut run in 1974 and was based on an inventory of 48,818 acres. From these two numbers, the factor of 70 was derived and used in this planning document to determine harvest levels for all alternatives. Alternative D, the No Action Alternative with 609 Mbf annual harvest differs from the existing situation (DRMP/DEIS, Table 3.4, showing 621 Mbf) because the previous John Day RMP did not account for the buffering of all nonperennial streams, springs and seeps which has been an accepted practice within BLM resource disciplines for the past 4 years. Until a current allowable cut is run, based on our latest forest inventory (1985), we believe we have used the most logical process available to determine annual harvest levels, which should be reasonably accurate.

Also, during the latest forest inventory, site classes were determined and all classes within this planning area are Class I or VI.

BLM forest standards are not being ignored for timber management potential. Current budget constraints dictate forest management activities which are generally confined to the more concentrated stands of substantial size (in acres).

14-2 Refer to response 14-1.

14-3 Refer to response 14-1.

14-4 Refer to response 14-1.

14-5 Refer to response 14-1.

14-6 Refer to response 14-1.

14-7 Refer to responses 2-25, 2-28 and 2-45.

14-8 The DRMP/DEIS does not list the Riddle Mountain Allotment as having poor range condition. On the contrary, Appendix 1, Table 9 shows Riddle Mountain Allotment as having satisfactory range condition. However, Appendix 1, Table 7 does identify this allotment as having unsatisfactory habitat condition for big game.

14-9 Refer to response 2-10.

14-10 See response 2-11. In the areas where a change in management will achieve the multiple-use objectives for an allotment, use reductions will not be necessary; however, in some areas reductions will be necessary to achieve the objectives.

Bureau of Land Management
 HC 74-12553 Hwy 20 West
 Hines, Or. 97738

January 31, 1990

Subject: Draft, Three Rivers, Resource Management Plan.

This appears to be a very good plan especially in the area of recreation.

The following comments refer to Table 2.1 and the Preferred Alternative. Page 3, Water Quality, 1., states: "On a case-by-case basis, close and rehabilitate all roads on public lands not needed for administration or fire protection." This statement, as made, applies to all roads in the Resource Area and not just wet or riparian areas. Most roads in the RA must be left open, whether maintained or not, to provide access to the handicapped, elderly, and non-athletic.

15-1 Page 19, #11. No land should be acquired except through the exchange process, except for public access.

15-2 Page 21, #16. What system will be used to assure that no livestock utilization on waddy riparian shrubs occurs?

15-3 Page 25, Aquatic Habitat, #1. Same comment as for page 3, Water Quality, #1.

15-4 Page 29 & 33; #3. very pleased to see planned improvements for Moon reservoir.

15-5 Page 31, Cultural Resources, #1. What are the proposed maximum 'take limits' for obsidian? Will there be a separate limit for each individual site? If not, why not? Will these 'take limits' be consistent with rules, regulations and policy in other public land resource areas containing obsidian deposits?

15-6 I strongly oppose the establishment of 'take zones'. What rationale would be used to establish which area would be open or closed? Would closed areas or open 'take zones' be adequately marked and posted? What would be the prescribed penalties for taking more than the maximum amount or from a closed area?

15-7 Page 39, Provide for Conservation Etc., #1. Private inholdings should only be acquired through land exchange. Th? tax base must not be reduced.

15-8 Page 43, Eliminate Unauthorized Use etc., #3.a.&b.. The option must remain open for qualified entities to have access to certain public lands for waste disposal sites. Needs for waste disposal sites are important to our society and it behoves the public domain to help meet those needs.

The BLM has grossly under allocated AUMs for big game use. The planned allocation is 7,800 AUMs (appendix 5, Table 1), while the need is 15,685-AUMs.

It is stated in Volume 1, Chapter 3, page 26: "An estimated 5,000 antelope, 14,000 deer and 1,500 elk winter on public lands in the planning unit during a normal year. Approximately 4,300 antelope, 13,000 deer and 300 elk summer on these lands."

Using the following equivalent ratios: antelope = 7 head/AUM; deer = 5.6 head/AUM; and elk = 3 head/AUM; season of use would be summer = 7 months and winter = 5 months. Competitive forage ratio: antelope = 10.1%; deer = 18.4% and elk 100%.

WINTER		SUMMER	
ANTELOPE	DEER	ANTELOPE	DEER
5,000 ÷ 7 X 5 X .101 =	361 AUM	4,300 ÷ 7 X 7 X .101 =	434 AUM
14,000 ÷ 5.6 X 5 X .184 =	2300 AUM	13,000 ÷ 5.6 X 7 X .184 =	2990 AUM
1,500 X 3 =	7500 AUM	300 X 3 =	2100 AUM
Winter total	10,161 AUM	Summer total	5,524 AUM
Annual total	15,685 AUM		

The information concerning estimated capacity and carrying capacity, as it relates to forage production is misleading and confusing.

15-9 In a communication, dated November 24, 1989, the BLM states: "Forage production estimates are computed through rangeland monitoring and evaluation process. Appendix 5, Table 6, displays these estimates either as Estimated Capacity (where additional years of data are required to complete the computation process) or as Carrying Capacity (where sufficient data are currently available). BLM has not made a "total forage production" estimate as this is not required under monitoring and evaluation procedures." If 'total forage production' is not available or known to the BLM then all capacities are estimates and the carrying capacities are unknown in all allotments. When if ever does the BLM ascertain total forage production?

15-10 There has to be a minimum pound per acre per year of forage produced for the range to be classified as suited for grazing. Total production must be known to know the true carrying capacity. While the 3 year monitoring data may be more reliable, capacities are still estimates. Carrying capacity is also based on the percentage of total production allocated to forage use.

It is imperative that the BLM ascertain the actual forage production rate, on an average, of 20 allotments a year for the next 10 years. Then and only then can the range be managed under a truly prudent plan.

15-11 A 20 percent check of the allotments in Appendix 7, Table 6, against Appendix 5, Table 1 showed that forage had been allocated for antelope in Allotments 7010 and 7030 in one table but no allocations for forage were made in the other table.

ACECS

HATT BUTTE RNA

15-12 There is no information given to support this area as an ACEC. What is the critical concern? Why were there no management directions?

15-13 I request that this area be dropped for consideration as an ACEC and that it be retained as an RNA.

SILVER CREEK RNA and Addition

15-14 Where is this area? Under Location you show it to be: T21S, R26E, section 20. In the first paragraph under site description it is stated: "The existing RNA, section 8..." In the second paragraph it is stated: "The proposed addition, section 20..." What would be the total size of the RNA with a" addition, 960 acres or 1,600 acres? What would be the total size if you acquired section 17?

15-15 No information is given to support a critical environmental concern. Under management recommendations you make some condition statements but your only recommendation is to acquire section 17.

15-16 I request that this area be dropped from ACEC consideration but that it be retained as an RNA.

FOSTER FLAT RNA

15-17 No information is given to support a critical environmental concern for this area.

15-18 A need and a recommendation are not the same thing. If you recommend fencing in this area, say-so.

15-19 I request that this area be dropped from consideration as a ACEC and that it be retained as a RNA.

SQUAW LAKE RNA

15-20 In the last sentence of the first paragraph it is stated: "...the lake remains in an enclosed basin that loses water only through evaporation." Is it possible that the lake also loses water through saturation, percolation and/or transpiration?

15-21 Why do BLM employees mix metric measurements into the draft and plan documents when the metric system is not the America" standard of measurement? I request that use of the metric system be discontinued until it becomes the America" standard, designated by the United States congress.

15-22 Again under Management Recommendations, conditions are stated but no recommendations are made. Needs were also stated.

I request that this area be dropped from ACEC consideration but that it be retained as an RNA.

DRY MOUNTAIN RNA Addition

15-23 This area is only a proposal to a proposal, it cannot be added to something that does "at exist. Map ACEC-1 does not show the proposed forest service RNA in a cross hatched pattern or any other pattern. Also the size, in acres, of the forest service proposal is not given.

15-24 There is no indication that this area would not be a continuation and duplication of the Natural area cells contained in the Forest service proposal.

The narrative mentions heavy impacts by grazing outside of the area, to the north and west but did not show any impact within the Dry Mountain unit.

The Management Recommendations section did not contain any recommendations.

15-25 I request that this area be dropped from both ACEC and RNA considerations and that it continue to be managed under the multiple use concept.

Saddle BUTTE ACEC

15-26 It seems that current management practices are adequate for this area, which does not include either ACEC or RNA recommendations. No discussion of critical concern give", or are recommendations made.

15-27 I request that this area continue to be managed under the current plan.

RIGER MUSTANG ACEC

15-28 There is no evidence that the progeny of the original Spanish mustang in Riger and Riddle Mountain herds are that much different from herds in other western states. There is "a evidence that these two herds could not exist equally as well in Stinkingwater, Warm Springs or Palomino HMAS. If kept confined inbreeding will decimate the herd over time.

15-29 Contrary to your claim, the Federal Land Policy and Management Act (FLPMA) of 1976, does not "clearly indicates the need to emphasize the management of the Riger and Riddle Mountain HMAS for these descendants of the Spanish mustang." No site specific areas are mentioned in either FLPMA, the Act of December 15, 1971 (85 Stat. 649, 651) or the Act of September 8, 1959 (73 Stat. 470). The BLM is required to manage the wild horse herds, but not in any specific area.

No specifics of environmental concern were identified in the text for this HMP were any Management Recommendations made.

15-30 I request that this area be dropped from further ACEC consideration and that continue to be managed as an RNA.

BISCUITROOT CULTURAL ACEC

Bureau of Land Management
HC 74-12535 Hwy 20 West
Hines, Or. 97738

February 1, 1990

Subject: Draft, Three Rivers, Resource Management Plan.

Reviewing my response, dated January 31, 1990, at the bottom of page 1 and top of page 2, I found that I made a gross error in calculating allotted AUMs for elk; which changes the annual total for big game. The winter need for elk should have been: 1500 + 3 X 5 = E.500 AUM, not 1,500 AUM as shown. The summer need would be 300 + 3 X 7 = 777 AUM not 2,100 AUM as shown. The total annual need for big game would be 3,285 AUM and not the 15,385 as stated. Please make pen and ink corrections.
Also I do recall seeing any AUM allocations for wild horses and burros, in the draft RMP. If they were not included please make these allocations.
I apologize for any inconvenience this may have caused.

Sincerely,
Frank Vaughn
Frank Vaughn
OPLAC-Southeast
936 N 7th
Lakeview, Or. 97630

15-31 It is quite clear that these root crop production areas are important to the various Indian and/or other user groups. It is not shown how much of the 8,480 acres are impacted by gravel pit activities, nor were other local land uses identified. The acres shown in Appendix 7, Table 1 are not consistent with the Summary in Volume I.

15-32 Do the Indians have a Treaty right to the use of these lands that could not be usurped by ACEC designation?

15-33 The proposed Biscuitroot Cultural ACEC lies in T.21 & 22S, and R33E & 34E, yet none of the Mineral Materials Sites listed in Appendix 9, Table 2 are located in these townships and ranges. What are the real concerns about gravel developments?

Critical environmental concerns have not been identified nor have any Management Recommendations been made.

15-34 I request that this area be dropped from further ACEC consideration, and that it continue to be managed under the multiple use concept.

OBSIDIAN CULTURAL ACEC

15-35 The BLM Shows a conflicting number of acres for this proposal. Appendix 7, Table 2 shows 13,900 acres while Alternative B in the Summary shows 16,900 acres.

15-36 Under description of resources and value, it is stated: "Obsidian flows are not common in the western United States." A Field Guide to Rocks and Minerals, by Dr. Frederick H. Pough, states: "Obsidian is locally abundant in the western United States, but does not occur in the east.----The western United States volcanic belt with its obsidian formations extends down into Mexico (p.14&15)."

These areas have had to much use and disturbance, in recent times, to be of any archeological significance. These areas should be protected from commercial exploitation.

15-37 No critical environmental concerns were identified nor were any Management Recommendations given.

I request that this area be dropped from all consideration as an ACEC.

15-38 In Appendix 9, Table 2, Mineral Materials Sites, many of the legal descriptions are incorrect and confusing. For instance in Site #7, Laton Point is listed in T.23S, R33E., sec.2, E,SW,4,SW SE SE and SW NW SE. and contains 400 acres. The E is set off from the SW by a comma and the E is an unknown quantity. The SW is the southwest 1/4 of sec. 2, containing 160 acres; The W is set off from SW SE SE by a comma and is an unknown quantity. The SW SE SE is the southwest 1/4 of the southeast 1/4 of sec. 2 and contains 10 acres; and SW NW SE also contains 10 acres for a total of 180 acres. Where does the other 220 acres come from?

Site #19, Fort Curry is listed in T.22S., R.26E., sec.5, NE NE NW. This subdivision would only contain 10 acres, not 40 acres as listed.

The subdivision location for all sites in this table needs to be reviewed for correctness.

15-39 In numerous places in Volume I of the Draft RMP a plus (+) sign is included where it is either superfluous or inappropriate; some are listed below by chapter and page: I-J, Lake (91,505+acres); 3-2, less than 10+ inches; 3-12, in 195+ allotments; 3-16, there are 8,973+ AUMs - (1981-1987) is 149,507+ AUMs; 3-21, Juniper (15+percent); 3-25, (see Map+R-1); 3-44, Table+3; 4-6, 0 to 5.15+ miles; 4-8B, April and July+31; What are the significance of all these marks?

Thanks for the opportunity to participate in the Three Rivers Resource Management Plan.

Sincerely,
Frank Vaughn
Frank Vaughn
OPLAC-Southeast
936 N.7th
Lakeview, Or. 97630

15-1 Refer to response 2-81.

15-2 Refer to response 4-14.

15-3 Refer to response 3-13.

15-4 A management plan will be developed to address the multiple-use requirements of several important obsidian source/quarry areas, especially the consideration for public uses like rockhounding and education. No specific "take limits" on obsidian will be proposed until there are rules or regulations in effect to consistently govern the establishment of reasonable quantity limits for personal collection, such as those already in effect for petrified wood.

Commercial collecting is regulated under 43 CFR 3600 requiring that an appropriate permit be issued prior to such taking. A permit is issued to ensure adequate measures are taken to protect the environment, minimize damage to public health and safety, and to obtain fair market value for the materials removed.

15-5 The concept of a "take zone" was considered as a means to conserve those portions of obsidian source/quarry areas that exhibit significant prehistoric archaeological resources and/or lesser surface disturbance. Accessible areas with existing surface disturbance are preferable for encouraging public uses, as "take zones." Such areas with previous disturbance are preferred for rockhounding and flintknapping uses, in order to minimize the overall extent of impacts due to extraction of obsidian boulders and the creation of artificial "Indian" sites by flintknappers.

Public uses in those areas where similar activities are already focused and roaded access is established will be encouraged by an on-site signing program. Less utilized areas and specific locations where significant cultural resources are present will not be emphasized in informational materials or on-site signing.

Any penalty for exceeding allowable quantities would depend upon the nature of the activity (e.g., commercial or personal collecting). Taking material from a closed area would depend upon the methods of extraction (e.g., mechanical or manual) and access (e.g., motorized or pedestrian), on a case-by-case basis, in accord with Bureau regulations.

Refer to response 15-4.

15-6 Refer to responses 4-14 and 6-10.

15-7 Harney County operates six waste disposal sites on public lands, in addition to several others on private land throughout the county. Counting the private landfill which services the Burnas-Hines area, the residents of Harney County have adequate waste disposal facilities to meet their current needs. Those disposal sites currently leased to Harney County on public land have adequate capacity to last well into the foreseeable future. Sale or exchange of public lands for waste disposal sites to qualified entities would be considered if a bonafide public need is exhibited.

- 15-8 Refer to responses 2-10 and 2-11.
- 15-9 Total forage production is the sum of competitive and noncompetitive forage. BLM allocates forage only on the basis of competitive forage; therefore, total forage production is not necessary to calculate allotment carrying capacity. To determine total forage production requires an inventory. A one-point-in-time inventory has been determined by the Bureau to be inadequate for determining carrying capacity. There are no plans to do a production inventory, however, there is an Ecological Site Inventory in progress in the RA which should be completed in 1994. We do not use suitability criteria. Carrying capacity is not based on a percentage of total forage production.
- While actual forage production rate would be valuable information, funding and staffing levels do not allow gathering such data. The monitoring and evaluations are an ongoing process. See PRMP/FEIS, Appendix 1, Table 11, for a description of monitoring and evaluation methods.
- 15-10 Refer to response 15-9.
- 15-11 It is assumed the reader is referring to DRMP/DEIS, Appendix 3, Table 6, and Appendix 5, Table 1. The comment is correct for allotment 7010 and incorrect for 7030. The tables have been examined and corrected. See Appendix 1, Table 9 and WL Table 1 of the Proposed Plan.
- 15-12 Refer to response 1-26.
- 15-13 Hatt Butte is not recommended as an RNA/ACEC in the Preferred Alternative. Neither is it recommended by the interdisciplinary team as an RNA/ACEC (see Table 3.16 of Volume I, DRMP/DEIS).
- 15-14 The existing RNA/ACEC is in Section 8 (640 acres). The proposed Silver Creek RNA/ACEC addition includes 640 acres of Section 20, currently under BLM ownership and 640 acres in Section 17 which is currently privately owned, but that the BLM is hoping to acquire in a land exchange. This results in a total of 1,280 acres in the proposed addition and results in a total RNA/ACEC size of 1,920 acres.
- See also response 3-5.
- 15-15 Silver Creek RNA/ACEC fills the Oregon Natural Heritage Plan (ONHP) (1988) cell for a first to third order stream. The proposed addition to the existing RNA/ACEC will provide a more complete representation of this cell. As an RNA/ACEC, this area will receive special management attention to maintain these important natural resources. Additional management uses/constraints can be found in Appendix 1, Table 16 of the Proposed Plan.
- 15-16 Silver Creek was designated in the Federal Register as an RNA/ACEC on June 20, 1983. The ACEC designation is the principal BLM designation for public lands "where special management is required to protect important natural, cultural, and scenic resources and to identify natural hazards." The relationship between ACECs and the wide range of other public land designations is such that a potential ACEC may be contained within or overlap another designation provided that the ACEC designation is necessary to protect the resource or value. This is the case with Silver Creek RNA/ACEC.
- 15-17 The site will be managed primarily to maintain the natural qualities of the ecosystem in a state which is suitable for conducting research or monitoring on this plant community.
- See also responses 3-1, 15-16.
- 15-18 Fencing of the Foster Plat RNA/ACEC is recommended as necessary to maintain the important natural values of the area.
- 15-19 Refer to response 15-16. The same conditions apply for this proposed RNA/ACEC.
- 15-20 This statement reflects the fact that this basin is not externally drained; there is no stream flowing from this lake. All water loss is internal. This could be by means other than evaporation such as percolation into the soil. However, the majority of the water loss is probably through evaporation.
- 15-21 The metric system is a standard within the scientific community; however, your concern is noted and the measurements cited have been converted to American (English) standard units.
- 15-22 The interdisciplinary team assessed the relative values represented in the Squaw Lake Proposed RNA/ACEC and determined that it did not sufficiently meet the importance and relevance criteria. The ID team recommended, and management concurred that the area not be carried forward for further consideration. Also, it should be noted that RNA is not an independent designation. RNAs and Outstanding Natural Areas (ONAs) are categories within the larger designation of ACECs. Therefore, an area cannot be dropped as an ACEC, but retained as an RNA.
- 15-23 Map ACEC-1 has been changed in the PRMP/FEIS to show the USDA-FS's proposed Dry Mountain RNA. The USDA-FS proposed Dry Mountain RNA contains 1,187 acres. Also, see Map ACEC-4, PRMP/FEIS.
- 15-24 The proposed Dry Mountain RNA/ACEC addition would be a continuation of the cells contained within the USDA-FS proposed RNA. Due to the elevational change between the USDA-FS and BLM areas, the two areas together provide a more complete representation of these cells.
- 15-25 The utilization of protecting and managing special uses and resources through ACECs/purpose-related designations is an integral part of multiple-use management. Dry Mountain RNA is currently a proposed RNA on the Ochoco National Forest and is included in the Preferred Alternative of the Draft Forest Plan. The Dry Mountain RNA/ACEC addition which is on BLM-administered land also contains the plant communities necessary to fill the cell for Ponderosa Pine Savanna in the Basin and Range Province. The combined areas would provide a continuous representation of low to high elevation plant communities in one area and contain five ONHP cells. Therefore, this area (Dry Mountain RNA/ACEC addition) will not be dropped from RNA/ACEC consideration until the proposal receives further study by both agencies, other people and organizations.
- 15-26 Refer to response 1-12.
- 15-27 Saddle Butte will not be proposed for RNA/ACEC designation as there are some conditions that do not make it a good candidate for such status. It will continue to be managed without designation, but used as an area for research by the Malheur Field Station and other interested researchers.
- 15-28 Phenotypically the wild horses in Kiger and Riddle herds are much different from animals in other herds. Also, no other herds on public lands possess the primitive dun factor coloration in total as do the Kiger Mustangs.
- There is no doubt that the wild horses presently on Riddle Mountain and Kiger HMA could physically survive on Stinkingwater, Warm Springs or Palomino Buttes HMAs; however, it is not the objective of the Herd Management Area Plans for those HMAs to be managed for Spanish Mustang type horses.
- Burns District does not intend to allow close inbreeding of any of its wild horse herds which would cause physical defects that would jeopardize the animals in those herds. While the BLM is not dealing with domestic horses, horse breeders in the domestic horse industry, in many cases, consider inbreeding and line breeding a very acceptable management practice with some of their most superior animals being obtained in this manner. Other wild animals seem to get along quite well without man's intervention in the mating process even in somewhat closed systems.
- 15-29 FLMPA does not indicate the need for special management of wild horses. The text as shown in DRMP/DEIS Appendix 7, Table 2, page 7-11 is only a reprint of the ACEC nomination as it was received.
- The BLM is required to manage wild horses in those areas in which they were found at the time of the passage of the Wild and Free-Roaming Horse and Burro Act, as described in Section 1 of the Act.
- 15-30 Refer to response 2-68.
- 15-31 The Biscuitroot Cultural ACEC is proposed for the designation of 6,500 acres. Discrepancies of acreages as depicted in the Draft RMP should be corrected to this figure.
- 15-32 Treaty rights will be reinforced by an ACEC designation in the Biscuitroot Cultural ACEC area. Access to "usual and accustomed" areas for hunting, gathering and fishing are provided for in treaties with the Confederated Tribes of the Warm Springs and the Confederated Tribes of the Umatilla Indian Reservation. Studies indicate that the ACEC was utilized by these and other tribes for root gathering (Couture, 1978; Couture, Housley, and Ricks, 1986).
- 15-33 The proposed Biscuitroot Cultural ACEC lies in T. 21 S., R. 34 E., and T. 22 S., R. 33 and 34 E. The mineral material sites include the Pine Creek Material Site which is in R. 34 E., rather than in R. 35 E. as incorrectly shown in the Draft RMP. This site was established in a main root camp and has affected the traditional use of the area.
- Refer also to response 6-13.
- 15-34 The Biscuitroot area is important for the protection of cultural values of Native Americans, especially the Paiute Indians, and will not be dropped from consideration as an ACEC. In accord with the BLM 1613 Manual, ACECs are a multiple-use designation, to the extent that all uses allowed are compatible with the ACEC management objectives.
- 15-35 ACEC acreages listed in the Draft RMP are sometimes inconsistent which is an error. The Proposed Obsidian Cultural ACEC will not be designated in the Proposed Plan.
- 15-36 It is true that obsidian sources are found throughout the western United States. The narrative description is intended to contrast those regions which have some surface available obsidian with Eastern Oregon's northern Harney County for which obsidian occurrences are characteristic. Here it is not only "locally abundant" but frequently occurs as a high quality visually variable mineral, such that prized obsidian sources are relatively common, as compared to the western U.S. where "locally abundant" obsidian is not typically so variable in color and texture and of such quality. Certainly Oregon, Nevada and California do have numerous obsidian occurrences, while in most other western states obsidian is not so prevalent.
- 15-37 Refer to response 15-35.
- 15-38 The observation that you make is correct. Acreages and legal descriptions in DRMP/DEIS, Appendix 9, Table 2, were in error. The corrected table is found in the PRMP/FEIS as Table 2.25.
- 15-39 These anomalies are the result of the electronic conversion of the draft from its original word processing document over to a typeset document for printing. Most of these marks (i.e. "+") were what are referred to as keyboard special characters and did not convert correctly. More stringent editing of the Final will attempt to ensure that such problems do not occur again.



January 25, 1990

District Manager
Burns District
Hines, OR

Dear Mr. Warburton:

I am responding for the NPSO to your Draft Three Rivers Resource Management Plan. Our statewide group of 850 members in 13 chapters appreciates the opportunity to provide input for the management of an area that is important to our members statewide. I would like to offer comments in several areas.

SENSITIVE PLANT SPECIES

16-1 This area is of primary concern to us. As you know, the South Narrows ACEC held populations of one of only two federally listed plants in the entire state of Oregon. As you also are aware, that plant (*Stephanomeria malheurensis*) became extinct in the wild under BLM management in 1984. Attempts have been made since then to recover the plant. This effort is not mentioned in your plan. We feel this taxon is of national importance and deserves specific attention. We would like details of the management of the ACECs included.

16-2 Other than a listing of species of interest, there is no outline of what the sensitive plant program for the area is. This is an oversight and should be corrected.

RANGE CONDITION

Management direction should be to get all lands in excellent condition. Alternative A comes closest to this. Special protection should be afforded to riparian areas. We do not support the substitution of crested wheat plantings for the native range species.

WILD HORSES

These animals significantly impact native vegetation and we strongly support their elimination.

We would support Alternative A (Emphasize Natural Values) as coming closest to protecting those resources most important to us. Even it is inadequate in the ways I have outlined above and we hope that this could be corrected in the final document.

Sincerely,

Stuart G. Garrett MD
Pres, NPSO
1501 NE Medical Center Dr
Bend, OR 97701

16-1 *Stephanomeria malheurensis* (Malheur wirelettuce) has not gone extinct in the wild. No Malheur wirelettuce plants were observed in the wild in 1985 or 1986; however, one plant survived to maturity in 1987, seven survived to maturity in 1988 and 11 in 1989. BLM and USFWS are currently cooperating in an ongoing recovery operation for this plant, including an intensive study of the effects of biological and climatological interactions with wirelettuce on its survival. These cooperative study efforts have been formalized in a Conservation Agreement between BLM and USFWS. Overall conservation actions and the management of the 160-acre South Narrows ACEC, which contains all of the designated Critical Habitat for Malheur wirelettuce, are conducted under the Draft Recovery Plan. As such, present management practices being undertaken through the Recovery Plan are being carried forward as valid existing management. The Draft Recovery Plan and associated documents are available for inspection at the Burns District Office.

16-2 See the Proposed Plan for management actions for special status species, including plant species. These actions will include inventory, monitoring and the establishment of species specific objectives within the allotment monitoring and evaluation process where appropriate. These activities will constitute a major portion of the special status plant program in the RA.

Stanley O. Shepardson
21635 Los Serranos
Bend, Oregon 97701
January 25, 1990

17-1 Refer to response 1-11.

17-2 Refer to responses 2-36 and 12-7.

District Manager
BLM
HC-7412533 Hwy 20 West
Hines, OR 97738

Dear Sir:

The BLM's EIS for the Burn's district fails to recognize the importance of restoring public lands back to the highly differentiated ecosystem they once were, before excessive grazing resulted in severe damage to the range and aquatic habitat.

Though restoration will take decades to accomplish, it must be the long term goal in the management of our public lands. Fencing off riparian areas, decreasing or dispersing cattle and in drought years removing livestock from public lands should be implemented. Many natural areas in your district exist which could provide future generations a wide variety of natural vegetation and wildlife that will be more valuable to a crowded world than the few cattle these arid lands are able to provide.

It appears crested wheat grass or the establishment of other monocultures is only a short term, expensive program which only exists through heavy federal subsidy. If the BLM cannot resist establishing such seedings, at least scatter them into smaller plots interrupted with natural vegetation and honestly report the full expense of such programs and the expected revenue received through the few benefited grazing allotments.

17-1

17-2

Sincerely,

Stanley O. Shepardson

18 12/14/88 5:10 PM
 BURNING
 URB 47266
 Jan 22 1990

District Manager
 BLM, HINES, ORE

Dear Sir, Re R-15 for Northern

- half of the Burns District of the BLM.
- 18-1 ① I ask that the BLM develop an alternative to restore a mountain meadow in excellent natural condition i.e. reduce or eliminate cattle grazing.
 - ② At a minimum adopt Alternative A.
 - 18-2 ③ Please improve water quality, riparian & aquatic habitat.
 - 18-3 ④ Riparian points be identified & preserved.
 - 18-4 ⑤ Riparian points be protected where grass needed.
 - 18-5 ⑥ Riparian points be protected & Special River designation for all of the S-middle Fork Madras Rivers all of Burn Creek & all of the Silver River. Thank you for your attention. Sam. E. Cox

- 18-1 Refer to response 1-13.
- 18-2 Refer to response 2-44.
- 18-3 Refer to response 12-1.
- 18-4 Refer to response 1-11.
- 18-5 Refer to response 3-6.

January 22, 1990

Jay Carlson
 Burns District Office
 Bureau of Land Management
 HC 74 12533 Highway 20 West
 Hines, Or. 97738

19

REVIEW COMMENTS FOR THE OCTOBER
 1989 BLM DRAFT THREE RIVERS RTP/EIS

Dear Mr. Carlson;

I am concerned about alternatives A, B, and C as they may result in a substantial loss of our base property values. The proposed BLM actions may result in reduced amounts of gross dollars generated in our community. These dollars are spent locally, strengthening our poor economic situation here in Harney County.

19-1 We request that if Alternatives A, B, or C are considered, that prior to issuing the final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries).

I am concerned with Allotments No.;

- 1) 7017 Cluster; I am the manager of the South Silver Creek Ranch and this is our grazing permit. We will be

evaluated this year. This unit can only be evaluated and improved with controlled burning, rest rotations and reseeding. To simply slash AUMs is a political answer only and not what is best for wildlife or multiple use.

2) 7026 Horton Mill; My Wife and I are the permittees on this allotment. Soil Erosion seems to be a major concern. There have been approximately 17 pairs here for the last decade and to rate this with no live water, as actively eroding must be prefaced with a statement about cattle, not being responsible. ~~to be protected~~. This is a 3,520 acre, 3 pasture, site.

19-2 3) 7028 Stinger Creek; My wife and I are the permittees and owners of the property through which flows Stinger Creek. We will not alter any vegetation at this altitude, nor disturb delicate riparian soils.

4) 7030 Skull Creek; My wife and I own 156.15 acres on Skull Creek. I manage the only other privately held acreage on Skull Creek for the owners of South Silver Creek Ranch.

This, 7030 Skull Creek Allotment, has no other live water in the North West corner. It has been proposed to fence off the entire Skull Creek canyon, both private land and public. This will not distribute cattle grazing evenly. This will cut cattle off from adequate water supplies. This will destroy any reasonable form of multiple use of this entire 27,500 acre pasture.

19-3 If a fence is built we request a legal survey to locate our boundaries. We will not fence out cattle from water. We object to the inconsiderate and thoughtless processes that have placed my wife and I in this delicate position.

The Culp Family and the Hotchkiss family have for several generations used management objectives and on site techniques that have preserved this resource for both recreation and wildlife.

19-4 We view your proposals to fence off the entire Skull Creek Canyon as very expensive and a threat to the existence of these family enterprises. Mr Morgan and ourselves have been placed in the position of having to participate in a fencing exercise, trade to the BLM, or sell to these families.

Neither of us can benefit from any of these options. It would be a severe blow to these fine families, and a severe economic loss to the community.

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers, and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

We endorse such letters and the Riddle Ranch document. Any additional comments we may have are enclosed herein.

Sincerely,

James C. Shepherd
Eli A. Shepherd

James C. Shepherd

Eli A. Shepherd

P.O. Box 55

Riley, Ore. 97758

19-1 Refer to response 2-63.

19-2 Average actual use on the Horton Mill Allotment is listed as 424 AUMs per year in the DRMP/DEIS, Appendix 3-141. However, the past couple of years actual use on this allotment has been light. A recent allotment evaluation notes an improvement in soil condition (reduction in soil erosion), and a need for further improvement. Past heavy use by livestock has been identified in previous field documentation as one factor which contributed to the erosion rate on this allotment. The current allotment evaluation outlines a strategy for improvement of the soils resource.

19-3 If fences are built in the vicinity of private land, appropriate measures will be taken to ensure that fences are not built on private land. The Bureau is generally prohibited from investing public monies on private land.

19-4 There are a variety of potential projects which may be utilized to solve the multiple-use conflicts in the Skull Creek Allotment. Site-specific measures to alleviate these conflicts have been discussed in the allotment evaluation.

20

District Manager
Bureau Of Land Management
HC- 7412533 Hwy 20 West
Hines, OR 97738

January 22, 1990

- 20-1 | In response to your Draft EIS, I find Alternative C to be totally inappropriate. I would like to see you adopt Alternative A with some modifications that would allow for the restoration and maintenance of rangeland in excellent natural condition. Cattle grazing should be reduced or eliminated where appropriate.
- 20-2 | Riparian and aquatic habitat as well as water quality should be improved and maintained in excellent condition. I would like to see Wild and Scenic River designation for the South Fork and Middle Fork Malheur Rivers, all of Bluebucket Creek, and all of the Silvies River.
- 20-3 | The remaining old-growth forests should be identified and protected.
- 20-4 | The Draft EIS needs to address big horn sheep habitat protection, with forage allocations going to bighorns in their home range. In general, wildlife winter range forage allocations should be given priority over livestock allocations. The seeding proposals for crested wheatgrass should be eliminated.
- 20-5 |
- 20-6 |
- 20-7 |
- 20-8 | To give an accurate picture, all costs of new road construction and other rangeland projects (fences, pipeline, troughs, wells, etc.) need to be included for each alternative. The environmental impacts of each should also be listed.

This is beautiful and ecologically important land. We need it in excellent condition. Please use Alternative A with the above modifications.

Sincerely,



Irene Bachhuber
10561 SE Idleman Rd
Portland, OR 97266

- 20-1 | Refer to response 1-13.
- 20-2 | Refer to response 2-44.
- 20-3 | Refer to response 3-6.
- 20-4 | Refer to response 12-1.
- 20-5 | Refer to response 2-78.
- 20-6 | Refer to responses 2-6, 2-10 and 2-11.
- 20-7 | Refer to response 1-11.
- 20-8 | Refer to responses 12-1 and 12-7.

21

815 S.E. 32nd, #3
Portland, OR 97214
January 25, 1990

District Manager
Bureau of Land Management
HC-7412533 Highway 20 West
Hines, OR 97738

Hello:


I am writing to comment on your draft EIS covering the northern half of the Burns District. As a frequent visitor to eastern Oregon, I am very unhappy with your choice of Alternative C for this area. Please reconsider and choose Alternative A.

The following points are very important:

- 21-1 | - An alternative to restore and maintain rangeland should be developed, and cattle-grazing should be reduced or eliminated in some badly damaged areas.
- 21-2 | - Water quality, riparian and aquatic habitat should be improved and maintained in excellent condition.
- 21-3 | - Ancient forests must be identified and protected.
- 21-4 | - All costs of construction of new roads and other rangeland projects should be included under the various alternatives along with their environmental impacts.
- 21-5 | - Please eliminate crested wheatgrass seeding proposals.
- 21-6 | - Bighorn sheep habitat protection and impacts should be addressed in the plan.
- 21-7 | - Wild and Scenic River designation is needed for all of the South Fork and Middle Fork Malheur Rivers (except for the reach through the Drewsey area), all of Bluebucket Creek and all of the Silvies River.
- 21-8 | - Wildlife winter range forage allocations should be given priority over livestock allocations.

Thank you for considering my opinion. I care very deeply for the welfare of Eastern Oregon.

Sincerely,



- 21-1 | Refer to response 1-13.
- 21-2 | Refer to response 2-44.
- 21-3 | Refer to response 12-1.
- 21-4 | Refer to responses 12-1 and 12-7.
- 21-5 | Refer to response 1-11.
- 21-6 | Refer to response 2-78.
- 21-7 | Refer to response 3-6.
- 21-8 | Refer to responses 2-6, 2-10 and 2-11.

District Manager
BLM Burns Dist. Office
P.O. Box 74-12533 Hwy. 20 West
Hines, OR 97738

Dear Sir:

I would like to take this opportunity to discuss with you two issues which have an impact on the environmental well being of BLM lands in your district.

First I wish to address the question of aloumey snowmobiles on Steens Mountain Loop. This activity can be expected to adversely affect wintering deer, ^{and elk} pronghorn, small animal life, and soil erosion. Therefore I urge you to implement alternative 3 which would eliminate these undesirable impacts.

The second issue which concerns me is the Draft EIS for Three Rivers Resource Management Plan. The fact that you

(over)

Sincerely,

David Burcombe
DAVID BURCOMBE
19466 SUNDRIK WAY
BRAND, OR 97702
(503) 385-1065

CC. SEN. MARK D. HATHCOCK
SEN. BOB PACKWOOD
U.S. REP. BOB SMITH.

22-1

would consider building 143 miles of fence, 80 miles of pipeline, 50 troughs, 10 wells, 91 reservoirs and plant 76,960 acres of crested wheatgrass all at taxpayers expense is appalling. The fact that you would do so for the benefit of a small group of ranchers is scandalous. You are aware I am sure that the grazing grazing fees paid by ranchers does not begin to pay for the cost of administering BLM lands much less the cost of the construction you propose. These lands are already over grazed and in poor to fair condition and now you propose to subsidize their further destruction.

Alternative "A" is the only one which will provide for some recovery of the range; the only one which you in good conscience can implement.

I urge you to do your utmost to preserve and protect all environmental values including air and water quality, wildlife habitat, forests, and river and stream protection

22-1 Refer to response 13-11.

Burns, Oregon
January 25, 1990

Bureau of Land Management
HCR 74 12533 Hwy 20
Hines, OR 97738

Gentlemen:

Please count me as one vote against the proposed Three Rivers Resource Management plan. As a long time Harney County rancher, now retired, I think this proposed plan would be a disaster for the ranchers involved and a real downer for the county.

Sincerely,

Ethel C. Catterson
Ethel Catterson
SR2 13685 Hwy 20
Burns, OR 97720

The preferred alternative does not provide anywhere near enough protection or restoration of riparian areas. This should be a high priority for BLM efforts. Reducing grazing pressure, and use of prescribed burning in certain areas of heavy brush or juniper, should be used along with fencing to help bring back these critically important areas.

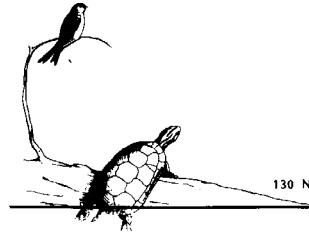
Alternative A is preferable to Alternative C, but reads like a necessary few words in a DEIS rather than like a commitment to address the real needs of the land. I hope that the FEIS will show either a radically changed Alternative C or a changed Alternative A as the preferred alternative. In either case, the changes should reflect a recognition of the need to restore native grassland, riparian zones, and wildlife habitat, by reducing cattle grazing pressure, especially in the spring, as well as by construction of fencing and water troughs, etc.

Thank you for the opportunity to comment on the DEIS for the Three Rivers Resource Management Plan.

Sincerely,

Char
Charlotte C. Corkran
130 N. W. 114th
Portland, OR 97229

23 No comment identified.



CHARLOTTE C. CORKRAN

130 N. W. 114th Street Portland, Oregon 97229 (503)643-1349

aw 1/25
Joshua L Warburton, District Manager
BLM Burns District Office
HC 74-12533 Highway 20 West
Hines, Oregon 97738

January 23, 1990

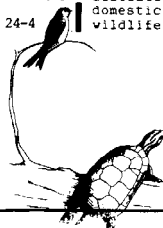
Dear Josh,

It has been a long time since I was on any of the BLM advisory boards, but just because I haven't been active doesn't mean I'm not still deeply interested in the management of BLM lands, especially in the Burns District.

The DEIS for the Three Rivers Resource Management Plan is a real disappointment. I can remember at least one advisory board tour through parts of the area, looking at some of the most fragile and erodable soils I've seen in Oregon, and most of them in poor condition. Where is the DEIS alternative that would truly protect and restore these soils? Alternative C inadequately addresses the longrange need to bring these lands back from past overgrazing. Major changes in the timing and intensity of grazing are needed, and will do more than will be accomplished by just the building of fences and watering facilities for livestock. I agree that some areas of crested wheatgrass seeding can be used to keep cattle off of desperate condition lands while they recover, however the preferred alternative relies too heavily on converting native range to crested wheatgrass monocultures. There is need for an alternative that uses some of these same techniques, but also an aggressive program of reducing grazing pressure, especially in the spring.

- 24-1 I am very concerned that wildlife is given the usual bottom of the heap rating in the priorities of the management area.
- 24-2 There are many important winter and breeding areas for bighorn sheep, deer, antelope, and other wildlife, but you'd never know it from the DEIS. How are these areas to be managed to benefit wildlife? Why are game animals given such a small forage allocation? How are grazing conflicts, disease transmission from domestic sheep to wild ones, and specific habitat needs of wildlife to be dealt with?
- 24-4

- 24-1 Refer to response 2-6.
- 24-2 Management actions for big game habitat are listed in management objectives WL 1, 2 and 3 in the Proposed Plan.
- 24-3 Refer to response 2-10 and 2-11.
- 24-4 Refer to responses 2-78 and 24-2.



CHARLOTTE C. CORKRAN

130 N. W. 114th Street Portland, Oregon 97229 (503)643-1349

From: Van G. Decker January, 29, 1990
P. O. Box 1069
Burns, Oregon 97720

To: Jay Carlson, RMP/EIS Team Leader
Bureau of Land Management
Burns District Office
HC 74-12533 Highway 20 W.
Hines, Oregon 97738

Dear Mr. Carlson:

The grazing use sold to livestock permittees is the only user fees of any significance that BLM can collect on a very large percentage of the RA.

The proposed reductions in grazing recommended in alternative A and B would have devastating economic effects on the Harney County community. As stated in the plan, 10.2 percent of total personal income in Harney County is from Agricultural income. However, in several of the small communities within the RA Diamond, Sodhouse, Riley, Crane, Princeton, Buchanan, Drewsey, and Pine Creek, agricultural income is near 100 % of the income.

Assignment of off-site forage to permittees is an acceptable method to most permittees particularly those in the Drewsey Area.

The proposed 30,000 acre seeding in West Warm Springs Allotment, will likely cost \$3,000,000.00. This money should be spent on more smaller projects in 5 to 10 different allotments. As stated in the study, this expensive seeding will mainly benefit the wild horses.

KIGER HMA:

Designation of 36,619 acres of Kiger HMA as a wild horse ACEC.

25-1 This includes significantly more area than this herd of horses has been using in the past years. If I recall correctly under the original Wild Horse and Burro Act passed in the late 1960's, Feral horses were not to be moved into new areas where they had not already been.

Van G. Decker Page 2

This Kiger herd of horses are not native to this area. They were hauled in here by BLM and planted in this area.

Mustang horses have been running in common with cattle in this area for over 30 years and have competed well with the cattle for feed and shelter.

RIPARIAN AREA USE BY HORSES

25-2 I recently made an inspection trip of the Yank Creek stream bed in the Kiger HMA. This is a parcel of privately owned land that has been totally used by BLM horses for many years. The BLM has had complete control and responsibility for the horse and range management of this area.

25-3 The Yank creek stream bed twenty years ago had several little small stringer meadows along the sides of the creek. These have been totally tramped out by the horses trampling in them when wet and pawing and rolling in them when they are dry. As I lay down beside the creek to get a drink of water, I noticed the bottom of the stream bed is a series of little ripples of silt, rather than a layer of small rocks as is normal in this type of creek. The soil area has been abused so badly that the soil is all being carried away down the creek. The horses, by their year round over grazing and abuse of this riparian area have 90 % destroyed the riparian area.

If a livestock permittee running cattle on a BLM allotment abused a stream bed area to this extent, I believe the BLM would likely require removal of his cattle forever. The Yank Creek stream bed is in the worst condition of any stream bed I have ever seen anywhere in the Burns BLM District. I believe this stream bed riparian habitat would be rated very, very, poor.

WILD AND SCENIC RIVERS:

Segment A and segment B of the Silvies River do not meet the characteristics to make this river a worthy addition to the National Wild & Scenic Rivers System

LEGAL:

The BLM should actively pursue the law suit by Delmer and Jo McLean, and not allow them to continue to abuse the BLM as they have in the past.

Thank you,
Van G. Decker
Van G. Decker

25-1 The Kiger HMA has not been expanded in this plan. Each wild horse herd has a designated boundary known as the Herd Area. This is the area in which they were located at the time the Wild and Free-Roaming Horse and Burro Act was passed. Within each of these Herd Areas, there is a Herd Management Area in which the wild horses are actively managed. The HMA may include all of the original Herd Area or may be only a portion of the original Herd Area in which it is feasible to manage wild horses. Although the Diamond Grade fields are not used by wild horses every year, they still remain part of the Kiger HMA.

See also response 8-9.

25-2 The area mentioned along Yank Creek is, as you said, privately owned. The BLM was given control of this area for grazing purposes only by means of an exchange of use agreement. Both livestock and wild horses have used this area at various times during the past 20 years.

25-3 The conditions along Yank Creek do indicate a stream in less than good condition. It is recognized that wild horses have caused some of this condition by their yearlong use of the area. However, since this area is privately-owned, the BLM is not in a position to prevent wild horses or livestock from using the stream area. The private landowner is in a position to fence off this area if he so desires. This may be one way of correcting the streambank conditions along Yank Creek. Also, refer to response 25-2.

JAMES A. ARNESON, P.C.
DIANA WALES, P.C.
KAREN K. C. PELLETTE
LEGAL ASSISTANT

ARNESON & WALES
ATTORNEYS AT LAW
318 S.E. JACKSON STREET
P.O. BOX 2190
ROSEBURG, OREGON 97470

26 TELEPHONE
503 / 673-0696

January 22, 1990

District Manager
BLM Burns District Office
HC 74-12533 Hwy 20 West
Hines, Or. 97738

Re: Draft EIS - Three Rivers area

Dear District Manager:

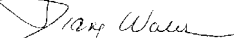
The proposed alternative, Alternative C, is totally unacceptable and simply continues the management of these publicly owned lands as cheap range for private cattle operations.

Interestingly the cost of construction of new roads and other rangeland projects is not included for this or the other alternatives, nor are environmental impacts accurately reflected. The result is a distorted cost/benefit picture.

- 26-1 The BLM must develop a new alternative to restore and maintain rangeland in excellent, natural condition. Cattle-grazing should be reduced, or totally eliminated, to the extent necessary to achieve this goal. Water quality, riparian and aquatic habitat must be improved and then maintained in excellent condition.
- 26-2
- 26-3 Ancient forests must be identified and protected. All crested wheatgrass seeding proposals should be eliminated.
- 26-4
- 26-5 Bighorn sheep habitat must be protected and forage allocations go entirely to bighorns in their home range. In general wildlife winter range forage allocations should be given priority over livestock allocations.
- 26-6

Of the alternatives presented, Alternative "A" is the least objectionable, in that it allows a token amount of recovery to occur.

Sincerely,


Diana Wales

- 26-1 Refer to response 1-13.
- 26-2 Refer to response 2-44.
- 26-3 Refer to response 12-1.
- 26-4 Refer to response 1-11.
- 26-5 Refer to response 2-78.
- 26-6 Refer to response 2-6.

Jan 29, 1990

Dear Josh,

We are apposed to the Three Rivers Draft for the following reasons:

- 27-1 1. no analysis of the impact economically of ranchers involved and economic impact on County
- 27-2 2. No proof water quality and riparian zones have been harmed by cattle
- 27-3 3. Wild horses should not take precedent over cattle on BLM lands
- 27-4 4. no proof wildland grazing is the sole cause of damage to riparian areas if any
- 27-5 5. No proof range data was taken properly and objectively.
- 27-6 6. no proof the EIS draft included input from ranchers
- 27-7 7. no alternative plan for ranchers as to where to graze cattle.
- 27-8 8. wild life should not take precedent over cattle on BLM.
- 27-9 9. no proof farming is available for alternative plan.
- 27-10 10. No clear outline of actual grazing reductions - where and how much - for how long?

Josh, this needs more study and work before it is

acceptable and liveable with all segments involved - BLM, Environmentalist, Rancher. Communicate! Please don't do it out any deals with some rancher and not others.

Sincerely,
Pat Siegel
Monte Siegel

P.S. Josh, no assessment has ever been made to the disruption of family lives and continuity in the ranching "way of life" which has produced some outstanding children and citizens.

- 27-1 Economic impacts were analyzed in the DRMP/DEIS, Chapter 4, pages 68-70. This impact analysis has been expanded to include the Proposed Plan (see PRMP/FEIS, Chapter 3).
- 27-2 Refer to response 2-44.
- 27-3 Refer to response 2-6.
- 27-4 See management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan.
- 27-5 Refer to response 2-87.
- 27-6 Refer to DRMP/DEIS, Chapter 5, pp. 5-2 to 5-4, Consultation and Distribution, where it is noted that all grazing lessees within the planning area and livestock organizations (such as Oregon Cattlemen's Association, Oregon Farm Bureau, Oregon Sheep Growers, etc.) were provided opportunities to participate throughout the planning process.
- 27-7 Grazing use adjustments would be implemented through monitoring and evaluation process (see PRMP/FEIS, Appendix 1, Table 1). If such use adjustments result in reduced stocking levels and no off-site forage is available, reductions would be absorbed by grazing operation. Also, refer to response 2-49.
- 27-8 Refer to response 2-6.
- 27-9 Refer to response 2-52.
- 27-10 Refer to response 2-11.

DATE: January 19, 1990 **28**

MELANIE S. HARRIS, NP
Harris-Tramel Med. Services, Inc.
229 NORTH EGAN
BURNS, OREGON 97720

TELEPHONE 573-6128

Bureau of Land Management
TO: HC 74, 12533 Highway 20
Hines, Oregon 97738

ATTENTION: _____
 URGENT / PLEASE REPLY BY _____ / NO REPLY NEEDED
SUBJECT: _____
REPLY TO: _____

MESSAGE
Gentlemen:

I would like to go on record as being opposed to the Three Rivers Resource Management proposal. According to the information that I have on hand, this is a loss in excess of \$3,000,000 taxable income into this county. This county has had a great economic loss in the last few years with the timber revenues being down and the mill not functioning a great portion of the time. The only thing that has kept this county afloat is the ranching that continues in this area. This amount of acreage loss to the cattleman has a devastating impact and therefore will impact the entire county. I would like to see this proposal denied.

Sincerely yours,

MELANIE S. HARRIS, N.P.

SIGNED _____

FORM #8502 COLWELL
Champaign, IL 61820

28-1 An analysis of community economic impacts has been included in the PRMP/FEIS. Impacts to cattle and calf sales and personal income have been estimated for each alternative. Standard input-output multipliers for Harney County were used to estimate total community impacts to personal income and employment.

28-1

29

29-1 see responses 2-1 through Z-96, 4-1 through 4-16, 30-1 through 30-4, and 78-1 through 78-10.

January 29, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson:

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the text for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Sincerely,

3J Cattle Co.
Box 14
Princeton, Oregon 977721





1730 Commercial St. S.E. • P.O. Box 2209 • Salem, OR 97308-2209 • (503) 581-1486

the voice of organized agriculture

January 29, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

RE: COMMENTS - 1989 BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

The Oregon Farm Bureau would like to go on record in general support of the testimony already received from the Riddle Ranch, Western Range Service and the Harney County Farm Bureau, in relation to the Three Rivers Resource Management Plan.

After reviewing the aforementioned comments, we agree that with the available data, current upland grazing practices are having no significant adverse impact on surface water quality. The proposal to remove livestock from streams will disrupt current successful grazing systems and will have a long-lasting adverse impact on livestock operations.

30-1 Water quality should be determined by standards developed by federal action under the Clean Water Act and should take into account the particular and difficult problems caused by the intrusion of naturally occurring pollutants. The solution to these difficult problems should not be at the expense of the established user of water, including agriculture.

30-2 Over grazing and damage to rangelands by wild horses or game animals should be managed by control of wildlife populations. Domestic livestock grazing permits should not be reduced or eliminated, as a result of misuse of public lands by wild horses or game animals. It has been recently reported there has been an increase of elk in the resource area. We strongly feel there should be no proposal to reduce grazing until a full EIS on the expansion of wildlife numbers has been done by an independent professional range manager.

30-3 If grazing permits are reduced to permittees, the permittee should be compensated economically for the amount of time the lands are used for another public purpose or when the reduction is due to no mismanagement by the permittee.

30-4 We feel that with the designation of the entire Kiger Active Horse Management Area as an area of critical environmental concern, it will have an adverse affect on at least one livestock operation. The takings issue should be addressed under the "Taking Implication Assessment" authorized by Executive Order 12630. Wild Horses and livestock have successfully run together in the past and as a result of the recent BLM sale of Kiger horses, it would tend to show that the wild horses in that management area are well established and doing fine.

Given the foreseeable problems associated with this RMP/EIS, it is our recommendation that a stewardship program and a cooperative management program be set up in the Three Rivers area.

Sincerely,

Doug Breese
President

DB/s1

- 30-1 Refer to response 2-3.
- 30-2 Refer to response 2-6 and 2-49.
- 30-3 There are no mechanisms in place which would allow the Bureau to compensate permittees for loss of grazing on public lands. Refer to response 2-63.
- 30-4 Refer to response 2-63.

January 30, 1990

District Manager
Bureau of Land Management
HC-7412533 Hwy 20 West
Hines, Oregon 97738

Dear Sir:

I am extremely disappointed to note that your Resource Management Plan identifies Alternative C as your preferred plan for the management of the northern half of the Burns District.

I have lived in the Central Oregon area for nearly forty years, and have noted a steady decline in the quality of the environment in which we live. Our "stewardship" of this wonderful land seems to have been characterized primarily by exploitation and overuse. I feel that the time to change our thinking, and the ways in which we manage both public and private lands, is long overdue. I believe that we must begin, now, to pursue policies of conservation, preservation, and reclamation.

31-1 I would, therefore, request that in the formulation of management plans for the Burns District, you emphasize the maintenance and responsible development of quality natural resources, and that the damaging effects of our use of natural resources be minimized (examples: overgrazing of rangeland, overcutting of timber resources, destruction of riparian zones and wildlife habitat, etc.).

I support your adoption of Alternative A, the "Natural Values Alternative". I am willing to actively support you in such a management program - even with increased tax dollars, if necessary!

Sincerely,

Philip M. Mickel
Philip M. Mickel

Jan. 26 - 1990

Jay Carlson - RMP 1815
Burns Dist. Office
Bureau of Land Management
HC - 74-12533 Highway 20 West
Hines, Oregon 97738

Dear Mr. Carlson,

We want to go as opposed to the Impact Statement on the Three Rivers Resource Management Plan.

It should not be implemented for the following reasons:

- 32-1 ① To put 150 thousands out of business would be a total disaster plan for Harney County.
- ② To take the amount of land off the tax rolls would be a disaster to anyone else in the county.
- ③ Researchers can prove what ever they want to prove. When the basis, prejudiced, inaccurate, incomplete, also the intelligence and ability or expertise of the researcher is involved.
- ④ Everything is compatible with wild life except man.
- ⑤ The government has caused the problems, or people representing the government. The people that settled here and their families know if you do not take care of the land, it will not raise animals. Having wild horses priority over man and ability to make a living with cattle is very not seem possible with what America is about.
- ⑥ With use of all lands is the best. Why does would the wild birds of Harney County on the porches instead of on Maxwell Lake Refuge. The native robbers know that they use their land wisely, and birds can get to the feed since it is grazed so unharmed can be cleaned up so birds do not get

tangled in it. The refuge does not do that.
⑦ They have ignored many aspects of life in Harney County except their own thoughts. Failure to address everything and ignore the people is wrong. Please listen to the opposition. You called learn a lot.
⑧ Please keep Harney County with good economy and help to make it a great place instead of taking livelihoods away.

Sincerely,

Mr & Mrs Allan Vaigter

32-1 The Three Rivers DRMP/DEIS does not propose to eliminate livestock grazing. FLPMA identifies livestock grazing as a valid use of the public lands. There are no proposals to interfere with private land holdings.

January 24, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West.
Hines, Or. 97738

Review Comments for the October 1989
BLM Draft Three Rivers RMP/EI

33-1 Refer to response 2-63.

Dear Mr. Carlson,

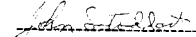
33-1 Alternatives A, B, and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12530 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

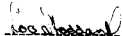
The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,


John Stoddart


Lois Stoddart

Enc:

Crow Camp Ranch
HC73-714 Buchanan Rd. 34
Burns, Or. 97720
January 24, 1990

34-1 Refer to response 2-11.

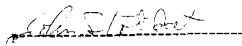
Jay Carlson
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Or 97738

Dear Mr. Carlson,

Since we purchased the Crow Camp Ranch and have the Miller Canyon range rights we have made a concentrated effort to improve the range, assuming that the suspended use will be returned to the range right.

By design we reduced numbers. There were so many horses that all we did was increase the forage for them. Then the horses were removed and the feed did increase. We reduced the length of time the cattle were on the range in the hope of having a lot of old feed. That, too, was successful. We feel that, with a normal rainfall year, and the majority of the wildlife using the forage on our base property, there is a great deal more forage than the grazing right demand of 600 AUMs.

We feel that the potential is there and that with an increase of water holes would further the distribution of the livestock.


John Stoddart

COMMENTS CONCERNING THE THREE RIVERS RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT:

IN REFERENCE TO PARAGRAPH # 5, "COMMENTS & RESPONSE", PREPARED BY: RIDDLE RANCH & WESTERN RANGE SERVICE, WE WOULD ADD THE FOLLOWING COMMENTS.

35-1 ALLOTMENTS 5514 (BIRCH CREEK) & 5517 (OTIS MOUNTAIN), THERE HAVE BEEN CONCERNS AND COMPLAINTS OVER LACK OF ALLOCATIONS FOR BIG GAME FORAGE IN THESE ALLOTMENTS. THE FACT IS, THAT BIG GAME HAVE ONLY RANGED IN THESE AREAS IN RECENT YEARS AND MAY MIGRATE TO OTHER RANGES IN THE FUTURE. IT DOES NOT SEEM REASONABLE TO ESTABLISH PERMANENT FORAGE ALLOCATION ON THIS BASIS.

35-2 ALLOTMENT 5564 (WHEELER BASIN), THE CONCERN THERE, BEING EXCESSIVE CONVERSION OF PLANT SPECIES IN THE ALLOTMENT AND DOES NOT ADDRESS THE FACT THAT IT IS ONLY GRAPED FOR ONE MONTH IN THE SPRING, THIS GIVING AMPLE TIME FOR REGROWTH. THERE IS NOT A PROBLEM OF WINTER BROWSE FOR DEER, OR ANY REAL DAMAGE BEING DONE TO PLANTS.

35-1 Forage allocations are for the life of the plan. The Drewsey MFP allocated forage to mule deer in allotments 5516 and 5517. Elk numbers have increased planning area wide and were not allocated for in the Drewsey MFP. Also, refer to response 2-10.

35-2 Vegetation conversion is listed as a constraint in the Wheeler Basin information in the DRMP/DEIS, Appendix 3, Table 6, as a guideline for future management due to deer winter range.

*J. W. Robertson
Carol Robertson
P.O. Box 227
Drewsey, OR 97904*

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUN's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of _____ AUN's livestock forage in _____ Allotment will reduce the value of our base property by approximately \$ _____. (Assume \$50 per AUN value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

J. W. & CAROL ROBERTSON
Name
P.O. BOX 227
Address
DREWSEY, OREGON 97904
City State Zip Code

J. W. Robertson & Carol Robertson
Signature

Enclosure: Supplemental Comments

36 No comment identified.

Burns, Oregon
Jan 29, 1990
37

Bureau of Land Management
Three Rivers Resource Area
Craig M. Hansen
Area Manager

Dear Sir

This is a letter of protest to the Draft Three Rivers Management Plan of which I agreed to 30% cut in numbers. I was told when survey was made I would probably get my numbers back or a portion. If I did not agree you would make the decision & I would have no rebuttal.

- 1- The reason for protest (I did not see a Taking Implication Assessment) to determine the effect on my property rights.
 - 2- Reason two. The promise of no cut in numbers for East Sageshen due to Walter Baker's nonuse would only be year to year.
- You do have extra P. V. Ms. to offset this 30% cut in numbers in the seeding by the Double O School which Dick Holthuis

and Don Miller were to use in rotation to relieve the pressure from livestock grazing on the East Sageshen allotment.
Therefore I see no need for a reduction in numbers yet this time.

Sincerely yours
Don Miller

37-1

37-2

37-1 Refer to response 2-63.

37-2 Nomuse is applied for and authorized on a year-to-year basis, therefore, your use of forage available because of Walter Baker's nomuse can only be authorized on a year-to-year basis.

38

JENKINS RANCHES, INC.

Barton Lake Ranch Diamond, Oregon 97722 Phone: (503) 493-2420

010

January 22, 1990

38-1 Refer to response 2-63.

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, Oregon 97738

Dear Mr. Carlson,

I am writing with review comments for the October 1989 BLM Draft Three Rivers RMP/EIS.

38-1 Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch commentary. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Sincerely,

JENKINS RANCHES, INC.
Richard J. Jenkins
Patricia E. Jenkins
Richard J. Jenkins, President
Patricia E. Jenkins, Secretary/
Treasurer

Jan 29 1990

39

Bureau of Land Management
NCR 74-15533-Highway 130
Hansen, Oregon 97738

39 No comment identified.

Dear Sirs:

This is to notify you that
I am against the grazing
policies implemented in
the Three Rivers Resource
Management plan.

J. M. Asaty
P.O. Box 378
Burns Oregon
97720

Dear Mr Carlson:

1/25/90 40

Concerning "The draft Three Rivers Resource Management
Plan and Environmental Impact Statement draft RMP"
EIS is not needed as I see it.

I feel there is not any need for any change
what so ever in the present plan + practices.

I also feel the surface water quality and
aquatic and riparian habitat conditions ratings
appear to be consistent and unrealistically restrictive.
I believe there is more fish harvest in South Fork
and its tributaries than any stream its size in the
state.

40-1 Refer to response 2-63.

I also feel the "poor" wildlife habitat conditions
were over exaggerated. There are far more elk
in this area now than 20 years ago. The antelope
and deer are well up in numbers. I have never seen
any wildlife that were poorly malnourished or
starved.

40-1

I also feel that before any alternative that
causes a reduction in RMP is imposed
no matter what reason a complete biology
implications assessment should be completed
as authorized by executive order 12630.

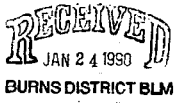
Sincerely yours

Darryl Harrison Ott
Box 793
Crane, Oregon 97732

DL
1/23/90 Andrew

1/23/90
41

District Manager
BLM Burns District Office
HC 74-12533 Hwy 20 West
Harris, OR 97738



Re: Snowmobiles on Steens Mt. and
Draft Three Rivers Resource Mgmt Plan
& EIS

- 41-1 Refer to response 1-13.
- 41-2 Refer to response 12-1.
- 41-3 Refer to responses 2-44 and 2-45 and DRMP/DEIS, Appendix 2.
- 41-4 Refer to response 12-1 and 12-7.
- 41-5 Refer to response 1-11.
- 41-6 Refer to responses 2-6, 2-10, 2-11 and 2-78.
- 41-7 Refer to response 2-6.
- 41-8 Refer to response 3-6.

Dear Sir:

Your plan to allow snowmobiles on Steens Mountain will adversely affect the area in many ways, such as: destroying endangered plants; displacing wintering deer; increasing soil erosion; lowering soil bacteria; delaying spring flowering; stinking up the air with exhaust fumes harmful to humans, plants, animals and trees; causing excessive noise pollution; and generally creating an urbanized, motorized, smelly, noisy ambience where there is now a lovely, serene, quiet and pure atmosphere. For these reasons I recommend that Alternative 3 (no motorized use) be implemented.

41-1 to 8

Alternative C, your preferred alternative, in the draft EIS for the northern half of the Burns district is an ecological disaster. There should be an alternative developed looking towards restoring and maintaining rangeland in excellent natural condition; ancient forests should be protected; water quality, riparian and aquatic habitat should be improved and maintained in excellent condition; all costs of new roads and rangeland projects should be included along with their environmental impacts; created wilderness

seeding proposals should be eliminated; bighorn sheep habitat should be protected; wildlife winter range forage allocations should be given priority over livestock allocations; and there should be Wild and Scenic River designation for the South Fork Blatchlet Creek and the Selma River. At the very least Alternative A should be adopted.

Mary Ellen Foreney
860 Humburg Creek Road
Applegate, OR 97530

Ken and Barbara Arnold
 PO Box 237
 Drewsey, Or 97904
 January 26, 1990

Jay Carlson - RMP/EIS
 Burns District Office
 Bureau of Land Management
 HC 74-12533 Highway 20 West
 Hines, Or 97738

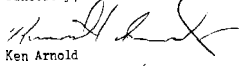
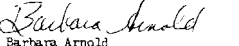
Dear Mr. Carlson:

Enclosed are our comments on the draft Three Rivers Resource Management Plan dated October 1989. We went through Table 2.1, Management Directives by Alternatives, and addressed each objective. We felt this method would be the most comprehensive.

We apologize if some of the comments are repetitive, but the solutions to several of the objectives are repetitive. In general, we found the report easy to read and would like to commend the staff for the excellent job they did in compiling this information.

We hope the final RMP reflects a broad based multiple use plan that allows commodity use along with improving natural resources. We don't feel reducing livestock numbers is the fix-it-all answer. But we feel that BLM thinks it is. We hope we are wrong.

Sincerely,


 Ken Arnold

 Barbara Arnold

ba/ enc. 12

Arnold comments page one

In this response we have directed most of our comments towards Table 2.1 which is Management Directives By Alternatives. We have gone through each category and analyzed the proposed objectives and actions and commented accordingly.

AIR QUALITY: the burn limits might be a solution, but the worst air we have in the county results from fires outside of the state.

42-1 **WATER QUALITY:** Your categorization of water quality as poor on the majority of the streams we feel is in error. The tributaries and the main branch of the middle fork of the Malheur River are improving, not declining. There are no more sewage drain fields emptying into the waters. The last 20 years have seen sharp cut banks slough off and grass and shrub growth begin on these banks. We have had the riparian areas evaluated on our private ground and the specialist report was stabilized and improving.

We feel most of the current damage in influents has more to do with unchecked runoffs than with livestock damage. The severe flooding of the middle fork rips loose these soft banks and the ice flows gouge out plant growth, keeping the banks unstable. We feel streambank stabilization projects should be implemented and do not feel livestock removal is necessary.

Cattle make up only a small percentage of animals using streams, ponds and reservoirs. Deer, elk and wild horses also use these water sources. Fencing an area would only make other, open areas congested and cause more erosion. Another question we have about fencing the proposed exclusion ponds, lakes, springs and reservoirs is how many of these were developed and / or constructed primarily as animal watering sources? If this was their original purpose and they have become a multiple use water source, we feel they should be retained as animal watering sources primarily with all other uses secondary.

(cont)

Arnold comments page two

As for road closures, it might help in some areas, but we fear that people would drive in there anyway and that could result in more ground damage and plant damage than maintaining a road with water bars and other erosion prevention measures.

Currently, BLM has good management practices in effect and we feel they need to be given time to work.

SOILS: We feel this issue was addressed strictly on a daily basis rather than a long term one. We would like to know if in fencing and reducing grazing you are excluding game and wild animals also? Elk, deer, antelope and wild horses cause unmeasured damage with their trails. Domestic livestock use currently existing trails which the wild animals use year around and keep defined.

Animals are not the only cause of erosion. Fires destroy plants whose roots hold the soil together and whose foliage diffuses heavy rains. While we need plant life to slow erosion, too much foliage is a fire waiting for the right bolt of lightening. Livestock removal will lead to dry, old growth foliage, which the wild animals would not utilize.

Also, some erosion is natural. The earth is not static. The alluvial fans and rimrocks along canyons are results of years of erosion, most before man ever saw the United States. The Grand Canyon is another example.

FORESTRY & WOODLANDS: We feel the current plan is the best. The main need is to maintain the current lumber supply and the forests. We are avid hunters and after years of observing game animal habits we know they prefer slash cut areas that have new seedings. These over old growth stands.

Also, if current logging regulations were enforced, erosion and slash problems would be drastically reduced. But the areas have buffer tree hedges planted along the roads and old practices continue away from the public's eye.

(cont)

Arnold comments page three

42-2 As for junipers, let's see the BLM permit unlimited cutting of them, except in the restricted area, with cleanup guidelines and hopefully reseeded with a more beneficial plant.

LIVESTOCK GRAZING: The ranchers in the Drewsey and Riley areas have absorbed all of the cuts in allotment numbers we can afford to. The value difference between the no action alternative and the emphasize natural value alternative is Five and one half MILLION DOLLARS! This amount would certainly affect the livestock industry dependent on these AUM's! Not to mention the other businesses dependent on the livestock industry. The cattle are being blamed for something they have no part in. At the turn of the century, all this area was severely overgrazed. From local cattle and sheep owners to the sheep trails that saw animals from the south and north pass through our county. These times saw a dramatic decline in range conditions. In the 1890's there was bunchgrass and other native grasses. The early ranchers and herders abused this pasture. Their descendants have been trying to rebuild the native ranges with BLM and private work through seedings and reduced numbers - not just of cattle, but of horses as well. These plans are succeeding. The range is coming back, everyone is trying to help. We want to maintain and improve the land for the next generations, not destroy it. The current system is working and needs to be allowed the time to continue to do so. We can't fix overnight or even in 20 years what took 80 years to do. Also, there are some areas that have never grown anything and never will.

42-3 The dramatic increase in big game animal numbers also is detrimental to the AUM's. But the Fish and Game department want more AUM's all the time. Not publicly, but they scatter game during hunting seasons so the kill will be minimal and numbers will increase.

(cont)

42-4 The water developments and vegetation treatment are great ideas, but the grazing reductions are not called for. Any grazing reduction would be subject to a "Takings Implication Assessment" as authorized by Executive order 12630. We feel horse and game animal numbers should also be reduced
42-5 if a reduction can not be avoided. The reductions should be equally distributed among livestock, horses and wild animal AUM's.

WILD HORSES & BURROS: We were glad to see minimum and maximum numbers for the horse herds. Please keep these herds within these ranges by gathering when herd numbers reach the maximum. We don't feel ACEC status is needed as the horse herds are within their optimum levels currently. This shows the current RMP is working well. We have mixed
42-6 feelings about the plan to acquire private land. Each acquisition should be carefully considered and should be used only when it is mutually beneficial to both the land owner and BLM. We know the Keper herd is gaining national recognition and feel current practices will maintain the herd.

42-7 VEGETATION: One area should be enough for the Oregon Natural Heritage Plan cell needs. Locking up land for the current species is not logical. Areas are not static but are continually changing. What was here a thousand years ago is not here today and what is here today will not necessarily be here in the future. These changes will occur with or without human interference. Plant communities are constantly changing, going from the early stages to the climax species. We strongly feel that reserving areas for a few interested sightseers is unconstitutional. It restricts the majority of people access to these public lands, which all are entitled to see and use. It also doesn't follow BLM's multiple use policy. We do agree with controlling noxious weeds and feel this problem has been ignored for too long in Harney County.

(cont)

SPECIAL STATUS SPECIES: Again, plant and animal communities are constantly changing, some will become extinct and new ones will evolve. Special management will only delay the inevitable. We disagree grouse need big sagebrush. There are several flocks of grouse in our area and they prefer crested wheat seedings and/or meadows to sagebrush areas. That is sage brush areas on flat, open ground. They do like deep, sage
42-8 choked canyons. We think the two mile buffer zone is extreme and would like to see all areas that are seedable to crested wheat seeded. Leave the sage brush on the steep hills in the canyons for their private areas. Besides, these sage brush covered flats at one time were likely a bunch grass pasture with little sage brush.

Number 14 on Table 2.1 - 18 under option A and B needs to be clarified. The area is right on top of Bartlett Mountain and not on the side slopes.

Again, we protest livestock removal as the plant and animal species are recovering and doing so with livestock present. Also, if livestock are removed, what about wild horses and game animals? These must also be removed. Then plant growth will be unchecked by grazing, old growth will become rampant and eventually fire will destroy the area and there will be nothing left.

Cattle are not the ones affecting the fish. Too many fishermen and trash fish which eat the trout fingerlings and the trouts food are the main problems. Poisoning undesirable fish is now forbidden, so that management tool is lost. These problems need to be addressed. Removing cattle is not the ultimate cure for many of the problems BLM is facing.

42-9 WILDLIFE HABITAT MANAGEMENT: We approve of road closures during winter months as long as it does not interfere with access to domestic animals on winter allotments. In this area the cow again becomes the automatic scapegoat for all the problems.

(cont)

42-10 The fences constructed for wildlife will not always hold cattle and that could cause a potential trespass problem. This would not be the permittee's fault, but would be their problem. Wild animals adapt and survive. They always make it through existing fences, occasionally breaking wires and flattening sections of the fence. We don't see new fences making any major changes. The only major change would be to eliminate fences completely and then we would be back in the 1950s, losing what has been gained in the last 40 years!

We don't see the need to allocate more than the current AUM's of cattle forage to big game. Please permit current grazing practices to continue.

42-11 Also, there is a mistake on the number of guzzlers in each of the options.

WETLAND, RESERVOIR AND MEADOW HABITAT: in reference to appendix 5, table 3, we understand the hardship the wide fluctuation of water causes at Warm Springs Reservoir. We do not see cattle and birds interfering with each other. The refuge also thought that and have found out the cattle and other agriculture practices were necessary to maintain the bird population.

Much work has been done by the government to reclaim wetlands and return them to production. It is with dismay that we observe the reversal of this policy and feel it is a serious mistake.

42-12 RIPARIAN HABITAT: Again, you have singled out livestock as the sole problem. Wildlife and unchecked runoff also add considerably to this problem. Exlosures should not be used unless they are complete, shutting out wildlife as well as domestic livestock. Currently, most riparian areas
42-13 are stabilized and improving. Time, streambank stabilization projects and runoff flow checks would dramatically help riparian areas without removing livestock.

Also, please note the current BLM riparian area management policy, signed 1-22-87, states that a riparian area is "directly influenced by

(cont)

permanent water". Permanent is underlined as Warm Springs Creek, Little Pine Creek, Beaver Dam Creek, Blue Bucket Creek, Little Muddy Creek, Stinkingwater Creek, Middle Fork Malheur River and the South Fork Malheur River go dry during long hot summers. So they can not, under BLM's own definition, be called riparian areas as the water is not permanent!

RAPTORS: You have covered this area well. It is sad that people have to choose. If we keep raptors, we loose game birds such as pheasants, quail and chuckars as raptors prey on them.

AQUATIC HABITAT: We applaud implementing aquatic habitat enhancement project work in the Middle Fork Malheur River. That and streambank stabilization, where needed, will help the fish population. As will removing the trash fish from the river and reservoir. We fish the middle fork and for every bass and trout we catch, we catch up to four times as many suckers.

Also the number of people fishing the river has dramatically increased, resulting in lower fish takes.

42-15 Again, you want to pull livestock and again we must remind you of wild animals, including horses, that also use the river. You can't blame it all on cattle!

Also, most of the Middle Fork Malheur River passes through private ground over which you have no control.

Oregon Fish and Game own several miles of river below US highway 20 and cattle grazing has been severely limited in this allotment for over a decade. The water, river banks, etc. have not changed dramatically from the areas where cattle are still on the river.

Your proposal to enhance warm water fish and their habitat are great! At the Fish & Game public meeting in Burns Jan. 17, 1990, this item was also discussed and many people feel the need to establish more pan fish. We feel the proposed projects outlined at your question and answer session

(cont)

will help. The only reservation is potential interference between recreation use and the submerged logs during low water years. We feel several reservoirs, higher in the watersheds, could solve many problems and keep water flows more consistent year after year.

42-16 HAZARDOUS MATERIALS: Please keep hazardous waste off all land. Let's find a way to neutralize this material before it is disposed of, thus eliminating this problem. Cities need to learn to recycle and reuse.

42-17 FIRE: Keep fire for the valuable management tool it is. Look at each fire separately and if it will benefit the land by removing unwanted brush, let it burn.

42-18 RECREATION: We disagree with the proposed plan to remove livestock from riparian areas for reasons already listed in our comments. We also feel the designation of the 5.4 mile section of the Middle Fork Malheur River as part of the Wild and Scenic River system is unnecessary. This area is isolated and seldom used. The designation could create more problems than it would solve. This area has seen many man caused changes over the last 150 years so technically it does not fit into the wilderness category.

We personally feel that wilderness areas are unconstitutional as they deprive some people from access to the land which is publicly owned, and reserve it for only a few.

42-19 We have the allotment on the west side of Warm Springs Reservoir. During the summer months, we spend a lot of time there and visit with the recreationists using the area. We have never found anyone who objected to cattle sharing the area. However, with the current use of four wheelers, we prefer our cattle to be else where as we have had problems with them being chased! This problem has no easy solution, except limiting areas of use for the ORV.

(cont)

42-20 A lot of effort and money was put into the crested wheat seedings. Now, due to recreation use, we can not use the reservoir field except early and late in the grazing period. The dry years, low water and dry feed has prevented use from using it in the fall for several years. As a result, wolf plants are appearing and both BLM and we agree these are bad. We would like to see the recreation areas fenced, similar to campground fencing the forest service uses. Then we could utilize these seedings during the summer when there were not many users. Also, this would allow more flexibility to our grazing plan during dry years. This would be beneficial to all.

42-21 ACEC: We have many mixed reactions to this section, mostly the fact that our environment is continually changing with or without man's influence. Trying to make a section of the living earth into a museum goes against nature. This is what we perceive ACEC are for. It would be nice to take a certain area and freeze it in time for future observation. But that is impracticable when you are dealing with a dynamic environment. Even in the lava beds a tree might take root and severely disrupt part of the lava flow. We do not feel that additional land needs to be added to this "earth museum".

VISUAL RESOURCES: We love the way our county looks and hope it remains this way forever, however we know that land continually changes so our hope is futile. We accept that. Land erodes and deposits elsewhere, streams and rivers continually change course, carving new channels in the land. On our land, where once was a deep pool in the river, now is a sand bar. Plants grow, die, are uprooted or eaten. This is the master plan and has been for centuries.

42-22 You have a preserve class and again we do not feel you can preserve a dynamic thing without altering it. The best policy is a moderate one. Man has been here for centuries and Harney County is not an eye sore!

(cont)

CULTURAL RESOURCES: This is an explosive area and again we are against an earth museum except in some of the areas listed here. We agree with most of the plan under the preferred categories. Some thousand years from now we will be under some microscope as we are artifact gathered. Yes, we must preserve some of our lands heritage, but we also must learn that time passes and we have no control of that.

42-23 Some areas you wish to withdraw from livestock use, such as the Native American root gathering areas. The cattle and sheep have ranged on these areas for about 100 years with no ill effect on the plants in question. In fact the "natural fertilizer" left behind has probably helped, not hurt these crops!

42-24 As for acquiring more private land, we have enough land under public ownership in the state. But it is each individual's right to dispose of their land as they decide. But if they wish to retain ownership of the land, that is also their right. We would like to see taking by condemnation prohibited in the final plan in all areas where private land acquisition is considered.

ENERGY & MINERALS: We feel that Harney County needs all the commercial help it can get. If this includes BLM leasing mineral, gas and geothermal rights, please don't hesitate to lease them. Just provide for protection of the environment. We agree with the management objectives.

42-25 LANDS & REALTY: After studying these maps and objectives, we do not see the need of acquiring all the private land designated for Z1 and Z2. There would only be small private communities in an area owned by the government. This is not the basis of the United States! We do not feel such wide spread acquisition is necessary. Also, funding for this project would be astronomical, especially for a federal budget that has

(cont)

not seen black ink for many years.

42-26 This objective, "consolidate public landholdings and acquire lands with significant resource values values", is not in the public's best interest. Nor in the interest of the private landholders in the Three Rivers Area.

We do applaud corridors for utility and transportation needs. Also, transferring existing dumps to the county sounded like a good idea, until we learned that the federal government is imposing guidelines on dump construction which could be a financial hardship for Harney County. Again we ask that acquiring access to land and/or land itself through condemnation be forbidden in the final plan.

42-27 We do not feel that the lands listed in Appendix 10, Table 5 would best serve public interest if withdrawn from Public Land Laws. We feel they should be carefully managed in the current practices without drastic changes. Let's not lock up this county, but keep it as a renewable, useable resource.

ALLOTMENT 5566: Texaco Basin is our allotment and we feel the water quality is excellent in this allotment and would like to see the data that determined poor water quality.

42-28 Also, here again you discuss riparian habitat and the streams in this allotment are not year long flowing streams. Several times since we have been in this allotment Warm Springs Creek has gone dry. The reservoir 42-29 has been a small pool against the dam several times in the 1980's. The river has been a small stream or completely dry. According to BLM's definition, the only area with live water would be the river. This would also include Warm Springs Reservoir as the reservoir was established for

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irrigation purposes, not recreation. The primary objective needs to be remembered and not replaced by a secondary benefit such as recreation. It is great that recreation has been a added use, but feel that the primary use, irrigation water, should not suffer for recreational use.

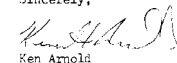
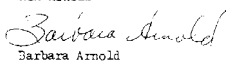
We hope that the final plan reflects your current practices with a few modifications. Please do not look at livestock reduction and removal as the main answer to the problems.

The Taylor Grazing Act's primary purpose was to control grazing on the public lands. Since BLM has evolved, the purposes have become varied and many. Again, please do not forget the primary one, the grazing of livestock!

42-30 A quick note on mistakes. In the text, the map index is usually two pages off from where listed. Also in Table 2.1 on page 44 under option A in the second #1 I think you mean Appendix 10 not 11.

Good Job!

Sincerely,


Ken Arnold

Barbara Arnold

- 42-1 Refer to response 2-3 and PRMP/FEIS, Table 2.1.
- 42-2 Juniper cutting is permitted within specific areas. This method has proven to be more effective at removing enough juniper to release understory vegetation when compared to indiscriminate cutting areawide. Also, some juniper stands are providing good cover for big game and the juniper/sagebrush type provides habitat for many songbird species. Juniper removal on site-specific areas can enhance understory species while allowing for continued juniper habitat availability.
- 42-3 Refer to responses 2-10 and 2-11.
- 42-4 Refer to response 2-63.
- 42-5 Refer to response 2-6.
- 42-6 Refer to response 3-16 and 4-14.
- 42-7 The Oregon Natural Heritage Plan (1988) has many cells for terrestrial and aquatic ecosystems. Each of the areas being considered for designation as an RNA/ACEC will fill one or several of these cells. It is correct that vegetation is not static. However, areas designated as RNA/ACECs do provide ecosystems where, hopefully, there is minimal modern human interference. These areas can be utilized for ecological studies, monitoring and research, and education. Information obtained about changes occurring within an RNA/ACEC will provide a basis to which communities, where a full range of other multiple-use activities are ongoing, can be compared.
- 42-8 Refer to response 2-78.
- 42-9 There are no road closures that would interfere with access to livestock on winter allotments. These roads are needed for administrative purposes and would not be closed.
- 42-10 Fence specifications for fences built in areas of wildlife use are outlined in BLM Manual Handbook H-1741-1. Fence design will be determined on a case-by-case basis that will provide for the movement of wildlife. This has been a standard stipulation in the past MFPs and is not proposed for change (see Appendix 1, Table 12, Proposed Plan).
- 42-11 See management action WL 2.4 of the Proposed Plan.
- 42-12 The riparian management actions have been revised, see management actions WL 6.1, 6.2 and 6.3 of the Proposed Plan.
- 42-13 Refer to response 2-3, 2-4 and 2-44.
- 42-14 The definition goes on to state "Excluded are such sites as ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil." The areas named have vegetation present that is dependent upon free water in the soil. Also, see Appendix 1, Table 4 of the Proposed Plan.

42-15 To meet the objectives of riparian, water quality and aquatic habitat, wild horses will need to be managed in a manner similar to livestock. They may be fenced from riparian areas or moved from these riparian pastures during critical periods in order to achieve a thriving ecological balance and meet the objectives of multiple-use and sustained yield as described in Sections 2 and 3 of the Wild and Free-Roaming Horse and Burro Act of 1971. Also, refer to responses 2-28 and 2-31.

42-16 There has been no authorization of discharge of hazardous materials on BLM public land.

42-17 Refer to response 4-9.

42-18 Segment A, Middle Fork of the Malheur River, does meet the criteria for a potential Wild River under the provisions of the Wild and Scenic Rivers Act (Public Law 90-542 as amended). A study process was completed which considered free-flowing values, outstandingly remarkable values, classification as wild, scenic and/or recreational and determination of suitability.

The 5.4 miles of river reach within the 1/2 mile corridor basically includes the land area between the river rims and very few human-caused changes are evident. See response 3-6 and Table 2, Appendix 11 of the DRMP/DEIS in which values for the various river segments were noted (i.e. primitive trail, primitive road, drift fences).

42-19 There are currently 23,811 acres of BLM-administered land which are designated as limited to off-road vehicle use around the perimeter of Warm Springs Reservoir in the Burns District. This designation limits the use of motorized vehicles to designated, existing roads and trails. However, the areas near the reservoir where conflicts are occurring are on lands withdrawn and administered by the Bureau of Reclamation (BOR). The BOR has a recreation management plan to manage recreation use, including regulation of ORV use, but has not made their presence known by fencing or signing of acres near the reservoir.

Portions of the seedings on the west side of the reservoir are on BOR lands, so coordination is necessary before establishing any new fence locations, implementing signing and enforcing regulations.

An action recommending the acreage designated limited be reduced to the land area around the reservoir in Reservoir Pasture, No. 5566, and the remaining acres be returned to management under an open designation is in the proposed PRMP/FEIS.

42-20 Refer to response 42-19.

42-21 Refer to responses 15-16 and 42-7.

42-22 See response 2-82 which discusses retention or preservation of scenic values for specific places (Class I and II areas as noted on Map VRM-1 in Chapter 3, Volume I of the DRMP/DEIS).

There are 8,560 acres which are under a VRM Class I. These areas are the two WSAs (Malheur River/Bluebucket Creek and Stonehouse) which are mandated to be managed as Class I under Wilderness IMP. If these WSAs are designated wilderness, Class I visual management will continue. If the WSAs are returned to multiple-use management, the areas will probably be managed under VRM Class II and 2,040 acres in Malheur River/Bluebucket Creek will remain under VRM Class I as an administered primitive area. Since scenic resources are high in both WSAs, this class is still restrictive on what developments will be allowed.

42-23 Refer to response 4-15.

42-24 Refer to responses 3-16, 4-14 and 6-10.

42-25 The objective of the land tenure zone concept is not to acquire all lands in Zones 1 and 2. This would be an unrealistic expectation since most land tenure adjustment would be through exchange. The concept does provide a means which can help direct land tenure efforts and funding in specific areas.

A large increase in funding for land tenure adjustment is not expected. Consequently, changes in the overall landownership pattern of the RA would be gradual over a long period of time.

Because exchanges will be the primary mode of land transfer, any increase in public land acreage in Zone 1 would generally have a corresponding increase of private ownership in Zones 2 and 3.

Also, refer to responses 3-16, 4-14 and 6-10.

42-26 Refer to response 3-16, 4-14, 6-10 and 42-25.

42-27 Section 204 of FLPMA gives the Secretary of the Interior authority to make, modify, extend or revoke withdrawals.

Diamond Craters ONA/ACEC is already withdrawn from the public land laws. The 400 acres identified in Table 2-25 are adjacent to the existing withdrawal and contain similar outstanding geologic and natural features as within Diamond Craters. Some of these features have been damaged from past mining of decorative slab lava. The additional withdrawal would help protect the features from further damage as well as provide consistency of management for the entire Craters complex.

The 640 acres identified for Squaw Butte Experiment Station is currently under State ownership. The parcel is proposed for exchange to the United States. If the land is acquired, the withdrawal would provide two important purposes. First it would transfer jurisdiction from the BLM to the Agricultural Research Service, USDA. Second, it would protect the land from mineral or other activity which might be incompatible with the ongoing range and agricultural research occurring at Squaw Butte. As with Diamond Craters, this would be an addition to an existing withdrawal.

Some of the acreage in Table 2.25 is a proposed withdrawal for the Bluebucket Creek and Middle Fork of the Malheur River. This would be an interim withdrawal to protect the areas pending final action by Congress on Wild and Scenic Rivers designation. Finally, Chickahominy Special Recreation Management Area is being added to the Proposed Plan for withdrawal to protect campground facilities and adjacent land from mining and other nondiscretionary activities which are generally noncompatible with intensive recreation use.

- 42-28 Refer to response 42-14.
- 42-29 Refer to response 42-14.
- 42-30 Page numbers for maps VRM-1, M-1 through M-5, L-1 and L-2 are in error. There were admittedly other page numbering errors in the draft, and we apologize for this inconvenience in reviewing the document. Stringent editing has been applied in the PRMP/FEIS to ensure that such errors are not repeated. The Appendix 11 citation should read Appendix 10.

43

REX CLEMENS RANCH INC.

Jay Carlson, RMP/EIS Team Leader
Bureau of Land Management
Burns District Office
HC 74-12533 Highway 20 W.
Hines, OR 97738

Dear Mr. Carlson:

This letter concerns the aspects of the Three Rivers Management Draft Plan that immediately affect Rex Clemens Ranch. Our affected allotments are the Kiger, Smyth Creek, and Deep Creek allotments.

The entire proposed plan of the Kiger, Smyth Creek, and Deep Creek allotments is basically centered on the issue of the mustangs. The BLM's vision is funneled positively toward wild horses and negatively toward cattle. This narrowness of mind is shown in all categories in the draft varying from riparian zones, forage utilization, to land acquisition.

Presently the Kiger mustangs are the hot fad of the Burns BLM. Please do not allow this fad to adversely cloud the long term management plan of the area's entire resource pool. Remember that this is a multi-use area. If this area is properly managed the range conditions will continue to improve and it can be shared by wild horses, cattle, deer, elk, and recreationalists.

Ideally we would not like there to be any wild horses at all on our range. But due to a great deal of public interest for the Kiger mustangs we do recognize a need to put these horses somewhere. And due to the circumstances of bad luck our range was chosen for these mustangs. The BLM has been running the Kiger mustangs along with our cattle for about the last 10 years. This arrangement has worked well. There has been plenty of forage year round for the horses as well as plenty of forage for the cattle during the grazing season. So if things are fine now why change them? The proposed reduction of cattle grazing on this range is not necessary. This fact is proven by the evidence of the past 10 years of grazing horses and cattle together at the level of utilization that has been used on this range.

Last year at the Kiger mustang observation site dedication I heard several of the KMA people say that they

thought there was not a problem with the cattle and horses sharing the range. The proposed plans in the draft will make the future of the horses seem better. These plans are very misleading. The horses' future will not actually be any better; but it will just appear to be that way. Actually the plan will just suppress the cattle issue with no actual better changes for the horses in the long run. If it ain't broke, don't fix it!

We believe the BLM is negligently biased for the Kiger mustangs and against cattle in this draft.

43-1 The BLM has failed to analyze some of the negative aspects that the wild horses do to the environment. They have failed to analyze the effect the horses have on the riparian zones. Yank Creek is a prime example of this damage. There have been no cattle in this creek for several years, just horses.

43-2 Horses favor the grass that grows in the creek bank areas. They graze this grass to the root stub destroying the crown of the plant with their close-biting nature. In Yank Creek this has led to several areas that are grazed bare and are subject to severe erosion. The soft springy areas are trampled to pieces. It is the nature of horses to graze these favorite grasses next to the creek until they are gone. The stated "free-foaming" concept of managing horses is not in the best interest of the resource area as a whole.

43-3 Prioritizing wild horses above big game and then cattle is wrong (App. 3-50). We believe the Taylor Grazing Act does not support priority allocations such as this.

43-4 On the issue of forage utilization, App. 3-50 has a big fallacy listed in the conflicts column. It is stated that "calculated capacity is less than forage demand." This is wrong or your calculations are too low. This allotment is in good shape and it presently has a lot of forage left over for the horses and wildlife. It is well known that low utilization of forage will cause a downward trend in the status of the watershed as a whole.

43-5 Appendixes 3-49, 3-57, and 3-62 state that "no management system established in the allotment." Look at App. 3-6, 3-9, and 3-12; they indicate that there is a management plan. We have been following a management plan in these allotments for years.

43-6 It would be wrong to enlarge the Kiger HMA as proposed. The East and West Diamond Grade fields of the Smyth Creek allotment should not be added to the initial HMA. There have not been horses down this low in the past. The fields also contain a large portion of Crested Wheatgrass which

does not coincide with the "wild" environment desired for the "wild" horses. Why have the HMA larger than what the horses actually use?

43-7 There is no need to have the Kiger HMA become an ACEC. Classification as an ACEC would just bring on more useless regulations that would block potential future good multi-use, multi-resource management systems. It would be poor judgement for the BLM to invite this classification when it is unnecessary.


43-8 We do not know why the BLM thinks that the parcels of land that we own on Yank Creek, Poison Creek, and Swamp Creek are for sale. They are not for sale. We also think that it is greedy for the BLM to want them. The mustangs water in these creeks just as easily now as if the BLM owned them.

One has to wonder if the BLM is really just trying to pressure Mrs. Clemens out of the ranching business so they can take over the Riddle Ranch on the Little Blitzen River sooner.

43-9 We believe that the best action for the BLM to take for the Three Rivers Resource Area is no action. No action is a legitimate plan that the BLM did not even consider.

We hope that you will seriously consider these comments on the draft plan. Thank you for your consideration.

Sincerely,



Daniel R. Barnhart,
Representative of
Rex Clemens Ranch Inc.
Diamond, Oregon 97722

43-1 There was no analysis of how wild horse movements would be affected when fencing and grazing systems are implemented on riparian areas and pastures at this time. Such impacts would be analyzed through the NEPA process on specific projects and appropriate mitigations would be applied to minimize detrimental effects on wild horse movement.

Also, refer to responses 25-2 and 25-3.

43-2 Refer to response 42-15.

43-3 Refer to response 2-6.

43-4 The allotment evaluation is not complete for the Kiger Allotment. The capacity listed in DRMP/DEIS, Appendix 3, Table 6, p. 50, is an estimate only. Calculated capacity will be determined in accordance with the methods outlined in Appendix 1, Table 11, PRMP/FEIS.

43-5 The DRMP/DEIS incorrectly listed the Smyth Creek Allotment; there is an AMP on Smyth Creek Allotment. Although grazing treatments are outlined for Deep Creek, Hamilton Individual and West Sagehen, they have never been formally incorporated into an AMP.

43-6 Refer to response 25-1.

43-7 Refer to response 2-68.

43-8 Refer to response 4-14.

43-9 Refer to response 2-2.

44

LaPine High School
P.O. Box 306
LaPine, Oregon 97739
(503) 536-1783

District Manager
Bureau of Land Management
HC-7412533 Hwy 20 West
Hines, Oregon 97738

Dear Sir;

It has come to the attention of the LaPine High School Advanced Forestry class that an Environmental Impact Statement has just been released for public comment. An immediate operation should be to return the land to an excellent condition. Presently, the poor condition of the land disturbs those who enjoy the scenery and surroundings. The draft basically does not protect the remaining forests or explain how many miles of road it expects to construct.

44-1 One thing evidently not covered was the effect it will cause to the wildlife. Most forage allocations belongs to cattle, which should not be the issue.

44-2 We would like to recommend (or demand) that BLM develop an alternative to restore and maintain rangeland in excellent, natural condition. Also that BLM adopt Alternative "A", which would allow full rangeland, riparian and stream recovery. We insist that

44-3 water quality, riparian and aquatic habitat be improved or maintained in excellent condition and ask that all ancient forests be identified and protected. We also ask that all costs of construction of new roads and other rangeland projects be included under the various alternatives

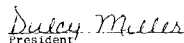
44-4 along with their environmental impacts and that all crested wheatgrass seeding proposals be eliminated. We would like to recommend that

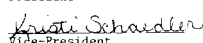
44-5 wildlife winter range forage allocations be given priority over livestock allocations and demand that Bighorn Sheep Habitat protection and

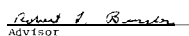
44-6 impacts be addressed in plan and further, that forage allocations go entirely to the Bighorns in their home range.

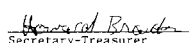
Thank you for your consideration on this matter.

Sincerely,


President


Vice-President


Advisor


Secretary-Treasurer

January 29, 1990
Date

44-1 Refer to responses 2-10 and 2-11.

44-2 Refer to response 1-13.

44-3 Refer to response 2-44.

44-4 Refer to response 12-1.

44-5 Refer to responses 12-1 and 12-7.

44-6 Refer to response 1-11.

44-7 Refer to response 2-6.

44-8 Refer to response 2-78.

1/29/30

District Manager
Bureau of Land Management
HC-7412533 May 20 1968
Halla, Oregon 97138

It is my understanding a new management plan is in the works for the Three Rivers Area. This area comprises 1.7 million acres, located mainly in Harney County. Also, there will be flow guide for the next ten to fifteen years. The long-range nature of this plan creates an urgent need for reconstructive action.

The immediate goal must be to restore and maintain the rangeland to an excellent and natural condition. Cattle grazing should be greatly reduced or eliminated where necessary to change this acreage from a "poor" classification to a healthy, natural state. As the minimum, Alternate "A" needs to be adopted. Water quality, riparian, and aquatic habitats must be improved. Concentric forests need to be protected and identified. Cuts of new roads, and other projects should be included in the Alternate and Environmental impact, not funded by taxpayers. The seeding of eroded wheel spurs is to be eliminated.

A 5% allocation of forage for deer, antelope, Elk and Big Horn Sheep is acceptable, a

Cattle allocation of the remaining forage of 91% is in complete disregard to the State Ranges of Oregon. These state owned lands along with other uses are also made available for the use of the general population. BLM acreage is not set aside for the commerce of only the cattle industry. Overgrazing on State and Federal Ranges within Oregon is one of the number one crimes against the environment. The natural range for the growing population of our Big Horn Sheep must be allotted only to the sheep until a least we accomplish healthy herds of this game animal. I have taken close to a generation and great sums of money to get established the current Big Horn population.

The four main rivers and creeks must be designated Wild and Scenic bodies of water.

The greed of the lumber and cattle groups have damaged, depleted, scared and destroyed thousands of acres within our State boundaries. As a visitor of the area I have seen over-logging polluted, over land including the high desert rangeland and prairie and eroded. Over vast stands of virgin timber cut and sold to foreign markets. In 63 years I see so much taken from before generation. There has been little thought as to what will be left for our unborn population.

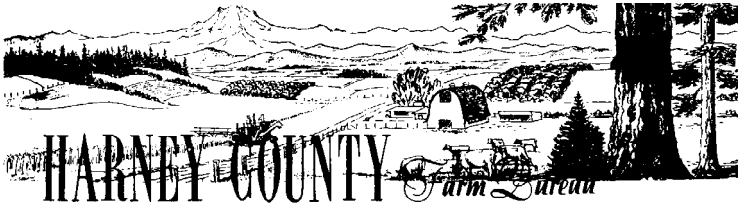
There are but few areas left within the state that do not reflect the ill effects of man. It is the duty of all to try to influence the wise decision of land use. To many, the high desert Country of Oregon represents nothing but waste land and in many areas used with that thought in mind. There are some of us that think it has a purpose and does support a large variety of wild life. Although proper management did assist to restore the land as much as possible to a natural state and use the land only to the point of the land being able to maintain itself.

Very truly yours,
Ed. Johnson

P.S. I am not an active environmentalist, but I am a concerned citizen of this state. I enjoy the outdoors and spend a great deal of time in various sections of Oregon. Believe me I've seen the scars which are daily inflicted by greedy and unmoved people.

- 45-1 Refer to response 1-13.
- 45-2 Refer to response 2-44.
- 45-3 Refer to response 12-1.
- 45-4 Refer to responses 12-1 and 12-7.
- 45-5 Refer to response 1-11.
- 45-6 Refer to response 2-10.
- 45-7 Refer to response 2-78.
- 45-8 Refer to response 3-6.
- 45-9 According to Federal timber export laws, no unmanufactured Federal timber is exported from the United States. Only private unmanufactured timber is permitted to be exported. Currently, there is strong support for legislation allowing individual states to decide whether to restrict or permit exportation of private timber.

In regard to ancient forests, refer to response 12-1.



Riley, Oregon 97758

January 19, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
NC 74-12533 Highway 20 West
Hines, Oregon 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson,

The Harney County Farm Bureau want to go on record that the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the text only for the reason that it would be an exact duplication of the Riddle Ranch document. There are several other areas of concern that this letter will address.

46-1 Enclosed is a copy of the Bureau of Land Management Riparian Area Management Policy, dated January 22, 1987 signed by BLM Director Robert J. Burford. This policy has never been rescinded. Please note that the definition of a riparian area is an area of land "directly influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence." The definition continues that areas excluded from the definition of a riparian area include "ephemeral streams or washes that do not exhibit the presence or vegetation dependent upon free water in the soil." There are areas classified as riparian that do not meet these criteria. Two creeks brought to our attention are Skull Creek and Landing Creek. A thorough review of all creeks should be made to ensure they meet the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.

46-2 Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied and then are extrapolated to indefensible conclusions. Management objectives, in the absence of AMP's, are documented only in the broadest of terms

making them virtually unmeasurable. No factors, other than short term wildlife, wild horse and livestock utilization, are indicated as affecting forage production, ecological status or potential of the resource. Therefore, reductions in authorized livestock use is the primary, if not the only, remedial action recommended. Until proper techniques and accurate information is gathered existing levels of livestock grazing should be maintained. At such time that reliable information shows trend increase or decrease, proper adjustments could then be made. The ratings in the recently published Riley Rangeland Program Summary Update classify range conditions as poor, fair, good, and excellent. The RMP/EIS classifies range conditions as satisfactory and unsatisfactory. Consistent use of evaluation ratings is necessary for accurate evaluation as well as better communication with the permittee.

46-3 There is no scientific data that indicates that livestock use has any negative effect on the sagegrouse population. The restrictions on livestock in the sagegrouse strutting grounds are unfounded and should be eliminated.

46-4 The exclusion of cattle on the Biscuitroot Cultural ACEC is not supported. The report states "...these areas to be a high-value resource due to the quality and quantity of roots available." Appendix 7-12; Vol. II Appendicies. Since grazing has been going on in this area for years and the quality and quantity have remained high, even with root harvesting, there is no justification to change the practice.

46-5 The designation of the entire Kiger active Horse Management Area (HMA) (36,619 acres) as an Area of Critical Environmental Concern (ACEC) will have a dramatic economical effect on at least three ranches. Before this change is even considered and the Final Three Rivers RMP/EIS is issued a complete "Takings Implication Assessment" should be conducted as authorized by Executive Order 12630.

46-6 Livestock and wild horses have run together successfully for years. The complete elimination of livestock grazing is neither justified nor proven necessary. The conditions for acquiring the private holds or the authority to impose this on the private holdings is not fully addressed.

46-8 The continual fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years

restrict the amount of available forage and can concentrate cattle more than necessary. Livestock have a biological need for water. Access can be accomplished by building the water gaps at the deep end of the reservoir. If the enclosure is more than one-half mile square, have more than one access point to allow livestock better access to all of the forage available around the reservoir.

Before any alternative that causes a reduction of AUM's is imposed, no matter what reason, a complete "Takings Implications Assessment" should be completed as authorized by Executive Order 12630.

46-9 Fire is nature's way of improving forage by burning Juniper and woody shrubs. The proposed limitations on prescribed burnings, as well as limitations and full suppression of natural fires, will continue to increase the trend of Sagebrush and Juniper encroachment. This will have a negative effect on the vegetation and grasses used by wildlife, wild horses and livestock. A more open policy on prescribed burns, as well as letting natural fires burn under fire management supervision will help maintain and improve a majority of the existing range. It will also prevent fuel loads building to a point that a major catastrophe fire would result. It is well known that smaller cooler fires are better for the return of native vegetation, than one major hot fire.

46-10 The air quality restrictions are the same for all alternatives. More alternatives need to be proposed. Unless there is valid scientific data to show that limits above this would permanently effect air quality these limitations should be increased.

46-11 Harney County recently passed a ballot measure that stated they did not want any more land acquired by the government. The Land and Realty Objectives indicate the plan to increase holdings with high public resource values through exchanges and acquisitions. The BLM should listen to the public voice and honor their decision. All new acquired land should be by exchanges only.

Sincerely yours,

Herb Davis, President
Harney County Farm Bureau
Box 115
Princeton, Oregon 97721

46-1 Skull Creek and Landing Creek have vegetation present which is dependent upon free water in the soil. Also, see Appendix 1, Table 4 of the Proposed Plan.

46-2 Refer to response 2-87.

46-3 Refer to response 4-6.

46-4 Refer to response 4-15.

46-5 Refer to response 2-68.

46-6 Refer to response 2-63.

46-7 Refer to response 32-1.

46-8 Refer to response 2-46.

46-9 Refer to response 4-9 and 5-6.

46-10 Refer to response 4-8.

46-11 The ballot measure referenced was specific to land acquisitions by the USFWS.

Since publication of the DRMP/DEIS, the Harney County Court passed a resolution opposing all Federal land acquisitions without public hearings and consent of the court. The BLM has, in the past, and will continue to coordinate and consult with the county on matters involving land acquisitions.

Also, refer to responses 4-14 and 6-10.

Jan. 24, 1987
 Jay Carlson B.L.M.
 HC. 74, 123533
 Hines, Oregon 97738

Dear Mr. Carlson,

As members of Harney County Stockgrowers/Farm Bureau/Cattlemen and VFW - our response to the draft - Three Rivers Resource Management Plan & Environmental Impact Statement in our opinion effects the whole county in all walks of life. This draft is NOT THE BEST alternative in to use all this paper work of many hours and dollars for firematerial. Support the management on public lands that was intended when the livestock Taylor Grazing Act of 1934/36 was put forth, WITHOUT the adverse impact of this draft RMP/EIS undermining the livestock producer and BLM, by special interest groups of today.

The livestock industry across the west are besieged with proposing regulations upon regulations such as this draft, and would effect and cost them their livelihoods - severely wounding the small sparsely populated communities - such as Burns/Hines and rural Harney County.

Alternatives A,B and C will result in substantial IOSS of base private property value AND our educational system for all walks of life. The BLM action would result in reducing the size of operations in the livestock industry that are family operated and be know long or operational units.

Listing the wildhorse priority over the wildlife/livestock grazing is ludicrous - the wildhorse has COST the taxpayers - instead of giving FUNDS. The livestock puts FUNDS back INTO THE FEDERAL GOVERNMENT. Listing the wildhorse with - wildlife/livestock as directed in this draft - seems a severe charge AGAINST the BLM mission of 'Adopt a Horse Program' which has cost the taxpayers millions of dollars - and the so called count in this draft is false of the herd number of wildhorses. Removing livestock from streams, giving priority to horses and wildlife is - inconsistent with Federal Court decisions,

2.

and above all against Gods plan for all creatures - cattle/sheep - are in the Bible also: Weather conditions in Harney County have a great effect on the surface water and riparian habitat conditions - the basis for the majority of the adverse impacts to the livestock grazing is unfounded and unreasonable. Fencing off water reservoirs is a conflict with the BLM objective to disperse livestock away from riparian areas to improve forage utilization. Those waterholes or reservoirs would not be there - if - it were not for the range improvement of private and improvement funds paid for by the per acre and grazing fees. Not only for the livestock, but for the wildlife as well.

Different segments of the livestock industry is funding - the cost of public land improvements thru the permits, fees, and which we also share in the federal tax structure of this nation. Along with the share of state tax structure and the private property tax. The majority of the 'special interest groups' do not share in these costs, nor do they have a (USERS FEE) - yet they use the public lands and undermine the livestock industry and the government agencies. We in the livestock industry feel - we are partners in respect of public lands; because we not only PAY over and over, we work to improve these lands for the livestock and the wildlife at OUR OWN EXPENSES.

We know the habits of the wildlife, fowl and wildhorse - along with knowledge of the lands and weather patterns. We as livestock producers LIVE WITH THE SEASON YEAR ROUND - our experience and as a majority - try - to be compatible in nature with the BLM management, as compatible managers::: We have the younger generation of all walks of life to produce food for, and, leave behind a 'hope' for the tomorrow of their future.

The Soviet Union economy and government without their people producers of food, without private property living on the land - effected their whole nation and the world. This SHOULD tell us something. "Democracy, constitutional rights, the bill

3.

of rights - was founded with agriculture 'The backbone of the nation', we are a vital part in keeping the wheel turning for this nation of a great deficit to remain a Free Nation Under God.

We 'Thank You' for allowing us - the livestock grazer producer and protector of public lands to be a part - Of The Public input in this issue. We support the Riddle Ranch/Western Range Service/ Farm Bureau/Cattlemen/Stockgrowers organization letters and endorse there comment/findings

Sincerely,

Harvey Dunbar
 Harvey / Margaret Dunbar
 Frenchman, Oregon 97736

47-1 Refer to response 2-46.

47-1

January 26, 1990

Mr. Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

Dear Mr. Carlson:

In beginning this letter I wish to go on record as supporting the views and comments contained in the January 19, 1990 letter addressed to you from the Harney County Stockgrowers Association.

48-1 Secondly, I wish to state that it is difficult for me to intelligently comment further in that I found the Draft RMP/EIS documents very difficult to follow. The presentation, which includes a text separated from the booklet containing maps and tables is extremely confusing to read comprehensively. The continual referral to another source index seems like some kind of mind game. This kind of presentation to layman appears as an attempt to befuddle and confuse. Thus, before any change for any reason is imposed, a second presentation for comment should be made. This second presentation should be condensed, logically sequential, and more comprehensive. It should be in a single text without cross reference. All supporting or informative maps or tables should be contiguous with specific text issues.

48-2 Thirdly, before any AUM reduction can be imposed, a complete "takings implications assessment" should be completed.

Cordially,



Louis John Borelli
1580 Wooden Valley Road
Napa, CA 94558

LJB:cr

48-1 The presentation of pertinent information for a comprehensive land use plan which addresses over 1.7 million acres is a complex task. The design of the Three Rivers Draft was to facilitate the reader's ability to work through a specific section without flipping back and forth (which has been a common complaint about large-sized single volume documents). It is unfortunate that this format did not work well for you. This is not, however, sufficient reason to republish the Draft. Should you require assistance in using either the Draft or the Final, please contact the Burns District Office.

48-2 Refer to response 2-63.

EOMA 49

Eastern Oregon Mining Association, Inc.
(a nonprofit corporation)
March 3, 1990

P.O. Box 932 503 523-3285
Baker, Oregon 97814

Three Rivers Resource District
Attn: Craig Hanson, Area Manager
Burns District Office
Highway 20 West
Hines, Oregon 97738

49 No comment identified.

RE: Three Rivers Resource Management Plan

Dear Craig Hanson,

First I wish to thank you for the kindness of granting us an additional 30 days for comment. We were still trying to sort out your management plan when the comment period ended.

Although I do want to object to you recommending more river mileage as suitable for wild status and withdrawing more acres from mineral entry.

I also want to object to your continued restrictive designations of RNA/ACEC-ONA/ACEC and the rest of the ACEC's listed under management objectives. Your designating additional ACEC's including extensions to existing ACEC's.

Way to much latitude given to Wildlife management under ODFW and USFW department.

Mineral activity and geology reports in the area indicates a potential for oil and gas, geothermal, coal, Uranium, and locatable or leasable minerals as, Cinnabar, Diatomite, Zeolite, Potassium, Felspar, Obsidian, Cinder, Sand and Gravel, Building Stone, Recreational minerals, including Obsidian, Thunder Eggs, Petrified Wood, and Agate.

No more land withdrawals. No Wild and Scenic, No ACEC's. We have watched with concern the Forest lock up public lands for perceived notions of ascetic values. The Forest Districts are drifting away from Multiple Use, locking up vast portions for no use by anyone. Congress has set aside large tracts for such use. We must protest vigorously the present trend in which the Forest seems to be locking up public lands under one designation or another.

Sincerely



Roy Grissom



President
Charles (Chuck) Chase

Treasurer
George Ziermann

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

50

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

50-1 Refer to response 2-63.

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

50-1 The reallocation and/or reduction of 797 AUM's livestock storage in Hay Creek Allotment will reduce the value of our base property by approximately \$322500. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Culp Cattle Co
Name Pat Culp
HC 71 Box 139
Address
Burns Ore 97720
City State Zip Code
Pat Culp
Signature

Enclosure: Supplemental Comments

51

P.O. Box 146
Hines, Oregon 97738
January 29, 1990

Josh Warburton
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

51-1 The DRMP/DEIS Preferred Alternative identified an initial livestock reduction of 11 percent. Reductions would be implemented only after the allotment monitoring and evaluation process has been completed. See PRMP/PEIS, Appendix 1, Table 11 for methodology.

Dear Mr. Warburton:

51-1 The Three Rivers Resource Management Plan should not be implemented. This plan which proposes to force ranchers to cut live-stock numbers on the range by 30% will adversely impact the already devastated economy of Harney County.

Many of the economical disasters which have occurred in the County have been brought about by unavoidable circumstances. This one can be avoided, I hope your Agency will do all within its power to see this does not occur.

It is very obvious that multiple use is the best management of Natural Resources.

Respectfully Yours,
Lorne Cagle



Drewsey Field Ranch

Drewsey, Oregon 97904
(503) 493-2620

January 28, 1989

Jay Carlson, RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

The January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Riddle Ranch Document. Their response has been submitted to you. We do not include a full copy of the text only for the reason that it would be an exact duplication of the Riddle Ranch document.

The following additional comments are supplemental to our principal response and address issues of specific concern to us. In conjunction to Riddle Ranch document, our comments will serve as Wilber Brothers, Wright Wilber and Patrick Wilber's comments to the "Draft Three Rivers Resource Management Plan and Environmental Impact Statement" dated October 1989.

54-1 We reject the proposed "Private Water Sources Selected for Acquisition of Permanent Access (Listed in Priority Order)" identified in Appendix 4-2 containing more than 1,600 acres of land owned by the parties principle to this document. We consider these lands essential for the protection of our downstream storage and rightfully adjudicated water rights. Acquisition of this property through any means contrary to the interests of private ownership fails the "health, safety and welfare" criteria of public takings and clearly violates the property rights of the owners.

54-2 We reject the allocation of 1,148 Animal Unit Months to wildlife and wild horses in Allotment 5532 referred to in Appendix 3-87. In

54-3 the past ten years, under the current management plan of multiple use, despite severe weather related stress, deer populations have stabilized while elk and antelope numbers have actually increased. In fact, ten years ago there were virtually no elk in the allotment. Concurrently, livestock production has improved with significantly higher conception rates and calf weaning weights. If livestock grazing has had an adverse impact on wildlife populations in the allotment, it is virtually inexplicable how their populations have increased simultaneously with enhanced livestock production. There is a fundamental inequity in increasing the allocation of AUM's in the allotment to wildlife given the already substantial number of wildlife AUM's provided by private lands for which no AUM allocation adjustment is provided. With the proposed allocation plan, wildlife populations will increase dramatically, further encroaching on private lands and likely requiring supplemental feed programs on a continuous basis.

54-4 We reject the allocation of forage in Allotment 5532 referred to in Appendix 3-87 giving priority to wild horses, in as much as the natural characteristics of the allotment are unsatisfactory for the present allocation of AUM's. Allotment 5532 is a "high mountain" range subject to heavy winter snow and late forage development in spring. Consequently, in winter and spring, horses are concentrated in lower ranges where they severely overgraze the prior years aftermath and virtually kill off the fragile young grasses of the new

54-5 We reject the reduction of AUM's allocated to livestock grazing in Allotment 5532 and assert that the proposal will have a substantial negative impact on the ability of the principles to this document to continue operating as a viable economic entity. In January 1989, Wilber Brothers acquired private ranch property with an active preference of 1,359 AUM's (643 suspended) in the allotment. An additional 2,119 AUM's of active preference (834 suspended) in Allotment 5532 makeup the economic unit. Financing for the private property acquisition was arranged through Farm Credit Services on the basis of continuing utilization of the existing preference. The reduction in livestock grazing AUM's proposed for Allotment 5532 in the Three Rivers Resource Management Plan would cause a loss in revenue from livestock sales of approximately \$80,000 per year. Such a reduction in the active preference would virtually ensure a default on Wilber Brothers' loan obligation.

54-6 The "Agricultural Credit Act of 1987" had among its principal purposes the reorganization of the Farm Credit System permitting the institution to provide credit to farmers, ranchers and cooperatives at reasonable and competitive rates. Of course, when defaults occur, the ability of Farm Credit Services to provide credit at reasonable and competitive rates is essentially eliminated. The proposals contained in the Three Rivers Resource Management Plan are in direct conflict with the intent of the "Agricultural Credit Act of 1987" and put the Department of Interior at odds with the Congress and the President.

54-7 In general, the proposals contained in the Three Rivers Resource Management Plan are arbitrary, without scientific basis and fraught with the preachings of radical environmentalism and do not represent the mainstream of society. In a recent study conducted by the Wirthlin Group of "1,000 representative American adults" the following opinions prevail:

"Seventy percent of consumers believe that cattle ranchers and farmers take good care of land and water." "...it is in producer's own interests to take proper care of their resources."

"Almost sixty percent say cattle grazing is a good use of public rangeland." "...consumers believe that beef production has no negative impact on the environment and that efforts to save the earth and our natural resources should focus on things that really matter."

"Nearly eighty percent say that private ownership and control are better than government ownership of agricultural land."

Sincerely,

AW Wilber
WILBER BROTHERS

Wright Wilber
WRIGHT WILBER

Patrick J. Wilber
PATRICK J. WILBER

cc: Mark O. Hatfield
Bob Packwood
Robert F. Smith

54-1 Refer to response 4-14.

54-2 Because the elk populations have increased, forage must be allocated to them to prevent over use of forage. The horse allocation has not changed. Refer also to response 2-6.

54-3 Refer to responses 2-10 and 2-11.

54-4 Refer to response 2-6.

54-5 The carrying capacity for Allotment No. 5532 was calculated using the methodology shown in Appendix 1, Table 11. Also, reference response 2-61 relative to the economic impacts of the proposed action.

54-6 The Agricultural Credit Act of 1987 is limited in its intent "to providing credit assistance to farmers by strengthening the farm credit supply system and facilitating the establishment of secondary markets for agricultural loans." The act does not address the management of public lands. Potential reductions in authorized livestock grazing levels based on sustained yield capacity or resource tradeoffs, authorized under the FLPMA, would not contradict the Agricultural Credit Act. Both public and private suppliers of farm credit should be aware that Federal livestock grazing permit and license levels are subject to adjustment and should not be used as a long-term basis for farm or ranch credit.

54-7 The various alternatives have been developed with full public participation. Specific sections are documented, where appropriate, as to the scientific basis for the prescribed actions. The management prescriptions conform to regulation and policy.

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 23 West
Hines Oregon

55 No comment identified.

Review Comments for the October
BLM Draft Three Rivers RMP/EIS

Dear Mr. Carlson:

I have carefully read a copy of the letter addressed to you from Mark S. Doverspike, President of the Harney County Stockgrowers Association.

Following many years as a rancher in the cattle business in Harney County, and upon retirement from the cattle business, served two terms as Harney County Judge, I wish to go on record as fully agreeing with Mr. Doverspike's concerns. Any drastic cut in cattle numbers in Harney County would be real detrimental and far reaching to the County at large.

Sincerely,
Newton Hotchkiss
Former Judge
Newton Hotchkiss

56

Mr & Mrs Del Clemens
769 Ponderosa Village
Burns OR 97720
Jan 27 - 1990

56-1 Refer to response 2-61 and 2-62.

Attention: Three Rivers Resource Mngr.

We are writing this letter with deep concern for the future of ranching and perhaps the Americans way.

Not only can such a plan without team work, be only devastating for ranchers, but also the BLM and other taxpayers, making Harney County's economic future even worse. We lose grazing, BLM loses that income and taxpayers go deeper in debt!

It seems to us communicating working together on these problems has to be a positive answer for all concerned, so that we can all live together for a better future, for all concerned.

Sincerely
Del & Teresa Clemens

56-1

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson:

57-1 In reference to the October 1989 BLM Draft Three Rivers RMP/EIS, we wish to voice our objection to alternatives A, B and C which will result in a substantial loss of base property value to ranches. The proposed BLM actions may result in reducing the size of an operation so that it is no longer an economical unit. We request that if alternatives A, B and C are considered, that prior to issuing the Final Three River's Resource Management Statement, a 'Taking Implication Assessment' be completed as authorized by Executive Order 12630.

It is alarming for us to observe what is happening on our federal lands. Our ranch has been in operation and in the same family for 100 years. We care for and about all of our land, private and federal. This land is as vital to our operation as our deeded land. Surely the federal lands are more protected today than ever before in the history of our country. To cut numbers in the cattle run on federal lands is no longer feasible. The next step is to move the farmer and the rancher off the land and into the city. This has happened in other countries and today their people are hungry. They no longer have farmers to go back on the land. The United States is the food basket of the world. We are all aware of the starving people around us. We must find a way we can work together rather than bring on an economic disaster.

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the draft Three River's Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you.

Sincerely,
Tom & Barbara Howard
Tom & Barbara Howard
Howard Ranch
Box 266
Drewsey, OR 97904

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson:

58-1 Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economic unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a 'Takings Implication Assessment' be completed as authorized by Executive Order 12630.

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

The members involved in Van Grazing Coop have individually received substantial cut in cattle numbers on their allotments. Our operation will not tolerate further cuts.

Sincerely,
Van Grazing Coop
Thomas C. Howard
President

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

59

59-1 Refer to response 2-63.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

59-1

The reallocation and/or reduction of 1698 AUM's livestock storage in West Umpqua allotment will reduce the value of our base property by approximately \$ 34,900. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Name Clayton King
P.O. Box 718
Address
Crane Ore 97732
City State Zip Code
Signature Clayton King

Enclosure: Supplemental Comments

60

January 26, 1990

60-1 Refer to response 13-1, which notes the current status of the Bureau's recommendations for wilderness. Congress will decide which areas will be designated wilderness after review of all recommendations, including those other than the Bureau.

Jay Carlson, RMP-EIS
Burns District Office
Bureau of Land Management
HC 74 - 12533 HWY 20 West
Hines, Oregon 97738

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Services comments and response to the Draft Three Rivers Resource Management plan and environmental impact statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the text, only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letter.

My expression of observation comes as a result of being a permittee of BLM for 24 years, a member of the Burns District advisory board for over 12 years, including tours and study trips as a result of being a member of that board.

60-1

After listening to and reading comments regarding the many W.S.A.'s. I feel very strongly that it is wrong to enclose any more area in wilderness.

The BLM is on course in its management program. Any area that I personally saw is in a state of improvement over the past 24 years and with continued cooperation between the service and permittees I see no reason for changing from the concept of multiple use.

It has been my experience from immediate observation, particularly in the Malheur Wildlife Refuge, any field that was put in non-use, experienced a severe degradation of vegetation cover with loss of use by wildlife to the extent of being almost non-existent. While the fields immediately adjacent ~~to~~ continued regular use had a continued wildlife productivity.

My fear is that any area, whether it be Wildlife Refuge or BLM, put in non-use would experience the same degradation. And any Wilderness Area, in my opinion is in non-use.

Sincerely,

Rex Taylor
Eita Taylor
HO-72 Box 220
Prineville
OR 97721

61

Princeton, Oregon
Jan. 27, 1990

61-1 Refer to responses 2-1 through 2-96 relative to comments submitted by Riddle Ranch which you endorse.

Dear Mr. Carlson,
I do endorse the Riddle Ranch document, which you have. I have read the letter from Mark S. Doverspike several times. The issues he has raised are ones which, I too, feel should be addressed before any decision is made. I am sure he must have written you; nevertheless, will enclose a copy of his letter.

Sincerely,
Madya Beckley
Box 2 E
Princeton, Oregon 97721

Tel. 493-2563
or
493-2536

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

62

62 No comment identified.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUN's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of _____ AUN's livestock forage in _____ Allotment will reduce the value of our base property by approximately \$ _____ (Assume \$50 per AUN value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Name: Madya Beckley
Address: Box 2 E
Princeton, Oregon 97721
City: _____ State: _____ Zip Code: _____
Signature: Madya Beckley

Enclosure: Supplemental Comments
One block of letter.

January 26, 1990

District Manager
Bureau of Land Management
Burns District Office
HC 74-12533 Hiway 20 West
Hines, OR 97738

RE: DRAFT THREE RIVERS EIS/RMP

Dear BLM Manager,

I have reviewed the Draft EIS for the northern portion of the Burns district and I am very disturbed to see the alternative written by the ranchers as the recommended alternative. Well-fare cattle ranching has caused serious deterioration throughout the area. So has poor forestry practices such as logging of ever smaller trees, virtual clear-cutting and the abysmal failure to protect old-growth.

In the short term BLM, to fulfill its responsibilities under the Federal Land Policy and Management Act (PL 94-979), the Public Rangeland Improvement Act (PL 95-514), should adopt Alternative A. This would prevent further destruction of the desert and forest by logging and ranching interests while a plan is developed to restore rangeland to its natural condition.

It is the responsibility of the BLM to protect natural diversity, not to pander to local interests. There is a national interest in the protection of the biosphere, particularly where it is most fragile. Economic interests should only be allowed to the extent that they do not degrade the environment. Clearly ranching has substantially degraded both rangeland and forests in northern Harney County and to continue with these practices is a violation of BLM's duties.


As a frequent visitor to the Ochoco and Malheur National Forests and the surrounding desert I am appalled at the way the USFS and the BLM allow the artifacts of cattle ranching and logging--from riparian destruction and garbage to generalized degradation of habitat--to occur. It should not only be stopped but reversed.

At a minimum BLM should:

- 63-1 1) Adopt Alternative A as the preferred Alternative in the interim.
- 63-2 2) In conjunction with the USFS identify and protect all old-growth forests in the region.
- 63-3 3) Protect water quality by protecting riparian habitat.
- 63-4 4) End subsidies for cattle ranching, including wells, roads and fencing. These are inappropriate tax-payer supports for the production of a dubious product with significant health hazards.
- 63-5 5) Develop a plan for restoring the rangeland to excellent condition.
- 63-6 6) Provide priority for the welfare of indigenous species over cattle, meaning adequate lands designated for habitat protection for big horn sheep and other large mammals, including priority in winter forage allocations.
- 63-7 7) Designate the following for inclusion as Wild and Scenic Rivers: the Silvies River (entire), South Fork and Middle Fork of the Malheur River (entire), and Bluebucket Creek (entire).

I look forward to seeing a vastly improved Final EIS/RMP that reflect BLM's legal mandate to protect natural diversity.

Very Truly Yours,



David M. Johns
2747 NE 18th St
Portland, OR 97212

C: Senator Mark Hatfield
senator Bob Packwood
Representative Ron Wyden
Representative Les AuCoin
Representative Peter DeFazio

- 63-1 Refer to response 12-4.
- 63-2 Refer to response 12-1.
- 63-3 Refer to response 2-44.
- 63-4 Refer to responses 1-13, 11-10 and 13-11.
- 63-5 Refer to response 1-13.
- 63-6 Refer to response 2-6 and 2-78.
- 63-7 Refer to response 3-6.

January 26, 1990

64

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 - 12533 Hwy 20 West
Hines, Or 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

64-1 Refer to response 2-61, 2-62 (economic impacts) and 2-63 (TIAs).

Dear Mr. Carlson:

64-1 Implementation of Alternatives A, B, or C would have a negative effect on the entire livestock industry in Harney County, drastically reducing base property values, cutting carrying capacities and creating a ripple effect that could be fatal to the economy of the entire county. It could jeopardize the very survival of Harney County. Before considering Alternatives A, B, or C we strongly urge that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel.)

We endorse and concur with comments contained in letters to you from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement. This letter constitutes our endorsement of those letters and documents, which have been submitted to you.

We urge you to seriously consider all correspondence received by you from livestock permittees and concerned citizens regarding alternative resource management plans. In our opinion, Alternative D is the only plan that could be successfully implemented to best serve multiple use principles and not cause severe hardships, particularly on the livestock industry in Harney County.

Please see enclosed letter containing our comments and concerns regarding your permit on Allotment 7013 (Zoglmann.) Thank you.

Sincerely,

Mike Morgan

Betty Morgan

Mike and Betty Morgan
Star Rt. 2, 13683 Hwy 20
Burns, Or 97720

Enclosure

January 26, 1990

65

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74 - 12533 Hwy 20 West
Hines, Or 97738

Re: Allotment 7013 (Zoglmann)
REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

65-1 The area cited has been thinned in the past. In response to this comment, BLM personnel have conducted a site examination of the area and have included the timber in the RA sale plan. See PRMP/FF Table 2.3.

Dear Mr. Carlson:

It states in Volume II-Appendices that no forage has been allocated for elk use and management objective is to allocate forage to meet elk forage demands.

If twelve head of elk were seen on this allotment, it had to be an isolated incident. We have spent countless days over the years in this area, and it has been our observation that this is primarily a migratory path between Snow Mountain and Dry Mountain; the elk do not stay there. We have used the allotment since 1963 when we bought property from Gus Zoglmann, including the 1600 wooded ('other') acres within the allotment. Before that we assisted Mr. Zoglmann with his cattle, fence maintenance, etc.

In all the years we have had the Zoglmann property we have worked continuously to improve our own land with brush and timber thinning, seeding, additional water development, etc. At the same time we have practiced responsible stewardship with the federal property. Forage has been increased significantly.

By contrast, the Bureau of Land Management has done ONE project! About twenty years ago they did some tree thinning and it was a sub-standard job! The slash wasn't piled but left strewn where it was cut, and the mess is still evident. The stumps were much higher than the six inches maximum mandated by forest practices code, and the thinned areas weren't re-seeded. In addition, not nearly as much thinning was done as should have been.

65-1 The timber on the public-owned acres on this allotment is badly in need of attention, and pine beetles are becoming increasingly evident. Even though we have thinned and done some logging in our timber in efforts to stop the problem, our efforts are being undermined by lack of attention to the BLM timber adjoining ours. We contacted BLM forest personnel in Prineville about our concerns and were told they would look into it and get back to us, but we have heard nothing from them. All the thinning and logging done by us has been under direct supervision of the Oregon State Department of Forestry.

Other than thinning, the BLM has done absolutely nothing to improve this allotment, nor have they shared any of the costs of work that has been done. All fencing, water development, seeding, etc. has been done and paid for by ourselves or Mr. Zoglmann before us.

We would seriously oppose cuts in our AUM's to provide forage for elk. There is always more than ample forage in excess of what our cattle use to far more than meet wildlife demands. Good stewardship is responsible for this.

Yours truly,

Mike Morgan

Betty Morgan

Mike and Betty Morgan
Star Rt. 2, 13683 Hwy 20
Burns, Or 97720

Mr. Jay Carlson
W. L. S.H.
H. C. R. 74-12533 No. 20
Hines, Or. 97738

Eric Jones
R. S.H.
Jan. 26, 1990

66

Dear Mr. Carlson,

Please accept my comment on the
Three Rivers Resource Management plan

66-1 My concern is the social issue of
human rights of causing a living soil
producing a 'food' product as opposed to
a wilderness closure.

66-2 The real expense to us tax payers
living in these areas concerns the costs
of otherwise unnecessary spending of relocating
highways; State and Federal, telephone lines;
United Communications, and the utilities
of Harney County, Electric Cooperative; a con-
sumer owned coop, power lines.

Please consider carefully the concerns of
these remote country people economies.
And review the enclosed guest editor article from
the Burns Times Herald dated 1-24-90.

Thank you for giving me the oppor-
tunity to reply to the RSM Plan.

Respectfully,
Eric Jones

January 29, 1990

67

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, Oregon 97738

Dear Mr. Carlson:

I do not agree with the Three Rivers Resource Management plan to wit:
Allotment # 7060.

67-1 It states there are 751 public acres in this allotment and says nothing
of the approximately 1902 acres of private lands that this 751 acres
are included within the perimeter of these fenced private lands. This
allot # 7060 should be designated FFR due to the fact that public
lands are scattered throughout. There are approximately 3 times the
amount of private lands to the public lands in this allotment # 7060.

67-2 I request a permanent right to the use of these public lands fenced
within this allotment # 7060. These public lands are accessible
mostly by crossing private lands or the use of aircraft.

There is no water for deer only from private sources. I've not observed
any deer in the winter time on these public lands. Only on private
lands at lower elevations.

67-3 In table 1 appendix 3-5 it states that investor not willing to invest.
This is wrong. I would like to purchase part of these public acres or
work out an agreement that is satisfactory to all.

In the past I have been issued a permit for 6 head of cattle in the
amount of 38 to 44 AUM on a Fenced Federal Range basis. I have spent
money and time to be in compliance with this Fenced Federal Range basis.

67-4 On January 27, 1990 I received a notice from BLM office intending to
impound livestock if found on public lands that are within this stated
allotment # 7060. In the years past I have not received a certified
letter with a return receipt from BLM office in regards to trespass.
I've not received any warning from BLM office nor to my knowledge have
I had animals trespass upon public lands.

A solution needs to be found immediately if not sooner.

Respectfully,
Vernon L. Seaman
Vernon L. Seaman
1325 Hwy 205 HC 71
Burns, Oregon 97720

c.c. Jasua L. Warburton

66-1 Refer to responses 13-1 and 60-1.

66-2 There will be no relocation of existing authorized rights-of-way
under the Proposed Plan. Only occasionally would proposed projects be
relocated or rerouted due to the designation of special management
areas. As stated in Chapter 4-66, DRMP/DEIS, conflicts from the
designation of special management areas on right-of-way development
is expected to be limited for several reasons. First, most of the
areas proposed for special designations are in isolated areas where
right-of-way demand is low. Second, most of the areas proposed for
special designations would be considered avoidance areas where
necessary right-of-way projects, if compatible with the purposes of
the designation, could proceed with some restrictions but short of
complete relocation. Third, a potential right-of-way applicant would
know early in the project planning process, what areas to avoid so
that the economic impact of an unexpected reroute could be reduced or
eliminated.

67-1 There are numerous fences in the vicinity of the public lands
considered Allotment No. 7060. This allotment is considered custodial
due to the large amounts of private land intermingled with scattered
public land. (Custodial means there is minimal management activity.)

67-2 By regulation (43 CFR 4130.2c), the Bureau does not issue permanent
grazing rights to public lands, but rather 10-year permits which must
be renewed. The lands in No. 7060 are leased on an annual, temporary,
nonrenewable basis.

67-3 Willingness to invest is based on a "prudent man" test to invest in
improvement. Willingness to purchase public lands is not part of the
criteria.

67-4 The impound notice you received is a notice sent annually to all
grazing permittees. Its intent is to notify permittees of the
consequences of unauthorized livestock use and also to define the
impound area.

January 17, 1990

Jay Carleon
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

68

68 No comment identified.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carleon:

~~(If you are sending a revision to this letter please include the next two paragraphs. If not, cross out second paragraph.)~~

~~Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that Alternatives A, B or C not be considered that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).~~

~~The reallocation and/or reduction of AUM's livestock forage in [redacted] allotment will reduce the value of our base property by approximately \$ [redacted] (Assume \$50 per AUM value). Please consider the economic loss in the requested Takings Implication Assessment.~~

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

VERNON L. SEAMAN
Name
1275 Hwy 205 HC 71

Burns, Oregon 97730
Address
City State Zip Code

Vernon L. Seaman
Signature

Enclosure: Supplemental Comments

69

P.O. Box 712
Placitas, NM 87043
25 January 1990

69-1 Refer to response 2-6.
69-2 Refer to response 1-11.

District Manager
Bureau of Land Management
HC-7412533 Hwy 20 West
Hines, OR 97738

Dear District Manager:

I recently received notice of the availability of a draft Environmental Impact Statement (EIS) on management of the Three Rivers Resource Area. A summary of the draft was also included. The purpose of this letter is to request 1) a copy of the full document; and 2) an extension of the public comment period to provide my group with an opportunity to review the document. Two weeks from date of receipt would be adequate. If you cannot honor my request, please consider the follow as my official comments.

The summary indicated that the Bureau is proposing to continue destructive grazing practices on range that is mostly in "fair" to "poor" condition. The intent of the Taylor Grazing Act was to improve range that had been destroyed by a combination of severe overgrazing and drought. What has been accomplished in the fifty-five (55) years since is appalling. When is the BLM going to quit serving as pawns of the livestock industry and start carrying out its responsibilities in a professional manner?

69-1 According to the information I received, you propose allotting 97% of the forage to cattle and only 3% to wildlife. What economic justification do you have for this split? What is the total cost to U.S. taxpayers of your grazing program? What potential revenues would be available if the land were managed for wildlife? In New Mexico, we have had a pilot habitat improvement stamp (Sykes Act) for three years. The program is going statewide in 1991. In the area covered by the pilot program, six times as much money was collected from hunters as was collected in grazing fees.

69-2 Finally, your preferred alternative calls for planting 76,960 acres of crested wheatgrass. Such destruction of native vegetation and of the biological diversity represented by native vegetation should be a crime.

Thank you for your consideration. I look forward to seeing the draft EIS. I trust it is not as bad as represented.

Sincerely,
Jim D. Fish
Jim Fish, Founder
Public Lands Action Network

Jay Eric Jones
4310 Mapleton Drive
West Linn, OR 97068
January 27, 1990

District Manager
Bureau of Land Management
HE 71-12533 Hwy 20 West
Hines, OR 97738

Dear Sir:

I am responding to the Three Rivers RMP & EIS (draft).

As developed, I currently support Alternative A, which provides the maximum protection of the ecosystem in the region.

The following are specific comments for your consideration:

- 70-1 | -- I notice that the Preferred Alternative C (Table 4.6) does not address rangeland returning to an excellent condition. It is my contention that an alternative that would return at least a part of the planning area to "excellent" needs consideration. Grazing, under law, must be currently allowed, but a majority of the land need not be grazed.
- 70-2 | Also, reduction or elimination of current grazing is appropriate where conditions are fair or poor.
- 70-3 | -- Wildlife habitat and allocations must be given priority, over grazing. An example would be bighorn sheep.
- 70-4 | -- Old-growth stands need identification and protection from reduction.
- 70-5 | -- Riparian and water environments must be improved to the best possible condition. Grazing should be reduced or eliminated in some areas to achieve this goal.
- 70-6 | -- All of the costs for new roads that benefit primarily resource users should be incurred in full (or nearly so) by those users. The costs of rangeland improvements that are designed to maintain or increase cattle grazing (those not strictly for environment improvements) should be paid in full (or nearly so) by those users. Public subsidizing of private for-profit users must be eventually eliminated. Reductions, therefore, are appropriate.

Page 2
Draft Three Rivers RMP & EIS
Jay Eric Jones comments

- 70-7 | -- Wild & Scenic status for all appropriate sections of rivers within the planning area should be considered/implemented.
- 70-8 | -- ACEC's protection should be continued and, where appropriate, tightened. Potential ACECs should immediately be made ACECs. Some examples include Hatt Butte for its ungrazed ponds atop the butte, Obsidian Cultural for its rare obsidian values, Saddle Butte for its threatened grasses, Squaw Lake for its location in the Steens area and use by wild horses, and Kiger Mustang Wild Horse for these unique herds.

Please let me know of any relevant information concerning the draft and advise me of your final decision in this matter.

Thank you for your time and consideration.

Cordially,

Jay Eric Jones

- 70-1 | Refer to response 1-13.
- 70-2 | Refer to responses 1-13, 2-10, 2-11 and 2-49.
- 70-3 | Refer to responses 2-6, 2-12 and 2-78.
- 70-4 | Refer to response 12-1.
- 70-5 | Refer to response 2-44.
- 70-6 | See Appendix 1, Table 13. Also, refer to response 12-1.
- 70-7 | Refer to response 3-6.
- 70-8 | Refer to response 15-16, which notes ACEC designation of public lands to provide protection of special natural features, as well as Table 3.16 of Volume I and Table 1, Appendix 7 of the DRMP/DEIS. The first table gives an assessment of the relevance and importance of the features within potential or existing ACECs and the recommendations of the interdisciplinary team. Hatt Butte, Squaw Lake and Saddle Butte do not meet ACEC criteria. Also, refer to responses 1-26 and 15-16 (ACECs), 2-68 (Kiger Mtn.) 15-36 (Obsidian Cultural).

- 71-1 Refer to responses 12-1 (ancient forests and logging road construction), and 1-13, 2-6 and 2-10 (forage allocations).
- 71-2 Refer to response 3-6.

January 25, 1990

District Manager
Bureau of Land Management
HC-7412533, Hwy 20 West
Hines, OR 97738

Dear District Manager,

The Resource Management Plan for the northern half of Burns District of the BLM is pure ecological destruction. Most of the rangeland, riparian and aquatic habitats are already in fair to poor condition, but all alternatives (particularly Alternative C) will further the demise. Alternative C is also expensive to taxpayers.

- 71-1 The alternatives do not address protection of remaining forest lands, logging roads expected to construct, and bighorn sheep habitat protection. Also, there is an imbalance of forage allocation--only 3% to deer and elk and 97% to cattle.

- 71-2 Returning all lands and water quality to excellent condition should be the goal. The only alternative that comes close to this is alternative A, but even this alternative does not allow for full land and stream recovery. Wild and Scenic River designation should be made for the South Fork and Middle Fork Malheur Rivers, Bluebucket Creek, and Silvies River to ensure that water quality is maintained.

Sincerely,

Lois Read

Lois Read
10 Polonius
Lake Oswego, OR 97035

District Manager
Bureau of Land Management
HC-7412533 Hwy 20 West
Hines, OR 97738

24 January 1990

re. Draft Three Rivers RMP and EIS

I have had opportunity to examine the Three Rivers Draft EIS/RMP recently released. I have several concerns. First, I propose a new alternative (or significant alteration of Alternative A) to address some badly neglected issues. Secondly, I will register my concern with the "Preferred" (Costly Cow) Alternative C.

- 72-1 #1 As noted in the document, nearly all rangeland is in "fair" or "poor" condition. No alternative presented addresses optimization of ecological condition. I would propose a new alternative with specific emphasis on ecological integrity--lets call it the "Optimized Ecological Condition" alternative. Under this alternative should be the long term goal of returning and maintaining most or all rangeland in good to excellent (late seral to climax) ecological condition.

- 72-2 #2 As noted in the document, nearly all water quality is in "fair" to "poor" condition. Alt. A addresses the problem quite well, but the long term goal should be to return and maintain most water in "excellent" (rather than just "good") condition. This again may require a new "Optimized Ecological Condition" alternative. Alternative C takes a step in the right direction towards improved water quality, but does not, in my opinion go far enough and may not meet DEQ requirements for water quality.

- 72-3 #3 I can find no mention made in the document regarding Ancient Forest habitat. I request that all Ancient Forest stands be identified and an alternative developed to protect it. Management of all other forest lands in such a way as to optimize ecological condition should be addressed as well. I cannot find in the document how many miles of logging roads are expected to be built under the various alternatives and what the expected costs will be. Please include this information in the EIS. An "Optimized Ecological Condition" alternative would discourage the building of any new logging roads.

- 72-5 #4 Optimization of ecological habitat for Bighorn Sheep and other native wildlife should be addressed under the proposed new alternative. I cannot find a discussion of impacts on Bighorn sheep in any of the alternatives and I request this be done.

- 72-6 Alternative C proposes projects including 143 miles of fence, 86 miles of pipeline, 50 troughs, 91 reservoirs and 76,960 acres of (habitat sterile) crested wheatgrass seeding. I request that the estimated costs of these projects be addressed in the various alternatives.

- 72-7 Seeding of crested wheatgrass causes irreversible deterioration of natural habitat, is costly and should be abandoned on public lands. It is unacceptable for any of the alternatives.

Thankyou for this opportunity for input regarding the RMP for the Three Rivers area.

Sincerely,

Craig Miller

Craig Miller
P.O. Box 6376
Bend, OR 97708

- 72-1 Refer to response 1-13.
- 72-2 Refer to responses 6-4 and 13-7.
- 72-3 Refer to response 12-1.
- 72-4 Refer to response 12-1.
- 72-5 Refer to response 2-78.
- 72-6 Refer to response 12-7.
- 72-7 Refer to response 1-11.



Oregon Trout ⁷³

P.O. Box 19540 • Portland, Oregon • 97219 • (503) 246-7870

1/24/90

District Manager
Bureau of Land Management
HC-7412533 Hwy 20 West
Hines, OR 97738

Dear District Manager,

These are comments to the draft EIS and Three Rivers Management Plan.

73-1 One of the areas of our concern are your management of the riparian zones. Currently most zones are in fair to poor condition. Under your preferred alternative, it is concluded that there will be little change. We of course feel that all riparian zones should be managed at an "excellent" level. The benefits would be numerous, not the least of which are better fisheries, more wildlife and improved water quantity and quality.

73-2 We also feel "Wild and Scenic River" designations are deserving of the South and Middle Fork of the Malheur River and all of Bluebucket Creek and Silvies River. If they do not qualify as per your standards, I should like to know why not.

I also have concerns outside my area of expertise but I will share them none-the-less.

73-3 Winter range is often the limiting factor for big game. It should be better managed. Rangelands in general are managed in mostly fair to poor conditions. This should be unacceptable on public lands that are for multiple use. Too high an allocation for cattle and too little for wildlife are apparent.

73-4 Little mention is made of your management strategies for chukar.

73-5 A specific plan should accompany the management of Bighorn Sheep.

Respectfully submitted,

Craig Lay
Craig Lay
Central Oregon Director
57 Pinecrest Ct.
Bend, OR 97701

- 73-1 The environmental consequences of the Proposed Plan concludes that dramatic improvement of riparian will result from implementation of the Proposed Plan. Also, see response 13-7.
- 73-2 Refer to response 3-6.
- 73-3 Refer to response 2-6.
- 73-4 During the planning process and interagency coordination with ODFW, no management actions were identified for improvement of chukar habitat and none of the proposed actions were determined to have a detrimental effect on chukar.
- 73-5 Refer to response 2-78.

25 January, 1990

District Manager
Bureau of Land Management
HC-7412533 Hwy 20 West
Hines, OR 97738

74

74-1 I have read with interest the draft Environmental Impact Statement for the northern half of the Burns District. I was concerned to learn that Alternative C was the Bureau's "preferred" alternative. In my opinion, this alternative leans much too dramatically in favor of cattle interests at the expense of all other issues. Deer and elk receive only token forage allocation with the vast majority being reserved for cattle. Wildlife winter range forage allocations should take priority over livestock allocations. In addition, virtually no consideration is given to bighorn sheep habitat protection.

74-2 Because so much of the range is in only "fair" to "poor" condition, I believe it should be a priority to return the range to "excellent" condition. At the very least, BLM should adopt Alternative "A", even though this alternative would allow only a token amount of recovery. This alternative should be viewed only as a temporary stopgap while BLM develops another alternative to restore and maintain rangeland to "excellent", natural condition.

74-3 To that end, cattle-grazing and crested wheatgrass seedings should be eliminated. In addition the plan should commit the Bureau to keep riparian and aquatic habitat in "excellent" condition. That should include designation of the South and Middle Fork Malheur Rivers, Bluebucket Creek, and the Silvies River as "Wild and Scenic" rivers.

74-5 Certainly all of this would require careful discussion of restoration efforts, which none of your current alternatives address. In addition, nowhere in your proposals do you even attempt to identify remaining ancient forests nor how logging might impact the region. I believe we need to reassess priorities for this area. The proposed Alternative C is a disaster for the land and for the naturally occurring wildlife. I hope my comments will encourage you to rethink your draft EIS.

Sincerely,

Karen L. Theodore
Karen L. Theodore
20941 Desert Woods Dr
Bend, Oregon 97702

- 74-1 Refer to response 2-6.
 - 74-2 Refer to response 1-13.
 - 74-3 Refer to response 1-11 and 1-13.
 - 74-4 Refer to response 3-6 (wild and scenic rivers) and 13-7 (riparian and aquatic habitat).
 - 74-5 This document is not designed to address the impacts of logging on a regional nor a site-specific basis. Site-specific environmental effects are fully evaluated in the environmental analysis process as required by the NEPA of 1969, Public Law 91-190. Also, refer to Chapter 3 and Chapter 4 of the FRMP/EIS for a discussion of economic impacts.
- Regarding ancient forest, refer to response 12-1.

- 75-1 Refer to response 2-6.
- 75-2 Refer to response 1-13.
- 75-3 Refer to responses 1-11 and 1-13.
- 75-4 Refer to response 3-6.
- 75-5 Refer to responses 12-1 and 74-5.

I have read with interest the draft Environmental Impact Statement for the northern half of the Burns District. I was troubled to learn that Alternative C was the Bureau's "preferred" alternative. In my opinion, this alternative leans much too dramatically in favor of cattle interests at the disastrous expense of all other issues. Virtually no consideration is given to bighorn sheep habitat protection. Deer and elk receive only token forage allocation with the vast majority being reserved for cattle. Wildlife winter range forage allocations should take priority over livestock allocations.

75-1

Because so much of the range is in only "fair" to "poor" condition, it seems amazing to me that none of the alternatives proposed would come close to rehabilitating the region to "excellent" condition. It is as if even the possibility of, for once, making a commitment to redeeming the land is out of the question. At the very least, BLM should adopt Alternative "A", even though this alternative would allow only a token amount of recovery. I believe it is imperative that BLM develop another alternative to restore and maintain rangeland in "excellent", natural condition.

75-2

To that end, cattle-grazing should be eliminated. Crested wheatgrass seedings should be eliminated. Along with that commitment to a return to natural condition should be a plan to keep riparian and aquatic habitat in

75-3

"excellent" condition. That should include wild and scenic designation for the South and Middle Fork Malheur Rivers, Bluebucket Creek, and the Silvies River. That would require careful discussion of restoration efforts, which none of your current alternatives address. In addition,

75-4

nowhere in your proposals do you even attempt to identify any remaining ancient forests nor how logging might impact the region. I believe we need to reassess priorities for this area. The proposed Alternative C is a disaster for the land and for the naturally occurring wildlife.

75-5

Sincerely,

Michael A. Sequeira
20941 Desert Woods Dr
Bend, Oregon 97702

76 No comment identified.

January 25, 1990

In our opinion the people who think that the range is not being managed the way it should be are either jealous or don't know what it is all about. The freedom of our country is at stake. If people can't do what they think is right on private land and private permits that are managed by the BLM and Forest Service, then it is wrong.

The cow is the best thing for this country so far. What little the cow has hurt the riparian areas (if they have) does not affect the economy, whereas taking the cow off of the BLM and Forest Service will affect the economy. The rancher's livelihood is being taken away. When the ranchers and farmers can no longer produce beef and crops, what are the people of this world going to eat.

Tyler Brown by Wesley L. Tyler

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

77

77 No comment identified.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

~~The reallocation and/or reduction of AUM's livestock storage in allotment will reduce the value of our base property by approximately \$ (Assume \$50 per AUM value). Please consider this economic loss in the requested Takings Implication Assessment.~~

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Tyler Brothers

Name HC 71 Box 19x

Burns, Oregon 97730

Address

City State Zip Code

Tyler Brothers by Wesley D. Tyler

Signature

Enclosure: Supplemental Comments



January 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74 - 12533 Hwy 20 West
Hines, OR 97738

P.O. Box 428
Burns, Oregon 97720

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

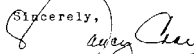
The Harney County Sheep & Wool Growers want to go on record that the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Riddle Ranch document. There are several other areas of concern that this letter will address.

- 78-1 The Bureau of Land Management Riparian Area Management Policy, dated January 22, 1987 signed by BLM Director Robert J. Burford has never been rescinded. Please note that the definition of a riparian area is an area of land "directly influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence". The definition continues that areas excluded from the definition of a riparian area include "ephemeral streams or washes that do not exhibit the presence of vegetation dependent upon free water in the soil". There are areas classified as riparian that do not meet these criteria. Two creeks brought to our attention are Skull Creek and Landing Creek. A thorough review of all creeks should be made to ensure they meet the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.
- 78-2 Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied and then are extrapolated to indefensible conclusions. Management objectives, in the absence of AMP's, are documented only in the broadest of terms making them virtually immeasurable. No factors, other than short term wildlife, wild horse and livestock utilization, are indicated as affecting forage production, ecological status or potential of the resource. Therefore, reductions in authorized livestock use is the primary, if not the only,
- 78-3

remedial action recommended. Until proper techniques and accurate information is gathered existing levels of livestock grazing should be maintained. At such time that reliable information shows trend increase or decrease, proper adjustments could then be made. The ratings in the recently published Riley Rangeland Program Summary Update classify range conditions as poor, fair, good and excellent. The RMP/EIS classifies range conditions as satisfactory and unsatisfactory. Consistent use of evaluation ratings is necessary for accurate evaluation as well as better communication with the permittees. There is no scientific data that indicates that livestock use has any negative effect on the sagegrouse population. The restrictions on livestock in the sagegrouse strutting grounds are unfounded and should be eliminated.

- 78-5 The exclusion of cattle on the Biscuitroot Cultural ACEC is not supported. The report states "...these areas to be a high-value resource due to the quality and quantity of roots available". Appendix 7-12; Vol. II Appendices. Since grazing has been going on in this area for years and the quality and quantity have remained high, even with root harvesting, there is no justification to change the practice.
- 78-6 The designation of the entire Kiger active Horse Management Area (HMA) (36,619 acres) as an Area of Critical Environmental Concern (ACEC) will have a dramatic economical effect on at least one ranch. Before this change is even considered and the Final Three Rivers RMP/EIS is issued, a complete "Takings Implication Assessment" should be conducted as authorized by Executive Order 12630. Livestock and wild horses have run together successfully for years. The complete elimination of livestock grazing is neither justified nor proven necessary. The conditions for acquiring the private holds or the authority to impose this on the private holdings is not fully addressed.
- 78-7
- 78-8
- 78-9 The continual fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years restrict the amount of available forage and can concentrate cattle more than necessary. Livestock have a biological need for water. Access can be accomplished by building the water gaps at the deep end of the reservoir. If the enclosure is more than one-half mile square, have more than one access point to allow livestock better access to all of the forage available around the reservoir.
- 78-10 Before any alternative that causes a reduction of AUM's is imposed, no matter what reason, a complete "Takings Implications Assessment" should be completed as authorized by Executive Order 12630.

Sincerely,


Nancy Cray, President
Harney County Sheep & Wool Growers
SR-1 Box 37
Burns, OR 97720

- 78-1 Refer to response 46-1.
78-2 Refer to response 2-87.
78-3 Refer to response 2-11.
78-4 Refer to response 4-3 and 4-6.
78-5 Refer to response 4-15.
78-6 Refer to response 2-68.
78-7 Refer to response 2-63.
78-8 Refer to response 32-1.
78-9 Refer to response 2-46 and 5-10.
78-10 Refer to response 2-63.

District Manager
BLM Burns District Office
HC 74 - 12533, Hwy. 20 West
Hines, Oregon 97738

Re: Draft Three Rivers Resource Management Plan and
Environmental Impact Statement

79-1 I oppose your preferred alternative, Alternative C. I would urge that you adopt a plan that would restore and maintain rangeland, riparian and aquatic habitat in excellent, natural conditions. I would hope that this proposal would eliminate the seeding of crested wheat grass and that your plan would address and protect such features as the ancient forests and Big Horn Sheep habitat.

Please adopt the "Natural Values Alternative A".

Sincerely,

ARNESON & WALES

James A. Arneson
James A. Arneson JAA

JAA/kkp

80

DISTRICT MANAGER
BLM
HC 7412533 HWY 20 WEST
HINES OR 97738

DANIEL SCULLARD
840 SW 11th
CORVALLIS OR
97333

- 80-1 Refer to response 2-78.
- 80-2 Refer to responses 2-10 and 2-11.
- 80-3 Refer to responses 2-44 and 13-7.
- 80-4 Refer to response 1-13.

HELLO
THIS LETTER IS COMMENTARY ON YOUR PREFERRED ALTERNATIVE C OF THE DRAFT RESOURCE MANAGEMENT PLAN.

80-1 THIS ALTERNATIVE FAILS TO ADDRESS BIGHORN SHEEP HABITAT AND THEIR FORAGE ALLOCATION. WHY? THEY REPRESENT A RARE & BEAUTIFUL, VALUABLE (= TOURISM), OREGON RESOURCE.

80-2 I RECOMMEND THAT MORE ALLOCATION BE GIVEN TO WILDLIFE WINTER FORAGE THAN LIVESTOCK.

80-3 WE NEED A RETURN OF ALL WATER QUALITY TO EXCELLENT CONDITION - IMMEDIATELY. PERHAPS COWS CAN DRINK MUD - PEOPLE, WILDLIFE CANNOT. IMPROVE RIPARIAN & AQUATIC HABITATS.

I AM VERY MUCH OPPOSED TO THE CONSTRUCTION OF 143 MILES OF FENCE, 50 TROUGH, 91 RESERVOIRS AND THE PLANTING OF CRESTED WHEATGRASS IN EASTERN OREGON.

80-4 PLEASE DEVELOP AN ALTERNATIVE THAT RESTORES RANGELAND TO EXCELLENT, NATURAL CONDITION.

THE 1990'S ARE GOING TO BE A DECADE OF ENVIRONMENTAL AWARENESS. AS THE POPULATION AS A WHOLE CAN NO LONGER ESCAPE THE RESPONSIBILITIES OF ITS ACTIONS. PLEASE DON'T LAG BEHIND!!!

KEEP ME ADVISED AS TO THE OUTCOME OF THIS MATTER

Sincerely
AS

81

District Manager

I am writing to you in regards to your land use proposals in your district.

I'm very concerned about several issues. The first being your reversal of prohibiting snowmobiles on Steens Mountain. It's not fair that you are giving in to the pressures of the few snowmobilers in your area. They have the entire country to ride in. Fragile and sensitive areas such as the Steens should be preserved. Evidently you feel the pressure from this group is more influencing than the wildlife and plant species who can't speak for themselves.

I realize the majority of people in this area feel their rights to ride where they want

81-1 The range must be maintained in excellent natural conditions. Cattle grazing should be reduced or eliminated where necessary. Alternative A will help.

81-2 Water quality, riparian and aquatic habitat should be improved and maintained in excellent condition.

81-3 All old growth (ancient) forest should be identified and protected.

81-4 All costs of construction of new roads be included under the various alternatives along with their environmental impacts.

81-5 All created wheatgrass seeding proposals be eliminated.

81-6 Bighorn sheep habitat should be addressed in the plan.

81-7 Wild and Scenic River designation is very important for the South and

②

on public lands are being denied. And that environmentalists who have probably never been there are getting their way. This is true. But this is beside the point today. Times are changing and the land has been exploited for far too long. All beautiful and special areas should not be made into parks with easy access. People have got lazy and don't want to walk anymore. (On x-country ski for that matter) I'm sure the handicapped will disagree with this statement, but it's reality.

The other issues I'm concerned with are range management and leach mining. Cattle ranching has been a big part of American history and it should continue. But more care and less impact should become a higher priority.

Middle Fork Malheur Rivers, all of Bluebucket Creek, and all of the Silvies River.

81-8 I also recommend the wildlife winter range forage allocations be given priority over livestock allocations. As for the Cyanide heap leach mining operations go, isn't it very obvious this should not be allowed. The damage and scars from this is outrageous. It must ~~be~~ not be allowed.

Very Concerned
Kent Beemer
19163 INDIAN SUMMIT CR
BEND OR 97702

- 81-1 Refer to response 1-13.
81-2 Refer to responses 2-44 and 13-7.
81-3 Refer to response 12-1.
81-4 Refer to response 12-1.
81-5 Refer to response 1-11.
81-6 Refer to response 2-78.
81-7 Refer to response 3-6.
81-8 Refer to response 2-6.
81-9 Refer to response 5-18.

(1)

82

Norman E. Parrish
P.O. Box 1127
Bend, Oregon 97709

- 82-1 Refer to responses 2-6, 2-10 and 2-11.
- 82-2 Refer to responses 2-3 and 2-5.
- 82-3 Refer to response 12-1.
- 82-4 Refer to response 2-78.
- 82-5 Refer to responses 2-6, 2-10 and 2-11.
- 82-6 Refer to response 1-11.

Dear Sir;

(1) I am writing you about two issues:
 First is about motorized vehicles in the
 Steens Mts. or any other Wilderness type
 area. I have lived here all my life and
 have watched the habitat for game deteriorate.
 I don't like what I see! Let the snow-
 mobilizers go to Mt. Bachelor or somewhere else
 to do their playing! Our Wildlife need a
 little peace to be able to graze and breed!
 The motorized vehicles ruin the foliage +
 it takes years to grow back! Our Grand-
 Children + yours will have to go to a zoo to
 see any Elk, deer, Big Horn Sheep etc. Think
 about how much our game has gone down
 hill since you were a boy, unless you
 are from California! I am an Oregonian, 59
 years old and I know what has been
 happening!

(2) The next subject is "Draft Three Rivers
 Resource Management Plan" I will list
 what I think should be done!

82-1 (A) There is too much cattle grazing where
 our Wildlife need to be able to winter

(2)

Reduce the cattle grazing and restore our
lands!

82-2 (B) Our water-ways are a mess! They should
 be restored for our fish and water-fowl.
 Stop the Pollution! Make it a Penitentiary
 offense. Such as the Russians from Woodburn
 who were Poaching fish in Central Oregon!

82-3 (C) Our old Forest lands should be marked and
 protected! We Oregonians will be like other states
 soon! - no timber! I've been a logger since I
 was 18 yrs. old, so I have seen the old growth
 cut so these Big Lumber Industries can get rich

82-4 (D) The Big Horn Sheep habitat should be left
 alone and protected!

82-5 (E) Our Wildlife winter range should be for
 our deer, Elk etc. and have priority over cattle.
 These things should all be protected
 and managed so future generations can,
 at least see partly what it used to be like

82-6 (F) I also think, see attached
 wheat grass seeding proposals
 should be eliminated! why
 should the Tax payers pay
 for cattle feed!

Sincerely
Norman E. Parrish

WILLIAM D. CRAMER
WILLIAM D. CRAMER, JR.
GORDON MALLON

CRAMER & MALLON
ATTORNEYS AT LAW
BURNS, OREGON 97720

83

P.O. BOX 646
PHONE (503) 573-2066
FAX (503) 573-2060

January 25, 1990

83-1 Refer to responses 2-5, 2-11 and 3-13.
83-2 Refer to response 3-13 and 5-10.
83-3 Refer to response 1-13 and 32-1.

U.S. Dept. of Interior
Bureau of Land Management
District Office
HCR 74, 12533 Hwy. 20 W.
Hines, OR 97738

RE: Three Rivers Resource Management Plan

Gentlemen:

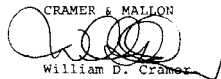
83-1 I am writing to oppose the preferred alternative grazing policy submitted in your Three Rivers Resource Management Plan. The idea that either the streams are as badly degraded as you contend, or that they can be substantially improved by the proposal to remove livestock from over 80 miles of stream for 5 years is ridiculous. If you follow your plan, you will not only take the livestock off their normal watering areas, but also close off vast areas of hillside grazing which cannot be utilized without water and without fencing off from the streams.

83-2 Your habitat preservation policies are extreme, and should not be put into effect without substantial additional plot testing. What I have seen of the relatively few areas you have tested is that fencing off has not significantly improved the grasses along the streams. It is true that the animals feed first on the grass closest to the water. Those plants are used to that kind of grazing by both domestic and wild life. They come back year after year after intensive grazing. In the few areas where you wish to re-establish willows, you can do this by fencing off those particular areas. You do not need to destroy the whole grazing system to accomplish this one minor goal.

83-3 It seems apparent that your proposals are motivated by an intent to remove more and more domestic livestock from the BLM areas. This is absolutely wrong and will not bring any substantial benefits for anyone.

Please reconsider and come up with a reasonable plan.

Very truly yours,

CRAMER & MALLON

William D. Cramer

WDC:s1
1/75

WILLIAM D. CRAMER
WILLIAM D. CRAMER, JR.
GORDON MALLON

CRAMER & MALLON
ATTORNEYS AT LAW
BURNS, OREGON 97720

84

P.O. BOX 646
PHONE (503) 573-2066
FAX (503) 573-2060

January 26, 1990

84-1 Refer to response 2-7.
84-2 Refer to response 11-11 and 25-1.
84-3 Refer to response 6-8.
84-4 Refer to responses 4-14 and 6-10.

U.S. Dept. of Interior
Bureau of Land Management
District Office
HCR 74, 12533 Hwy. 20 W.
Hines, OR 97738

RE: Three Rivers Resource Management Plan

Gentlemen:

I have written to you about other matters, but I am writing specifically to object to several other aspects of your plan.

- 84-1 1. I strongly oppose any attempts to limit upland forage by 30%. There's no scientific basis for this and it is outrageous. Particularly after the flowering period, there should be no limitation at all.
- 84-2 2. I strongly oppose increase of any wild horse area whatsoever. This is against the meaning and intent of the Wild Horse Act and will be a terrible burden on any of the ranchers in those areas. The fact that the BLM now wants to go into the wild horse business does not change this.
- 84-3 3. I request that you emphasize the eradication as much as possible of juniper trees on the BLM areas. They are causing far more damage to domestic livestock and wildlife in the overall range than all other causes put together. You should plan more substantial burning programs to get rid of quantities of these trees. They have taken over a huge amount, of particularly the Steens Mt. area, in the last 50 years.
- 84-4 4. I oppose any limitation on mining and searching for minerals in any of the BLM areas.
- 84-4 5. I strongly oppose the BLM purchasing any additional lands in this area or facilitating purchase of any lands in this area by any parties.

Very truly yours,

CRAMER & MALLON

William D. Cramer

WDC:s1
2/16

85

85-1 Refer to responses 2-44 and 13-7.

January 31, 1990
Mari Baldwin
135 East 34th Place
Eugene, OR 97405

District Manager
BLM Burns District Office
Hines, OR 97738

85-1

Dear Joshua Warburton:

I am writing concerning Draft Three Rivers Resource Management Plan and Environmental Impact Statement.

I am very concerned with water quality and the present condition of riparian and aquatic habitats. Returning and maintaining all water quality to an excellent condition should be an immediate goal of yours. Therefore I support Alternative A.

Sincerely,
Mari Baldwin

71

MAYO RANCH, INC.

86

71

January 26, 1990
Page Two

January 26, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, Oregon 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

86-1

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economic unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

86-2

The reallocation and/or reduction of 1,859 AUM's livestock forage in our Rim Lake, Juniper Ridge, Claw Creek and Dry Lake Allotments will reduce the value of our base property by approximately \$92,950.00. Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

We wish to state unequivocally that we believe the direction the Draft purports to take the Three Rivers area is detrimental in the extreme to the economic growth and future welfare of both Harney County and the people living and working therein. We also wish to state that with the documented and current cooperation of those same people, we believe the progress being made at this time in the areas of concern addressed in the Draft, is in the best interests of the environment and the land at issue.

Sincerely,

Mayo Ranch, Inc.

Mark R. Mayo
Mark R. Mayo

Kathy A. Mayo
Kathy A. Mayo

Jean M. Mayo
Jean M. Mayo

Carl L. Mayo
Carl L. Mayo

HC 74, Box 130
Riley, Oregon 97758

86-1 Refer to response 2-63.

86-2 Refer to response 2-63.

71

71

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

87

87 No comment identified.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of ~~_____~~ AUM's livestock forage in ~~_____~~ Allotment will reduce the value of our base property by approximately \$_____. (Assume \$50 per AUM-value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

John Valle
Name Rn. 720

Conroe Oregon 97320
Address Conroe Oregon 97320
City State Zip Code

John Valle
Signature

Enclosure: Supplemental Comments



1000 N.E. Multnomah Street
Portland, Oregon 97232
(503) 281-3811
FAX (503) 280-6660

Mr. Jay Carlson
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

RE: BLM Draft Three Rivers RMP/EIS

Dear Mr. Carl son:

The Oregon Cattlemen's Association appreciates the opportunity to respond to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement.

Based on conversations with, and information provided by livestock producers located in the Three Rivers region, there is substantial disagreement with the data used to develop the draft policy for the region. Before the BLM approves the RMP/EIS, efforts should be undertaken to study and resolve the issues where parties disagree with conclusions reached by the BLM. A meaningful dialogue with affected livestock producers should prove beneficial. There is no reason for the BLM to move with celerity when draft policy affects so many with the potential for an outcome not in the best interest of improving the environment and economy.

Ye believe the BLM should thoroughly examine the major arguments brought forth by livestock producers. The following are a few issues that should be resolved:

- * reviewing all creeks in the region to determine whether or not they should be included in the riparian area
- ** developing information to ascertain the impact livestock has on the sagegrouse population
- * allowing cattle on the Biscuitroot Cultural ACEC unless studies clearly demonstrate damage (we note that historical grazing practices have not impacted root structures)
- ** examining historical data on water quality, since there is a major disagreement concerning the data provided by BLM, that does not appear to be substantiated by the human eye and those living in the area for a number of years

88

January 30, 1990

- 88-5 | ** determining if preference for wildlife and wild horses is inconsistent with federal court decisions
- 88-6 | ** ascertaining how the fencing of reservoirs will enhance riparian areas
- 88-7 | ** developing an objective standard to determine the condition of the range

Undoubtedly, the Draft Three Rivers RMP/EIS will have an adverse impact on livestock producers raising livestock in the area. Resolving the issues we have raised, plus the other issues articulated by producers, will guide the BLM in their quest for what is best, based on the scientific data.

Sincerely,

Don Gomes
Don Gomes Sr
President

- 88-1 | Dennis Hill
Route 2, Box 796
Klamath Falls, OR 97603
- 88-2 | Richard Nichols
700 Old Brockway Road
Warrenton, OR 97146
- 88-3 | Mark Rietmann
Route 1, Box 315
Hogpen, OR 97336
- 88-4 | Executive Vice President
Mick Swan
1000 N.E. Multnomah St.
Portland, OR 97232
- 88-1 | Refer to responses 4-4 and 42-14.
- 88-2 | Refer to responses 3-9 and 4-6.
- 88-3 | Refer to response 4-15.
- 88-4 | Refer to response 2-3.
- 88-5 | Refer to response 2-6.
- 88-6 | For a discussion of the predicted improvement see the environmental consequences of the Proposed Plan. Also, refer to response 3-10.
- 88-7 | Refer to response 2-87.

P.O. Box 96
Enterprise, OR 97828
January 30, 1990

District Manager
Bureau of Land Management
HC 74-12533 Hwy 20 West
Hines, OR 97738

Dear District Manager:

I am writing to comment on your preferred Alternative E for resource management in the BLM's Burns District.

89-1 As I understand it, you propose to install miles of fence and pipeline, and numerous troughs, wells and reservoirs, **at my expense**, for the benefit of a handful of "welfare" ranchers.

As a former employee and student of Malheur Field Station, I grew to know and love that land, and think you're missing a real opportunity to restore the range to its full potential for **all** living things, not just cattle.

I'd prefer my tax dollars to finance native grass planting, riparian restoration and preservation of ancient forests — necessary steps for maintaining a **diverse** ecosystem.

89-2 The Malheur and Silvies Rivers and Bluebucket Creek are too special to serve as cattle troughs and urinals. **Indeed**, the rivers deserve wild and scenic status.

Tourists and their credit cards will not venture to Harney County to see cows and/or gulches; they will come for bighorn sheep and healthy trout streams.

I beg of you not to cave into pressures from the local OCA. Think of the future generations of Oregonians that will need and benefit more from wilderness than a few ounces of range-fed beef.

Sincerely,

C. M. Sterbentz
Cathu Sterbentz

89-1 See DRMP/DEIS, p. 3-16, for information on how range improvements are funded.

89-2 Refer to response 3-6.



CENTRAL OREGON
AUDUBON CHAPTER
P. O. BOX 565
BEND, OREGON 97709

January 31, 1990

District Manager
BLM
HC-74-12533 Hwy 20 West
Hines, Oregon 97738

Dear District Manager:

90-1 I am writing as a representative of the 437 members of Central Oregon Audubon. We were very upset with your preferred alternative(C). It maintains the range in horrible condition and continues to degrade the range even further. All of the range should be in restored within the next 5-10 years to excellent condition. It is time the BLM manage their lands properly instead of allowing the ranchers to do whatever they want. The BLM lands are owned by all 240 million Americans not by a few local ranchers.

90-2 We find all crested wheatgrass seedings totally unacceptable. Why should the American taxpayers have to foot the bill to provide non-native forage for the local ranchers? **NATIVE SPECIES OF GRASS** are the only species acceptable for wildlife.

90-3 All riparian zones needed to be upgraded to excellent condition immediately. **90%** of the wildlife on BLM lands in eastern Oregon need healthy riparian zones to survive.

90-4 We would like to see the costs of all your new projects listed along with the environmental impacts. The public needs to know where their taxes are going.

In summary we feel that the only Alternative that is even close to being acceptable is Alternative A. This alternative needs to be modified so that the emphasis is on restoring rangeland to a healthy natural condition. It is time for the BLM to stand up and manage their lands properly instead of being waterboys for the local ranchers.

Sincerely,

Glenn Van Cise
Glenn Van Cise
Conservation Chairman

90-1 Refer to response 1-13.

90-2 Refer to response 1-11.

90-3 Refer to response 3-13.

90-4 Refer to response 12-7.

PO BOX 796
Crane, OR 97732
January 31, 1990

Mr. Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson:

91-1 Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan the Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The letters from the Harney County Cattlemen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Sincerely,

Jerry A. Miller
Jerry A. Miller

lm

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

92-1 The reallocation and/or reduction of 690 AUM's livestock forage in ~~Woolgrowers & Sheep~~ Allotment will reduce the value of our base property by approximately \$28,600. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

F. C. and Deborah Purdy

Name F. C. and Deborah Purdy

Address HCR 73 Sandhill Lane

City Prineas OR 97720
State OR Zip Code 97720

Signature *F. C. Purdy*

Enclosure: Supplemental Comments

Harry E Wilson
2120 N Callow Ave
Bremerton, WA 98312-2908
27 January 1990

Jay Carlson
RMP/EIS Team Leader
Burns District Office
HC 74-12533
Highway 20 W
Hines, OR 97738

Dear Sir:

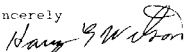
Thank you for the opportunity to comment on the Draft Environmental Impact Statement / Resource Management Plan for Three Rivers Resource Area.

I believe that Alternative B would be the best alternative for the resource area as it is almost the same as Alternative C (the preferred alternative).

- 93-1 On Table 4-3, Impacts to Forestlands and Woodlands, the Average Sustainable Annual Harvest (acres) is an estimate only. Has any systematic volume and production inventories been conducted in the Resource Area? Or are the figures just educated guess?
- 93-2 Table 4.10, what are the figures for Palomino Buttes, good and fair? Table 4.11, what are the figures for Kiger and Riddle Mountain, poor? Table 4.12, what are the figures for Warm Springs, Total Change, poor? In most cases it looks like the figures should be zero, but are they?
- 93-3 Upon reading the impacts on Big Game Habitat it seems that the allocation of 7,800 AUMs of cattle type forage to big game would better increase big game and their habitat.
- 93-4 Table 4.19, it seems that there is approximately 1/4 of the streamside riparian habitat that is in any unknown condition. Is their plans to inventory this habitat to see what condition it is in?
- 93-5 On page 4-68, Economic Conditions, Livestock Grazing, their should be discussion of the monetary values the ranchers would face.

Thank you for your time and consideration.

Sincerely



Harry E Wilson
2120 N Callow Ave
Bremerton, WA 98312-2908

- 93-1 As stated in the DRMP/DEIS, p. 4-9, Table 4.3, Footnote 7, "the average annual harvest is an estimate since no systematic inventory of our woodlands has been conducted. No woodland inventory is planned for the immediate future."
- 93-2 Thank you for bringing these number omissions to our attention. The correct numbers are shown in the Proposed Plan. See Table 3.5.
- 93-3 The reallocation of 2,622 AUMs, in addition to the current 5,278 AUMs, would add up to the 7,800 figure. Also, refer to response 2-10.
- 93-4 Refer to response 4-4.
- 93-5 Refer to response 28-1.

DWIGHT & SUSAN HAMMOND
HAMMOND RANCHES, INC.
DIAMOND, OREGON

JANUARY 29, 1990

MR. JAY CARLSON
BURNS DISTRICT OFFICE
BUREAU OF LAND MANAGEMENT
HC 74 12533 HWY 20 WEST
HINES, OREGON 97738

DEAR MR. CARLSON:

NOT BEING DIRECTLY INVOLVED AS LIVESTOCK PERMITTEES, BUT BEING EFFECTED THROUGH ASSOCIATION AND DIRECTLY NEIGHBORING "THREE RIVERS" BOUNDARIES, AND BEING A RESIDENT OF HARNEY COUNTY WHICH HOUSES THE THREE RIVERS AREA, WE WOULD LIKE TO COMMENT ON THE BLM DRAFT THREE RIVERS RMP/EIS.

HAVING READ THOROUGHLY THE COMMENTS SUBMITTED TO THE BLM BY THE HARNEY COUNTY CATTLEWOMEN, STOCKGROWERS, FARM BUREAU, SHEEP & WOOLGROWERS AND THE JANUARY 17, 1990, RIDGLE RANCH AND WESTERN RANGE SERVICE COMMENTS AND RESPONSE TO THE DRAFT THREE RIVERS RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT; WE WOULD LIKE TO ADD OUR COMPLETE SUPPORT FOR THOSE VIEWS AND COMMENTS, AND MOST IN PARTICULAR THE FACT THAT THIS RMP/EIS IS NOT NEEDED IN ITS PRESENT FORM.

THIS RMP SEEMS TO US TO BE A COSTLY, WASTE OF TAXPAYERS EQUITY IN THAT IT IS A REPLICA OF A NUMBER OF PROGRAMS THAT ARE ALREADY IN EFFECT AND FROM FIRST-HAND, ON THE GROUND OBSERVATION, WORKING.

PROPOSALS TO REMOVE LIVESTOCK FROM STREAMS AND RIPARIAN AREAS IS, IN OUR OPINION, NOT A VERY PROGRESSIVE RESPONSIBLE ACTION. IN OUR PARTICULAR AREA AND AREAS WE HAVE OBSERVED PERSONALLY, TO REMOVE LIVESTOCK AND GAME FROM ONE NATURAL WATERING SOURCE, TO BE REPLACED BY A MAN-MADE WATER AREA, IS CREATING A PROBLEM IN OTHER AND ADDITIONAL AREAS, WHICH AREN'T EVEN PREDICTABLE.

94-1 TO GIVE WILD HORSES PRIORITY OVER DOMESTIC GRAZING RIGHTS SEEMS TO US TO BE VERY BIAS AND POSSIBLY NOT TAKING INTO CONSIDERATION OR HONORING HISTORIC RIGHTS AND ECONOMIC USES. THIS PLAN SEEMS TO FURTHER PERPETUATE A PROHIBITIVELY COSTLY BUREAUCRATIC BOONDOGGLE IN THE "WILD HORSE PROGRAM". WE LIVE HERE AND WE SEE THESE HORSES ALL THE TIME, AND IN OUR OPINION, THERE ARE NO MORE "WILD" HORSES THAN THERE ARE DINOSAURS.

ALL OF THESE CRITICAL AFFAIRS ARE OF UTMOST CONCERN TO US AS LIVESTOCK PRODUCERS AND HAVING SEEN THE EFFECTS OF MANY OF THE PROPOSED ACTIONS, KNOWING FULL WELL THE ADVERSE IMPACT THEY WILL HAVE ON THE LIVESTOCK INDUSTRY, WE DO NOT FEEL THE COMPLETE ECOSYSTEM IS BEING CONSIDERED.

1.

94-2 THE ECONOMIC IMPACT ON HARNEY COUNTY OREGON AND ALSO THE UNITED STATES CITIZENS, IN THAT THE CARE, PRESERVATION, COST OF IMPLEMENTATION AND MAINTENANCE OF THE THREE RIVERS RESOURCE MANAGEMENT PLAN WOULD ULTIMATELY BE THAT OF THE PEOPLE OF THE U. S., SEEMS TO BE MISSING. THESE TAX DOLLARS ARE, AT THIS TIME, IN SHORT SUPPLY, AND THIS HAS NOT BEEN ADDRESSED OR TAKEN INTO CONSIDERATION IN THIS PLAN. AS IN A LOT OF GOVERNMENTAL PLANNING PROCESSES, THIS PART SEEMS TO HAVE BEEN OMITTED. AS TAXPAYERS, WE WOULD LIKE TO KNOW WHAT THE COST, OR "ESTIMATED COST OF IMPLEMENTATION" WOULD BE?

94-3 ALSO, HAS AN ECONOMIC STUDY BEEN DONE AS TO THE ADVERSE EFFECT ON "PRIME AND UNIQUE FARMLANDS" IN HARNEY COUNTY AND ALSO THE ECONOMIC EFFECTS ON THE CATTLE INDUSTRY IN HARNEY COUNTY AND OREGON. THERE IS A "HUMAN" ELEMENT INVOLVED.

94-4 WE DON'T FIND MENTION OF THE PERCENTAGES OF FEDERALLY OWNED LANDS IN COMPARISON TO THE PRIVATE OWNERSHIP IN HARNEY COUNTY OR OREGON; AND WE FEEL THAT THIS PARTICULAR COMPARISON IS OF UTMOST IMPORTANCE TO COUNTY AND STATE ECONOMICS AND GOVERNMENTS WHEN CONSIDERING FUTURE ACQUISITIONS OF PRIVATELY HELD LANDS AND ALSO LAND EXCHANGES WHERE THE PRIVATE SECTOR IS LOSING ACRES TO FEDERAL OWNERSHIP ACRES.

94-5 WHERE DOES THE THINKING "IDENTIFY AND AGGRESSIVELY PURSUE LAND EXCHANGES OR PURCHASES TO INCREASE THE ACREAGE OF WETLANDS IN PUBLIC OWNERSHIP" HAVE A PLACE IN A DEMOCRATIC SOCIETY? THIS DOES NOT SEEM CONSISTANT WITH OUR COUNTRY'S BASIS.

WE FEEL THIS THREE RIVERS RMP WOULD MAKE A WONDERFUL REFERENCE BOOK AND THAT WE SHOULD USE IT AS SUCH, CONSIDERING THE TIME AND TAX DOLLARS ALREADY SPENT ON IT; AND, THAT WE SHOULD UTILIZE THE ALREADY IN PLACE, WORKING, COMMON-SENSE MANAGEMENT PLANS AND CURTAIL FURTHER NEEDLESS SPENDING OF OUR VERY SCARCE TAX \$\$\$.

THANK YOU FOR ALLOWING US TO COMMENT.

SINCERELY,

Dwight & Susan Hammond
DWIGHT & SUSAN HAMMOND
HAMMOND RANCHES, INC.
DIAMOND, OREGON 97722

CC: ROBERT F. SMITH
HARNEY COUNTY COURT
HARNEY COUNTY STOCKGROWERS

94-1 Refer to response 2-6.

94-2 Appendix 1, Table 13, PRMP/FEIS displays specific expenditures for each type of alternative. Also, refer to response 28-1.

94-3 None of the BLM land under agricultural leases is considered "prime or unique" under Soil Conservation Service definition. Changes in private land use, including conversion of privately-owned prime or unique farmland, would be subject to local comprehensive plans. It is assumed that no private farmland productive capability could be adversely affected by BLM land uses or allocations.

The DRMP/DEIS details the availability of public forage under each alternative. The economic contribution of this single production input to the ranching industry in Harney County has not been quantified.

94-4 The landownership percentages for the Three Rivers planning area found in Table 3.20 of the DRMP/DEIS are in error. They should be: Public Land - 57.8 percent; Private Land - 34.7 percent; State Land - 4.6 percent; and, USFWS - 2 percent. U.S. Department of Agriculture, Bureau of Reclamation and the Bureau of Indian Affairs (Burns Paiute Reservation) make up less than 1 percent each of the land in the planning area.

Harney County landownership percentages include 72 percent Federal, 25 percent private and 3 percent State. In contrast, the ratio of landownership in Oregon is 52 percent Federal and 48 percent State and private.

94-5 Wetlands are one of several public resource values that would be considered for acquisition. They have international importance as one of the most productive habitat types. Also, refer to responses 4-14 and 6-10.

1-30-90

95

The Bureau of Land Management
P.O. #. 74-12533-Refuge-20
Hines, Or. 97738

95 No comment identified.

We are against the
grazing policies, implemented
in the Three Rivers Resource
Management plan.

Sam Schellinger
Walt Schellinger
Gerry Schellinger

96

Jay Carlson
Burns District Office
B.L.M.

Sincerely
Duane E Neuschwander
Diamond Oregon

Comments & Response
for Three Rivers RMP/EIS

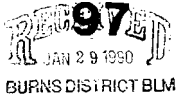
Dear Mr. Carlson

I want to lend my support to
the letters from the Harney County Shot-
growers, Riddle Ranch and Rex Clemens Rd.

I don't think we should change the
way the East Kiger allotments are managed
or cut back the AUM's. We have been getting
along with the horses and the only over grazing
I've seen is in the Yank Springs field where
there are no cattle. It is very easy to see
the horses are harder on the riparian
zones and the range especially since they
are there all year & when the range is most
vulnerable.

My main concern is the economics.
It's time we learn in this country that
some one will have to pay the bills, you
keep trying to squeeze out the private
sector but remember we pay the taxes.
Are the horse lovers & hikers willing to
pick up the bill?

96-1 Refer to responses 25-1, 25-2, 25-3 and 43-2.



January 26, 1990

District Manager
BLM Burns District Office
Hc 74-12533 Hwy 20 West
Hines, Oregon 97738

To Whom It May Concern:

At a time when my respect for the BLM is on the rise, I am disillusioned and shocked to hear that you might reopen Steens Mtn. to snowmobiles. These energy-consuming, noise and air polluting machines have no place in sensitive wilderness areas! One snowmobile dominates any space; unfortunately, there is no such thing as one - they travel in packs. Please resist the pressure from these snowmobilers and recommend Alternative 3.

Additionally, I ask that you adopt Alternative A for the northern half of the Burns District. I am primarily concerned about bighorn habitat. Certainly you must sense the thrill of seeing them forage undisturbed in their range, a true wilderness habitat.

Sincerely,

Timothy H. Cowles
33334 SE Lusted Road
Gresham, Oregon 97080

98

February 1, 1990

District Manager
Burns District, BLM
Hines, Oregon 97736

Steens Mtn. Loop

As an avid outdoorsman and conservationist, it has come to my attention that you want to reopen the Steens loop during winter/spring to motor vehicle access, principally snowmobiles.

I urge you not to do this. The area is an important winter habitat for deer, elk and other wildlife, which none of us want disrupted. Your Alternative 3 prohibits vehicular access in winter, and will guarantee the ecological soundness of this sensitive ecological area. Snowmobiles can go elsewhere. I hope that you will adopt Alternative 3.

Three Rivers Management Plan

On a related issue, Alternative C of the Three Rivers Management Plan will be an ecological disaster, and a giveaway to the already pampered grazing industry at taxpayers expense. I urge you not to adopt Alternative C.

Alternative A will help to restore and maintain the natural rangeland. This will ensure protection of water quality, wildlife habitat, what's left of the old growth forests and other natural resources which, in the long term, will provide a far greater return on investment than continued kowtowing to the heavily subsidized ranching industry.

I urge you to adopt Alternative A as a minimum.

Wild and Scenic River Designation

98-1 In order to restore, protect and ensure water quality, soil quality, wildlife habitat, and scenic and recreational values, I urge you to designate the Malheur River (South and Middle forks), Bluebucket Creek and the Silvies River as Wild and Scenic. This will ensure that these waterways will continue to provide optimum long-term returns from tourism, hunting, fishing and boating.

Regards,

Mike Quigley
2009 Red Rock Lane
Bend, Oregon 97701

cc: Senators Mark Hatfield, Robert Packwood

DEAR BLM DISTRICT MANAGER,
 REGARDING THE DRAFT THREE RIVERS RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, I WISH TO EXPRESS MY VIEWS. THE BLM HAS DONE A TERRIBLE JOB AS STEWARDS OF WESTERN PUBLIC LANDS. THE BLM HAS DONE AN OUTSTANDING JOB AS STEWARDS OF SPECIAL INTEREST INDUSTRIES SUCH AS THE LIVESTOCK (CATTLE AND SHEEP), MINING, AND TIMBER INDUSTRIES. YOUR PREFERRED ALTERNATIVE IN THIS DEIS IS ONE MORE EXAMPLE OF THIS. THE FACT THAT THIS IS BEING PERPETRATED AT TAXPAYER EXPENSE IS BLATANTLY IRRESPONSIBLE. THE BAIT AND SWITCH VODOOD ACCOUNTING OF ROAD CONSTRUCTION AND RANGE LAND PROJECT COSTS IS REPREHENSIBLE.

IN ORDER TO EXONERATE YOURSELF YOU MUST REVERSE THIS TREND. YOU MUST DEVELOP ALTERNATIVES WHICH WILL RESTORE AND MAINTAIN THIS RANGELAND IN A PRISTINE NATURAL CONDITION.

99-1

HAS DEVELOPED A SERIOUS PLAN FOR IMPLEMENTING THESE TYPES OF PROGRAMS WHICH REPRESENT A TRUE STEWARDSHIP OF THE LAND. YOUR ONLY RESPONSIBLE CHOICE OF ALTERNATIVES IS ALTERNATIVE "A". ALL OTHER ALTERNATIVES ARE A SHAM, CATERING TO VARIOUS INDUSTRIES.

GARY GERL
 3444 SE 35TH CT
 LINCOLN CITY, OR.
 97367

99-2 | A CONDITION WHICH REQUIRES THE ELIMINATION OF CATTLE GRAZING AND CRESTED WHEATGRASS SEEDINGS, ROAD BUILDING, FENCE BUILDING, WELL DIGGING, PIPELINE LAYING, RESCAVIOR BUILDING ETC.

99-3 | A CONDITION WHICH IMPROVES AND MAINTAINS WATER QUALITY AND AQUATIC HABITATS AND ASSOCIATED RIPARIAN ZONE HABITATS IN EXCELLENT CONDITION, RATHER THAN THE DEGRADED CONDITION PRESENTLY DEEMED ACCEPTABLE BY THE BLM.

99-4 | A CONDITION WHICH PROVIDES HABITAT PROTECTION & YEAR ROUND FORAGE ALLOCATION FOR DEER, ELK, BIGHORN SHEEP, ANTELOPE (PRONGHORN) AND ALL NATIVE SPECIES OF WILDLIFE

99-5 | ADDITIONALLY THE BLM SHOULD IDENTIFY AND PROTECT ALL REMAINING STANDS OF OLD GROWTH TIMBER (ANCIENT FORESTS) AND BESTLY DESIGNATING AS WILD AND SENIC SUCH RIVERS AS THE SILVIES, SOUTH AND MIDDLE FORK MALHUER RIVERS AND BLUE BUCKET CREEK UNTIL SUCH A TIME WHEN THE BLM

- 99-1 Refer to response 1-13.
- 99-2 Refer to responses 1-11, 1-13 and 12-7.
- 99-3 Refer to response 2-44 and 13-7.
- 99-4 Refer to response 2-6 and 2-78.
- 99-5 Refer to response 12-1.

Northwest Federation of Mineralogical Societies



Public Land Advisory Committee
2516 5th Ave. #204
Seattle, WA 98119

100

Bureau Of Land Management
Burns District Office
HC 74-12533 Highway 20 West
Hines, Oregon 97738

Re: Draft Three Rivers Resource Management Plan and EIS

Gentlemen:

Enclosed is our response to the above draft plan. We do appreciate the opportunity to comment on it and wish to commend those responsible for its preparation.

Should the District wish any additional input from the rockhound community, please feel free to contact this committee, and/or the Oregon Council of Rock and Mineral Societies in care of Art Newcombe, Vice President, HC 64, Box 410, Lakeview, OR 97630.

Thank you for this opportunity to comment.

Very truly yours,

Northwest Federation of Mineralogy
Societies
Jon Spunaugle, 2nd Vice President

by the Bureau in 1990, and we would expect to see an increase in fossil collecting activity as a result. Some reference to these new rules might want to be included in the Three Rivers Resource Management Plan final draft.

An area of our concern is the occasional unreasonable and possibly commercial collecting of large quantities of mineral materials, especially obsidian, that has occurred from time to time, in the area by unscrupulous and careless individuals. This has resulted in some resource depletion and environmental damage.

100-3 We do not condone such activity and would suggest that the District proceed with establishing clear collecting rules and reasonable quantity limits ("take limits") for personal collection. We would also suggest that signs be posted in the most widely used areas to inform visitors of the regulations. At the same time we are not opposed to commercial collection of these same resources and materials, but think commercial collection, or personal collection above the regulation limits should be done by "permit only" and from only areas the District manager feels would not be unduely damaged by such activity. The organized rockhound groups would be interested in assisting the BLM in accomplishing this and in publicizing anysuch regulations.

100-4 In this regard, we did carefully consider the "Obsidian ACEC" proposed in some of the Alternatives. Even though we believe some control is desirable, we do not support the creation of this Area of Critical Enviornmental Concern. Instead we feel that the entire Plan area should be regulated as we outlined in the paragraph above. Perhaps the BLM District would want to publish a pamphlet on obsidian collecting to point out the best collecting areas and to remind visitors of the rules and regulations including thoes on archaeological and cultural resources.

100-5 2. Other ACEC disignations: As long as rockhound access is not further restricted in these area désignations, we support their continuation. The one possible exception to this is the Middle fork of the Malheur including Bluebucket Creek designation as Wild and Scenic. Our concern is not so much with the actual designation, as it is with the lack of information on the

Response to the

Draft Three Rivers Resource Management Plan and Environmental
Impact Statement prepared by the Burns District Office,
Bureau of Land Management, Department of the Interior
October 1989

The Northwest Federation of Mineralogical Societies, representing over 95 organized rockhound clubs with over 5000 members in the northwestern United States, wishes to respond to the above Management Plan and EIS. Our response is generally supportive of the Alternative C, the "Preferred Alternative" or the Alternative D, the "No Action Alternative". All other Alternatives have many undesirable aspects and could negatively impact recreational rockhound activities in the management area.

Our reasons for this opinion and our observations from our study of the Management Plan Text, the Appendicies, the Table 2.1 and our collective knowledge of the area, are stated below. We offer them in hopes that they will be helpful to the BLM in its planning process. We would also commend thoes involved in the preparation of the Plan documents, especially in recognizing their thoroughness and the time and effort required to research, compile, and produce them.

1. Rockhound Recreational Opportunities: We were very pleased to note that rockhounding is recognized in the Plan as one of the principal recreational activities. The areas outlined in Chapter 3 in Map R-1, M-5, and M-4 do, in fact, outline most of the areas our members have used for collecting activity. Our understanding of Alternative C and Alternative D, would suggest that these Alternatives do not unreasonably change access to these areas for collecting reasonable amounts for personal use.

100-1 However, we did not find any mention of the area mineral collecting possibilities, also part of our hobby interest. This Plan area does contain collecting sites for flourescent minerals and zeolites, as well as others.

100-2 We also would suggest that strong consideration be given to initiating a study of the paleontological resources of the Plan area. New federal land fossil collecting rules should be published

resources this area may contain, and the lack of public input opportunity. In our opinion, the Omnibus Oregon Wild and Scenic Rivers Act of 1988 was passed without giving the citizens of Oregon reasonable opportunity to consider which rivers they wanted to designate as "Wild and Scenic". To add to this total without much publicity or public input opportunity inside this Management Plan, does little to improve our opinion. Quite possibly, an original well-thought-out designation of this river system might have contained this four mile section. However we suggest that all Wild and Scenic River designation be considered separately and adopted only after prudent consideration of all the effected area resources.

- 100-1 All public lands not withdrawn from mineral collection are available for casual or hobby collection of mineral specimens, provided there is minimal disturbance, explosive or mechanical means are not used, and areas of paleontological or scientific interest (e.g., prehistoric artifacts) are not disturbed. BLM does not have staffing or funding necessary to specifically outline potential collecting areas for casual prospecting; however, District Geologists are often aware of where such activities commonly are occurring.
- 100-2 The Three Rivers RA will have an inventory of high potential paleontological zones, as shown in the PRMP/FEIS.
- The Antiquities Act of 1906 prohibits the excavation, taking, or destruction of any vertebrate or other fossils of recognized scientific interest. Taking of such items is strictly limited to qualified institutions under special permit.
- Proposed rules on the management of paleontological resources that would become 43 CFR 8270 were promulgated in 1990 and reviewed by the field offices of BLM. These rules will have a bearing upon fossil collection but are not approved and enforceable at this time.
- 100-3 Refer to responses 15-4, 15-5 and 100-1.
- 100-4 Refer to response 15-35.
- 100-5 Refer to response 3-6.

101

Leta Gay Snyder
 351 S. Broad St.
 Monmouth, OR 97361

January 31, 1990

101-1 Refer to responses 1-13, 2-6, 2-10 and 2-11.

District Manager
 Bureau of Land Management
 HC-7412533 Hwy 20 West
 Hines, OR 97738

Dear District Manager:

Subject: Three Rivers Resource Management Plan & Environmental Impact Statement

I received a Desert Alert letter from the Oregon Natural Desert Association who expressed some major concerns about your recommendation of Alternative C as your management plan.

101-1 I've bow hunted a lot of areas in Eastern Oregon and found extreme overgrazing. Springs de-watered, willows stripped to nothing, and grass if any so short sheep couldn't eat, let alone deer or elk. The deer kill last year at Lookout Mt. in Baker Co. I feel is partly cause by overgrazing the year before. I saw the de-watered springs, the grass eaten down to nothing, and had to watch out for cattle grazing and this was in September. I'm writing this letter because I'm tired of see poor range land allocation for the wildlife who needs a good range to survive. These are our Public Lands not just cheap lease land for cattle grazing.

It is time to take care of what we have. Provide better range land by reducing grazing, and force improvements around springs and streams. By fencing areas around streams, springs, etc. the riparian zone will come back so will the water quality and aquatic habitat.

It is time that you start taking second looks at your management practices. Our resources are diminishing so stronger management of our Public Lands must be followed for it is just not a cattleshaw anymore.

Sincerely,

Leta Gay Snyder
 Leta Gay Snyder

cc: Baker County BLM District Office

JAN. 30, 1990

102

District Manager:

I am writing to comment on the draft EIS for the northern half of the Burns District of the BLM, the draft Three Rivers Resource Management Plan + EIS!

I believe that your preferred alternative C is an ecological disaster and should not be chosen as the final plan alternative.

102-1

Instead, you should develop an alternative to restore and maintain rangeland in excellent, natural condition. The grazing of cattle should be eliminated.

At the very least, you should adopt Alternative A until you create an alternative that will provide for complete rangeland, riparian, and stream recovery.

It is essential for the ecological health of the area that water quality and riparian + aquatic habitat be improved and maintained in excellent condition.

102-2

The true costs of new road construction and other range projects should be included in

(2)

102-3

the alternatives, along with their environmental impacts. Created wheatgrass seeding proposals should be eliminated from

102-4

all alternatives, and winter range forage for wildlife should be given

102-5

top priority over domestic livestock. Bighorn Sheep habitat protection should be addressed in the plan and forage allocations in their home range should be slated entirely for Bighorns!

102-6

Also, Wild + Scenic River designation should be recommended for all of the South Fork + Middle Fork Malheur Rivers (except through Drewsey), all of the Silver River, and all of Bluebird Creek.

102-7

And all ancient forest in the area should be identified and given permanent protection! There should be no new logging roads!

102-8

For too long our BLM lands have been abused for the profits of a handful of welfare ranches and commodity extractors. That deal and Elk get 3% of forage and cattle the rest is a national disgrace! The time has come to restore to an excellent, natural condition our BLM lands.

Sincerely,
Bob GERR
720 S. JETTY
LINCOLN CITY, OR 97367

- 102-1 Refer to response 1-13.
- 102-2 Refer to responses 12-1 and 12-7.
- 102-3 Refer to response 1-11.
- 102-4 Refer to response 2-6.
- 102-5 Refer to response 2-78.
- 102-6 Refer to response 3-6.
- 102-7 Refer to response 12-1.
- 102-8 Refer to responses 2-10 and 2-11.

PO Box 566
La Grande, OR 97850
31 January 1990

District Manager
Burns District Office
HC 74-12533
Highway 20W
Hines, OR 97738

Dear Manager:

The draft Three Rivers RMP and EIS have been carefully reviewed. We present the following comments for the record:

The two volumes provide much necessary information and some important considerations are presented. However, the work as a whole reveals a most unfortunate bias on the part of BLM leaders who seem intent on discounting the concept of good stewardship and true multiple use in favor of grazing special interests.

While multiple use is mentioned occasionally throughout the RMP, actually it is almost totally ignored as a program to be implemented. Consider that, by using your figures on II and III, 76.8% of the public land in your area is devoted to grazing. Simultaneously you point out that only 34.5% of our land is in "good" condition. Out of a total of 126.55 miles of streams, you find none (zero) miles in either "good" or "excellent" condition. There are no "excellent" quality surface water acres and only 45 of 4491 acres of surface water are in even good condition, i.e., about 1%.

The degradation of land, water quality and vegetation have come about largely as a result of grazing cattle. This you well know. In spite of this knowledge, you ignore positive alternatives and propose to continue and to expand on the same discredited approach of past years of mismanagement.

Your Alternative C preference illustrates how bound you are to ignoring the national public interest. The plan chosen suggests that taxpayers pay to install fences and pipelines and to develop springs, convert land to a monoculture of crested wheat, and further disrupt or eliminate habitat for numerous species of plants, animals and insects.

The mandate of the BLM is given on p 1-3 as "to fulfill the requirement of the FLPMA." On p 1-5 "Planning Criteria" listed include (3) "Give priority to the designation of areas of critical environmental concern." On p 4-44 you propose under Alternative C to have slightly less ACEC acreage. This is not a way to "give priority." FLPMA criteria also include on page 1-5 that BLM (5) "Consider present and potential uses of the public lands." Again on p 2-3 under Ecological Systems it states (3) "Protect, restore and enhance water quality" etc. is a "must

incorporate" into the Preferred Alternative. The selected alternative merely repeats the past and ignores the growing need for recreation, wildlife habitat, clean water, changing job opportunities and demographics.

103-1 Your proposal to increase cattle grazing would also require financing and constructing fencing on almost all riparian zones. A great public expense for a special interest group is not justified here. Neither is it in the public interest that you favor a small segment of the public as proposed under Socioeconomic Systems (p 2-3). A socialistic paternalistic subsidy to "Provide for the continued opportunities for ranching operations typical of the American western heritage" (!) is outrageous subservience to a myth. Since when are public lands and resources assigned to sustain a lifestyle? Perhaps we should bring back the buggy-whip maker and butter-churn craftsman with public land resources under BLM guidance.

103-2 The table 3.5 (p. 3-12) is difficult to read because the Estimated Volume (MMBF) apparently are given to three decimal places. Since these are estimates, why write 2.000 (indicating 2 million BF, I assume)?

103-3 On the limited acres of forestland (13,307) there is excessive emphasis on removing trees. On such a small area you could have perhaps chosen to emphasize multiple use of recreation, wildlife habitat, water retention, visual amenity, oxygen production, shade protection and many other multiple uses. It is unfortunate that again you abandon multiple use for a meager commodity production. Alarming is the complete lack of protection for ancient forest and ancient junipers.

Please note that Volume I-Text and Volume II-Appendices [sic] are more than half devoted to cattle, which reaffirms our belief that multiple use is a practice consciously avoided by the BLM. Less than half of the RMP is concerned with the numerous values on our public lands--water, air, vegetation, birds, insects, wild animals of many species, recreation, hiking, camping and campgrounds, oxygen production, open space, wilderness, beauty, scientific investigations, solitude, etc. The RMP is extremely narrow in its focus and does not represent professional land stewardship.

We urge you to implement Alternative A as a minimum to be supplemented by plans to:

- 103-4 > avoid all crested wheat grass plantations,
- 103-5 > protect all old growth trees including junipers in substantial stands,
- 103-6 > bring all water quality to the "excellent" category,
- 103-7 > apply professional stewardship to rangelands in order to bring them to a natural and excellent classification.

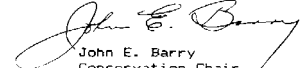
103-8 Imperative is the public's need to know precisely the financial aspects of each proposed Alternative. Why do you not list

all costs for each alternative so it is clear what specific expense the public is facing for management and for proposed projects, as well as income from sale of permits, uses and sales of resources? Providing clear cost/benefit ratios would enable both BLM administrators and concerned citizens to make informed judicious decisions.

We are requesting at least Alternative A, as well as the development of forward-thinking public land stewardship.

cc: BLM Reg. Dir.
Gov. Goldschmidt
Rep. DeFazio
Senator Packwood
ONDA
Sierra Club

Yours very truly,



John E. Barry
Conservation Chair
Range Ecology Group

- 103-1 Refer to response 1-13.
- 103-2 Writing volumes in this format (3 decimal places) is the normal practice in timber management activity. The three decimal places allow for accounting to the nearest thousand board feet, which is the rounded amount used in inventories, cruising, contracts and the recording of data. The three decimal places allow for the elimination of needing to use three more zeros in our number systems.
- 103-3 Of the total 1,709,918 acres within the planning area only 13,307 is classified as forestland (less than 1 percent). Of this, only 8,263 acres are classified as commercial forestland remaining within the timber base (less than 1/2 percent). While forest management activities on these 8,263 acres allow for multiple resource protection and enhancement, there still remains 1,701,655 acres (greater than 99.5 percent) within the planning area dedicated to other resource values.
- Forest management includes not only the removal of trees but emphasis on the growth and improvement of the existing forest stands, for the benefit of all resources including wildlife, recreation, fisheries, visual, etc.
- In regard to the ancient forest concern, please refer to response 12-1.
- 103-4 Refer to response 1-11.
- 103-5 Refer to response 12-1.
- 103-6 Refer to responses 2-44 and 13-7.
- 103-7 Refer to response 1-13.
- 103-8 Refer to response 12-7.

January 28, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12553 Highway 20 West
Hines, Or. 97738

104

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

104-1 Refer to response 2-63.

Dear Mr. Carlson:

104-1

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Tinkins Implication Assessment" be completed as authorized by Executive Order 12610 (see the November 8, 1987 Memorandum to the Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald F. Hodell).

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep and Acorn Growers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and the Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Erma L. Davies

General Delivery

Hines, Or. 97738

Erma L. Davies

Jay Carlson
Bureau District Office
Bureau of Land Management
H.C. 74 12522 Highway 20 west
Hines, OR 97736

Dear Mr. Carlson:

As permittees on the Lone Pine Allotment of the B.L.M., and owners of private land adjacent to B.L.M. lands, we would be significantly impacted by all of the alternatives submitted in the B.L.M. Draft Three Rivers RMP/EIS.

105-1 Alternatives A, B, and C would result in a substantial loss of our base property value. The proposed B.L.M. action may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B, or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630.

105-2 The reallocation and/or reduction of 107 AUM's livestock forage in the Lone Pine Allotment would reduce the value of our base property by a substantial amount; further, any proposed reduction on the Whiting allotment would increase this reduction of value. Please consider this economic loss in the requested "Takings Implication Assessment."

105-3 Table 1 of Appendix 6 and Table 2 of Appendix 6 of the Draft Plan show part of Poison Creek as being in the Lone Pine Allotment and the creek to be in poor, declining condition due to heavy livestock use. We point out that the rimrock forms a natural barrier for cattle between Lone Pine Allotment and Poison Creek. Any effects on Poison Creek from livestock use are due to livestock other than those ranging on the Lone Pine Allotment.

105-4 We are concerned about the possibility of even further reductions on the Lone Pine Allotment due to the presence of sagebrush. There is no scientific data indicating that livestock use has a negative effect on the sagebrush population. Closing the hunting season on these birds would be far more beneficial to their population.

105-5 We also point out that Landing Creek is not a perennial stream. It goes dry in the summer. It is therefore not affected by permanent water and cannot be classified as a riparian zone.

105-6 Appendix 3, Table 7 falls for juniper control and burning, and the building of additional reservoirs on the Lone Pine Allotment. We agree with these improvements, plus the need for sagebrush control. Juniper invasion is a serious problem, and its control should be practiced on all allotments, to the point of including the issuing of free post and juniper firewood permits.

105-7 Alternatives A, B, and C have an arrogant disregard for private land ownership in their zoning proposals. There are large

105-1 Refer to response 2-63.

105-2 Refer to responses 2-11 and 2-63.

105-3 Refer to response 2-12.

105-4 Refer to response 4-6.

105-5 Refer to response 42-14.

105-6 The issuance of free use firewood and post permits is permissible when such disposal will benefit public land management (BLM Manual 3500.02A). If juniper clearing areas are for the benefit of our land management and in the public interest, free use of these clearing areas is permissible. Also, refer to response 6-8.

105-7 Refer to responses 4-14, 6-10 and 94-5.

105-8 Refer to response 4-16.

portions of Silvies Valley and Poison Creek that are privately owned, and are proposed by the B.L.M. for Zone 1 classification (acquire or exchange for). These lands are vital to the operations of the private land owners and should not be zoned for possible acquisition. The U.S. Government already owns enough of Harney County's wetlands in the form of Malheur Wildlife Refuge. We would not want to see Silvies Valley takeover by noxious weeds such as is seen at Malheur Refuge.

We do however, support the sale of, or exchange of small, isolated B.L.M. tracts.

105-8 We adamantly oppose the acquisition of public access up Silvies River, Poison Creek, and the old Oregon Northwestern Railroad right-of-way.

The January 19, 1990, letter from the Harney County Stock-growers and the January 17, 1990, Riddle Ranch and Western Range Service Comments and Response to you are consistent with our views and comments. We endorse the** letters and wish their contents to be part of our response.

One of the B.L.M.'s stated objectives for the Preferred Alternative is to "provide for continued opportunities for ranching operations typical of the American Western heritage." We believe that the Preferred Alternative instead, goes far towards stifling these opportunities.

Yours truly,

Hilton Whiting

Hilton Whiting

Eva Whiting

Eva Whiting

Ronald Whiting

Ronald Whiting

4

105-9 P.S. If juniper invasion is allowed to continue without extensive control, all the livestock could be removed from the range and it's condition would still decline, simply from the juniper problem. This trend would continue to the progressive detriment of wildlife. Therefore, reducing livestock numbers is not the simple solution to the range condition problem.

105-9 Refer to response 6-a.

EUGENE (GENE) D. TIMMS
HARNEY, LAKE, MALHEUR, GRANT, BAKER
CLATSOP, MORGAN COUNTIES
DISTRICT 30
PLEASE PRINT ADDRESS INDICATED
 Senate Chamber
Salem, Oregon 97310-1347
 1048 N. Court
Burns, Oregon 97720



106

OREGON STATE SENATE
SALEM, OREGON
97310-1347

106-1 Refer to response 2-11.

January 31, 1990

Mr. Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12433 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson:

I recently attended a field tour at the Starkey Field Station near La Grande, Oregon. There I saw where government was beginning to collect factual information in regard to cattle grazing on our public lands.

106-1 I feel that each cattle operation is unique and areas are different. Therefore, they should be studied before any across the board cuts in AUM's are made.

I have noticed with interest the increase in wildlife on private lands in my district. It is ironic that ranchers are feeding greater numbers of wildlife on private lands and having their cattle numbers lowered on public land.

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with my views and comments.

These are reasons I am opposed to any cuts in AUM's on a broad basis.

Sincerely yours,

Eugene "Gene" D. Timms
State Senator
District 30

EDT/ee

107

107-1 Refer to response 2-2 and 2-63.

Jan. 28, 1990

Jay Carlson
BLM HC 74-12533
Highway 20 West,
Hines, Or 97738

Dear Sir,

In response to BLM
Draft on the Three Rivers RMP EIS.

107-1 A no action alternative was not developed, and a no action alternative should be considered before any action is taken.

Also a Takeings Implication Assessment should be conducted as authorized by Executive Order 12630

The loss of taxable income should be enough to consider a No Action alternative

Sincerely

Dan Joyce

Three Rivers Resource Area Mgr.
Burns District
Bureau of Land Management
HC 74-12533 Highway 20 west
Hines, OR 97738

Dear Sir:

I am writing in response to your draft Three Rivers Resource Management Plan/EIS.

108-1 I would ask that you reconsider your management direction for wild burros as given in Table 2.1-13. Management direction #5 under Wild Horses and Burros states that burros in the Warm Springs HMA be managed for maximum of 24 head and that burros not be reintroduced should they die out from natural causes.

It would appear that the intent is to eliminate the burros by ignoring burro herd needs until such time as the existing population dies out. I question as to whether this is in keeping with the intent of the Wild Horse Act.

I realize that BLM is justifiably proud of their success with management of wild horses in Eastern Oregon and especially with the fact that there are remnants of the Spanish Mustangs in the area. I also can relate to the pride associated with being the custodian of "living history".

I would point out, however, that "desert canaries" are also a part of our history. Regardless of the suspected origins of the Iron Mountain burros, prospectors and early settlers did use them in eastern Oregon. Unless, the BLM can show definitively that these animals did not originate with the early settlement, I think you stand a chance of losing one aspect of our "living history".

108-2 BLM is actively managing the horse herds to prevent severe inbreeding which would jeopardize the survival ability, reproduction, and to improve adoptability of the horses. Why can't it do the same for the burros? After all, we are not talking about hundreds and thousands of animals.

The BLM adoption program shows that burros are more easily adopted than are horses especially in the East where burros and mules are more common and people have a history of using them, farmland is at a premium, and feed costs higher.

I am concerned that while Harney County is trying to emphasize the uniqueness of its resources in order to attract tourists and diversify the economy, we stand to lose one of those unique features.

The burro herd at Iron Mountain is the only one in eastern Oregon, and as far as I know, the only herd in the entire state. Yes, there are burros in Nevada, California, New Mexico, Arizona, and Wyoming. There are wild horses at those locations also. That does not dissuade BLM from managing Oregon wild horses.

The burro herd can be considered a liability or an asset, depending on the point of view. The ghost towns and remnant burro and horse herds all lend themselves to historical interpretation and a unique experience for the eastern Oregon visitor.

Many of the BLM wild horse folks come from a ranching background. I've found these folks to be extremely knowledgeable, dedicated, and committed to the wild horse program. Most ranches didn't use burros in their work, but did use horses. Could it be that there may be some bias, albeit unintentional, that horses are useful, and therefore, "good", while burros have no practical value and are therefore a nuisance, and "bad"? I'm just asking for a little self examination as to your rationale for not actively managing the burros at Iron Mountain.

Thank you for the opportunity to comment.


James M. Keniston

108-1 The management direction for burros has been reevaluated. It has been determined that a small number of burros can be effectively managed in the Warm Springs HMA. The management actions under the Wild Horse and Burro objectives have been changed to reflect the fact that in Oregon, burros are unique to the Burns District. Also, refer to response 2-6.

108-2 Refer to response to 108-1.

The Evergreen State College
Olympia, Washington 98505
January 31, 1990

Joshua Warburton, District Manager
Bureau of Land Management
Burns District Office
HC 74-12533
Highway 20 West
Hines, Oregon 97738

Dear Mr. Warburton,

I have reviewed much of the Draft Three Rivers Resource Management Plan & Environmental Impact Statement and offer the following comments:

1. I" general, I am appalled that you have chosen to continue your policy of resource destruction. I" an era when the BLM is being lauded for progressive efforts to rectify mistakes that have been made for decades, the Burns District seems bent on business as usual. Certainly there are some positive components included in the preferred alternative, but they are weak overall and fall far short of the kind of restorative actions that are mandated by the condition of the resource.
- 109-1 2. You must develop and alternative that will aim at the restoration of the landscape to excellent condition. You owe that to all Americans who own the land you manage.
- 109-2 3. Water Quality, riparian, and aquatic habitat must be improved to or maintained in excellent condition.
4. The "Natural Values" alternative is very weak, but certainly it is the only acceptable one of the several you propose. It is the only one that would allow any significant recovery to occur.
- 109-3 5. You must protect all ancient forest, whether that be commercial conifers, juniper, or sagebrush.
- 109-4 6. Your cost/benefit analyses must include all costs of range improvements.
- 109-5 7. It is impossible to believe that you are still promoting Crested Wheatgrass; please eliminate all such proposals.
- 109-6 8. Forage allocations for all kinds of wildlife (and especially Bighorn Sheep) must be given priority over forage allocations for livestock.
- 109-7 9. Please designate all of the south Fork and Middle Fork of the Malheur River (i.e., those portions over which the BLM has

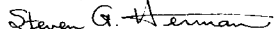
- 109-1 Refer to response 1-13.
- 109-2 Refer to responses 2-44 and 13-7.
- 109-3 Refer to response 12-1.
- 109-4 Refer to response 12-7.
- 109-5 Refer to response 1-11.
- 109-6 Refer to response 2-6.
- 109-7 Refer to response 3-6.

control, and not the reach through the Drewsey area), all of Bluebucket Creek, and all of the Silvies River. as Wild and Scenic Rivers.

As a person who has Caught and done research on Burns District lands for more than two decades, as a neighboring landowner, and as a member of the Board of Directors of the Great Basin society and the Malheur Field Station Consortium, I have a very strong interest in encouraging the improvement of the condition of the lands over which you have stewardship. Please keep me fully informed as your plan progresses and please respond specifically to my comments.

Thank you very much.

Sincerely,


Steven G. Herman, Ph.D.
Member of the Faculty (Biology)

January 22, 1990

Craig M. Hansen, Area Manager
 United States Department of the Interior
 Burns District Office
 HC 14-12533 Hwy 20 West
 Hines, Oregon 97738

Dear Mr. Hansen:

This letter is being written in response to the invitation of the Bureau of Land Management to participate in evaluating the draft of the Three Rivers Resource Management Plan. The sections of the plan concerning the cultural plants and cultural resources were reviewed in the Cultural Resources office at Warm Springs. This office, as well as the Culture and Heritage Department and the Culture and Heritage Committee, were set up on the Warm Springs Reservation to preserve the cultural heritage and traditions, and to manage the cultural plants and cultural sites. The traditional foods are very important to the people here. They are a part of their livelihood, and are necessary part of meals at all of the traditional ceremonies that take place throughout the year.

The proposal to set aside areas under BLM jurisdiction to be managed for traditional usage, such as root digging, is one that we would strongly support. The proposed Biscuitroot ACEC is primarily used by Burns Paiute people as part of their customary gathering areas. It is outside of the Warm Springs ceded area, but there are enrolled members of Paiute descent at Warm Springs. The three enrolled tribes are the Wasco, Warm Springs, and Paiute tribes. There are a number of Paiute tribal members, as well as people from other tribes, who do come down in the spring to dig roots in the Burns area on BLM lands. Members from Burns also come up to Warm Springs to trade their roots with people here. This exchange is a long established custom. It contributes to the economic support, as well as continuing traditional practices, and strengthening family ties.

We would encourage the adoption of one of the management alternatives that favors the consideration of traditional uses and the protection of culturally important plants. We would also support the proposal to retain in federal ownership the root areas that the BLM currently manages with the maintenance of access to these lands for traditional usage.

Warm Springs, Oregon 97761 / 503 553-1161

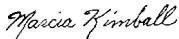
Mr. Hansen
 January 22, 1990
 Page 2

The ethnobotanist who worked in the Cultural Resources office pointed out that increasing reliance on a smaller number of root digging areas was adversely affecting the root production. His recommendation was to alert federal agencies about the root areas under their jurisdiction and to discourage trading away the remaining root areas to private developers.

In 1988 a Cultural Plant Conference was held on the Warm Springs Reservation to educate personnel working in the federal agencies in central Oregon about the cultural plants, their uses, and management. Studies have been done on five of the main roots used today by people at Warm Springs. A report on these studies includes management recommendations for these culturally used plants. We would be glad to share this and any other information we have that might be helpful.

In the last few years a cooperation has been built up between the cultural programs at Warm Springs and Cultural Resource personnel at the Burns District Office. This cooperation has been very valuable. In closing, please accept our gratitude for your sensitivity and responsiveness to our Tribe's wishes to protect and preserve its interests and opportunities in part of our ancestral lands. We look forward to strengthening the relationship already established as this plan and its proposals are being advanced.

Sincerely,



Marcia Kimball, Tribal Archaeologist
 Cultural Resources

MLK/mw

Enclosure: (2)



OREGON HUNTER'S ASSOCIATION
P.O. Box 6618 - Bend, Oregon 97708 • (503) 382-4058

January 31, 1990

Mr. Joshua L. Warburton
District Manager
Burns District
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

RE: DRAFT THREE RIVERS RESOURCE MANAGEMENT PLAN

Dear Mr. Warburton:

The Oregon Hunter's Association (OHA) would like to provide **comments** to the above-referenced draft plan. OHA is a statewide organization of nearly 3000 members concerned with management of wildlife habitat. Briefly, our concerns center on management **direction** for winter and **summer** range for deer, elk, and antelope.

- 111-1 One of our chief concerns regards the great emphasis placed on **livestock** grazing in the plan, at the expense of wildlife habitat. The animal unit months (AUMs) allocated to livestock in the Preferred Alternative (139,851) are nearly the maximum possible (164,622), according to Table 2.1. While this number reportedly does not meet the demand, it is nearly three times the level **proposed** in the natural values alternative, and allocates only 5% of the AUMs to wildlife (7759). Only 10% of the required AUMs for antelope, and 18% of the required AUMs for deer are allocated AUMs. The balance of the forage required by these species are assumed to be **accomodated** by unallocated forage. We question this assumption. In **addition**, about one-half of the allotments allocate nothing to wildlife (Appendix 3, Table 4.. Furthermore, nearly 50,000 acres are to be planted with crested wheatgrass, a species that benefits **only** livestock. Deer winter range occurs on about 20% of the area proposed to be Seeded with crested wheatgrass. We believe that any seedings should be native bunchgrasses, perennial rye, fescue, or other species that can be utilized by wildlife as well as livestock. We also support seasonal

I

- 111-3 grazing restrictions to hasten range improvement and minimize Conflicts with wildlife usage.


- 111-4 The management objectives in Table 2.1 describe 170,000 acres of a total of 500,000 acres of deer winter range as needing improvement. Corresponding numbers for summer range are 293,000 out of 670,000 acres. Yet in Chapter 4 of the plan (p. 4-21) 88% of the winter range and 87% of the summer range are described as being in satisfactory condition. These numbers do not appear to be consistent, and we are inclined to believe the former. Similar numbers are presented for elk ranges. We believe a much more aggressive range-rehabilitation program must be established.

- 111-5 Bighorn sheep habitat is identified on maps in the plan, yet there is little if any discussion of management direction for bighorn sheep habitat. Bighorns are an important wildlife component of the Three Rivers area, and a thorough discussion of their management should be included.

- 111-6 There is proposed to be maximum development of off-road vehicle use in the plan. We are concerned with potential conflicts with wildlife and habitat degradation caused by ORV use. A coherent plan for managing and restricting ORV use is essential for responsible management of the other values in the RMP area.

Please give our concerns serious consideration. We would be happy to meet with personnel from your district to work on these issues.

Sincerely,


Kelly L. Smith
State President

- 111-1 Refer to response 2-10.
- 111-2 Refer to response 1-11.
- 111-3 Seasonal grazing restrictions through various grazing treatments are a technique the Bureau uses to improve the range and to minimize conflicts. See Appendix 3, p. 3-8, DRMP/DEIS, for a discussion of grazing treatments.
- 111-4 The larger figures of unsatisfactory condition are the current conditions and the smaller figures are predicted big game habitat conditions 10 years after full implementation of the plan.
- 111-5 Refer to response 2-78.
- 111-6 Refer to response 1-23.

Peila Ranch, Inc.
Box 806
Burns, Oregon 97720

112

-2-

February 5, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

Peila Ranch Inc. wants on record that our response and comments to the Draft of the Three Rivers Resource Management Plan and Environmental Impact Statement are consistent and incorporate with those of Riddle Ranch and Western Range Service and the Harney County Stockgrowers.

We have additional comments and concerns pursuant to our allotment of East Wagonfire No. 7003. We have an active preference of 8281 AUM's plus 518 ADM's, exchange of use with a total of 8799 AUM's but BLM estimated capacity is 7730 AUM's and stated the average actual use of 6707 AUM's.

We purchased the original ranch in 1959, then leased and purchased the balance of it in 1976, giving Peila Ranch all of East Wagonfire allotment. Each year since 1959 the total active preference in East Wagonfire was used until 1985.

In 1968 we gathered 400 wild horses and in 1988 the BLM gathered the balance of wild horses off Wagonfire (about 45 head), as this allotment was to be free of horses.

The allotment has over 50 miles of wire fences, numerous water holes and thousands of acres of crested wheat grass. Most of these improvements, other than the crested wheat grass seedings, were done with cooperative agreement between the BLM and Peila Ranch, with labor and cash from Peila Ranch.

Consequently, the condition of the range over the last 30 years has vastly improved, as well as, the distribution of livestock with the fences, water, seedings and removing the horses off of the allotment.

112-1 This fall of 1989, thru a cooperative agreement with BLM, Peila Ranch paid \$7425 to drill a water well in a much needed area for livestock distribution and also for wild life, especially antelope. Therefore, it is erroneous and factually unfounded for the Resource Management Plan to state that there isn't enough feed on East Wagonfire for the active preference.

112-2 Appendix 3-116, the "Identified Resource Conflicts Concerns" states limiting big game habitat in unsatisfactory habitat condition. Peila Ranch owns 99% of the live water plus Wagonfire and Little Juniper mountains and the wild meadows that are irrigated from the seeped springs and creeks, creating a very

(cont.)

satisfactory habitat for deer and antelope in late spring, summer and fall. The antelope group up in large herds in the fall and early winter to feed on the meadows and our bunched hay. Even with the increased hunting pressure on our allotment, the game has increased dramatically. Therefore, we strongly disagree that wild life should be given priority over livestock forage.

As stated, all the alternatives will have adverse impacts upon livestock production, the economy of Harney County and the concept of multiple use which is the BLM's criteria by law. Alternative "D" is the only one to come close to having no adverse impact.

112-3 A complete "Taking Implication Assessment" should be completed as authorized by Executive Order 12630 before any alternative causing reduction in livestock AUM's is implemented.

Sincerely,

John M. Peila
John M. Peila
Peila Ranch, Inc.

112-1 Refer to response 2-11.

112-2 Refer to response 2-6.

112-3 Refer to response 2-63.

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

113

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

113-1 The reallocation and/or reduction of 1069 AUM's livestock forage in East Wagonfire No. 7003 Allotment will reduce the value of our base property by approximately \$53,450. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County Cattlewomen, Stockgrowers, Fars Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

John M. Peila

Name Peila Ranch, Inc.

Box 806

Address Burns, OR 97720

City Burns State OR Zip Code 97720

John M. Peila

Signature

Enclosure: Supplemental Comments

113-1 Refer to response 2-63.

114

Jay Carlson
Burns Dist. Office
Bureau of Land Management
HC 74 Highway 20 West
Hines, Or. 97738

Dear Mr. Carlson,

In reference to Oct. 1989 BLM Draft Three Rivers RMP/EIS: Alternatives A, D, and G will result in a substantial loss of my base property value. The proposed BLM actions may result in reducing the size of my operation so that it is no longer an economical unit. Therefore I request that if Alternatives A, B, and C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see Nov. 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel.)

114-1

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and the Jan. 17, 1990 Riddle Ranch and Western Range Service Comments and Response to Draft Three Rivers Resource Management Plan and EIS are consistent with my views and comments.

114-2

Furthermore I feel that 30% reduction of AUMs in my allotment is unfounded and unfair. In 1988 and 1989 due to draught and other conditions I took a voluntary "on-use in the Upton Mt. Allotment. Prior to this time I observed a large number of trespass cattle in this allotment. BLM was informed of this, but there was never any action taken. I feel that because of the draught conditions and the trespass cattle, that when the monitoring was done the allotment was in poor condition, (thus my reasons for voluntary non-use.)

At this time, in my opinion that allotment is in as good a condition as it has been in my life time and I have lived on this family operated ranch for 46 years.

114-3

After the draught in 1977 BLM planned to remove the brush and seed in my allotment. I took my cattle to the Princeton seeding for two grazing seasons at my expense. The seeding in my allotment never materialized. My dollar loss over those two years was approximately \$100,000. Another (there was an earlier reduction due to BLM EIS) reduction at this time is totally unwarranted.

Sincerely,

Richard Edmunson
Drewsey, OR.

cc: Congressman R.F. Smith

114-1 Refer to response 2-63.

114-2 Refer to response 2-11.

114-3 Refer to response 8-7.

BUREAU OF LAND MANAGEMENT
HCR 74-12533 Hwy. 20
HINES, OR 97738

FEBRUARY 4, 1990
115

I hope you have thought the Three Rivers Plan through, thoroughly.

Do you know the importance of land owners? It does only good to encourage and keep land private ownership. We will lose our freedom and strength within our nation if we lose the private land owner. The mystic of the West is an awful big toy to play with, when it might mean tomorrow the hunger of your children.

Land teaches us to develop our minds, our hands, and our country and is the base of reality. Food can only make it through land to us.

I agree there is abuse to the land but that is where you can be most helpful directing, stipulating and teaching with common sense experienced with the land, with ideas, and with honesty & truth!

There is room for us all, who will we listen to, to be the Great Teacher?

No I am not for the Three Rivers Plan.

Freedom and strength within our nation if we lose the private land owner. The mystic of the West is an awful big toy to play with, when it might mean tomorrow the hunger of your children.

Land teaches us to develop our minds, our hands, and our country and is the base of reality. Food can only make it through land to us.

I agree there is abuse to the land but that is where you can be most helpful directing, stipulating and teaching with common sense experienced with the land, with ideas, and with honesty & truth!

There is room for us all, who will we listen to, to be the Great Teacher?

No I am not for the Three Rivers Plan.

Thank you,

115 No comment identified.

February 9, 1990
Theresa Peila
Box 806
Burns, OR 97720

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

116-1 The grazing fee is published annually in the Federal Register. Permittees do contribute to a variety of construction projects such as wells, fences, reservoirs and springs. Permittees are responsible for paying for electricity on wells. Contributions of money, time or materials for project construction also come from ODFW, USDA-FS, Izaak Walton League, among others.

116-2 Refer to response 116-1.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

Being born and raised as a city person, there is an aspect of the BLM Three Rivers Resource Management Plan that concerns me. Especially, when you live in a large metropolitan area, there is only one escape from the concrete, and for most people it is recreation and/or hunting.

To the average urban resident terms like AUM's, ODEQ water quality, non-use, permittee and active preference are an enigma. Therefore, to those persons, tho they may be interested in the public lands, whether they are used or abused, they can only evaluate a situation by what printed matter is available.

116-1 Nowhere, have I seen any publication from the BLM that discloses not only that ranchers pay fees for land usage, but of their contributions to wells, fences and roads.

This year, for a BLM well, our contribution was \$7925. Also, the total cost of 15 miles of new BLM fence was split by our ranch and 3 other ranches.

In 1977 we hired a man, equipped him with a 7600 gal water tanker and CE radio to fill water holes. He sustained not only our cattle but the entire herd of antelope and wild horses. We certainly felt good he could. He paid the same fees for usage, even without water because the BLM said they were unable to help with any water improvement. The Fish & Wildlife too, responded they couldn't help in any way.

In 1988, before the wild horses were gathered off the Wagontire area by BLM, we found them to be out of water and reactivated the water tanker to haul water to them so the horses could survive.

A serious fire year BLM called and asked if we could let them use our caterpillar and any manual help we could send to a fire. We took a large truck & "cat" and pulled 4 men from our hay crew to help fight fire for several days.

Salt is another forgotten donation from rancher to wild life. No salt is furnished, at least in our area, to wildlife. All the salt put out by ranchers goes to antelope and deer, too. I've never heard a rancher complain

(cont.)

-2-

about this sharing. Many ranches may be situated like ours. We own 99% of the live water on our entire allotment. We irrigate wild meadows with deeded springs and creeks. Deer and antelope have feed late spring, summer and fall. In fall and early winter, the wild life feeds on the hay we have bunched. Therefore, it is disproportionate to associate only a paid fee with the ranchers use of his permit. He contributes much more to both BLM and Fish & Game agencies than he is ever credited. These expensive and extensive improvements ranchers make are a constant up-grading for the existing wild life habitat.

There is a constant accusation by some of the public, that BLM has made a "bad deal" on grazing. The best defense is making public all the contributions derived from such agreement. The media never presents that perspective and the public never realizes that BLM, indeed, has endeavored besides fees, to constantly improve the land with additional ranch contribution and help.

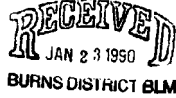
116-2 Perhaps, an impact statement on ranch contribution should be made by the BLM and available thru their office, so people are aware it is not a one-sided situation and that BLM - Ranch Permittee is in actuality a supervised and improvement cooperative involving not only fees, but cash and labor contributions from the cattlemen.

Sincerely,

Theresa A. Peila
Theresa A. Peila

117

January 21, 1990



District Manager
BLM
HC 74-12533
Hines OR 97738

117-1 Refer to response 12-1.

117-2 Refer to response 3-6.

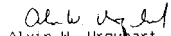
Dear District Manager:

I believe that all of the alternatives to the draft EIS and Plan for the management of the Three Rivers area are unacceptable because they do not restore the natural resources of the area. At best, Alternative "A" would not cause further extensive degradation of an already damaged natural ecosystem. All of the alternatives are simply excellent examples of the "tragedy of the commons." Instead of encouraging activities that are only of local economic significance, the BLM should be protecting the national dryland heritage given to its stewardship.

117-1 Any resource management plan for the district, should at a minimum, insist that rangeland, water quality, riparian and other wetlands be restored to excellent condition--not simply be maintained at the degraded level that currently exists throughout most of the region. Virgin forests must be protected--but first identified clearly in the plan; they seem not to be. Priority to protection of adequate rangeland for wildlife must be given. Wild and Scenic River classification would best fit all of the South and Middle Forks of the Malheur River with the exception of the Drewsey area. In a similar manner Bluebucket Creek and Silvies River should be so designated.

This fragile area demands restoration not the continued harmful uses permitted in all of the alternatives. The area is well on its way to even greater desertification than it has already experienced. If the BLM won't stand up for the protection of the nation's land, who will?

Yours sincerely,


Alvin W. Urquhart
(Professor of Geography, University of Oregon)
1820 Olive Street
Eugene, OR 97401

cc: Senators Hatfield and Packwood

Patricia A. Muller Box 287 Alsea, Oregon 97324 487-7348

February 5, 1990

District Manager
Bureau of Land Management
HC-7412533 Hwy 20 West
Hines, OR 97738

Hello:

Please accept my comments on the Draft Three Rivers Resource Management Plan and Environmental Impact Statement.

I would like the Bureau to change its management direction to focus on wildlife and recreational needs, rather than acting merely as a grain supplier for cattle. Charges for grazing allotments should reflect the true cost of maintaining allotments in excellent condition.

I would be glad to assist you whenever you need public comment on certain areas or biological plans. I will be lobbying to see that the Bureau gets the financial allocation it needs to properly fund these programs. Let me know when times like this arise on your district. Please send a full copy of the Final Plan when it arrives.

Thank you.



Pat Muller

Cultural Resources

118-7 The DEIS states that the overall trend is downward due primarily to erosion and vandalism. The BLM management trend should be towards no further sacrificing of these resources, protecting all remaining sites.

Water Quality

118-8 In the preferred alternative, livestock would be temporarily removed from streams with poor water quality until conditions have improved to fair. There is no excuse for this! Considering the high number of areas with poor water quality the BLM should aggressively pursue returning water quality to good/excellent and then adopting management procedures to maintain water quality at that level.



Nongame Animals and Upland Game Birds

118-1 Pg 3-34 states that there has been no comprehensive survey of non-game or upland species conducted in the RA. It would be impossible to assertively state that the preferred alternative would either improve or make worse the wildlife situation. From my own observations in the area, I have found fields that are planted in crested wheatgrass to not contain the native species which used to be even more abundant in the RA. All seeding of crested wheatgrass should stop until the effect of replacing native grasses on bird populations is known.

118-2 Wetlands containing vegetation of importance to nesting birds should not be allowed to be grazed until well after the nesting season is completed. It is remarkable to assess the difference in quality of nesting habitat where cows cannot reach, the vegetation there is of sufficient height to provide cover and protection for nesting species and their young.

118-3 No spraying of herbicides should take place for the sake of range improvement, since the effects of many of these chemicals are still unknown.

118-1 Refer to response 1-11.

118-2 Specific wetland proposals are covered in the Burns District Wetlands Habitat Management Plan. Providing nesting cover and brood water are two of the major components of this plan. Also, see response 7-12.

118-3 Refer to response 11-27.

118-4 Refer to Response 1-23.

118-5 Refer to response 3-6.

118-6 Refer to response 12-1.

118-7 The BLM management orientation is toward protection of cultural resources, as well as utilization of these values for public purposes. There are numerous known cultural sites and innumerable unknown properties such that the abatement of erosion and vandalism will intensify at known significant sites.

118-8 Refer to responses 2-44 and 13-7.

Off Road Vehicle Use

118-4 No off road vehicle use should continue on snowy plover nesting habitat.

Wild and Scenic Rivers

118-5 The BLM should more aggressively pursue wild and scenic designation for more rivers to include all of the South Fork and Middle Fork Malheur Rivers, Bluebucket Creek, and Silvies River.

Timber Harvest

118-6 Given the scarcity of timber areas, the BLM should feel no obligation to cut them. The DEIS states that the harvest of these BLM lands will have little or no effect on the local economies. Any ancient forest ecosystems should be identified and studied to see if species utilizing them have sufficient habitat.

February 5, 1990

Jay Carlson - RMP/EIS
Bureau of Land Management
HC 74 12533 Hwy 20 W.
Hines, Oregon 97738

Dear Mr. Carlson,

119-1 On behalf of W.J. Hoyt & Sons Ranches, I must express our concern of the BLM Draft Three Rivers RMP/EIS. In accordance with the Federal Land Use Policy Management Act of 1976, Section 202c, items 1.) and 3.) of the criteria to be used in planning would be:

- 1.) Use and observe the principles of multiple use and sustained yield.
- 3.) Give priority to the designation of areas of critical environmental concern.

With respect to these planning and management objectives, we feel that domestic livestock grazing is not being given proper consideration.

In the Preferred Alternative, "Alternative C", under Criteria for the Composition of the Preferred Alternative, much special attention is given to the Waterbased systems; riparian, aquatic, wetlands, and playa habitats, to Oregon Natural Heritage Plan cell needs, the Special status species habitat, the Big Game Habitat, and the need to protect and enhance the unique Kiger mustang herd. Your criteria gives very little recognition for need to protect the domestic livestock grazing rights. While we recognise the need to protect the afore mentioned Natural Resources, We feel a greater emphasis must be placed on the domestic livestock grazing rights.

119-2 W.J. Hoyt and Sons has experienced a significant "cut" in AIM's in several of their BLM Allotments, that will greatly effect production. It is unfair that misleading data was used in arriving at this AIM reduction.



W J HOYT SONS
RANCHES

P.O. BOX 647 • BURNS, OREGON • 97720 • (503) 573 4244
"The Nation's Largest Producer of Registered Shorthorn Cattle"

Page 2

This misleading data was obtained via the good management practices of this ranch, during drought years, while protecting the Public Lands under our stewardship. We are being penalized for good management during dry years, the reduction in our grazing capacity represents a significant economic loss to this ranch.

Over the next three years, we will lose a minimum of approximately 626 AIM's, this represents a \$30,000.00 loss to this ranch. Please note, as yet, less than half of our Allotments have gone thru the evaluation process.

In summary let it go on record, that we :

- 119-3 1.) Feel the monitoring technique used by the BLM, to gather data regarding our AIM reduction, was improperly applied and inaccurate data was used to arrive at their conclusions.
- 119-4 2.) Feel that giving wildlife and wildhorses grazing priorities over domestic livestock is inconsistent and unfair to the struggling beef producers.
- 3.) Stand firm beside the Harney County Stockgrowers Assn and endorse their letter to you concerning the Three Rivers RMP/EIS.

Sincerely,

Claude Mulholland
W.J. Hoyt and Sons Ranches

CM/cmc

119-1 The planning criteria used in guiding planning efforts are shown on pp. 1-5 and 1-8 (DRMP/DEIS). These criteria incorporate all nine of the FLPMA Section 202(c) criteria (not just numbers 1 and 3) and were utilized in the development of all alternatives, including the Preferred Alternative. Criteria for the Composition of the Preferred Alternative (p. 2-3, DRMP/DEIS) were utilized by management in addition to the other planning criteria, as a means of more clearly defining management emphasis.

119-2 Refer to response 2-11.

119-3 Refer to response 2-87.

119-4 Refer to response 2-6.



United States
Department of
Agriculture

Forest
Service

Pacific
Northwest
Region

319 S.W. Pine Street
P.O. Box 3623
Portland, OR 97208-3623

120



Director, Bureau of Land Management

3

Reply to: 1950

Date: February 1, 1990

Mr. Dean Bibbes, Director
USDI Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

Dear Mr. Bibbes:

Hal Beamer and Jim Keniston prepared this joint response to the Bureau of Land Management (BLM) Draft Resource Management Plan/Environmental Impact Statement (EIS) to eliminate duplication. Hal and Jim are District Rangers located at Burns, Oregon for the Malheur and Ochoco National Forests.

They met with Jay Carlson of BLM on Friday, January 5, to discuss the BLM Draft Plan. The meeting was extremely productive. They were able to clarify misunderstood direction, determine management adjacent to National Forest lands, and identify some potential conflicts.

It appears that to a large extent the BLM management is consistent with both the Ochoco National Forest Plan and the proposed Malheur National Forest Plan. Being a programmatic resource plan rather than an allocation resource plan like the Forest Service plans, there are a limited number of specifics. It will be imperative as you implement your Plan that we coordinate closely on management around common boundaries to ensure compatible management.

There are few apparent inconsistencies. These were discussed with Jay and are documented below.

120-1 1. The visual Quality objective for FR 41 on the Snow Mountain Ranger District is Retention as per the Ochoco National Forest Plan. On pages 3-51 of the BLM Plan, the visual management direction for BLM land along a portion of FR 41 in section 10, T21S, R27E is Level IV. Level IV corresponds to the National Forest Service Visual Quality objective of Modification. Jay did not indicate that it would be a major problem to have the BLM direction be consistent with the Forest Service.

120-2 2. The BLM proposes a Wild and Scenic River classification of "wild" to a Malheur River segment passing through section 16, T18S, R34E identified as Segment A, Middle Fork Malheur River, pp. 3-42, 43. The boundaries for this segment would include National Forest lands in Section 15, T18S, R34E. However, this would not conflict



FEB 02 1990

Director, Bureau of Land Management

2

with the proposed allocation under the proposed Malheur National Forest Plan should the final designation be "wild." If it is not designated as "wild," there is potential for conflicting management.

120-3 3. BLM proposes mineral withdrawal for all river segments designated under the Wild and Scenic Rivers Act. In addition, BLM direction in riparian and wetland areas is to allow no surface occupancy within 660 feet of these areas (Appendix, pp. 9-12, 13).

The Forest Service direction in the proposed Malheur National Forest Plan is that mineral and other uses could exist within river corridors as long as key river values are protected. The Ochoco National Forest Plan allows mineral activity to occur outside the riparian zones (Ochoco National Forest Plan, pp. 4-172, 173).

120-4 4. The BLM Plan identifies most of the Silvies Valley as winter range (pp. 3-30, 31, 32, 33). The winter range is shown extending to the National Forest boundary on the Burns Ranger District, but there is no corresponding winter range shown on Malheur National Forest lands at various locations west of Highway 395 and in the Silvies valley. East of Highway 395, the identified winter range is reasonably consistent.

In discussing this with Jay, we found that the Oregon Department of Fish and Wildlife (ODFW) was involved in identifying winter range on both Agency's area of responsibility, but the data on Elk Winter Range on the BLM land may be more recent. It is necessary to understand the explanation for this difference in winter range lines between the BLM and Forest Service lands. Two possibilities seem to exist. Either there is a biological explanation for the difference and the lines are correct or different information was used to identify winter ranges on BLM land. We are not aware of any recent studies which have updated winter range use in that area. We believe the ODFW personnel at the Burns Office could assist in this matter. ODFW input regarding winter range lines on the Malheur National Forest was provided in 1982. We recommend that biologists of respective Agencies discuss this matter and provide an explanation.

120-5 5. On the Snow Mountain Ranger District (pp. 3-30, 31, 32, 33), the winter range shown primarily agrees with that identified as winter range on National Forest lands. The exception is on the west side of the Snow Mountain Ranger District, Ochoco National Forest where winter range identified on the National Forest is not matched by corresponding winter range on BLM.

120-6 6. Both the Ochoco and Malheur National Forest management for winter range is based on Habitat Effectiveness Indices (HEI). The BLM direction is based on providing 30 to 60 acre blocks of suitable big game cover so that 40 percent of the treatment area remains in suitable thermal and hiding cover. We believe there is potential for inconsistency in interpretation of this direction and recommend that BLM and Forest Service biologists discuss this at the earliest convenient time. Ochoco biologists question the potential of winter range on BLM to produce thermal cover, based on traditionally used definitions (percent crown closure, etc). In



addition, the effect of road density in the BLM direction is unclear.

7. Direction for managing eagle protection differs slightly. The size of special management areas around nests and roosts agree, but the Malheur National Forest identifies "potential" roosting habitat. Similarly, the Snow Mountain Ranger District has two roost sites and the Ochoco National Forest Plan calls for protection of potential roost trees within 1/2 mile of existing sites (Ochoco National Forest Plan, pp. 4-428). The draft Three Rivers Plan calls for protection of existing sites and any sites that are subsequently found to be occupied. It does not identify any potential sites for Bald Eagle roosting. The Malheur and Ochoco National Forests both contain roost sites but do not have any active nest sites. Three active roost sites and 15 potential roost sites have been identified on the Burns Ranger District. The identification of potential sites is felt to be important to insure there are options in the future to provide for an expanding population or provide an alternative should existing active roost sites become unsuitable for use. This need is identified in the Bald Eagle Recovery Plan for Oregon and Washington (January 1989). Management plans will be completed for the three roost sites within the Burns Ranger District within the next five years. Due to their close proximity to BLM land it is important that a high degree of coordination occur between Agencies to insure protection and perpetuation of this sensitive habitat. It is recommended that BLM and Forest Service biologists discuss the bald eagle habitat management strategy within their respective plans to insure consistent implementation of the Federal Recovery Plan.

The restricted season for management activities around eagle roosts varies in the current cooperative Agreements between the Burns Ranger District and BLM, and between BLM and the Snow Mountain Ranger District. We were unable to locate any reference to a restricted season of use in the BLM Plan. This is of concern as the Ochoco National Forest Plan has travel restrictions to protect eagle roosts on adjacent BLM land. See Item 7.

120-8 8. The BLM Plan, in Table 2.1-9, calls for a restriction of management activities within 660 feet of raptor nests from March 1 to August 15. The Ochoco National Forest Plan, on pages 4-428 and 429, states that for eagles the restriction period will be March 1 to August 15, and for other raptors March 1 to August 1.

120-9 9. The BLM and both Ranger Districts have a number of mutual livestock grazing permittees. It is important that our management direction be as consistent as possible to reduce the potential for conflict and confusion.

In reviewing the BLM Plan, we found that allotments on both National Forest and BLM lands were receiving utilization exceeding the carrying capacity.

It appears that both Agencies will be faced with significant challenges in turning the situation around. Since we share permittees, it will be imperative that we coordinate our management closely as we implement our respective plans, and we would like to



Director, Bureau of Land Management

4

see some wording to reflect this when our allotments are adjacent and the same permittee is involved.

There is a difference in utilization standards to resolve riparian habitat problems. In Table 2.1-23, the BLM calls for removal of cattle from streams in poor condition for a five year period, followed by a grazing system that would allow 50 percent use of riparian herbaceous vegetation and 30 percent use on upland herbaceous vegetation.

The Ochoco National Forest Plan, on pages 4-141, does not require the complete removal of livestock, but certainly retains that option. The Plan also institutes these utilization standards.

Riparian Areas		Max. Use % Grasses		Max. Use %	
Range Mgmt Levels	Shrubs	Sat.	Unsat.	Sat.	Unsat.
Unsat.					
	B	40	0-30	30	0-25
	C	45	0-35	40	0-30
	D	50	0-40	50	0-35
Suitable Range Not Riparian		Max. Use % Grasses		Max. Use %	
Range Mgmt Levels	Shrubs	Sat.	Unsat.	Sat.	Unsat.
	Shrublands				
	Unsat.				
	B	40	0-30	50	0-30
	C	45	0-35	55	0-35
	D	50	0-40	60	0-40

Percent allowable use is driven and prescribed by management intensities A (not shown in above table: in FSM 2200), B, C, and D. The use standards are Pacific Northwest Regional direction and are to be used unless more site-specific objectives are approved in individual Allotment Management Plans. This applies to all National Forests with permitted livestock grazing and aids in consistent dealing with the same permittees on different National Forests.





120-10 10. I" Table 2.1-3 and 2.1-31, 32, BLM direction calls for closure of all roads not needed for administration or fire purposes, allowing all types of Off Road vehicles (ORV) use in designated open areas except where unacceptable resource impacts are occurring or are likely to occur, maximizing development of ORV areas and cross-country routes (including those for snowmobiles and motorcycles) to increase the number of out-of-county users and developing trails to accommodate a number of other recreational activities (paraphrased and emphasis added).

It would appear that this direction could have the potential for significant impact to forest resources and to our management. Since no specific locations are given, it is impossible to assess exactly what this impact would be. We would like to see some wording added that would emphasize that any planned recreation developments or road closures adjacent to or within National Forest boundaries of either Ranger District be coordinated with the Forest service.

Thank you for the opportunity to comment.

Sincerely,

John F. Buttrille
JOHN F. BUTRUILLE
Regional Forester

cc:
Malheur NF
Ochoco NF
PLAN - Nygren

- 120-1 The Bureau-administered lands in Sec. 10, T. 21 S., R. 27 E., along USDA-FS Road 41 have been changed to a VRM Class II which is similar to the USDA-FS Retention Class in their Visual Management System.
- 120-2 Refer to response 3-6.
- 120-3 Minerals management in designated Wild and Scenic Rivers will be established through Federal legislation, if any, which establishes river classification and the USDA/USDI Secretaries' guidelines for river management.
- 120-4 The differences between BLM and USDA-FS maps were discussed at an interagency coordination meeting on April 11, 1990, and consequently, some minor revisions have been made. See Maps WL-1 and WL-2, PRMP/FEIS.
- 120-5 Refer to response 120-4.
- 120-6 Current timber inventory data show that the thermal and hiding cover requirement is being met within the timber treatment areas and the objective is to continue to provide for these needs. Coordination between agencies is essential and will continue. Also, refer to response 7-25.
- 120-7 In a 1982 inventory, no potential roost sites were discovered. The characteristics of current roost sites were used to search for potential sites, but none were found. The subsequent Bald Eagle Winter Roost HMP of 1985 outlined specific actions needed to ensure that the Burns District's portion of the Pacific Bald Eagle Recovery Plan would be accomplished. Since that time, the HMP has been fully implemented and reviewed on a yearly basis. The Proposed Plan has been revised to include USDA-FS in the coordination of any new or ongoing management actions as this coordination is essential to the success of the HMP actions. Also, the cooperative agreements arrived at through the HMP process were not felt to have significant impacts to other programs and were not analyzed in the RMP.
- 120-8 The restrictions are dependent on the specific needs of the species and the site involved.
- 120-9 Refer to response 2-7.
- 120-10 Refer to responses 1-22 and 1-23. The action pertaining to cross-country ORV travel (use of roads and trails) has been reworded to clarify the management recommendation to the exclusion of maximizing development and increasing use by out-of-county residents. Additional management actions have been written in the Proposed Plan to enhance ORV management in the RA.



121

February 6, 1990

Joshua Warburton
BLM Burns District Manager
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Re: DRMP/EIS
Biscuitroot Cultural ACEC

Dear Mr. Warburton:

I agree with your assessment and description of the resource and value of the Biscuitroot Cultural ACEC, having studied these resources and patterns of cultural use by the Burns Paiute Indians since 1974.

Oral history reveals there has been a long term traditional use of the area by local Native Americans as well as Native Americans from Warm Springs, Yakima, McDermitt, Fort Hall, and Fort Bidwell areas with attendant social interactions.

While the crops are nutritious and have a cash value in trade, the people rely upon the wild root crops in modern days primarily for their value as an important cultural tool in educating and creating awareness of young tribal people as to cultural traditions.

The wild plant resource and its use by Indian people is sensitive to gravel pit activities (concurrent use is not desirable; pit expansion is a threat, and drought year livestock grazing (resource is vulnerable to competition). The livestock compete especially for the yampa (*Perideridia bolanderi*) which tends to grow under moist conditions or streamside.

121-1 I agree with your recommended management and use constraints for this area, and would further recommend that all Native peoples be allowed to camp and dig for roots in this area unrestricted.

Thank you for the opportunity to respond to your DRMP/EIS.

Most sincerely,

Marilyn Couture
Marilyn Couture
Cultural Anthropologist
1951 N.W. Walmer Drive
Portland, OR 97229
(503) 297-3449

- 121-1 The Biscuitroot Cultural ACEC has been proposed for designation; however, detailed and specific use protocols will be determined in a management plan tailored to the requirements of the subject traditional activities. Native American consultation will be the basis for any site-specific restrictions, inasmuch as this ACEC locality is considered to be a "common area" for Native peoples to use for root gathering.

Josh Warburton + Jay Carlson

Feb. 8, '90

122

Concerning the Three Rivers RMP comments;

122-1

enclosed is a definition to use for old growth or ancient forest stands. These stands do not need to be virgin in nature, but should possess old growth characteristics in the definition. Exceptions to all criteria should be provided for. I hope this helps,

The old growth resource in the canyons and on the edge of the forest land is very important for those species because the habitat is on the limit of the range for such species. Also for allocation purposes if some areas do not meet the criteria, an old growth (restoration stand should be allocated to meet future needs.

Thanks for coming over to Bend and discussing

3 Rivers issues with us.

Sincerely Tim Lillebo

122-1 This definition and set of criteria closely resemble those currently being used by both the Burns Ranger District (Malheur National Forest) and the Snow Mountain Ranger District (Ochoco National Forest). A composite definition and criteria have been formulated for this plan. See Proposed Plan, Table 2.4.

FROM: NATL. WILDLIFE FED. PDX TO: 13694819 FEB 7, 1990 2:51PM P.09

[as recommended by Tim Lillebo - (R. Brown 2/6/90)]

Old Growth Forest Stand Criteria: [for eastside ponderosa pine and pine-associated forests]

1. (5) 10-20 (30) large (greater than 21" dbh) ponderosa pine/acre; other components generally less than 20%;
2. the size of the area should generally be no less than 40 [Regional Guide says 10] acres (with exceptions) arranged as to maximize internal integrity and have representative mosaics of mature, overmature, and decadent tree components;
3. in addition to the layer provided by large overstory trees, at least one recognizable layer of seedlings, saplings, or poles present;
4. (0) one or more standing 14" dbh or larger snags per acre;
5. (0) 3-6 (10) large (greater than 12" dbh at largest end) 8 foot long logs being a portion of the overall woody material component;
6. native shrub canopy cover of (0) 20-40 (60)% associated with a variety of native herbaceous plants composed of grasses, sedges, and forbs.

^adapted with modifications from material prepared by Bill Hopkins, area ecologist for Fremont, Winema, Deschutes and Ochoco National Forests. Numbers in parentheses indicate low and high ends of a range.

January 17, 1990

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

123-1 Refer to responses 2-1 through 2-96 (responses to Riddle Ranch and Western Range Service Letter).

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Warburton:

The January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Jennie Otley
Name

Box 55 HC 72
Address
Princeton, OR 97721
City State Zip Code

Jennie Otley
Signature

Enclosure: Supplemental Comments

January 31, 1990

Joshua L. Warburton
Burns District Manager
Bureau of Land Management
HC 74-12533 W. Highway 20
Hines, OR 97338

Following is my comment in addition to the comment prepared by Riddle Ranch and Western Range Service, concerning The Draft Three Rivers Resource Management Plan & EIS.

- 124-1 I am opposed to the fencing of 80.9 miles of stream in this RMP, resulting in a loss of 28,937 AUM's for 5 years or more. Often the permittee loses much more than the creek bottom with the fence extending beyond the creek bank. The promise of off-site forage to replace temporary reductions may not become a reality.
- 124-2 BLM lists Riddle Creek and Paul Creek as having poor surface water quality and poor aquatic and riparian ratings due to warm water temperature and silt. However during normal water-shed years fish are plentiful in these streams. Research has proven that livestock grazing is beneficial to riparian areas, with proper management.
- 124-3 Since Juniper is the number one erosion problem in this RMP a workable tool of management, such as burning, could be implemented into BLM's yearly program. Presently, little is being done to rescue the drainage areas from these forests of Juniper. These trees intercept much of the moisture, leaving little water for plant life.
Antelope, deer and elk have greatly increased in herd population in the past ten years, which proves the vegetation is plentiful. Ten years ago Riddle Mountain allotment had few, if any elk.
- 124-4 The Kiger and/or Riddle Mountain wild horse Herd Management Area should not be expanded. Many of the HMA's in this RMP have herd numbers far beyond the minimum and often more than the maximum. Stallions from the wild horse corral in Burns should not be returned to the range. They ought to be castrated and placed for adoption or destroyed. Since cattle have priority over wild horses in public land forage, one must question the legality of classifying wild horse HMA's as Areas of Critical Environmental Concern.
- 124-6 Mineral exploration and mining should be allowed to continue in this RMP, since Eastern Oregon public lands are rich in minerals. Also energy possibilities must receive high priority. Public lands must remain in multiple-use with recreation allowed.
Maintain timber harvest and livestock grazing in forested areas in the RMP under present management system. There is no scientific proof that livestock grazing is harmful to sage grouse strutting areas. Neither is there proof of harm to nesting areas of the long bill curlew and raptor, due to livestock grazing. Cattle have grazed for more than 100 years on Stinkingwater Mountain with no harm to the harvest of Native American roots.
- 124-8 No private property should be sold to the federal government, only land exchange when feasible. Roads should not be closed and re-habilitated without considering ranchers' needs. Under the current management system, Drawsey EIS, the total AUM's issued might remain the same until BLM monitoring data indicates a decline in available forage. BLM area managers should identify anything of concern in each allotment and work with ranchers to provide a solution before it becomes a problem. Many of the alternative proposals, if implemented, are in violation of the multiple-use concept of the Taylor Grazing Act. Any reduction in livestock grazing AUM's will have an adverse effect on the local economy.

Thank you for the opportunity to make comment.

Sincerely,
Jennie Otley
HC 72 Box 55
Princeton, OR 97721

- 124-1 Refer to response 5-10.
- 124-2 Refer to response 6-4.
- 124-3 The practice of prescribed burning and the felling of juniper stands has been proposed in the PRMP/FEIS. The implementation of this process is expected to be ongoing year after year. For information on prescribed fire constraints and wildfire suppression policy refer to responses 4-8 and 4-9, respectively. Also, refer to response 6-8.
- 124-4 There is currently a 5-step process for disposing of excess wild horses gathered from the range. This process as outlined in the 7th Report to Congress on the Administration of the Wild and Free-Roaming Horse and Burro Act, is as follows:
 1. Regular adoption program at full fees.
 2. Special adoptions at altered fees.
 3. Training of wild horses at prisons by inmates, with the trained animals to be made available for adoption. Animals not adopted within 30 days after training should be handled through steps 2 and 4, and if not adopted within 30 days, destroyed in accordance with step 5.
 4. Placement of wild horses on private sanctuaries, with the animals maintained with non-Federal funds.
 5. Euthanasia for any animal not disposed of within 90 days following BLM's certification of its availability for adoption.
 Castration or other sterilization measures do remain an option under the Wild and Free-Roaming Horse and Burro Act; however, these measures have proven to be unfeasible and are no longer used very extensively as a method of control.
Also, refer to responses 2-68 and 11-11.
- 124-5 Refer to responses 2-6 and 2-68.
- 124-6 Refer to response 52-1.
- 124-7 Refer to responses 1-15, 2-79 and 3-9. Also, no livestock grazing restrictions are proposed for raptor habitat enhancement.
- 124-8 Refer to responses 4-14 and 6-10.
- 124-9 Refer to response 2-81.
- 124-10 Refer to response 2-11.



Oregon Trout 125

Speaking out for Oregon's fish

P. O. Box 19540 • Portland, Oregon • 97219 • (503) 246-7870

February 6, 1990

Joshua L. Warburton
District Manager,
Bureau of Land Management
Burns District Office
HC74-12533
Hines, Oregon 97738

Dear Mr. Warburton,

Anyone with some knowledge of our natural resources cannot dispute the low ecological condition of many of the riparian areas in the Three Rivers Resource Area. A significant reduction of shrub and tree cover and loss of many native herbaceous species such as Deschampsia cespitosa to lower producing exotics like Poa pratensis, have greatly reduced the resource values of our riparian zones. Many of these zones are not only producing far below their potential for water quality, aquatic habitat, wildlife habitat, and recreation values, but also red meat production. Since European settlement in the sagebrush steppe region the potential to produce red meat has been reduced by 60 to 90%. It is my belief all of these resource needs can be met with intensive and creative management. It is essential for the long term benefits of everyone, that management decisions be made from a biological basis. If management decisions are made from a political basis we will all be losers.

Grazing by domestic herbivores has been identified as one of the primary activities causing the decrease in ecological condition in riparian areas. However, the problem in most cases is not overstocking but animal distribution. Riparian zones are unlikely to respond to livestock reductions unless the pastures are truly overstocked. Riparian areas are frequently overgrazed even in understocked pastures. Total forage may be adequate in a pasture, but if livestock have access to riparian zones these areas are frequently the focal point of use, leading to overgrazing even in an understocked pasture. Fencing these areas as separate pastures will be one of the most effective tools in returning these systems back towards maximizing their potential benefits. Timing, duration and frequency of use by livestock must be controlled if we are to maintain the integrity of these systems. Non traditional seasons of use may also be evaluated, such as early on and early off, which has worked well in parts of central Oregon. Brainstorming with leaders in the ranching industry may also develop creative alternatives to the problem. This will also increase cooperation which is critical since the majority of the riparian zones are in private holdings. Proper use of riparian zones will develop vegetation structure that will increase capture of sediment and better store water. This means longer growing seasons and higher quality

forage. It also means more consistent water flows throughout the year. The ultimate end point is better aquatic habitat, wildlife habitat, recreation values, increased water quality and quantity, and livestock production.

Concern for fire due to lack of road access and build up of fuels in these zones should not be a concern. Fire played an important historical role in developing plant ecosystems in the Great Basin. Pre European fire frequencies ranged from 8 to 12 years in the pine forest to 20 to 30 years in the mountain big sagebrush communities. Riparian systems were frequently exposed to fire prior to European settlement. Many of these plant systems would benefit from periodic fire. This would be particularly true of the uplands where juniper is rapidly invading shrub steppe communities. If allowed to continue the increase of juniper woodlands will have a negative effect on the watershed with increased sediment loss, decreased water storage and increased water loss from the watershed due to evapotranspiration.

125-2 Reduction of roads in the Three Rivers Area is a positive move forward. Logging buffers adjacent to riparian areas, however, are not adequate, particularly in the 0 to 40% slope category. Movement of streams in areas with 0 to 2% slope can easily move outside of the buffer. Stream channels are very dynamic.

I sincerely hope the BIM does not decide to go with the status quo. Current conditions of most of our riparian zones are unacceptable with 82% in fair to poor condition and 44.35% continuing to decline. These zones are producing far below their potential for all resource values. It is time to move forward with aggressive management to benefit everyone. Although increased inputs, such as fencing, are expensive many resource benefits will be realized in the long term outlook. If we do not manage these ecosystems in an aggressive and creative manner, from a sound biological basis, we will continue to exploit our resources.

Sincerely yours,

Richard F. Miller
Southeast Oregon Director

125-1 Refer to response 3-13.

125-2 The proposed buffers have been effective at decreasing sedimentation into the small v-shaped canyons characteristic of those found in the forested areas of the planning area.



126

Department of Fish and Wildlife

506 SW MILL STREET, P.O. BOX 59, PORTLAND, OREGON 97207

February 5, 1990

126-1 Refer to response 1-23.

Joshua L. Warburton
District Manager
HC 74-12533
HWY 20 West
Hines, OR 97738

Dear Mr. Warburton:

On January 19 the Department provided you with our review and comments on the Three Rivers Resource Management Plan.

Our district staff has subsequently contacted me to express apprehension over an item in Table 2.1: Management Directives by Alternatives. The point of concern is found on page 31, under the column for the preferred alternative. It reads: "Maximize the development of usable ORV areas and cross-country routes (including snowmobiles and motorcycles), including areas away from the population centers in the county, to increase the number of out-of-county users."

The Department is concerned about the possible negative impacts of encouraging increased ORV use from out-of-county users. In most areas of the state we have taken the position that ORV use should be restricted to designated areas; other than those areas, ORV's should be required to stay on developed roads and follow the same rules and regulations as highway vehicles.

The Burns district, however, is somewhat different. Other than a few local areas, ORV use is relatively light throughout SE Oregon. The Department felt that this provided a unique opportunity for ORV enthusiasts to explore this vast, sparsely settled, and lightly roaded region with minor environmental consequences. Therefore, we reasoned that the potential for negative impacts was slight and did not recommend designated areas for ORVs..

The key issue here is that ORV use has historically been light and broadly distributed. Such usage causes little in the way of negative, long term, environmental impacts and provides much in the way of unique outdoor opportunity. The high desert environment, however, is quite fragile and the balance between negligible and significant damage can be quite precarious. Even one, relatively intense exposure to ORV use can cause damage that may take years to heal.

Continued intensive exposure can easily cause significant environmental damage and displacement of wildlife communities.

126-1 The passage at issue here seems to suggest that the BLM intends to solicit additional use. The Department would like to discourage such action by the BLM. Current levels of usage do not require restrictive actions. However, increased usage would probably have a negative impact on indigenous plant and animal communities. More restrictive rules pertaining to ORV use would probably have to be implemented to circumvent these impacts. Not only would this be an unfortunate loss of a traditional use, it would be very difficult to enforce.

The Department recommends that the BLM take no action to encourage additional ORV use. We suggest that item 2 at the bottom of page 31 be substituted with item 2 at the bottom of page 30. It reads: "Develop usable ORV areas and cross-country routes (including snowmobiles and motorcycles) around the populated areas of Burns and Hines to accommodate the needs of the local population and the occasional request by out-of-county users for cross-country use."

Thank you for your consideration and attention to this matter.

Sincerely,

Darryl M. Gowan
Forest and Rangeland
Staff Biologist

Feb. 5, 1990

Dear Mr. Carlson,

127-1 Concerning your recent assessment on the draft
Three Rivers Resource Management Plan and
Environmental Impact Statement of the Revised
allotment. I feel your conclusions are in-
accurate, and the monitoring techniques used are
improperly applied to reach the present conclusions.

127-1 Refer to responses 2-11, 2-87 and 8-4.

127-2 Refer to response 8-4.

127-3 Refer to response 2-63.

At the time we had the estimated
capacity of 778 A.U.M.'s. At present, the actual
usage is around 451 A.U.M.'s., which is based
exclusively on water influence. The main reservoir,
which lies at the upper end of Calkum Basin,
has a tendency to go dry in the early Summer.
Thereby prohibiting the usage of any range within
the boundaries.

127-2 It is also stated that the present management
is unsatisfactory. On what basis do you reach
this conclusion? Not utilizing the estimated 778
A.U.M.'s? Or by driving through and looking at
how overgrazed the area around the reservoir is?
Cattle do have a tendency to hang around the
water, as do wild horses, etc. If the present
conclusions were reached in this manner, then
the factors governing this decision were in-
adequate and insufficient.

127-3 Your proposed alternatives A, B and C will
result in a substantial loss of base property
value. The proposed B.M. actions may result
in reducing the size of many operations
so that they are not an economical unit.

Therefore, I request that if Alternatives A, B
or C are considered, that ~~in~~ ⁱⁿ the issuing
of the Final Three Rivers Resource Management
Plan and Environmental Impact Statement,
a "Taking Simplification Assessment" be com-
pleted as authorized by Executive Order
12430.

The letters from the Sheep and Livestockmen,
Hemmi County Cattlemen, Stockgrowers, Farm
Bureau, and the January 17, 1990 Riddle Ranch
and Western Range Service Comments and
response to the Draft Three Rivers Resource
Management Plan and Environmental Impact
Statement are consistent with my views and
comments.

This response is my endorsement of
such letters and documents. This response has
been submitted to you. I do not include a
full copy of text as it would be an exact
duplication of the Riddle Ranch document and
organizations letters.

Sincerely,
M. Martin Harris
M. Martin Harris
P.O. Box 7
Paradise, OR

977-21

FEB 2, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 W.
Hines, Oregon 97735

- 128-1 Refer to response 8-4.
- 128-2 Refer to responses 2-11 and 2-87.
- 128-3 Refer to response 2-63.

Dear Mr. Carlson

128-1 THIS LETTER IS IN RESPONSE TO THE DRAFT THREE RIVERS RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT.

CONCERNING THE DAVIES ALLIEMENT; WE FOUND THAT WE ARE CONSIDERED POOR MANAGEMENT MATERIAL AND THAT OUR PRESENT RANGE CONDITIONS ARE POOR. I HAVE TO GO ON RECORD THAT I TAKE ~~NO~~ OFFENSE AT THAT. YOU HAVE OUR ESTERATED AUM'S AT 778 WHEN THE ACTUAL AUM'S ARE 451. YOU HAVE US WAY OVER THE LAND CAPACITY.

YOU ALSO MIGHT NOT REALIZE THAT THERE ARE ONLY TWO WATER HOLES: A MAN-MADE RESERVOIR AND A SMALL SPRING AT THE HEAD OF BEAVER CREEK. THE MAN-MADE RESERVOIR USUALLY GOES DRY MID-SUMMER, AND THE SPRING CAN'T HANDLE OVER 10 HEAD A HOUR. WE RUN LESS THAN 100 HEAD OF CATTLE AND WHEN THERE IS NO WATER WE DON'T HAVE CATTLE ON BLM.

WE ARE AS CONCERNED AS EVERYONE ELSE ABOUT MAINTAINING THE NATURAL HABITAT. PROBABLY MORE SO - AS IT IS OUR ~~MANAGEMENT~~ LIVELIHOOD AND ONLY BY MAINTAINING THE GRASSES AND ECOLOGICAL SYSTEMS CAN WE STAY IN BUSINESS.

128-2 YOUR ASSESSMENT OF OUR ^{MANAGEMENT} RANGING ABILITIES, RANGE CONDITIONS AND PRODUCTION ^{LEVELS} ~~BASE~~ WITHOUT BASIS. I AM NOT AWARE OF HOW ^{OUR} MONITORING TECHNIQUES WORK BUT THEY ARE INACCURATE.

128-3 YOUR PROPOSED ALTERNATIVES A, B AND C WILL RESULT IN THE LOSS OF ^{OF} ~~OUR~~ BASE PROPERTY VALUE. THE PROPOSED BLM ACTIONS MAY RESULT IN REDUCING THE SIZE OF MANY OPERATIONS SO THAT IT IS NOT AN ECONOMIC UNIT. THEREFORE, I REQUEST THAT IF ALTERNATIVES A, B OR C ARE CONSIDERED, THAT PRIOR TO ISSUING THE FINAL THREE RIVERS RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, A "TAKINGS IMPLICATION ASSESSMENT" BE COMPLETED AS AUTHORIZED BY EXECUTIVE ORDER 12630.

THE LETTERS FROM THE HARNEY COUNTY CATTLE-WOMEN, STOCKGROWERS, FARM BUREAU, SHEEP AND WOOL-GROWERS AND JANUARY 17, 1990 RIDDLE RANCH AND WESTERN RANGE SERVICE COMMENTS AND RESPONSE TO THE DRAFT THREE RIVERS RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT ARE CONSISTENT WITH MY VIEWS AND COMMENTS.

Sincerely,
ANDREA DAVIES
P.O. Box 7
Princeton, OR 97721

COMMENTS AND RESPONSE

Prepared by: Mitch and Linda Baker

SUMMARY

The Draft Three Rivers Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS) is not needed.

131-1 I don't think we need to do a lot of fencing and make this a riparian corridor. I also don't think we need to change the 'SMC' from 'M' to 'I' when everything is improving steadily.

We need to get a good water source in the Plateau pasture to be able to utilize this field and help rotations on the other three pastures. This would improve wildlife in the plateau and improve the river riparian at even a faster rate of return.

131-2 The removal of livestock from this 1.5 intermittent miles of river will disrupt current successful grazing. It will also have long-lasting adverse impacts on livestock operations. Only a portion of the streams are publicly owned. Therefore, BLM's proposed actions will have very little, if any, effect on overall stream conditions.

131-3 The surface water quality and aquatic and riparian habitat condition ratings appear to be inconsistent and unrealistically restrictive. If water quality conditions are as poor as BLM claims, we would expect that there would be no fish left in the Resource Area. These water quality ratings (surface, riparian and aquatic) are the basis for the majority of the adverse impacts to livestock grazing.

All available information indicates that current upland grazing practices are having no significant adverse impact on surface water quality.

131-4 BLM has failed to address many of the adverse impacts of their preferred alternative on livestock grazing. Funding for the proposed range improvements will probably not be available.

In the last five years during the BLM's surveys, three of these years were dry years and ran consecutively with each other. Two of these years, 1986 and 1987, the river all but went dry during the summer. In 1988 it did dry up and the only water going through this property was what was coming from Myrtle Creek. The river was dry from Myrtle Creek up river.

2-10-90

*Mitch Baker
Alice K. Baker*

2-10-90

*Mitch Baker
Alice K. Baker*

Silvies River
Allotment # 7033

Background

This allotment contains 1044 acres of BLM land and 699 acres of private and state land. The allotment is divided into four pastures. The plateau pasture is non-used every year due to no water in this allotment. Two of the remaining three pastures are basically private land. The remaining pasture is a majority BLM land and accounts for only approximately one third of the total 1044 BLM acres. This is the only pasture that the Silvies River runs completely through BLM property. This pasture does not include 1.5 miles of continual river side riparian and fisheries area because the river goes from Forest Service into private, then to BLM, back to private, to BLM, and back to private land.

These sections of the river are very heavily fished during the spring and summer. It is the only access to the river for the public in any direction for at least 10 miles. The river is shallow and has adequate cover. The cover is improving every year.

River side riparian and fisheries habitat had a set back in 1982, 1983, and 1984 during the higher than normal and longer water run-off season. During the run-off season the high water and ice jams in the river changed the river channels, taking out 'S' curves and creating sand bars. This destroyed old dense growth willows and grass. But this caused invigoration of the new growth of willows and grass along the sand bars and river banks at a much faster rate.

The cattle have had very little effect on this situation. Mother Nature caused the damage and she is also repairing the damage with the new growth. Along with our efforts with lower AUM numbers and shorter rotation periods, riparian and fish habitat is improving greatly and has been considered and addressed by the permittee.

131-1 Allotment categorization is based on a variety of criteria. The process involved is in accordance with Bureau policy and guidance. See Appendix 1, Tables 10 and 11, PRMP/FEIS.

131-2 Refer to responses 2-5, 2-11 and 3-13.

131-3 Refer to responses 2-27 and 2-28.

131-4 Refer to response 2-52.

February 10, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/ EIS

Dear Mr. Carlson:

Mitch and Linda Baker want to go on record that the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Riddle Ranch document. There are several other areas of concern that this letter will address.

- 132-1 Refer to response 42-14. Also, those streams with no condition or trend data have not been inventoried. Streams not meeting the definition will be dropped from the list.
- 132-2 Refer to response 2-87.
- 132-3 Refer to response 4-3.
- 132-4 Refer to response 4-6.
- 132-5 Refer to response 2-46.
- 132-6 Refer to response 2-63.

132-1 A riparian area is defined as an area of land "directly influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence." The definition continues that areas excluded from the definition of a riparian area include "ephemeral streams or washes that do not exhibit the presence or vegetation dependent upon free water in the soil." A thorough review of all creeks should be made to ensure they meet the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.

132-2 Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied and then are extrapolated to indefensible conclusions. Management objectives, in the absence of AMP's, are documented only in the broadest of terms making them virtually unmeasurable. No factors, other than short term wildlife, wild horse and livestock utilization, are indicated as affecting forage production, ecological status or potential of the resource. Therefore, reductions in authorized livestock use is the

132-3 primary, if not the only, remedial action recommended. Until proper techniques and accurate information is gathered existing levels of livestock grazing should be maintained. At such time that reliable information shows trend increase or decrease, proper adjustments could then be made. The ratings in the recently published Riley Rangeland Program Summary Update classify range conditions as poor, fair, good, and excellent. The RMP/EIS classifies range conditions as satisfactory and unsatisfactory. Consistent use of evaluation ratings is necessary for accurate evaluation as well as better communications with the permittee.

132-4 There is no scientific data that indicates that livestock use has any negative effect on the sagegrouse population. The restrictions on livestock in the sagegrouse strutting grounds are unfounded and should be eliminated.

132-5 The continual fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years restrict the amount of available forage and can concentrate cattle more than necessary. Livestock have a biological need for water.

132-6 Before any alternative that causes a reduction of AUM's is imposed, no matter what reason, a complete "Takings Implications Assessment" should be completed as authorized by Executive Order 12630.

Sincerely yours,
Mitch Baker
Mitch and Linda Baker
P. O. Box 105
Burns, Oregon 97720

2-10-90
Alice K. Baker
P.O. Box 469
Burns, OR. 97720

Comments

- 133-1 The reduction of AUM's in this allotment is not necessary if the BLM would stop the unauthorized use of allotment by the surrounding property owner and leasees. The reduction of our AUMs is not going to improve this allotment if the unauthorized use is going to continue year after year through out the summer and fall even on the allotment's rest years. Also, I don't think we need to change the SMC from M to I. The range has been improving. It is not as bad as the BLM survey says.
- 133-2 Landing Creek is not a free flowing creek year around. It will have water through out the length of the creek year around if it is a very wet year. During drier years, this creek will dry up throughout the length of the creek except for small pools.
- 133-3 This creek is fed by a small spring at the head of Landing Creek Canyon and is located outside of this allotment. The spring would no way ever produce enough water to free flow the length of the creek. It doesn't even run water to the boundary fence of the allotment from the spring head year around except on very wet years. How can riparian and water quality be declining while fish habitat is improving? This is not consistent. One can't improve or decline without effecting the other also.
- 133-4 There is in no way by the year 2000 that you will have a 55% stream shading and water temperature at 77°F. There is not the water source and flow to support such an assessment. The reduction of livestock from the stream area will disrupt the current, successful grazing system. Therefore it will have very little effect on the overall stream conditions.
- 133-1 Refer to response 2-11.
- 133-2 Refer to response 131-1.
- 133-3 Refer to response 46-1.
- 133-4 The objectives were formulated partially from Bureauwide objectives outlined in Fish and Wildlife 2000, A Plan for the Future. Management actions to meet those objectives were then formulated. Predicted riparian conditions are listed in the Proposed Plan. Experience has shown that many riparian areas have the potential to recover quickly when managed to meet riparian objectives. Particular recovery time will be dependent in part upon the current condition of the riparian area.
- 133-5 Refer to response 133-4.
- 133-6 Refer to response 2-6.
- 133-7 Monitoring is not done by volunteers.

Mitch Baker

*2-10-80
Alice K. Baker*

Comments and Response

Prepared by Mitch and Linda Baker

- I don't think the AUM cuts for me in this allotment are fully justified when the unauthorized use of the allotment goes on year after year all year long.
- 133-5 The water quality and riparian habitat is not going to improve very much when you have a creek that goes dry off and on. How are we to have a good fish population without a good water source to start with. I don't think fencing cattle out is our answer. Our uplands are in very good condition. That is where cattle go to graze and have no significant adverse impact on surface water quality.
- 133-6 Giving wildlife priority over cattle in forage allocations is unfair and inconsistent. If we were not improving our range land conditions in these areas, our wildlife would not be increasing. However, they are increasing due to more forage. There needs to be more money spent on constructive range land improvements and less spent on survey after survey. The continued surveys don't produce forage or water which is essential to cattle and all wildlife.
- 133-7 NOTE: It has also been brought to my attention that volunteer people are being used to assess allotment and plot surveys and conditions. I question the validity of these assessments when done by volunteer, possibly unqualified labor.

Mitch Baker

*2-10-80
Alice K. Baker*

Page 1 Feb. 12, 1990

Jay Carlson
Bunns District Office
B.L.M.
HC 74 12533 Highway 20 west
Hines OR. 97738

Dear Mr. Carlson:

My Father bought and developed this Ranch, by building the irrigation Dam, clearing approximately 250 acres of 6 to 12 foot tall Sage brush, and planting it to productive crops. Creating homes for hundreds of Ducks, Geese, Deer, Antelope, Eagles, plus other kinds of wildlife, where before there was almost nothing. I've lived on this Ranch for forty-one years. My Grandparents owned a Ranch in Silver Valley for years. I own part of the Ranch my Great Grandparents homesteaded, so I feel I'm fairly acquainted with the environment. "Want to take care of the land." "Want to be the Lord's good Tenant." I feel we do our part and more to create all of these natural elements ("wildlife - watershed").

Page 2

I love this land enjoy taking care of it, want to continue. When misformed and Outraged groups and Clubs put us small Farmers and Ranchers out of business, we have no choice but sell out to big Corporate - Farms and Ranches. Our Private Lands - Public Lands - and wildlife Protection will no longer be a priority. "Only The God Almighty Dollar".

To many good Roads determine our fish + wildlife reductions. My Parents - older sister, hire man and myself use to go fishing up Blue bucket Creeks (Known at that time as Sage hen Creek.)

IT was somewhere in the mid "1950". Very poor roads, Took us probably Two hours getting there. We would come home with 1/2 Burlap sack of legal size Trout. AT that time there were lots of cattle on the Streams.

Sage hen's have become a major Issue on Public lands. Government Agency's have Tried making us, (Public) believe

Page 3

134-1

They need tall Sagebrush to Strutt an nest in. Bentz Ranch Seeded Crested wheat close to a Strutting ground, Sagehens moved from tall brush to seeding, to Strutt. Several of us have watch 25 to 30 pair mating there. As a boy growing up in this Country very seldom seen Sagehens. Now when I saddle my horse, to ride or move cattle at Home - Van co-op - Princeton - on Shelley abatment, almost always see Sagehens.

In the "1950's" just inside Forest Boundary at Vano Forest Service decided to fence a plot of ground, away from livestock. Grasses grew died and choked themselves out. Became Em barrassing to Forest Service, they let fences go down and dropped the Subject.

My feeling is that we need to work together. Each permittee an Range conservationist on each abatment draft long range plans, In form Public and media that our main goal is taking proper care of public lands. Educate the misunderstood that were not trying to destroy the ground environment. However lean hand on the misusers and Abusers.

Thank you! *John J. Seward*

134-1 Refer to responses 3-9 and 4-6.

Drewsey, Oregon
February 10, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, Oregon 97736

Mr. Carlson:

The so-called study on the Three Rivers Resource Management Plan and Environmental Impact Statement as it is being proposed could have a tremendous effect on the livestock operators and the total population of Eastern Oregon, and all the way through the total livestock industry in general.

Alternatives A, B and C will result in a loss, not only of how many cattle we could graze but also in our ability to operate profitably. Either of these would also reduce our base property value.

135-1 In all of these alternatives and ideas, I see no mention of the option to have a plan whereby all parties concerned could work together and eliminate the problems. In our particular case there is a great need to control and remove overpopulation of juniper trees, sagebrush, and noxious weeds. Through joint effort and management with mechanical removal, fire, spring modifications and seeding as well as voluntary rest in these areas, all of the problems could be eliminated or controlled to benefit all parties involved.

There is no need to close down an area to livestock any more than to close it to wildlife and man. Some of the areas being considered are practically impossible to have access to if closed to all but the few who could walk to them.

It's time the powers that be spend some time with the people who will be the most affected and go over each individual area to get an understanding of what this plan is all about. When I say "powers that be", I mean Senators, Representatives, Agriculture Secretary, and even including the Administration (top close representative of the President of the United States).

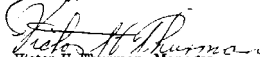
These type of plans involve not only the eastern portion of Oregon but all the way across the whole United States where the Government controls or administration is involved in any type of land use. I know of instances in other areas where the same type of problems exist, so we the people have to speak up to you and your comrades who have so much power over us.

135-2 I suggest a Takings Implication Assessment be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors for Secretary of Interior, Donald P. Hodel).

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers, the January 17, 1990 Riddle Ranch and Western Range Service Comments, and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are mostly consistent with my views and comments.

Before any action of this magnitude, which would have such drastic results on so many, is taken, I suggest a little common sense be put to use and everything evaluated to the fullest.

Sincerely,


Victor H. Thurman, Manager
Ellingson Rocking 3E Ranch
Drewsey, OR 97904

135-1 This is an underlying principle of the overall monitoring and evaluation process. To support such a process, the allotment summary tables were developed (Appendix 3, Table 6, DRMP/DEIS) to show major known resource management conflicts or concerns and management objectives. Such information forms the basis for such interaction among all interests and is available under all alternatives.

135-2 Refer to response 2-63.

Drewsey, Oregon
January 29, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, Oregon 97738

Dear Mr. Carlson:

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and the Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the texts only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations' letters.

- 136-1 Refer to response 2-63.
- 136-2 Refer to response 4-15.
- 136-3 The Stinkingwater Allotment has been a part of the active Stinkingwater HMA since 1971 when the Wild and Free-Roaming Horse and Burro Act was passed. The BLM has been directed under Section 1 of the Act to protect wild horses in the areas in which they were found at the passage of the Act.
- 136-4 California bighorn sheep are not an introduced species to the Upton Mountain-Bartlett Mountain area. They have been reestablished in the area, which was once part of their home range. See also response 2-78.

- 136-1 Alternatives A, B and C will result in a substantial loss of base property values. The proposed BLM actions may result in reducing the size of many ranching operations so that they will no longer be economical units. Significant reduction of cattle grazing on public lands would be detrimental to economic well-being of the families who earn their living from ranches that have BLM grazing permits, the economy of Harney County, and all people who provide services and goods to the ranchers affected. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all

2

Assistant Secretaries and Bureau Directors for Secretary of Interior, Donald P. Hodel).

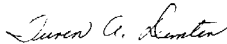
- 136- We object to the prohibition of livestock grazing on the 6000 acres of Biscuitroot Cultural ACEC area in the Stinkingwater allotments. Restricting grazing on the Biscuitroot site is not necessary, as evidenced by the present quality and quantity of roots after being included in an active cattle and sheep grazing area for over 80 years.

- 136-3 We also object to the designation of Stinkingwater allotment as an active wild home and burro area, and Bartlett Mountain-Upton Mountain area as California bighorn sheep habitat, since these species are introduced species to these areas.

We object to the restriction of livestock from artificial ponds and reservoirs, and the designation of these man-made structures in semi-arid environments as wetland habitat for waterfowl.

Thank you for your attention to these problems and our comments.

Yours truly,



Turen A. Dunten



Carol A. Dunten

OREGON
SHEEP GROWERS
ASSOCIATION

137

INC. 1270 CHEMEKETA ST. N.E. SALEM, OREGON 97301 . 503-370-7019 . FAX m-5851921
February 13, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

Re: Three Rivers Resource Management Plan Draft EIS

Dear Mr. Carlson:

On behalf of the Oregon Sheep Growers Association, I would like to express our concerns in regard to the Draft Resource Management plan (RMP) and Environmental Impact Statement (EIS) for the Three Rivers area.

137-1 First, we are concerned and disagree with the designation of Landing Creek and Skull Creek as "riparian areas." The designation of these two areas as riparian seems to be in direct conflict with existing policies of the Bureau of Land Management which define a riparian area as an area of land:

"directly influenced by permanent water and having visible vegetation of physical characteristics reflective of permanent water influence."
(emphasis added)

In light of this definition, we would suggest that Skull and Landing Creeks should not be considered as "riparian" areas. We would also suggest that following a complete review of all creeks or streams in the affected area, those not meeting the existing definition be removed from this classification.

137-8 Finally, we have serious concerns with the proposed prohibition against changes in livestock classes to enhance Bighorn Sheep populations. At the present time, there seems to be a complete absence of any scientific evidence indicating that managed grazing of sheep could be detrimental to Bighorn Sheep populations.

For these reasons, we strongly believe that existing grazing practices should not be restricted through the draft plan.

Thank you for the opportunity to submit our comments on you proposed draft.

Sincerely,

William Rill
William Rill
President, OSGA

WR/RK/HR

137-2 Secondly, we are concerned with the potential reduction in the use of lands for livestock grazing as a result of improper monitoring techniques. We believe current techniques are too narrow in scope and do not provide adequate consideration of numerous other factors impacting the resource. Current techniques seem to maintain a preconceived bias against livestock grazing, when, in fact, proper and well-managed grazing practices can be shown to actually "enhance" a land-based resource. In addition, we disagree with the initial conclusion that existing grazing practices have negatively impacted populations of sagegrouse. We would suggest the proposed restrictions on livestock grazing, due to the "potential" impact on sagegrouse, be eliminated from the draft plan.

137-4 We would like to express our concern regarding the Biscuitroot Cultural Area of Critical Environmental Concern (ACEC) and the Kiger Horse Management area. The proposed exclusion of cattle grazing in the Biscuitroot Cultural ACEC does not seem justified, since grazing and root harvesting have continued on these lands for a number of years without apparent harm.

137-5 We would also disagree with the proposal to designate the Kiger Horse Management area as an Area of Critical Environmental concern. Without question, such a designation would result in an extreme economic hardship for individuals within the area. We believe designating this area as an ACEC is premature, at best, and represents an inappropriate "taking" of private lands. At a minimum, we suggest that if efforts to designate this area as an ACEC are pursued, the BLM should conduct a complete assessment to determine if such action would constitute a "taking."

137-7 Current practices of fencing reservoirs in an effort to control livestock patterns in riparian areas should also be reviewed. Locations and numbers of accessible routes around reservoirs should be reviewed to improve the level of forage utilization, as well as to enhance and maintain riparian areas to the greatest degree possible.

Finally, we have serious concerns with the proposed prohibition against changes in livestock classes to enhance Bighorn Sheep populations.

137-1 Refer to response 46-1 and Appendix 1, Table 4, Proposed Plan.

137-2 Refer to response 2-87.

137-3 Refer to responses 3-9 and 4-6.

137-4 Refer to response 4-15.

137-5 Refer to response 2-68.

137-6 Refer to responses 2-63.

137-7 Refer to response 2-46.

137-8 Foreyt (1989) held six bighorn sheep in captivity for over a year, then introduced six clinically normal domestic sheep into a 5-acre (2 ha) pasture with the bighorn sheep. All bighorn sheep died within 71 days of initial contact with the domestic sheep. He concluded that domestic sheep and bighorn sheep should not be managed in proximity to each other because of the potential fatal consequences in bighorn sheep. The area in question is not currently a domestic sheep allotment; therefore, potential conflicts can be avoided by continuing to license this area to cattle use.

Drewsey, Oregon
January 29, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, Oregon 97738

Dear Mr. Carlson:

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep and Woolgrowers and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the texts only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations' letters.

- 138-1 Refer to response 2-63.
- 138-2 Refer to response 4-15.
- 138-3 Refer to response 4-6.
- 138-4 Refer to response 5-10 and Appendix 1, Table 4, Proposed Plan.
- 138-5 Refer to response 2-87.
- 138-6 Refer to response 6-13.

138-1 Alternatives A, B and C will result in a substantial loss of base property values. The proposed BLM actions may result in reducing the size of many ranching operations so that they will no longer be economical units. Significant reduction of cattle grazing on public lands would be detrimental to economic well-being of the families who earn their living from ranches that have BLY grazing permits, the economy of Harney County, and all people who provide services and goods to the ranchers affected. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12,630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors for Secretary of Interior, Donald P. Hodel).

In regard to our particular Allotment the following issues are of importance to us; The proposed Biscuitroot gathering area, the Sagegrouse Strutting Grounds and the exclusion of Cattle from Riparian areas and reservoirs.

138-2 The proposed Biscuitroot Cultural ACEC has had cattle grazing in this area for many years and there has been no adverse affect on the quality and quantity of roots available.

138-3 On the subject of the Sagegrouse Strutting Grounds, cattle have no adverse impact on the strutting areas and should not be removed.

138-4 Removing cattle from the Riparian Areas, Little Pine Creek, is not warranted because current grazing practices have no significant adverse impact on surface water quality.

138-5 Monitoring techniques currently in use on Three Rivers Resource Area are insufficient, inaccurate and are applied improperly to indefensible conclusions. The techniques should be consistent throughout the entire study. Until proper techniques and accurate information are gathered, existing levels of livestock grazing should be maintained.

138-6 As regards the Pine Creek Material Site which is under lease to Harney County, I believe that the site as now developed has little or no impact on the Biscuitroot ACEC.

Thank you for your attention to these areas of concern

Yours truly,
Pine Creek Ranch
Donald A. Dryer, Jr.
Donald A. Dryer, Jr.

Jay Carlson RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR.

February 2, 1990

139

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. CARLSON,

I would at this time like to go on record as OPPOSING the Draft Three Rivers Resource Management Plan and Environmental Impact Statement dated October 1989, especially the first three alternatives.

The overall Draft is not based on any sound scientific information! Excluding cows from riparian and aquatic areas will not enhance the environment, it will DESTROY it!

Leaving grass around riparian and aquatic areas will create a fire hazard. The first heavy rain after a fire will wash ashes and lye into the water, killing all living things in it.

Your first three alternatives will DESTROY the environment not save it.

139-1 Taking away any livestock AUMs or locking up any forest land in 30 to 60 acre parcels will adversely affect the economic stability of the local communities.

139-2 Closing and rehabilitating roads will not only result in the local residents losing the recreational opportunities, but will also curtail tourism. Restricting travel only to main roads puts a heavy strain on already crowded facilities.

Cattle do not conflict with wildlife.

WILD HORSES DO!!

Beef cows keep coyotes away from the vicinity of their calves, consequently, protecting any wildlife in that area as well.

Wildhorses are aggressive towards other animals including wildlife.

139-3 Please remove the wild horses from our public land!

139-4 Do not take the cattle off of the biscuitroot areas! The grass will compete with the biscuitroot plants and eventually crowd them out!

139-5 I object specifically to the classification of unsatisfactory range conditions, medium allotment potential, medium present productivity, medium resource conflicts, and unsatisfactory present management on Davies allotment #5215. These classifications do not coincide with the accurate estimated capacity of 778 AUMs and average actual use of 451 on page 42 of Volume II.

I wish to go on record that the views and comments of the Horney County Stockgrowers dated January 19, 1990 and the January 17, 1990 Riddle Ranch and Western Range Service comments and responses to the Draft Three Rivers RMP/EIS are consistent with my views and comments. I endorse the Riddle Ranch document.

I ask that you leave all livestock allotments as they are.

LOU W. DAVIES
PO BOX 5
Princeton, OR. 97721

Lou W. Davies

- 139-1 The economic impacts section has been revised, see Chapter 3 of the PRMP/FEIS.
- 139-2 Refer to response 2-81.
- 139-3 The Wild and Free-Roaming Horse and Burro Act of 1971 mandates in Section 1 of the Act that wild free-roaming horses and burros are to be protected. Section 3 of the Act further provides for their management on specific ranges. The BLM is not in a position to change this law.
- 139-4 Refer to response 4-15.
- 139-5 Refer to responses 2-11 and 2-87.

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02/14/90

Bureau of Land Management
Attn: Craig M. Hansen and Joshua L. Warburton
Burns District Office
HC 74-12533 HWY 20 West
Hines, Oregon 97738

Re: Draft Three River Resource Impact Statement

Dear Sirs,

After reviewing the draft 01 the Three Rivers Resource Management Plan/Environmental Impact Statement, alternative A is our recommendation.

140-1 Due to the fact that four HMA's have been eliminated through previous land use planning and environmental analysis, leaving only five HMA's in Oregon, we feel it is necessary to protect these few remaining areas. We would like to see the natural values emphasized, as in alternative A.

Please keep us updated on the progress of this RMP/EIS.

Sincerely,

Barbara J. Rehfield

Barbara J. Rehfield
Executive Director

- 140-1 The five active HMAs in the RA are being equally protected under all alternatives in this plan. There has been no proposed reductions or increases in either the number of wild horses or size of the HMAs. There are a total of 19 active HMAs in eastern Oregon. Of these, 18 are managed by BLM and one is jointly managed by BLM and USDA-FS.

AMERICAN MUSTANG AND BURRO ASSOCIATION
P.O. BOX 7
BENTON CITY, WA 99320
(509) 588-6336

TO DISTRICT manager RE: 3 Rivers EIS ? Plan
 @ is preferred alternative for this area
 if inadequate riparianas must be fully
 restored reducing or eliminating grazing. It
 is essential that water quality riparian
 habitat be in excellent condition.
 It is highly identifying & protecting Ancient
 Forests needed. Elimination of weed grass
 seeds must be eliminated. This area
 requires protection, not disturbance destruction
 15 10 1990 Beth S. [unclear]



Drewsey Field Ranch

Drewsey, Oregon 97904
(503) 493-2620

February 14, 1990

142 No comment identified.

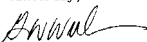
Jay Carlson, RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson:

This will serve as a follow up to that certain letter of response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement dated January 28, 1989, signed by Patrick J. Wilber, Wright Wilber and G. W. Wilber for Wilber Brothers.

The letter was incorrectly dated 1989, when, of course, it was intended to read 1990. Please associate this follow up correspondence, correcting the date, with the original response in your files.

Sincerely,


 G. W. Wilber

For: Wilber Brothers
Patrick J. Wilber
Wright Wilber

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1237 Wygant Ave.
Coos Bay, OR 97120
Jun. 23, 1990

Josh Warburton, District Manager
Burns BLM Office
NC-74 12533 Hwy 20 West
Hines, OR 97738

- 143-1 Refer to response 13-7.
- 143-2 Refer to response 12-7.
- 143-3 Refer to response 13-U.
- 143-4 Refer to response 12-1.
- 143-5 Refer to response 2-78.

Dear Mr. Warburton,

Although I did not receive a copy of the Draft Three Rivers RMP and EIS, I would like to comment on what I have heard about the document.

Alternative C, the Preferred Alternative, calls for the conversion of 76,400 acres to crested wheat-grass seedings. This proposed action would violate Sec. 103 of FLPMA, which states that management activities will strive to protect... scenic, ... ecological [and] environmental values. I urge you to adopt Alternative A, which would more closely comply with FLPMA mandates and the national interest.

143-1 | Water quality on public land needs immediate attention; I do not think Alternative C goes far enough in improving water quality. The goal should be to restore water quality to excellent condition.

143-2 | The RMP does not address the costs of construction of proposed range projects. As a taxpayer, I am tired of having my money spent on projects

- 2 -

143-3 | damaging to the ecological integrity of our public lands. Construction of roads, fences, pipelines, troughs and reservoirs serve only to benefit a small segment of the population and do not bring sufficient revenues back to the public coffers to even cover costs. Please include in the final document cost analyses for all projects, including the cost/benefit ratio.

143-4 | The document fails to identify old-growth forests. Please include this information.

143-5 | The document fails to put forth a convincing argument that big game range conditions will improve to "satisfactory." Please detail methods by which bighorn sheep habitat will be protected and improved.

I would like to comment more fully on the Three Rivers Draft RMP & EIS. Will you be attending the comment period? Please send me a copy of the document.

Sincerely,
Elaine Rees



SIERRA CLUB
Oregon Chapter

144

February 12, 1990
2743 SE 33rd Ave.
Portland, OR 97202

- 144-1 Refer to responses 1-13 and 3-13.
- 144-2 Refer to response 1-11.
- 144-3 Refer to response 12-7.

Mr. Joshua L. Warburton
District Manager, Burns District
Bureau of Land Management
HC 74-12533
Highway 20 W.
Hines, Oregon 97738

Dear Mr. Warburton:

This letter is in response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement of October, 1989.

First, we commend the efforts of the Bureau's staff to incorporate the concepts of multiple use, sustainability, and diversity. Soil condition, wetland, riparian and aquatic habitat condition, archaeological sites, scientific values, wild and scenic rivers, special status species, and other resources all received attention in the Draft Plan. It is encouraging to conservationists, whose interests on public lands are affected by the actions of the managing agency, that the mandates of the Federal Land Policy and Management Act are being addressed.

An example of this is the 11% reduction in active preference AUMs in the preferred alternative during the first five years of implementation of the Plan as shown in Table 4.6. This, plus the exclusion of livestock from certain reservoirs, would promote improvement of water quality, a vital concern to environmentalists. Other examples include reductions in grazing in areas with severe erosion problems, elimination of grazing in a number of Resource Natural Areas and Areas of Critical Environmental Concern, and incorporating threatened and endangered species' habitat needs into grazing systems.

These and other components of the preferred alternative are to be applauded, and we strongly support them. Nevertheless, given that 96.8% of the land covered by this Plan is grazed, it is clear that one resource, one use, remains overwhelmingly dominant. And a closer examination of the Plan's preferred alternative is disturbing. For example, a 7.7% increase in active preference AUMs will occur after the initial five-year 11% reduction in active preference AUMs. Although the Plan would limit grazing to certain levels, the document itself states that even under the "most favorable management," full recovery "may require many years in some cases."

To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness

Mr. Joshua L. Warburton
February 12, 1990
page two

Livestock grazing degrades the ecological and esthetic conditions of water sources, soils, and vegetation. The baseline levels of several resources addressed by the Plan show clear evidence of the deleterious effects of grazing. For example, only 1% of surface water is in 'good' condition; none is classed as 'excellent.' Nor are any of the area's streams considered to be in 'good' or 'excellent' condition. Streamside riparian, aquatic, and wetland habitat all show similar degraded conditions. So, why allow cows back when the areas grazed will likely never fully recover? Furthermore, the final AUM level projected for 10 years, 162,145 AUMs total, is only 2500 short of the proposed level of Alternative E, the alternative that emphasizes commodity production. What does this communicate about the commitment to multiple use and natural values?

144-1

Also of concern are projections in the Summary of Potential Projects in Table 4.9. In the preferred alternative, a number of projects will be implemented to support grazing. Among these are 203 miles of fence, 1000 acres of juniper control, 88 miles of pipelines, 96 reservoirs, and nearly 47,000 acres of plant seedings, presumably crested wheatgrass, a non-native plant. Monoculture plantings do nothing to promote biological diversity; they merely provide cow habitat and favor single, rather than multiple, use of public land. We urge the use of seeding, where necessary, with a variety of native plants instead. Furthermore, there is no indication of how much these projects, which exist only to benefit grazing interests, could cost the taxpayers.

144-2

144-3

Clearly, the Bureau can envision a world in which natural values are emphasized. Alternative A of the Plan does this much better than the Preferred Alternative. The High Desert Wilderness Committee supports the implementation of Alternative A, in order to promote the ecological health of these lands. We urge the Bureau to continue to expand its vision beyond the traditional use of the land, looking towards a future in which livestock is not all that is at home on the range.

Thank you for your attention.

Sincerely,

Mary L. Gaffard, Chair
Grazing Committee, High Desert Wilderness Committee

cc: Mr. Dean Bibbes
Governor Neil Goldschmidt
Congressional Delegation
Environmental Groups

Jay Carlson, Planning Team Leader
Bureau of Land Management
HC 74-12533 Hwy 20 West
Hines, OR 97738

Dear Mr. Carlson:

Thank you for the opportunity to review and comment on the draft Three Rivers Resource Management Plan and Environmental Impact Statement. We have the following general and specific comments:

Text page 2.3:

145-1 The Plan states that monitoring will be accomplished to determine the success of the RMP. Yet, no where in the Plan is there a summary of actions, management, and monitoring accomplished since the Riley RPS which would establish a need to change the implementation of the original Riley RPS. The Riley RPS decisions were intended to be implemented over a ten-year period, followed by a fifteen-year period in which the benefits of that plan would be realized. Less than seven years later, before full implementation of the original plan, the BLM is essentially abandoning its proposal of 1982 upon which it has presumably invested considerable time and monies, and proposing actions which are drastic deviations from those of the original plan. We will appreciate a full accounting of the management systems implemented or improved since 1982, and the range improvements (spring developments, miles of pipeline, wells, reservoirs, acres of burns (discounting wildfires), sprays and seeding) then planned and those actually accomplished.

145-2 The BLM now proposes, as a result of actual implementation of the 1982 proposed actions lagging behind that projected at the time, to instead make wholesale livestock reductions and eliminations as a cure-all for perceived, mostly unverified and undocumented "problems" within the Resource Area. Such a broad-brush approach is contrary to applicable laws and regulations governing the BLM in its treatment of individual permittees.

Text page 3-2 and Appendix 1, Table 1 (appendix pages 1-1 and 1-2):

145-3 The table does not quantify water quality at all, but gives a summary of a subjective evaluation of condition and trend.

Does specific data exist which lists water temperatures, turbidity, siltation, etc. for the listed waters, and which establishes a trend by repeated observations over several years? If so, Appendix Table I-1 should list specific factors and assess them against state water quality standards that apply for specific waters (not all standards apply to all bodies of water), and the "include objective, specific assessment of factors, both natural and man-made, which prevent the attainment of those standards.

Text page 3-3:

145-4 AS stated on this page, the parameters of Soil Surface Factor do not separate natural levels of soil erosion from "unnatural" or accelerated levels. The BLM cannot use these figures as justification for decisions to adjust livestock stocking levels, or to support the conclusion that adjusting utilization percentages, or reducing or eliminating livestock from given areas, will result in lessened sediment yields or erosion. No baseline data exists to even suggest that ANY accelerated erosion is occurring in the Resource Area.

Text page 3-12:

145-5 How many grazing systems have been implemented to date, compared with those proposed in the Drewsey and Riley EIS and John Day RMP? The Riley EIS predicted that implementation of management systems would realize benefits in the fifteen years following implementation of management systems. That time span and the benefits to be derived have been "snore" in the present Plan, and monitoring and evaluation which would assess those benefits have obviously not been completed.

Text page 3-16 and Appendix 3:

1. Table 3-1 (appendix page 3-3 and 3-4):

145-6 To our knowledge, the BLM has completed no ecological site inventory or range condition classification based upon ecological potential of the range. This is specifically true of the West Sagehen Allotment (7023) and Hat Butte Allotment (7007), and we believe of the entire Resource Area. Areas of naturally low production because of soil factors, depth to restrictive layers, rockiness, etc. will forever be "unsatisfactory" from the standpoint of forage production surveys. We believe Table 3-1 to be a summary of forage production rather than range condition on the basis of potential. If so, it is an unreliable measure of the amount or degree of "improvement" that needs to, or

can, occur in the resource area or in a particular allotment, since it includes areas that will forever "need" forage production improvement and never be able to accomplish that objective because of their basic soil make-up.

With no ecological site inventory and condition classification, it is impossible for the BLM to assert either an allotment Potential (even in such amorphous terms as "High, Medium, Low") and the Present Productivity as compared to it. Lacking this data for the resource area, and by specific allotment and areas within each allotment, the BLM has no rational basis for a value judgement of present productivity versus potential productivity, and Table 3-1 is both erroneous and misleading to the general public who would rely upon it for their review of the need for management changes.

Specifically, the west Sagehen Allotment contains at least two (possibly as many as four) distinct ecological range sites, with vastly different potential to produce forage even in climax ecological condition. The Hat Butte Allotment likewise contains at least two, and possibly more, distinct ecological range sites, with different potentials to produce forage.

145-7 Resource conflicts in the West Sagehen Allotment are listed as "medium", and in the Hat Butte Allotment as "high". AS compared to what, and by what parameters of measure? Controversy is listed as "high" in both allotments. To our knowledge there has been no public controversy concerning the West Sagehen Allotment or the Hat Butte Allotment. What is the basis of this statement?

145-8 Present management in the West Sagehen Allotment is listed in Table 3-1 as unsatisfactory. A recent BLM evaluation lists the management system as satisfactory. We believe management will be improved in the future by every-other-year deferment rather than using the same Pasture twice in a row in the growing period, and that development of waters and fencing of reservoir sites, as we have proposed to the BLM, are further improvements which can be accomplished under the continued development of management called for in the Riley EIS (the No Action Alternative of the Plan).

145-9 Present management in the Hat Butte Allotment is listed in Table 3-1 as satisfactory, even though the same table lists the conflict and controversy as high. While we agree that present management is for the most part satisfactory (with further improvements possible), the table is self-contradictory.

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145-10 Prudent Investor's Willingness to Invest is listed as "maybe". We are not sure of how the BLM defines a prudent investor. "or if we are one, but Meadow Creek Enterprises has requested for several years to invest in water facilities which would improve livestock distribution and provide wildlife waters within the West Sagehen Allotment. These requests have been both for cooperative funding of the projects with BLM, and more recently under section 4 I authorization requests.

2. Table 3-2 (appendix page 3-7):

145-11 This table lists the grazing treatment in the Hat Butte Allotment as "Season-long". The treatment in this allotment is an early grazing treatment and a deferred grazing treatment. No season-long grazing occurs in either of the main pastures of the allotment.

145-12 This table also lists one type of treatment used in the West Sagehen Allotment as "Early-before growing season", which is defined as "use before the growing season". Table 1-4 of the 1982 EIS lists all major forage components of West Sagehen Allotment as initiating growth prior to or by April 1. (The exception is bitterbrush, which is a minor vegetation component in a portion of the allotment.) Authorized use of the West Sagehen Allotment begins April 1 on only half of the allotment, well after the majority of forage species have initiated growth. The other half is deferred until after seedripe of the key forage species. No "early" use, as defined by this table, occurs in this allotment.

3. Table 3-6 (Appendix page 3-17):

145-13 West Sagehen Allotment is one of the 16 allotments which has supposedly had carrying Capacity determined. The BLM has erred in numerous and significant ways in their assessment of the West Sagehen Allotment Carrying capacity. Including the oversampling of areas within close proximity to waters, inconsistent and erroneous computation of forage utilization, improper and inaccurate "adjustment" (i.e. artificial and unwarranted manipulation) of utilization data, and ascribing all utilization to livestock while significant wildlife numbers have also contributed to that utilization. These errors have certainly led to erroneous conclusions about the West Sagehen Allotment, and if they are repeated on the other 17 allotments where "Carrying Capacity" has been "determined", the figures for those allotments can be nothing but suspect.

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- 145-14 The "Estimated Capacity" figure used for all the other allotments of the Resource Area, including Hat Butte Allotment, no doubt contains the same errors.
- 145-15 Appendix pages 3-120 and 3-137 purport the calculated grazing capacity of the Hat Butte Allotment and the West Sagehen Allotment to be lower than the active preference and less than the forage demand. Range studies conducted by Meadow Creek Enterprises in 1989, and those of the BLM prior to and including 1989 do not support these statements. The BLM's proposed management objectives to allocate forage in priority to wildlife imply an understanding of the overlap of diets of each wildlife species and livestock. This dietary overlap is not a set figure, as is implied throughout the Plan, but is highly dependent on the type and variety of forage species present, the stage of growth and maturity of the vegetation species, relative abundance of preferred species, preference displayed by each of the grazing species, and season of the year. Dietary competition depends not only on dietary overlap, but also on the premise that the components of the diet are lacking or in short supply compared to demand, and further on the spatial and temporal sharing of the habitat by the two species. Lacking this specific information by allotment and season, the BLM has no justification for assuming that wildlife use in the same vicinity as livestock use automatically constitutes either a conflict or competition, or that "livestock forage" should be deducted from the estimated or calculated capacity of the range to the detriment of livestock grazing.
- 145-16 allocate forage in priority to wildlife imply an understanding of the overlap of diets of each wildlife species and livestock. This dietary overlap is not a set figure, as is implied throughout the Plan, but is highly dependent on the type and variety of forage species present, the stage of growth and maturity of the vegetation species, relative abundance of preferred species, preference displayed by each of the grazing species, and season of the year. Dietary competition depends not only on dietary overlap, but also on the premise that the components of the diet are lacking or in short supply compared to demand, and further on the spatial and temporal sharing of the habitat by the two species. Lacking this specific information by allotment and season, the BLM has no justification for assuming that wildlife use in the same vicinity as livestock use automatically constitutes either a conflict or competition, or that "livestock forage" should be deducted from the estimated or calculated capacity of the range to the detriment of livestock grazing.
- 145-17 The BLM has specifically failed to account for wildlife use (ADM's) in its calculation of "carrying capacity" on the West Sagehen Allotment and the Hat Butte Allotment, and the wildlife use is included in the total utilization being read on the allotment. The proposed Plan would then further deduct a predicted wildlife forage demand from the figure which already includes consumption of forage by the wildlife on the allotments. This application is erroneous in the West Sagehen Allotment, in the Hat Butte Allotment, and in the Resource Area as a whole.
- 145-18 Appendix pages 3-120 and 3-137 list the livestock forage condition on the Hat Butte Allotment and the West Sagehen Allotment as unsatisfactory. This statement implies a comparison of present production of forage to the potential production under climax ecological conditions. Lacking an ecological site inventory and a range condition classification based upon the ecological potential of the range, the BLM lacks the information to make such comparison. The fact that areas of the allotments produce less forage than other areas within and without the allotments is moot as a conflict, since those areas
- 145-19 producing less forage are not capable of producing great quantities of forage, or will they ever be capable of significant change, due solely to the nature of the soils which define them.
- 145-20 Appendix pages 3-120 and 3-137 list as a conflict in the Hat Butte Allotment and the West Sagehen Allotment "detrimental" use distribution. No data exists to support the statement that the use patterns encountered in the allotments have been detrimental to the range resource or any other renewable or non-renewable resource. The BLM's proposed management objective is listed in this table as improving livestock distribution, yet no where in this Plan is there any proposal to install the water facilities necessary to accomplish the objective (reference Appendix Table 3-7, pages 3-174 and 3-175). The BLM has not matched its stated objective to a management proposal which will accomplish the objective. Meadow Creek Enterprises has requested for at least three years the development of wells on the West Sagehen Allotment to accomplish this objective. With no response to date, either in funding or in planning, from the BLM, additional water sources would also be beneficial on the Hat Butte Allotment, other than the sole reservoir proposed.
- 145-21 Appendix page 3-120 lists as a conflict/concern on the Hat Butte Allotment "active erosion occurs on the allotment". Map S-2 (text page 3-9), however, lists the erosion classes on this allotment as 'Stable' and 'Slight'. Text Page 3-3 obviates the fact that BLM cannot distinguish this "active erosion" as being natural or accelerated. Listing it as a conflict/concern, considering the contradictions self-contained in this RMP, is illogical and unfounded.
- 145-22 Appendix page 3-137 lists as a conflict/concern on the West Sagehen Allotment "no management system". Appendix page 3-10, however, lists "GS" (Grazing System) as being implemented on the allotment since 1978, and appendix page 3-7 lists this grazing system as a "DR" (Deferred Rotation). Appendix pages 3-7 and 3-10 are correct; appendix page 3-137 is not.
- 145-23 Appendix pages 3-120 and 3-137 lists big game habitat on the Hat Butte Allotment and the West Sagehen Allotment in unsatisfactory condition, implying that a conflict with livestock grazing is occurring on the allotment. No data exists to support this implication. The BLM proposes on page 3-175 to install big game guzzlers in the West Sagehen Allotment, which we assume is the proposed action to satisfy this objective. The effect of the proposal to install guzzlers is to create additional big game forage demand where it does not currently exist, which will
- prompt the BLM to further reduce livestock grazing, to the detriment of the livestock permittees of the allotment. We are opposed to this action and will view such action as a taking under Executive Order 12630 and demand restitution of loss of grazing revenue and value to the ranch should this proposal be implemented.
- 145-24 We are opposed to this action and will view such action as a taking under Executive Order 12630 and demand restitution of loss of grazing revenue and value to the ranch should this proposal be implemented.
- 145-E Appendix page 3-138 proposes to allocate forage to elk in the West Sagehen Allotment. If elk have been using this area, they have done so under the current grazing conditions, and despite any "conflicts" which the BLM may believe exist. Were the forage and habitat not currently available to support the animals which are purported to be using the allotment, they would be unable to do so. If the BLM wishes to allocate forage to elk, it must also assess the amount of forage which the elk have been consuming in the time they have been using the allotment. Since this forage demand has been included or ignored in the BLM's monitoring (utilization) studies, the future allocation and present consumption by elk must logically be off-setting. No basis exists for a reduction of livestock use as a result of this "allocation".
- 145-26 Appendix page 3-138 lists as a conflict on the West Sagehen Allotment the presence of special status species and their habitats, and proposes to prevent significant risk to the well-being of special status species. First of all, the presence of one or more particular species in an area which also contains other species, be they livestock, other wildlife, or other vegetation, does not in itself constitute a conflict. To our knowledge, no information exists which supports the notion that wildlife grazing, livestock grazing, or the growth of other vegetation on this allotment constitute risk to the well-being of either sagegrouse or Cusick's buckwheat. We believe that the habitat requirements of neither is threatened or put to significant risk by continuation of the present management of the allotment. A recent BLM evaluation of this allotment contained no data which supports a supposition opposite to ours.
4. Table 3-1 ' <appendix page 3-175):
- 145-27 All alternatives create big game forage demand in the West Sagehen Allotment by creating water sources accessible only to big game species in areas which do not presently support those species in significant numbers. BLM proposes to decrease livestock use while increasing big game demand for forage, which we view as unfair and incongruous, and as a taking action under EO 12630. This table is also in error in that the No Action Alternative (Alt. D) would, according to text page 2-2, consist of the present management as proposed in the 1982 Riley EIS.
- 145-28 All alternatives create big game forage demand in the West Sagehen Allotment by creating water sources accessible only to big game species in areas which do not presently support those species in significant numbers. BLM proposes to decrease livestock use while increasing big game demand for forage, which we view as unfair and incongruous, and as a taking action under EO 12630. This table is also in error in that the No Action Alternative (Alt. D) would, according to text page 2-2, consist of the present management as proposed in the 1982 Riley EIS.

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- producing less forage are not capable of producing great quantities of forage, or will they ever be capable of significant change, due solely to the nature of the soils which define them.
- 145-20 Appendix pages 3-120 and 3-137 list as a conflict in the Hat Butte Allotment and the West Sagehen Allotment "detrimental" use distribution. No data exists to support the statement that the use patterns encountered in the allotments have been detrimental to the range resource or any other renewable or non-renewable resource. The BLM's proposed management objective is listed in this table as improving livestock distribution, yet no where in this Plan is there any proposal to install the water facilities necessary to accomplish the objective (reference Appendix Table 3-7, pages 3-174 and 3-175). The BLM has not matched its stated objective to a management proposal which will accomplish the objective. Meadow Creek Enterprises has requested for at least three years the development of wells on the West Sagehen Allotment to accomplish this objective. With no response to date, either in funding or in planning, from the BLM, additional water sources would also be beneficial on the Hat Butte Allotment, other than the sole reservoir proposed.
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- 145-22 Appendix page 3-137 lists as a conflict/concern on the West Sagehen Allotment "no management system". Appendix page 3-10, however, lists "GS" (Grazing System) as being implemented on the allotment since 1978, and appendix page 3-7 lists this grazing system as a "DR" (Deferred Rotation). Appendix pages 3-7 and 3-10 are correct; appendix page 3-137 is not.
- 145-23 Appendix pages 3-120 and 3-137 lists big game habitat on the Hat Butte Allotment and the West Sagehen Allotment in unsatisfactory condition, implying that a conflict with livestock grazing is occurring on the allotment. No data exists to support this implication. The BLM proposes on page 3-175 to install big game guzzlers in the West Sagehen Allotment, which we assume is the proposed action to satisfy this objective. The effect of the proposal to install guzzlers is to create additional big game forage demand where it does not currently exist, which will
- That document did not include provisions for the development of big game guzzlers in this allotment.
- Text page 3-24:
- 145-E Western sage grouse are currently sport-hunted in the state of Oregon. It seems incongruous and arbitrary for the species to be the subject of "special status" designation and to be a Federal Candidate for listing as threatened or endangered when it is subject to harvest by hunting. The BLM has also identified 54 specific sagegrouse strutting grounds covering the length and breadth of the Resource Area. No doubt many, many more exist which have not been identified. The fact that sagegrouse exist in such numbers within the Resource Area testifies to their ability to co-exist with the present management in place in the Resource Area.
- Text page 3-26:
- 145-30 "Future demands" by wildlife implies management for maximizing wildlife use which does not currently exist, and the proposed actions include restrictions to livestock use on the basis of predictions of a future demand which does not exist and cannot be accurately predicted. If the phrase "future demands" means those which currently exist and it is predicted they will continue into the future, then it seems obvious that the current and future demands are already being met, since the wildlife already are satisfying their demand for forage.
- Text page 3-27 and Appendix 6, Table 1 & 2 (appendix page 6-1,2,3):
- 145-31 Table 6-2 contains very specific parameters concerning the rating of aquatic habitat, but the values of those parameters are not listed in Table 6-1. Have the specific parameters been applied to all of the listed aquatic environments listed in Table 6-1? Where they have been, the specific values should be listed, where repeated measurements have not been taken over time, no trend of the aquatic environment or any other environment, can be assessed. If repeated monitoring of the listed bodies of water have taken place, the values (relative or absolute measurements) should be listed to establish the long term trend attributed to the waters in Table 6-1.

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Text page 3-27 and Appendix 5, Table 2 (appendix page 5-8):

145-32 We assume the trend reported in Table 3-10 on page 3-27 and in Appendix Table 5-2 are a result of monitoring repeated over time on the aquatic and riparian areas. Please list specific data parameters and their respective readings over time which culminate in the conclusions of trend listed in these tables. Have these parameters over time undergone statistical analysis to avoid conclusions based on sampling error or sampler bias?

Text page 3-27 and Appendix 5, Table 3 (appendix page 5-9):

145-33 Wetlands are defined in the Plan as a combination of the water-covered acreage and the vegetation surrounding those waters. No parameters of measurement of condition or trend are listed in the Plan, and the measurement of condition of the two components must necessarily be different. Lacking classification of the range sites surrounding the particular waters and lacking water quality analysis, there can be no scientific or management basis for the assignment of condition and trend listed in these pages. Lacking repeated measurements of measurable parameters, there can be no basis in assigning a trend of the condition of the particular parameters. If these parameters exist and have been measured over time, they should be included in this document. The presence of livestock and different species of wildlife obviously does not constitute a conflict by the mere presence of the different species.

Text page 3-31 (Map WL-1):

145-34 This map shows deer winter use in a portion of West Sagehen Allotment dominated by low sagebrush. If deer are dependent upon big sagebrush for winter thermal and escape cover, this pairing of low-sagebrush dominated range with wintering deer is not likely. If deer really are wintering on this area, the fact serves to prove deer do not require the presence of big sagebrush to overwinter, and the restrictions placed on management of big sagebrush in the Plan are overly restrictive and prohibitive. The Plan also contains no assessment of potential damage by wildlife species to special status wildlife species or to special status vegetation species which occupy the same habitat.

Text page 3-32 (Map WL-2):

145-36 This map shows elk winter range in the same area of deer summer range indicated on Map WL-1 in the West Sagehen Allotment. The Plan contains no assessment of wildlife interspecific competition. Other than general areas

proposed to drastically change management direction. This assumption cannot be considered a valid one in light of the BLM's change-at-a-whim proposals contained in this Plan.

Text page 4-2 (WATER QUALITY):

Alternatives A - C:

145-42 The 1982 EIS, page 2-5, states that sediment yields are low in the EIS area and that erosion on upland areas is generally low, and that instream water quality is generally high, except for problems associated with diminishing flows and unshaded streams. It also states that most of the streams in the EIS area are intermittent and flow only as a result of snowmelt or rainfall in which the intensity exceeds the capability of the soil to absorb water. The 1982 EIS also states at page 3-9 that most of the runoff in the EIS area occurs during snowmelt and that no expectation existed that any change to the normal runoff would occur as a result of any of the alternatives.

This is in direct conflict with the predictions contained in these sections of the current Draft RMP/EIS. If the BLM has monitoring data which indicates the former impact statement was in error, those data should be discussed and presented in this Plan. This Plan itself states that no differentiation can be made between naturally occurring erosion and accelerated erosion in the area for which it is written. Lacking such data, and lacking proper site-specific research which supports the notion that removal of livestock from streams and 30% utilization of upland forage species will have the predicted effect on water quality, the BLM has no basis for presenting such a conclusion.

145-43 The mere presence of livestock, unless shown by adequate data, cannot in and of itself be construed as the source, or even a source of "poor water quality". Where specific parameters of "poor water quality" are attributable to livestock through reliable monitoring, the specific problem can be rectified through specific case-by-case prescriptions under provisions of the No-Action Alternative (continued implementation of management systems).

145-44 A large majority of western streams are steep, narrow, and rocky, and do not have the potential for overhanging banks and meadows adjacent to the stream; most, as stated in the 1982 EIS, are intermittent. Assessment of the individual traits of particular streams under the No Action Alternative (continued implementation of the 1982 RPS) would accomplish necessary site-specific analysis to analyze and implement needed actions on a case-by-case basis, and would avoid the

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145-37 supplied the BLM by Oregon Department of Fish and Wildlife, what is the specific source of data for designating the areas as they have been designated -- pellet group counts? aerial counts during winter? We believe the BLM is obligated to verify information supplied by any single-use group, including ODFW, which it uses to formulate proposals which affect the other multiple uses of the federal lands.

Text page 4-2:

145-38 The text defines short-term vs. long-term impacts of the various alternatives. BLM has not completed the short-term implementation of the proposed action of 1982, let alone realized the benefits which were to accrue in the ensuing 15 years following implementation of the proposed action. The BLM is now proposing changes to systems and management parameters without benefit of the knowledge of impacts of the proposed action and ongoing management implemented since 1982.

Text page 4-2 (Assumptions):

145-39 1. Funding and personnel will be available -- The Plan contains no analysis of implementation of the 1982 EIS to enable the reader to know the viability of this assumption. The "need" for this RMP is stated to be that the last one was not implemented on schedule, and there is contained in this RMP no assessment of the annual ability of BLM to perform range projects it states will be accomplished in the short term. The 1982 EIS proposed action included many miles of riparian fence, acres of brush control, seeding, etc.; how many of each has been accomplished other than in wildfire situations since 1982? How many annual dollars and how many people will be required for each alternative in the present Plan? The Plan contains no "cash flow" prediction upon which the reader can depend to assess the reliability of the assumption, and therefore the reliability of the predictions of implementation of management and impacts.

145-40 2. Monitoring studies. We have previously mentioned the lack of proper and thorough monitoring studies, particularly on the Hat Butte Allotment and the West Sagehen Allotment. There also exists a lack of appropriate and accurate monitoring studies, such as determination of accelerated versus natural erosion, to rely upon the veracity of this Plan.

145-41 3. The RMP is to remain in effect for 10-15 years. The BLM has not allowed the full implementation, even if delayed, of its 1982 RPS, and the long-term changes predicted in the EIS have not had sufficient time to occur before the BLM has

broad-stroke generalizations and erroneous conclusions contained in Alternatives A-C of this Plan.

145-45 Siltation is a natural process which eventually fills all lakes and reservoirs. No stated sources of pollution <siltation> are listed in the RMP, and this proposal is based solely on supposition and anti-grazing biases.

145-46 We know of no research which supports the proposed removals or restriction of utilization levels on the basis of improvement of water quality. We request all such site-specific data and research literature which the BLM has depended upon for the conclusions contained in this Plan.

145-47 The position taken by the BLM in the present Plan is in direct contrast to that taken in the 1982 EIS. Lacking information to the contrary, the BLM has no basis upon which to doubt the validity of its former Impact Statement. The fact that utilization may be heavy around a water source does not automatically prove that either accelerated upland erosion is occurring, nor that lighter or no utilization around the water source would prevent or reduce siltation of reservoirs, "of that areas of increase" vegetative cover around water sources would be sufficient to prevent erosion, if occurring, from entering the reservoir. Nothing in the current EIS analyzes these factors, and they are presented as foregone conclusions.

Text page 4-7 (SOILS):

Alternatives A-C:

145-48 There exists absolutely no scientific or management basis for the 30% utilization levels proposed under alternatives A, B, and C. The BLM has stated in this Plan that it cannot separate natural erosion from accelerated erosion with its current monitoring data concerning soils. It stated in the 1982 EIS that erosion on uplands is generally low, as are sediment yields (page 2-5 of the Riley EIS). Considering the lack of monitoring data and research which would support the need for implementation of the proposed utilization levels, and considering that the BLM now speculates that these "may" decrease sediment yields, reduce headcutting, and lower the amount of sediment delivered to streams, these proposals can be considered nothing but arbitrary and unfounded.

Again, the document contains no supporting information to lead to the conclusion that accelerated erosion is occurring any "here in the Resource Area. The Plan explicitly states that no differentiation can be determined by the BLM between natural and accelerated erosion with the data now in hand,

and there can be no reasonable prediction that "accelerated soil erosion would decrease significantly."

49 The No Action Alternative (1982 preferred alternative) provides the BLM with the ability to make specific adjustments to specific case-by-case problem areas to correct the specific problems, and the same opportunity applies to Alternative E. Neither of these alternatives is a wholesale "rape and ruin" alternative, as is implied in the analysis. If the Assumptions contained in this Plan are to be accepted, then one has to assume that management manpower would be committed, and MONITORING would be conducted, to assess real damage occurring, and correct specific problems. The statement that these alternatives have the "potential" to decrease soil stability is an amorphous indictment of livestock grazing and commodity production without specific proofs. The BLM lacks data of an accuracy to support the conclusion that under these alternatives soil conditions would decrease in many areas. This generalized statement can be made for each and every alternative. Provisions of laws governing the management of BLM-administered lands under the preferred alternative of the 1982 EIS (Alternative D in this Plan) allow the BLM to make corrections of site-specific management deficiencies where identified by reliable information.

Text page 4-8 (LIVESTOCK GRAZING):

145-50 The Plan contains no economic analysis of the alternatives and, considering the implications of Alternatives A-C, is in violation of the President's Executive Order 12630, which requires an economic implications assessment of all taking actions by the federal government. Considering the lack of data which would support the "need" to impose both livestock exclusion and limitation of grazing utilization to the stated levels, these alternatives are entirely unacceptable.

145-51 Alternative A would decrease the stocking level of BLM administered lands by 13,654 Animal Units, assuming a current 7-month authorization. Assuming a \$125/Animal Unit annual operating cost, this represents an annual revenue loss of \$1,706,750 to the area affected by the Plan. These operating costs are monies spent by ranchers which go directly to the communities in the form of taxes, vet fees, purchase of food and supplies, machinery purchases, and the like. In the five year timeframe of Table 4.4 (page 4-9), this represents a loss to the area of at least \$8,593,750.

145-52 This figure, of course, does not represent the total loss to the communities because of the symbiotic, or "trickle down" nature of this monetary flow. A recent economic estimate is

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that each AUM of federal range grazing has a total annual value of \$494 to the local economy of small communities such as exist in the area affected by this Plan. Application of this value would predict a loss to the local area affected by this Plan of \$46,261,204.

Alternative B equates to a loss of 7,286 AU's, with a \$910,750 annual loss to the area of the RMP, at the simplistic value of \$125 per AU. This is a loss of \$4,593,750 over five years. With a value of \$484 per AUM to the local communities' economies, this represents a potential loss of \$24,684,000.

Alternative C would cost the area 4,134 AU's at a simplistic value of \$316,750 annual loss of revenue, or \$2,583,750 over five years. With a value of \$484 per AU to the local communities' economies, this represents a potential loss of \$14,005,508. This figure further represents only the loss to the communities as a result of excluding livestock from areas with streams. A further and significant loss of revenue would result from the imposition of 20% utilization levels.

Alternative D would result in an eventual increase of 1536 AU's with a annual (simplistically valued) benefit of \$192,000 annual gain in the economies of local areas. With a value of \$484 per AUM to the local communities' economies, this represents a potential net benefit of \$5,203,000. Furthermore, the BLM's assessment in 1982 and in the present Plan is that forage demands for total grazing preference can be met in the No Action Alternative.

145-53 If range improvements would be limited under alternative D to those listed in Riley EIS, then no guzzlers will be developed, and no brush control or timber control would be accomplished in the West Sagehen Allotment, since no range improvements were listed for that allotment in the Riley EIS. Likewise, no brush control or seeding would be accomplished in the Hat Butte Allotment. The Statement in this Plan assumes that all possible range improvements were identified in the Riley EIS; they have not been, and Meadow Creek Enterprises has requested the construction of wells to accomplish the better distribution of livestock.

145-54 Alternative E would result in a eventual increase of 2857 AU's with an annual (simplistically valued) benefit of \$357,125 annual gain in the economies of local areas. With a value of \$484 per AUM to the local communities' economies, this represents a potential net benefit of \$9,680,000.

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Text page 4-19 (VEGETATION):

The assumption has to be that only low forage-producing (i.e. "poor condition", ranges with potential to respond would be treated or seeded under any alternative which includes brush control and vegetation manipulation proposals. This would obviously include historically degraded range sites with poor diversity at present. The 1982 EIS predicted that such projects would be beneficial to both wildlife and livestock due to both more forage production and the establishment of perennial forage which would be available during times of fall and spring green-up for wildlife needs.

Text page 4-20 (WILDLIFE):

All Alternatives:

If the proposed livestock reductions are implemented under Alternatives A-C, the "allocation" of AUM's to wildlife is both unnecessary and moot. We repeat our earlier observations concerning the BLM's failure to account for wildlife use and its effect upon range utilization in their present monitoring data, and the resultant double-allocation these proposals represent.

145-55 The active and aggressive suppression of wildfire in wildlife habitat leads to a stagnation of sagebrush overstory, with resultant decline in understory forage species. This will obviously lead to a decline in vegetation diversity. Fire is a natural component of the ecology of western ranges, and such fact needs to be assessed in this Plan. The historic aggressive suppression of wildfires in Yellowstone Park, the resultant build-up of fuels, and the ensuing conflagration in the mid-1980's should serve as notice of this fact.

145-56 The installation of water facilities accessible only to big game will create a demand by wildlife where it does not now exist due to natural factors of the environment. The BLM's stated proposal to exclude, eliminate, or reduce livestock grazing in areas of perceived competition for forage places them in the position of first creating a demand, then taking of grazing authorization because of that demand. This is in violation of the Multiple Use / Sustained Yield Act. It is also a taking action under the President's Executive Order 12630, and Meadow Creek Enterprises will seek to recoup from the federal government its monetary losses and the loss in value of the ranch properties, should this proposal be implemented.

145-57 The installation or development of waters which are accessible to both livestock and wildlife, however, benefits both, and is in conformance with the principles of multiple

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use and sustained yield. Where the opportunities exist to benefit both livestock and wildlife, Meadow Creek Enterprises supports proposals to implement such water development.

145-58 This document contains no data or analysis which would support the BLM's conclusion regarding the benefits of alternatives to mule deer and elk habitat. Other than supposition and an apparent and unfounded attitude by the BLM that removal or reduction of livestock MUST be beneficial, there exists no basis for these conclusions.

145-59 Without a determination of antelope habitat condition, there can be no basis in fact for the conclusions that any of the alternatives would result in beneficial impact to antelope habitat. For all the BLM knows, antelope habitat may be in the best condition it has ever been and may be the best it can ever be.

Text page 4-24 (AQUATIC HABITAT):

145-60 The BLM has insufficient data to conclude that any of the proposed alternatives, particularly Alternatives A-C, will reduce sediment loads and water temperatures in streams as a result of livestock removal or reduction of utilization levels. No foundation has been laid to believe that sediment loads are anything but the result of normal erosion. The BLM's data on erosion cannot separate normal erosion from accelerated erosion, and the Plan presents no evidence of monitoring which supports the claim.

145-61 No data which the BLM has revealed in this RMP/EIS supports either the claim that livestock use has accelerated erosion losses above the normal levels, nor that that use has resulted in above-normal siltation or turbidity of the specified reservoirs, lakes, springs, and ponds. No data is presented in this plan which supports the conclusion that livestock use is resulting in degradation of vegetation strips around the specified areas, or that removal of livestock from around the specified areas would have the stated effects. Turbidity is the result not only of wave action against shorelines, but also windblown dust, common and normal in the cold desert regime. It is also abundantly obvious to the most casual of observers that reservoirs, ponds, lakes, and playas for the most part contain bottoms which are DIRT. Currents, whether created by wave action, thermal churning, or stream tributaries, turn this dirt and stir up the bottom sediments, creating turbidity.

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- 145-1 Refer to response 5-17.
- 145-2 Refer to response 2-17.
- 145-3 Table 3.1, Water Quality, in Volume I of the DRMP/DEIS was derived from data collected by the BLM and information published by DEQ for stream condition in the RA (refer to response 2-25). The BLM does maintain files with water quality, macroinvertebrate, fish population and aquatic habitat data for streams in the RA. Trend information was derived from repeated field monitoring of waters in the RA.
- 145-4 The soils information provided in the DRMP/DEIS was not used to adjust stocking levels. Adjustments are made on an allotment by allotment basis using information from allotment evaluations. These evaluations assess whether site objectives are being met, then stocking levels are adjusted if needed. Vegetative indicators are the primary parameters used to assess the success of management actions, unless specific soils problems are identified as a management concern on an allotment.
- There are many scientific studies which indicate that accelerated runoff and erosion are related to grazing intensity (Heede 1977, Gifford and Hawkins 1978, Luby 1979). Increases in runoff and erosion can also be attributed to other human activities such as roads, off-road vehicle use, logging and mining activity.
- 145-5 See pp. 3-12-16 and Appendix 3, Table 3, DRMP/DEIS.
- 145-6 Refer to responses 2-6, 2-10, 2-11, 4-3 and 131-1.
- 145-7 Refer to response 131-1.
- 145-8 The management system which is listed as unsatisfactory is the 2-year in a row system which is listed as the official system. The area manager's recommendation is that an annual graze/defer system will be more satisfactory. Site-specific information is analyzed in the allotment evaluation. Refer to response 2-11.
- 145-9 Refer to response 131-1. The present management criteria deals with grazing management only. It is entirely possible to have satisfactory grazing management and still have resource conflicts which are independent of the livestock or not affected by the grazing system.
- 145-10 The prudent investor test asks if the benefits of a project outweigh or are of greater value than the cost of an improvement.
- 145-11 According to the information in the Bureau files, the information in Table 3.2, DRMP/DEIS is correct.
- 145-12 Refer to response 145-11.
- 145-13 Refer to response 2-87.
- 145-14 Refer to response 2-87.
- 145-15 Refer to response 2-87.
- 145-16 Refer to responses 2-6 and 2-10.
- 145-17 Refer to response 2-87.
- 145-18 Refer to response 2-87.
- 145-19 Refer to response 2-87.
- 145-20 There are plans for additional water sources for West Sagehen Allotment to improve livestock distribution. DRMP/DEIS, Appendix 3, Table 7 has been corrected to include these projects; see Appendix 1, Table 14.
- 145-21 This is correct, Hat Butte (7007) was listed in error as having an erosion problem. This has been corrected in the PRMP/FEIS.
- 145-22 Refer to response 43-5.
- 145-23 The areas proposed for water facilities are currently within big game ranges. These ranges are in unsatisfactory condition due to distance from water. The proposed big game forage allocations remain the same with or without the additional water.
- 145-24 Refer to response 2-63.
- 145-25 Refer to responses 2-6 and 2-10.
- 145-26 Presence of a special status species is not, in and of itself, a conflict. It is, however, a concern. While there is no information which indicates present grazing management is detrimental to *Eriogonum cusickii*, the Bureau is still responsible to prevent significant risk to special status species.
- 145-27 Refer to responses 2-6 and 2-63.
- 145-28 Page 2-2 calls for continuation of present management under Alternative D. The Riley Grazing EIS only analyzed the impacts associated with livestock grazing and is only a portion of the present management direction. The Riley MFP calls for 12 additional water sources (reservoirs, spring developments, or guzzlers) in the East and West Sagehen Allotments.
- 145-29 Refer to responses 4-6 and 4-7.
- 145-30 Refer to response 2-10. Also, p. 3-26 of the DRMP/DEIS, uses the phrase "current forage commitments" which are allocations from the Drewsey and Riley planning processes.
- 145-31 Specific parameters discussed in Appendix 6, Table 2 (Criteria for Evaluating Aquatic Habitat), were used to develop condition and trend data presented in DRMP/DEIS, Appendix 6, Table 1, Aquatic Habitat. For additional information, refer to response 2-3.
- 145-32 See Appendix 1, Table 4 of the Proposed Plan and responses 2-3, 2-27, 2-25, 2-26 and 4-4.
- 145-33 See Appendix 1, Table 4 of the Proposed Plan.
- 145-34 Winter range habitat type selection is dependent upon many factors. Some include temperature, proximity of foraging areas to cover, snow depth and severe weather duration. As the duration of severe conditions increases, mule deer utilize the best cover available which in many cases is big sagebrush and juniper. Also, Vavra and Sneva (1978) found that sagebrush and juniper combined for 82 and 87 percent of the diets of mule deer on Palomino Buttes during the winters of 1975-76 and 1976-77, respectively.
- 145-35 No conflicts have been identified; however, monitoring of these species and their habitat will continue and conflicts which are identified will be addressed on a case-by-case basis.
- 145-36 Aerial and ground census data were used by ODPW to delineate seasonal ranges.
- 145-37 Refer to response 145-36.
- 145-38 As noted on page 1-4 of the DRMP/DEIS, Planning Issue 1, it does not appear that the grazing management decisions of the Riley MFP will be implemented within a reasonable timeframe. This is because the effectiveness of those decisions depended heavily upon very large investments in rangeland improvements. Such investments have not been funded and there are no indications that they will be. For this reason, the current planning process has reoriented the Proposed Plan toward management prescriptions which are much less investment intensive.
- 145-39 Refer to response 145-38. Such assumptions are necessary in order to analyze an adequate range of alternatives in the DRMP/DEIS as required by NEPA. In contrast with earlier planning efforts, however, the Proposed Plan has been designed to be fully operational over a broad range of funding and staffing levels and is not dependent upon extensive investment levels to be put into effect. "Cash flow" predictions are not included because they are not pertinent. Public land management is not a "business" in the sense that there is a monetary bottom line (income, expense, cash flow). By law, BLM is required to manage for a broad spectrum of nonmonetary values as well as monetary values. Most receipts such as grazing billings do not return directly to the RA, but contribute to the general treasury. As such, cash flow predictions are not a valid measure.
- 145-40 Refer to response 2-87.
- 145-41 Refer to responses 145-38 and 145-39.
- 145-42 In reference to the 1982 EIS, data presented were not inaccurate given circumstances found in the RA at that time. In 1982, DEQ had not gathered data nor published statewide basin studies. Additionally, the State and Federal agencies had not developed best management practices for nonpoint source (NPS) pollution nor identified those NPS impacts on the beneficial uses of water. For details of utilization and grazing systems proposed, please see PRMP/FEIS, Appendix 1, Table 4. Also, refer to response 2-7 regarding utilization levels.
- 145-43 Monitoring and evaluation of field data indicate that livestock were often directly responsible for poor riparian condition, degraded aquatic habitats and poor water quality. The No Action Alternative would not resolve existing multiple-use conflicts within the RA. Additionally, the BLM is required under FLPMA to prepare comprehensive land use plans consistent with the principles of multiple-use and sustained yield (see responses 6-3, 6-4 and 6-6).
- 145-44 The No Action Alternative would leave many waters in the RA in poor condition and provide unnecessary delays in meeting DEQ water quality standards. Also, refer to response 2-28.
- 145-45 Streambank destabilization and subsequent silt and sediment deposition are processes often accelerated by poor management of livestock in riparian zones. Methodology used to identify condition of aquatic habitats was reviewed in the DRMP/DEIS Volume II, Appendix 6, Table 2, Criteria for Evaluating Aquatic Habitat.
- 145-46 Refer to responses 2-4 and 2-28 and Appendix 1, Table 4, PRMP/FEIS.
- 145-47 Refer to responses 2-3, 2-4 and 145-42.
- 145-48 See Appendix 1, Table 4, PRMP/FEIS. Also, refer to response 2-7.
- 145-49 Refer to responses 9-10 and 13-9.
- 145-50 Refer to responses 2-63 and 28-1.
- 145-51 Refer to responses 2-49, 2-61 and 28-1.
- 145-52 Refer to responses 2-49, 2-61 and 28-1.
- 145-53 It is not feasible to list all possible range improvements in a land use plan. Alternative C is the Bureau's Preferred Alternative. Refer to response 145-20 and 145-28.
- 145-54 Refer to responses 2-49, 2-61 and 28-1.
- 145-55 Prescribed fire as well as other public land treatments are proposed to enhance wildlife habitat.
- For information on prescribed fire and suppression policy, refer to responses 4-8 and 4-9, respectively.

Text page 4-28 (RIPARIAN HABITAT--Alternative D):

145-62 We believe the BLM has taken the No Action label of this alternative literally. The No Action alternative does not preclude the BLM from continuing to identify specific issues, including riparian habitat, on specific allotments and implement grazing systems and/or enhancement projects to rectify identified problems. The No Action alternative does not imply that the BLM will close its doors -- only that it will continue to implement the type of management systems identified in 1982, or alter the proposed systems as appropriate on a case-by-case basis. We believe there to be no credibility to the conclusion that riparian areas with a current declining trend would continue to deteriorate. If the BLM has done repeated sampling (no data is presented in this Plan to indicate that it has been done), and if specific areas have been identified by quantifiable data to have inadequate management, then the BLM is certainly not hamstrung to rectify those deficiencies under Alternatives D or E.

Text page 4-28 (WETLAND/PLAYA/MEADOW HABITAT):

145-63 Table s-3 (appendix page 5-9) verifies that the BLM has absolutely no basis for concluding that any alternative would have any effect on "playa habitat". since It has no current data on condition or trend of the subject areas. We repeat our request for the listing in this document of the specific parameters of condition and trend, and the repeated readings of those parameters which have resulted in the conclusions of both condition and trend in this table. It appears that the only criterion for an area to be listed in upward trend in this table is that at some time, whether recently or in the past, the particular area was excluded from livestock use.

145-64 The BLM also has no basis in fact for concluding that playas or meadows would suffer declining trend as a result of seeding projects "adjacent" to them. Lacking condition and trend data, no conclusion can be made. Lacking utilization data, no conclusion can be made that a seeding would increase use on those areas. We assume that proposed seedings would be developed into their own pastures, which would enable management of them separately from surrounding native vegetation. Even if this is not the case, there exists no reason to conclude that the development and use of seedings would lead to the predicted increased utilization of playas, and even if it did, no data exists which supports the conclusion that the grazing per se would lead to deterioration of the playas.

The conclusions of this section are based not on current data but on biased and unprofessional "doom and gloom" speculation.

Text page 4-30 (SPECIAL STATUS SPECIES):

145-65 We fail to understand the conclusion that grazing playas only prior to July 31 will provide more forbs for sagegrouse. Most forbs in the cold desert regime make their growth, flower, seed, and disarticulate long before the first of August. While livestock certainly do consume forbs, their dietary content is generally very low. If the conclusion is based on the assumption that grazing per se before July 31 is "bad" for grasses, and therefore competitively "good" for forbs in the long term, the conclusion is still unfounded, since it is both the degree of utilization and the overall grazing management system which would ultimately decide whether the particular grazing is "bad" for grasses. If the BLM is proposing that grasses be grazed to an abusive level in these areas prior to July 31, and therefore give a competitive advantage to forbs, we are opposed to the general prescription. Furthermore, no data has been supplied in this Plan which would lead to the conclusion that forbs are currently a limiting component to the "ester" sagegrouse in the habitats it occupies, or that indeed any habitat component is deficient for this species anywhere in its range. We repeat our position that the mere presence on a given parcel of land of two species, be they wild or domestic, does NOT constitute the presence of conflict between them.

145-66 Likewise, no evidence is presented in this Plan that the Long-Billed Curlew is somehow suffering from the current management of the range in this resource area, so that a prescription of no livestock grazing from April 1 to June 30 is necessary. The livestock have been on the western range for well over 100 years, mostly at greater numbers than presently exist, and never before with as intensive management as at present, and the long-billed curlew is still around, finding nesting sites and raising its young.

145-67 Absolutely no medical proof exists that domestic sheep, by the mere fact of their species, present a danger to California Bighorn in their present habitat. nor that construction of livestock watering facilities would in any way be harmful to the bighorn. No basis therefore exists for the conclusion that the restriction of those actions would be beneficial to bighorn.

145-68 We take strong exception to the conclusion that "reduced livestock grazing pressure would benefit some of these species." -if the BLM has evidence that grazing is harmful to the multiple uses or renewable resources of a specific

area. It certainly is empowered to rectify that situation. Lacking knowledge of the habitat requirements of the particular species, and lacking a knowledge of interactions, and therefore potential conflict, between species, and finally lacking the specific knowledge that a grazing system or intensity is causing harm to a particular population of "sensitive" species, this conclusion is completely unfounded.

Text page 4-43 (WILD AND SCENIC RIVER DESIGNATION -- Alternative D):

145-69 The wilderness IMP does NOT prohibit livestock improvements in wilderness study areas. certain types of facilities, such as corrals, may be prohibited, but livestock watering facilities are certainly allowed, so long as they meet a single criteria: that the construction does not impair the suitability of the area for consideration as wilderness (anything which can be constructed and/or removed without long-term impairment qualifies). The litmus test is whether the area would have been excluded from designation as a WSA had the project existed at the time of designation and whether construction would remove the area from consideration as wilderness. Spring developments, troughs, and reservoirs have been constructed in BLM WSA areas throughout the west since the IMP guidelines were established.

Text page 4-46 (CULTURAL RESOURCES):

145-70 It is incredible to us that the BLM seeks to link cultural resources with its desire to eliminate or reduce livestock grazing, and that it would purport its desired outcome of such elimination or reduction to have a beneficial impact on cultural resources. "No specific values are identified as yet" is the most telling phrase in this entire section -- no cultural values are identified as being at risk in the riparian zones or upland areas targeted in the alternatives, or in any other locale, but somehow, in the BLM's reasoning, getting rid of the cows must be a good idea.

Text page 4-66 (ECONOMIC CONDITIONS):

This section is woefully inadequate in assessing the economic impacts to the local economy and to Oregon as a result of implementing the various alternatives. It needs great expansion so as to clearly, precisely, and accurately reflect the potential economic damage to the local communities and the economy of the state which is merely eluded elsewhere in this document.

145-71 The size of operation which the BLM believes to be a self-contained business has little to do with the importance of the decisions contemplated in this RMP. A family ranch with a 100 cow permit is just as important to that family as a 1000 cow permit is to a corporation, and perhaps more so. The implication in this RMP is that any operation of less than 300 cattle is expendible or not as worthy of consideration as one of over 300 cattle. We will remind the BLM that the regulations of 43 CFR apply equally to all permittees who are dependent by use upon the public lands.

Subleasing of BLM forage is a prohibited practice and not open as an alternative for ranchers affected by the proposals of this plan.

145-72 We take strong exception to the conclusion that "many ranchers could choose to delay capital replacement, when possible, and cover only the cash costs of the ranching operation until forage availability is restored" under Alternative C. The need to replace equipment, facilities, and livestock is not a matter of choice; nor is the payment of ranch debt. This is an extremely poor and simplistic analysis of the situation facing most ranches in the area of the RMP, and shows a poor understanding of ranching and agriculture in general, which have very high capital investment and relatively low return on capital expenditures.

Table 2.1 (MANAGEMENT DIRECTIVES BY ALTERNATIVES):

Our comments on specific sections of this table are contained in our above comments on the text and appendices of this draft RMP/EIS.

Thank you for the opportunity to comment on the subject document.

Sincerely yours,
Dick Raney
Dick Raney
Meadow Creek Enterprises

- 145-56 Refer to response 145-23.
- 145-57 Suitable reservoir sites in the areas listed for guzzlers have not been identified. Many reservoirs have been attempted in some of these areas and have failed; therefore, the guzzler recommendation. It is estimated that a 2,500-gallon guzzler would only supply water to 10 cattle for 10 days or about 3 to 4 AUMs.
- 145-58 See glossary DRMP/DEIS, pp. 6-11 and 6-13, which define satisfactory and unsatisfactory big game habitat conditions. The management actions are designed to correct any habitat component deficiencies.
- 145-59 Yoakum (1974) described one of the preferred characteristics of antelope habitat in the sagebrush steppe as areas having 10 to 30 percent forb composition. This is true because antelope prefer succulent forbs throughout the summer. The recommended management actions to improve forb availability would improve antelope habitat.
- 145-60 Refer to responses 2-3, 2-26, 2-28, 2-44, 145-3 and 145-43 and Appendix 1, Table 4, PRMP/FEIS.
- 145-61 Refer to responses 2-4, 2-5 and 145-45.
- 145-62 Refer to response 2-2 and 2-26.
- 145-63 Refer to response 1-19 and Appendix 3 of the PRMP/FEIS.
- 14564 Refer to responses 1-19 and 7-13.
- 145-65 There is a difference between grazing of upland forbs versus forbs around playas. Forbs around playas initiate growth as the soil dries. This can take place throughout the summer dependent upon the size of the playa and precipitation.
- 145-66 Refer to response 2-79.
- 145-67 Refer to responses 2-78 and 137-8.
- 145-68 Where habitat conflicts have been identified for particular species, management actions have been formulated to reduce or eliminate these conflicts. As data and information become available, management actions within the scope of this RMP will be initiated on a case-by-case basis to resolve identified conflicts.
- 145-69 Wilderness IMP does not prohibit livestock improvements in WSAs. The portion of the reach of the Middle Fork of the Malheur River and Bluebucket Creek is within the 2,080-acre administered primitive management area which was proposed and accepted through a resource management decision in the previous Drewsey RA MFP.
- The 2,080 acres basically includes the area along the river and creek that is within the steep, canyon walls. There are no range improvements other than a couple of drift fences. The recommendation in the Drewsey MFP notes allowance of cattle as a restricted use

pasture which can be made compatible with the use of the area. However, grazing use does not allow livestock improvements within the administered primitive area (i.e., the river and creek canyon). If this reach of river and creek is designated as part of the National Wild and Scenic Rivers, the management guidelines and standards for such rivers notes under Management Standards for Wild River Areas, Item f, "Agricultural Practices and Livestock Grazing: Agricultural use is restricted to a limited amount of domestic livestock grazing and hay production to the extent currently being practiced. Row crops are prohibited."

The statement in Alternative D, "Under IMP or primitive recreation management . . ." is changed to read, "under primitive recreation management . . ."

- 145-70 Some heavily grazed areas will have important cultural resources present that have not been documented and where no projects are planned, including riparian zones. Any management practices that reduce overall impacts to these zones may beneficially affect cultural sites by minimizing soil erosion and trampling of sites caused by livestock congregation. Livestock grazing may be detrimental to cultural resources in many situations where hard data is lacking, since the existing database indicates that highly sensitive cultural sites frequently occur at or near live water, including riparian zones.
- 145-71 The intent of recognizing the numbers of large and small operations is to better display the impacts to smaller operations. Without this division, large operations statistically overshadow the smaller operations. The text has been changed to better express this intent.
- 145-72 The word "many" should be replaced by the word "some."

Three Rivers Resource Area Mgr.
Burns District
Bureau of Land Management
HC 74-12533 Highway 20 west
Hines, OR 97738

Dear Sir:

I am writing in response to your draft Three Rivers Resource Management Plan/EIS. In further reviewing the documents, I found another item that I would like to respond to.

146-1 I ask that you further define your management direction for ORV areas to show what uses are actually intended and specifically where these uses would occur. In Table 2.1-31, you state: "2. Maximize the development of usable ORV areas and cross-country routes (including snowmobiles and motorcycles), including areas away for the population centers of the county to increase the number of out-of-county users." These areas are not identified in the document.

The low rainfall and slow vegetation growth on many of the lands administered by the BLM doesn't permit very rapid recovery once damage has occurred. In fact, the tracks made by homesteaders over 100 years ago can still be seen in some areas. I question as to whether the results of encouraging ORV cross country travel is something the BLM would really want to live with in the future.

I have further concerns regarding the effects of ORV travel on native wildlife and plants, especially on sensitive and rare species. There is considerable concern about the fate of Desert tortoise in Nevada due to ORV impacts. I would hate to see similar situations developing here. We also have some species that are unique.

146-2 Another aspect that I feel needs to be spelled out in the document is how you will discourage and handle unauthorized entry by ORV users from BLM managed lands onto other ownerships. There are a number of private and other public lands intermixed with BLM land with very little boundary designation.

From experience in working on the Mark Twain National Forest in Missouri and on the Ochoco, I know that letting ORV use develop without control is not the way to go either. Established use is much harder to control than use that is planned for. It is imperative that both trails and ORV use be carefully planned to: first, prevent resource damage and second, to limit damage should it occur.

146-3 I also ask that the types of ORV uses and the scale of those uses that would be acceptable to your management be considered and spelled out in your final. The

terms "maximize ... development" and "increase the number of out-of-county users" really concerns me. I question as to whether maximization of this type of activity is compatible with management of BLM lands. Not all ORV users are families looking for a weekend of recreation.

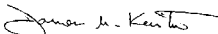
Once it becomes known that the BLM is encouraging ORV use, it will not be long before large groups will want to have enduros, meets, and competitions. This has already been proposed on National Forest lands in the Prineville area. While this might be beneficial to the local economy, I feel this type of activity is not suitable on public lands. The impacts are devastating. We do not need another Barstow run located in Eastern Oregon.

146-4 Table 2.1-31 does mention "unacceptable resource impacts", but exactly what is unacceptable is not spelled out. This leaves room for considerable amount of interpretation, with the potential for BLM having to defend its position against an organized group's interpretation and all the associated political pressure.

BLM should be trying to promote both an appreciation for the unique ecology of the Great Basin and an attitude of responsible use to protect that ecology. Too many people travelling Route 20 think of Eastern Oregon as that "God-forsaken sagebrush flat east of Bend suitable for all manner of land abuse". (my quotes)

The open-ended, vague direction of your current plan provides an opportunity for user groups to propose uses and facilities that could have severe impacts to the land and resources, while at the same time placing the burden of proof on the BLM to deny that use. More specific direction in your plan would avoid this situation.

Thanks again for the opportunity to comment.


James M. Keniston

146-1 Refer to response 1-23. The ORV use intended for management within the RA include cross-country motorcycle, specialized vehicle and 2 and 4-wheel drive vehicles on designated roads and trails as allowed on a case-by-case basis. Other uses include intensive off-road vehicle use in specific areas (the only area is Radar Hill) and snowmobile use in areas north and west of Burns which are adjacent to the Malheur National Forest. Since the snowmobile use is in areas at lower elevations than those in the forest, the use is more short-term (mid-winter), sporadic and in some winter seasons, almost nonexistent.

The known areas of use for the various off-road vehicle uses and snowmobile use are noted in the Recreation Map R-1. These uses will not be maximized. The existing off-road vehicle designations in DRMP/DEIS, Table 3.13 listed as open, closed and limited are now noted in a new Map R-2, in the Proposed Plan.

Unacceptable resource impacts should have been more appropriately stated as "considerable adverse effects." While difficult to define precisely, this term does not include ephemeral impacts of short duration and small area which do not affect endangered species, critical soils, or life cycles of flora and fauna. However, degradation in any degree of a significant cultural site shall be considered a "considerable adverse effect." For Bureau purposes, Section 9(a) of E.O. 11644 is a tool to be used to protect areas when protection is needed, until the areas can be processed through the planning system and given a proper designation, and for emergencies such as fire, flooding, unusually deep snow (for wildlife protection), etc.

Section 9(a) requires closure or restriction of an area despite any current designation made under Section 3 of E.O. 11644 when it is determined that ORV use will cause or is causing considerable adverse effects. However, there must be a clear showing, not merely suspicion, that the use of ORVs will, in fact, have a considerable adverse impact. When these conditions prevail, immediate closure or restriction must be made. Restrictions may be made for a specific type of vehicle causing the adverse effects. Under Section 9(a), closure or restriction may be made without public participation, and the closure or restriction may be rescinded without public participation.

In any case, ample public notice will be given of the action to be taken or the actual action taken, as is appropriate, and all feasible action will be taken to mitigate the adverse effects.

146-2 Refer to Response 1-23

146-3 Refer to response 1-23 and 146-1.

146-4 Refer to response 1-23 and 146-1.

Joshua L. Warburton
District Manager
Burns District
Bureau of Land Management
HC 74-12533
W. Highway 20
Hines, OR 97738

- 147-1 Refer to responses 2-5 and 3-13.
- 147-2 Refer to response 2-11 and 2-49.
- 147-3 Refer to responses 2-68, 11-11 and 124-4.

I am not commenting on all the Three Rivers Management Plan and Environmental Impact Statement, as Western Range Service has commented on most of the issues.

- 147-1 I wish to comment on a few issues, as follows: I am opposed to fencing any of the streams in this RMP. Very little, if any, off-site forage will be available to replace the AUM's lost in fencing riparian areas. These off-site fields are presently being grazed, annually.
- 147-2 If BLM area managers foresee a problem in an allotment they should work with the rancher or ranchers to find a solution instead of saying nothing. Then later propose a reduction in AUM's, which may not solve the problem in any way.
- 147-3 I see no reason for enlarging the wild horse Herd Management Areas. BLM already has trouble to maintain the numbers below the maximum in all HMA's. The wild horse adoption program should not be competing with the commercial horse business. Declaring a wild horse area an Area of Critical Environmental Concern may not be legal. The wild horse stallions that are taken from the Burns wild horse corral and returned to the range, should first be castrated and/or destroyed.

I foresee no reason for changing the present grazing system, Drewsey EIS. No private property should be sold to the federal government.

Thank you for allowing me to make comment.

Sincerely,
Allan Otley
Allan Otley
HC 72 Box 55
Princeton, OR 97721

Feb. 6th, 1990

U. S. Department of the Interior
Bureau of Land Management
Three Rivers Management Plan
Hines, Ore.

- 148-1 The routes portrayed on Map LR-3 in the Proposed Plan are along existing roads and trails on private lands where no legal access has been acquired. Bureau policy, as stated in Manual 2100.06, is to acquire lands and interest in lands, such as easements, which are needed to provide for public use and enjoyment of the public lands. Access to be acquired would be through negotiated easements or by other means, such as exchange or donation. Condemnation would only be considered in rare instances where critical access is needed to public lands with extremely important resource values and only after every effort to negotiate has failed. By whatever means of acquisition, all landowners would be fairly compensated and every effort would be made to limit the impact of public access through private property.

- Dear Sirs;
- 148-1 In regard to your Three Rivers Resource Management Plan section on access needs, we are extremely dismayed with your total disregard of the private land owner. After a study of your map L-1, it is obvious that practically all of the proposed new accesses are routed directly through private property. In nearly all cases, access is available through alternate routes that remain on public lands. It seems that you have declared "open season, come one, come all" on the rights of the private land owner. It is hard enough to make ends meet in the ranching business, with attacks from environmental, special interest groups, governmental agencies, without being tagged with the job of baby-sitting the general public. It seems contradictory to us, that in one breath, you are trying to limit use and protect those so called, fragile riparian areas, and in the next breath, you are trying to increase access and usage of them.
- Private property is one of the few remaining places of refuge for our deer, elk, and antelope herds for whom you are now proposing to allow so many AUM's to help increase their numbers and their natural habitat areas. It seems insane to do this and then try to increase access to them.
- As you have surmised by now, we the undersigned, are definitely against any increases in new access routes, be it public or private land within the Three Rivers Management Area.
- The hills are already overflowing with roads and trails to satisfy the needs of the general public.

The accesses portrayed are generally the best available vehicular route into an area. If an alternate route does exist, it is often limited by difficult terrain, long distance or other private lands. Prior to pursuing an acquisition of any given access, alternative routes would be considered carefully to determine the feasibility of the acquisition.

Sincerely yours,

Jim Dunbar
Cheryl Dunbar
Jack Dunbar
Betty Dunbar

Jay Carlson RMP-EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

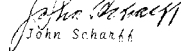
Review Comments for the October 1989
BLM Draft Three Rivers RMP/EIS

Dear Mr. Carlson:

A number of letters have come to my attention, largely in opposition to the recommended reductions in livestock numbers on a number of ranges. I can appreciate the concerns of the Ranchers.

149-1 Harney County has thousands of acres of non-producing grass lands, which were producing good grass when the early day settlers arrived in this area. Long continued over-use by vast numbers of livestock denuded many areas of the native grasses, but a large percentage of these lands have made little or no signs of grass re-vegetation during the past fifty years, since I have been in the area. It would appear to me that more of these non-grass producing areas could be re-stored to good grass land with Crested Wheat Grass, so where it wouldn't be necessary to make cuts in numbers.

Reductions in cattle numbers would not only be devastating to the livestock operators, but to the county at large.

Very Sincerely,

John Scharff

65095 Swalley Road
Bend, Oregon 97701

February 9, 1990

District Manager
Bureau of Land Management
Highway 20 West
Hines, Oregon 97738

Dear District Manager,

I am writing to you concerning the Three Rivers Resource Management Plan and Environmental Impact Statement.

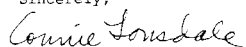
You must develop alternatives A & C to restore and maintain rangelands, riparian and stream habitats to their natural and healthy condition.

150-1 Cattlegrazing should be reduced or eliminated where appropriate as well as crested wheatgrass seeding. Winter range forage allocations for wildlife, namely bighorn sheep should be given priority over livestock allocations. Also with this management plan it is imperative that Wild & Scenic River designation be given for all of the South and Middle forks of the Malheur River (except for the stretch through the Drewsy area) all of Bluebucket Creek and all of the Silvies River.

150-2 Lastly I ask that all ancient forest areas that are left be identified and protected. Remember the stands of ancient trees in the Pacific Northwest are the last remaining in the world.

150-3 Costs of construction of new roads and other range-land projects should be included under the various alternatives as well as the environmental impact on the areas.

Please review this Resource Plan and Impact Statement and make the necessary changes to ensure and protect a most magnificent natural area.

Sincerely,

Connie Lonsdale

150-1 Refer to response 12-4. Also, refer to responses 1-11, 1-13, 2-6, 2-10, 2-78 and 3-6.

150-2 Refer to response 12-1.

150-3 Refer to responses 12-1 and 12-7.

GRANDE RONDE RESOURCE COUNCIL, INC.

District Manager
BLM-Burns
Hines, OR 97738

Dear Manager--BLM,

Our group has a strong interest in public lands and your wise stewardship of public resources. We submit for your records the following comments on the Draft Three Rivers Management Plan and Environmental Impact Statement.

1. There is a measure of irresponsibility and a lack of professional management in allowing continued heavy grazing on public lands already degraded by cattle. By your own assessments the condition of extensive areas of public lands in your district are in "poor" and "fair" condition: 1,085,298 acres of a total of 1,655,439 acres.

151-1 2. The riparian zones on our public land under BLM-Burns District management have suffered for years from excessive cattle populations. Not to propose a substantial reduction in AUMs is a serious failure in the objectivity of the RMP-EIS planners. We propose that considerable reduction in grazing be an essential component in several of the alternatives.

151-2 3. Our emphasis here is a reflection of problems pointed out in 1. and 2. above. The RMP-EIS in its draft form has a flawed design. The range of alternatives is extremely limited. Every alternative emphasizes exploitation of public land at the expense of the owners--the American public. Alternative A is the only rational approach, merely because the others are so unacceptable.

151-3 4. Although we recognize that the designated forest acreage is relatively small (9,291 acres for "intensive management (Table 4.3) it is disturbing to find no reference to preserving old growth or to eliminating all logging for the benefit of water quality, wildlife habitat and recreation. It is alarming to find that you insist on exploiting even this small acreage.

151-4 Your comment under "Forestlands Alternative A" p. 4-7 that "The significance of this reduction would be very high" is totally unsubstantiated. "Significance" to what? to whom? to ecosystems? And "very high" is a most unscientific and imprecise way of measuring anything at all. We urge a reconsideration of the value of public forests that will lead to a plan more appropriate to the multiple values they represent.

151-5 5. Recreation is dealt with in the DRMP-EIS as incidental to grazing and is another example of multiple use being referred to but ignored in practice. The two volumes of information and proposals deals largely with grazing and grazing problems, and there is no real plan to provide more sites for campgrounds and for proper control of ORV use.

Post Office Box 2968, La Grande, Oregon 97850

151-6 6. Stating that Riparian Habitat would benefit from "the various grazing treatments" p. 4-26 is analagous to stating that you intend to put out the fire after you have ignited it. The best and obvious "treatment" is to prohibit grazing within drainages. The proposed alternatives give little or no attention to large reduction in the expensive practice of private grazing on public lands.

151-7 7. The DRMP-EIS totally omits an itemized financial accounting to the taxpayers of the costs of various aspects of the proposed alternatives. However, the dollar totals presented on p.4-69 reveal that Alternative E would cost the taxpayers \$4,355, 131 to benefit a limited number of grazing permittees-- amounting to a subsidy of nearly \$50,000 for each permittee. This is a flagrant example of special interest welfare.

151-8 8. Scrutiny of the very brief references to Wetland Habitat p. 3-27 and Table 3-12 reveals how apparently ineffectual BLM procedures have been in protecting wetlands. Of the 1351 acres not classed as "uncontrollable" only 50 are in "good" condition for a meagre 3.7 percent. Since these areas have been under BLM jurisdiction for many years, there is reason to believe that BLM management practices and decisions have failed to protect this resource. Furthermore, it is puzzling to read on p. 4-28 that 151-9 the BLM prefers now to wait until 1997 before altering past destructive practices. We fail to understand why immediate action for repairing wetland habitat damage is not underway.

151-10 9. We are very much opposed to vegetation manipulation; in particular we reject the notion that monoculture on public lands benefits our society. Converting the natural variety of vegetation (and the habitat it provides for numerous insects, plants and animals) is a desecration of public land for private gain. Multiple-use is a charade under this prescription and is a publically subsidized measure for a very few local individuals.

Our intent in presenting this critique is to encourage you to reexamine BLM approaches to managing public lands. There are some positive tendencies in the DRMP-EIS but unfortunately they only begin the shift from a discredited special-interest management philosophy. Much serious reevaluation of BLM procedures will be necessary before our public lands will be in good to excellent condition.

For the GRRC Conservation Committee
Roberta Bates, Chair

cc: BLM Director
U.S. Congress
U.S. Senate
Sierra Club
Wilderness Society
Gov. Goldschmidt

Roberta Bates

151-1 Refer to response 1-13.

151-2 Refer to response 12-4.

151-3 Refer to response 12-1.

151-4 Refer to response 11-22.

151-5 The DRMP/DEIS does consider development of intensive use areas, in particular Chickahominy Recreation Site, Diamond Craters ONA/ACBC, Warm Springs Reservoir and Moon Reservoir. Chickahominy Reservoir receives the greatest number of visitors and is the highest priority in the RA for development, followed by Diamond Craters. Because of the small local population in the county, plus the current projected use by out-of-county visitors, development and management of more campgrounds by the BLM in this RA is not in the best interest of the public at this time.

In regard to plans for campground development, this document provides management direction with more comprehensive activity plans to be written as a next step for addressing specific, on-site needs. Please refer to responses 1-23 and 145-1 regarding additional explanation of ORV management which has been incorporated into the PRMP/FEIS.

151-6 Refer to response 3-13.

151-7 Refer to response 12-7.

151-8 Refer to responses 7-12 and 118-2 and Appendix 1, Table 8 of the Proposed Plan.

151-9 Refer to response 7-12.

151-10 Refer to response 1-11.

Bureau of Land Management
Burns District Office
Att. Joshua L. Warburton
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Dear Mr. Warburton,

Following are our comments concerning "Draft -- Three Rivers Resource Management Plan and Environmental Impact Statement". We would like to compliment your staff on language included in the riparian habitat, aquatic habitat and water quality Management Directives by Alternative (Table 2.1) "systems which are widely recognized as promoting the most rapid riparian recovery practicable (note that full recovery under even the most favorable management may require many years in some cases)." This language is vital to successful management systems in many areas providing CRMP and AMP planning processes with the needed flexibility to fully utilize modern technology and management to enhance and manage for all resources and uses.

We are concerned about the 30 and 50 percent utilization levels in the same section. Timing of use and duration of use are the most important grazing management practices needed to solve problems and conflicts in wetland type areas in the short term. Utilization levels to meet resource objectives should vary with different times of use and with the duration of grazing -- the described utilization levels are unrealistic and without supporting data. The 30 percent utilization levels in the upper watershed and on uplands is not appropriate with modern progressive management systems.

Juniper encroachment due to ecological succession and fire suppression is beginning to negatively impact riparian and upland watershed areas. The RMP and future RMP's need to emphasize vegetative manipulation to optimize long term watershed needs. Ground cover decreases and erosion increases as junipers take over many areas in the RA. As much as 50 - 75 percent of winter precipitation is intercepted and lost in the form of evaporation in thick juniper stands in addition to direct competition for available moisture.

Vegetative manipulation should be done by mechanical means on low productive sites while fire should be used where adequate fuels exist. A fire management plan needs to be developed where preestablished fire control lines can be located and built by mechanically cutting and other means. Potential harm to life, property and livestock should be the primary determinates of conditional suppression. Prescribed fire should be more actively pursued with all juniper encroachment areas mapped out and an ongoing/longterm control program developed.

The Kiger and Riddle HMA ACEC's are not biologically sound nor beneficial to long term resource management needs. Both HMAs should not be expanded nor should horse numbers be allowed to increase. The horses should not have been moved to the Kiger area in the first place. Livestock permittees inside the HMA's should either keep boundary fence gates shut or put a wire over the top of the gate to keep the horses inside the HMAs.

page 2

The Diamond Craters Natural Area would be protected better under a special multiple-use designation. The heavy build up of fine fuels poses severe wildfire potential and greatly increases the chance of a major fire getting started in the Malheur Refuge where heavy fuels also exist. The DCNA should not be expanded and existing and historical uses of proposed additions should be allowed to continue. It appears the present effort to designate (and add to) new ACECs and RMAs is for reasons other than required biological, sensitive plant or critical habitat criteria. The Kiger and Riddle HMAs do not qualify in any stretch of the imagination nor does the addition to the Diamond Craters ACEC in which man's improvements and historical use predominate and pose no risk to adjacent areas. In fact, existing uses of the land protect many values in the DCNA.

All other areas (Hatt Butte RMA, Silver Creek addition, Foster Flat, Squaw Lake, Dry Mountain, Saddle Butte, Biscuitroot Cultural and Obsidian Cultural) need to be rejected at this time due to public input (or economic impact to livestock permittees or adjacent landowner) or be put into a further study status. Foster Flat fencing would cause undue congregation of livestock and horses and change use patterns so other resource management objectives will not be met. Water development, range seeding and other improvements away from Foster Flat could protect the inherent values better because the involved plant communities developed inconjunction with grazing. The South Narrows ACEC is a good example where nongrazing has been detrimental to the plant community being protected.

Generally, the grazing reductions appear to be unnecessary and not justified with trend data or other biological information. AMP planning and CRMP planning efforts continually evaluate and monitor other resources and uses. Wildlife forage needs have already been provided in each area so the competitive use ARA's are double accounting. Grazing plans provide higher quality forage for all wildlife as compared to ungrazed areas and unless big game populations overpopulate forage quantity is not limiting. Big game forage requirements are ridiculous and ignore big game habitat and use of the high desert area.

Land tenure adjustments with willing parties should only be in the form of land exchanges even if you have a willing seller. The long term needs of the local economy are inextricably tied to private land. The BLM's main objective to continually improve land management efforts to improve the biological needs of soil, water and related resources will meet the needs of all uses and the local area. Sample use designations and allocations should be minimized in final plans. We will provide additional information if you have any questions concerning our comments.

sincerely,

Mary Atlas
Arnold Otley
Mary and Harold

OTLEY,
Genevieve Eves, Inc.
Diamond, OR 97722
(503) 418-2400
(503) 418-2700

cc Bob Smith,
Sec. of Interior
State Director

152-1 Prescribed burning and conditional suppression areas are identified for assisting the RA in meeting management objectives.

The use of pre-established fire control lines has been considered. Only areas with high resource values at risk and a history of continued large or multiple fires will justify the costs involved and the possible impacts to other resources.

All suppression actions give priority to life, property and resources, in that order.

Also, refer to responses 4-8 and 4-9 for prescribed fire and suppression policy.

152-2 Refer to responses 2-68 and 11-11.

152-3 Refer to response 8-9.

152-4 This is a good recommendation and will be incorporated into the HMAP.

152-5 The Diamond Craters were designated as an ONA/ACEC on April 1, 1982.

All fires will be controlled to prevent loss of human life or property within the ONA/ACEC or to prevent the spread of fires to areas outside the ONA/ACEC where life or property may be threatened. Use of heavy equipment for building fire lines will not be allowed.

Prescribed burning and presuppression measures and techniques may be allowed when necessary for the protection of public health or safety (Recreation Management Plan, 1985).

152-6 The recreation management plan for Diamond Craters ONA/ACEC which was written and presented to the public in 1985 notes three parcels for acquisition through land exchanges or purchase. These are:

- (1) E1/2, Sec. 16, T. 28 S., R. 32 E. 320 acres
- (2) W1/2NE1/4, NW1/4, N1/2SW1/4, Sec. 36, T. 28 S., R. 32 E. 320 acres
- (3) SE1/4SE1/2, Sec. 36, T. 28 S., R. 31 E. 40 acres
- Total 680 acres

The following discussion in the Recreation Management Plan offers an explanation for proposing the acquisitions.

"If these private lands are offered for sale or exchange the Bureau should actively seek to acquire them in cooperation with the landowners. The parcels have large portions of the lava flow within their boundaries. A trail goes through Section 16 and a main county road goes through Section 36. Both provide access to fringes of the lava flow where adverse impacts are possible through removal of materials, dumping and possible leasing."

152-7 The interdisciplinary team considered the available information and concluded that the Kiger and Riddle HMAs and the Diamond Craters ONA/ACEC extension met Bureau criteria for ACEC designation. Please see Appendix 1, Table 16 of the Proposed Plan for allowable management use constraints in ACECs.

152-8 The qualities of the proposed ACECs were examined by the District's ID team in terms of the importance and relevance criteria established in BLM Manual 1613.1 (see DRMP/DEIS Table 3.16). Those proposed areas which the ID team felt met the criteria were carried forward in the planning process (Silver Creek Addition, Foster Flat, Dry Mountain, Biscuitroot Cultural and Kiger Mustang).

RNA/ACEC designation establishes a management direction in which the qualities of the site will be managed primarily to maintain the natural qualities of the ecosystem in a state which is suitable for conducting research, monitoring or other studies on the plant communities. In some areas, this can be done without excluding livestock or wild horses. At Foster Flat, the presence of a water source dictates that fencing to exclude livestock and wild horses will be necessary in order to minimize external influences.

Also, refer to responses 3-1 and 15-17 (Foster Flat); and 15-13 (Hatt Butte); 15-15 and 15-16 (Silver Creek); 15-22 (Squaw Lake); 15-24 and 15-25 (Dry Mountain); 15-27 (Saddle Butte) and 4-15, 15-32 and 121-1 (Biscuitroot Cultural ACEC).

The Obsidian Cultural ACEC is not proposed for designation at this time. The management of significant obsidian occurrences which are included in the nomination will be addressed in a resource-specific management plan as part of the overall cultural resource program. Specific and detailed guidelines for use of these areas will be developed at that time, with consideration given to the stipulations you have proposed.

152-9 Refer to response 2-10.

152-10 Refer to response 145-34.

152-11 Refer to response 4-14 and 6-10.



FEB 7 1990

3

REPLY TO
ATTN OF: WD-136

Joshua L. Warburton
District Manager
Burns District
Bureau of Land Management
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Dear Mr. Warburton

In accordance with our responsibilities under the National Environmental Policy Act, (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Draft Three Rivers Resource Management Plan and Environmental Impact Statement (draft RMP and EIS). This planning area includes 1,709,918 acres primarily in Harney County in southeast Oregon.

Based on our review we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). This rating reflects our concern that the declining water quality trends in the Malheur and Malheur Lake Basins be reversed and that a distinct "no action" alternative be developed. A summary of our comments will be placed in the Federal Register.

As indicated in Appendix 1 of the draft EIS and the 1988 Oregon Statewide Assessment of Nonpoint Sources of Water Pollution, water quality in many of the area's streams are in poor condition or beneficial uses are impaired. The degraded water quality conditions in the Malheur and Malheur Lake Basins is largely due to livestock grazing, irrigated agriculture, vegetation management, and recreation.

We would favor Alternative B over preferred Alternative C, as it is more protective of water quality and would allow a better chance of recovery. Alternative B would exclude livestock for 5+ years from streams with poor water quality (Alternative C would feature only "temporary removal" of livestock). Alternative B would also discontinue livestock grazing along 16+ reservoirs (four more than Alternative C). More stream miles would be stopped from declining or improve

Alternative C allows for a "variable no-cut buffer" along streams, while Alternative B would have a "no-cut buffer." Even though Alternative B appears more conservative the buffer issue is still ambiguous. (Appendix 2-2. "General Best Forest Management Practices," uses the term "variable "o-cut buffer.") The differences between alternatives on no-cut buffers needs to be explained.

The draft EIS lacks a definitive no action alternative (Council on Environmental Quality Regulations, § 1502.14(d)). A no action alternative, that is a continuation of existing management plans, would allow the reader to have a reference point from which to compare the action alternatives. A new "no action" alternative needs to be included in Chapter 4 so that the environmental consequences of no action is understood for each of the resource categories. The draft EIS USES the term "Baseline Level" in some of the comparison tables. This needs to be explained.

The text states that the environmental consequences of management activities will have a "positive effect on water quality." The implied reason is that improved management practices will allow existing degraded conditions to recover. This assumes guaranteed implementation of mitigation measures. This is a significant assumption that needs to be explained further. What changes will be needed in the day-to-day operations of the district to effect these changes? Will increased staffing or budgets be required? Are there circumstances where this new management approach would not be achieved?

With regards to state coordination we would suggest that consistency with the State Water Quality Management program be added (page I-10)

The inclusion of existing conditions for individual streams is good (Appendix 1, Table 1). The future condition or water quality goals for individual streams should also be included in the final EIS. Does this table agree with the 1988 Oregon Statewide Assessment of Nonpoint Sources of Water Pollution? The source for this data should be cited. Abbreviations for water quality category such as I, M, and C should be explained with the table.

When the terms poor, fair, good, excellent are used to describe environmental conditions (such as Tables 3.10, 3.11, and 3.12 which describe aquatic, riparian, and wetland habitat) they should be defined. In the water quality discussion on page 4-3 for example, is "fair" or "good" water quality consistent with Oregon Water Quality Standards and are beneficial uses being fully supported?

The text states that for Alternative C, one mile of stream would decline to poor water quality apparently due to mining activity. This does not appear to be consistent with Oregon Water Quality Standards and Antidegradation Policy. This should be corrected.

We are pleased that a detailed monitoring and evaluation plan will be included with the final EIS. The monitoring plan should respond to the issues and concerns identified in the scoping process. It will increase the ability of the public to verify that the environmental effects are within those described in the final EIS.

Good monitoring can be critical to assurance of minimal environmental consequences. This is why we believe that the RMP should contain as much detailed as possible on monitoring. We recognize that detailed monitoring may not be possible in conjunction with each activity. We encourage using opportunities to

coordinate the efforts with agencies. To the extent that methods and parameters can be agreed upon and sampling stations and timing be coordinated, a district wide data base can be developed that can be effectively used for decisionmaking

153-9 The monitoring plan should be designed to reduce adverse effects from plan implementation and demonstrate the effectiveness of mitigation. It should include types of surveys, location of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups. Appendices A and O of the Final Nez Perce National Forest Plan, October 1987, includes the and approach to water quality and fishery monitoring which we believe will accomplish the stated objectives

10 As a integral part of monitoring a built-in feedback mechanism is needed so that activities causing a problem will be corrected before they are allowed to continue and upgrading of best management practices or prescriptions to correct inaccurate predictions occurs. The feedback mechanism will ensure that mitigation measures, best management practices, standard operating procedures, intensity of monitoring, grazing allotment administration, and timber sale administration are adjusted when monitoring indicates a need. Special grazing allotment administration techniques that will increase the success and effectiveness of mitigation measures should be discussed.

153-11 The RMP also needs to describe project monitoring. This primarily means on-site inspection and administration during a activity, verifying that a particular activity is occurring as prescribed in contracts, leases, or permits. Discussions should include: frequency of on-site inspections for different activities (before, during and after); events which trigger when specialists make site visits; and chain of command for how on-site corrections and decisions are made

Thank you for the opportunity to review this draft EIS. Because of the critical need for improving water quality in the Malheur, and Malheur Lake Basins we recommend close coordination with the Oregon Department of Environmental Quality. Please contact Wayne Elson at (206) 442-1463 if you have any questions about our comments.

Sincerely,

Ronald A. Lee, Chief
Environmental Evaluation Branch

cc: Phil Hamilton, BLM Oregon State Office
Roger Wood, Oregon DEQ

153-2 The draft EIS lacks a definitive no action alternative (Council on Environmental Quality Regulations, § 1502.14(d)). A no action alternative, that is a continuation of existing management plans, would allow the reader to have a reference point from which to compare the action alternatives. A new "no action" alternative needs to be included in Chapter 4 so that the environmental consequences of no action is understood for each of the resource categories. The draft EIS USES the term "Baseline Level" in some of the comparison tables. This needs to be explained.

153-3 The text states that the environmental consequences of management activities will have a "positive effect on water quality." The implied reason is that improved management practices will allow existing degraded conditions to recover. This assumes guaranteed implementation of mitigation measures. This is a significant assumption that needs to be explained further. What changes will be needed in the day-to-day operations of the district to effect these changes? Will increased staffing or budgets be required? Are there circumstances where this new management approach would not be achieved?

153-4 With regards to state coordination we would suggest that consistency with the State Water Quality Management program be added (page I-10)

153-5 The inclusion of existing conditions for individual streams is good (Appendix 1, Table 1). The future condition or water quality goals for individual streams should also be included in the final EIS. Does this table agree with the 1988 Oregon Statewide Assessment of Nonpoint Sources of Water Pollution? The source for this data should be cited. Abbreviations for water quality category such as I, M, and C should be explained with the table.

153-7 When the terms poor, fair, good, excellent are used to describe environmental conditions (such as Tables 3.10, 3.11, and 3.12 which describe aquatic, riparian, and wetland habitat) they should be defined. In the water quality discussion on page 4-3 for example, is "fair" or "good" water quality consistent with Oregon Water Quality Standards and are beneficial uses being fully supported?

153-8 The text states that for Alternative C, one mile of stream would decline to poor water quality apparently due to mining activity. This does not appear to be consistent with Oregon Water Quality Standards and Antidegradation Policy. This should be corrected.

We are pleased that a detailed monitoring and evaluation plan will be included with the final EIS. The monitoring plan should respond to the issues and concerns identified in the scoping process. It will increase the ability of the public to verify that the environmental effects are within those described in the final EIS.

Good monitoring can be critical to assurance of minimal environmental consequences. This is why we believe that the RMP should contain as much detailed as possible on monitoring. We recognize that detailed monitoring may not be possible in conjunction with each activity. We encourage using opportunities to

153-1 It appears you are referring to Alternative D's no cut buffer since Alternatives A, B and C refer to the variable no cut buffer. Alternative D emphasizes the standard 100-foot buffer since that alternative emphasizes the commodity side of the spectrum. The variable width buffer is supported by all resources throughout this document.

153-2 Alternative D is clearly identified as the Continuation of Present Management or No Action Alternative on page 2-2 of the DRMP/DEIS under the Alternatives Considered in Detail section. This is also the case in Table 2.1 where all of the alternatives are displayed side by side. Column 5 clearly identifies the subject alternative as No Action. Also, refer to response 8-1 and 12-4.

153-3 Refer to responses 2-11.

153-4 Coordination with interested State agencies was facilitated through the State Clearinghouse of the Intergovernmental Relations Division of the Executive Department of Oregon. Direct communication would be established with the State Water Quality Management Office for coordination of the PRMP/FEIS.

153-5 Water quality goals were identified as management objectives in DRMP/DEIS, Table 2.1-2 through 6. The 1988 DEQ Statewide Assessment of Nonpoint Sources of Water Pollution does agree with, and was a source of information for data presented in Table 1 of Appendix 1, DRMP/DEIS.

153-6 The I, M and C abbreviations are for selective management categories for allotments, not water quality designations. These allotment categorizations are noted in the DRMP/DEIS on p. 3-12. Parameters used to identify and determine these categories were elaborated on in the DRMP/DEIS, Appendix 3, Table 1. Allotment Categories.

153-7 Refer to response 9-2 and Proposed Plan, Table 2.1.

153-8 Under 43 CFR 3809 regulations, the operator must comply with all applicable State and Federal water quality regulations.

153-9 The Proposed Plan has been composed to display general monitoring requirements for each management action. The detailed parameters to which you refer are normally addressed at the activity planning level and are, therefore, not contained in the RMP.

153-10 Monitoring procedures and feedback mechanisms have been incorporated in the Proposed Plan (see Procedures to Implement/Monitoring Needs) for each management action.

153-11 Refer to response 153-10.



A PUBLICLY SUPPORTED
COMMUNITY COLLEGE
7
1522E MLODGHENR RD
VANCOUVER, WA 98681
TELEPHONE (206) 994-6321

2 February 1990

Jay Carlson
RMP/EIS Team Leader
Bureau of Land Management
HC 74-12533
Highway 20 W.
Hines, OR 97738

Dear EIS Team:

I am responding to the Draft, Three Rivers Resource Management Plan and Environmental Impact Statement. I am a biologist who does research in the Burns area each summer and I am increasingly concerned about our loss of land and water that emphasizes natural values.

I suggest that natural values be stressed over commodity production. In my opinion, the purpose of an environmental impact statement is to project into the future consequences of our actions. Long range, we must favor natural values.

My suggestions for alternative are:

Water Quality (stream miles)	Alt. A
Water Quality (surface area)	Alt. A
Forest Management (acres)	Alt. A - less than suggested
Forest Management (annual harvest)	Alt. A - less than suggested
Grazing Management (acres)	Less than 1 million total
Grazing Management (initial stocking levels)	50,000
Special Recreation Management Areas	17,176
Off-Highway Vehicle Designations (acres)	Alt. A
Wild & Scenic Rivers (stream miles)	Alt. A
Wild & Scenic Rivers (acres)	Alt. A
Areas of Critical Environmental Concern (acres)	Alt. E
Visual Resource Management	Keep Class I
Cultural Resources	Alt. A

Energy & Minerals	Alt. A
Solid Leasable Minerals (acres)	Alt. B
Fluid Energy Minerals (oil & gas lease acres)	Alt. A

Although writing a resource management plan is no easy task, the hardest part is making a commitment to the future, even though short-term effects are felt. I commend you on your efforts so far and hope to see Harney County enjoying another centennial with clean air, water, and soil within the beautiful landscapes.

Sincerely,

Erleen Christenson, Ph.D.

Erleen Christenson, Ph.D.

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

155

155 No comment identified.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of _____ AUM's livestock forage in _____ Allotment will reduce the value of our base property by approximately \$_____. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Kaye E. Smith

771 Ponderosa Village

Burns, Oregon 97720

Address

City State Zip Code



Signature
Enclosure: Supplemental Comments

156

February 17, 1990

156-1 Refer to response 2-63.

Jay Carlson - HRL/215
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson,

156-1

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B and C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of 210 AUM's livestock forage in West Warm Springs Allotment will reduce the value of our base property by approximately \$10,500. Please consider this economic loss in the requested "Takings Implication Assessment."

Sincerely,



Louis A. Priarte
P. O. Box 545
Burns, Oregon 97720

January 26, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
H.C. 74 - 12533 Highway 20 West
Hines, OR 97738

Comments And Response to
Draft Three Rivers Resource Management Plan
And Environmental Impact Statement

The Draft Three Rivers RMP/EIS raises many concerns. The full impact of reduced grazing as proposed in alternatives A, B, and C were not fully addressed. Especially, the negative impact upon the community and individual rancher.

The BLM monitoring techniques and conclusions on livestock forage are questionable. Management objectives vague, especially in the area of surface water quality, aquatic and riparian habitat. The condition ratings for the surface water and aquatic and riparian habitat are unreasonable and seem to be the "heart" of the proposed reductions in livestock grazing. Yet, if cattle were to be removed from these areas, wouldn't wildlife and wild horses still use these creeks and areas unless an elaborate and expensive fencing system was implemented?

- 157-1 There is absolutely no basis for giving wildlife and wild horses priority over cattle in forage allocations. This has already been contested.
- 157-2 In the West Warm Springs allotment, estimated capacity (8259 aum's) is 2908 aum's below active preference (11,167 aum's) and the range is classified unsatisfactory. Appendix 3-114-115. Yet the average actual use (5952 aum's) is half of the active preference. In the last three years the average actual use had been only 4255 aum's 6912 aum's below preference. Plus this allotment has had over 50,000 acres of burn due to lightning fires in the last five years. In essence this range has been rested and allowed to reinvigorate. The estimated carrying capacity information is grossly inaccurate and reflects the BLM's attempt to cut livestock grazing "across the board".
- 157-3 The area shown as mule deer wintering range in the West Warm Springs allotment is in error. The area mapped as winter range (Ch 3-30) was burned off in 1985 by lightning fire. This area doesn't provide any browse. The area mapped as winter range is also a short distance from the Malheur National Wildlife Refuge. The Refuge provides open water all winter with springs and a greater variety of feed. Any increase in aum's for deer in the West Warm Springs allotment would certainly not be realistic.
- 157-4 The wild horse numbers in the Warm Springs allotments are above the maximum allowed. In order to improve forage the first thing to be done is bring those numbers back down to the proper level. Apparently forage must be adequate as the wild horses are reproducing at a fast pace. Any reduction of livestock aum's for horses is unfounded.
- 157-5 Alternatives A, B, and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if alternatives A, B, or C are considered that prior to issuing the Final Three Rivers Resource Management Plan Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by

- 157-1 Refer to response 2-6.
- 157-2 The evaluations are done and figures are in the PRMP/FEIS (see Appendix 1, Table 9).
- 157-3 Refer to responses 2-11, 2-17 and 2-87.
- 157-4 This area is generally used in early winter before snowfall and temperatures become too severe and in late winter after snow melt. Also, refer to responses 2-10 and 145-36.
- 157-5 The wild horses and burros are currently substantially below the maximum number allowed in the Warm Springs HMA as listed on an inventory report dated December 8, 1989. Also, refer to response 2-6.
- 157-6 Refer to response 2-63.
- 157-7 Refer to response 2-36.
- 157-8 See Appendix 3, Table 7, DRMP/DEIS and Appendix 1, Table 14, Proposed Plan.
- 157-9 Refer to response 2-87.

page 2
RMP/EIS Comment and Response

by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodd).

The reallocation and or reduction of aum's livestock forage in West Warm Springs allotment will reduce the value of our base property. Please consider this economic loss in the requested "Takings Implication Assessment."

Much progress has been realized in striving for multiple use and improvement of range condition. Alternatives A, B, and C are not consistent with those objectives.

- 157-7 In all the Alternatives including the "preferred" a huge amount of funding would be needed for livestock range improvements. Funding and personnel has not and probably would not be available. Therefore the only course of action would be the reduction of livestock grazing to the detriment of the livestock industry and community.
- Letters from the Harney county Stockgrowers, Cattlewomen, Farm Bureau and the document prepared by Riddle Ranch and Western Range Service have our whole hearted endorsement. Their responses have been submitted to you.

Recommendations

Alternatives A, B, and C should not be implemented. They would be devastating to a community such as Burns, Oregon that depends heavily on the cattle and timber industry for survival.

The Drewsey and Riley MPP are working and should be continued. Alternative D comes the closest to that objective.

- 157-8 Range improvement should continue as funds allow.
- 157-9 Long term studies should be conducted to determine vegetation and range condition. Adjustments could then be made as the trends go up or down. Grazing should be maintained at present levels until those trends are definitely defined.

Sincerely,

William S. Peila

Please file a copy of this letter in my permanent file.



- 158-1 Refer to response 2-87.
158-2 Refer to response 6-8.
158-3 Refer to responses 2-7 and 4-2.

February 9, 1990

Mr. Joshua Warburton
District Manager
Bureau of Land Management
Burns District Office
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Dear Mr. Warburton:

158-1 The Three Rivers Resource Management Plan and Environmental Impact Statement reflects a tremendous amount of work on the part of your staff. However, it is completely uninterpretable because no clear description of the methodology used is given. The reader must accept that each data point used is collected properly and with no sampling error. Therefore, it is nearly impossible to evaluate the quality of the data included in the report. I suggest a clear description of methodology for collection of all data including actual sampling strategies must be included so the conclusions can be evaluated.

158-2 There is a general successional theory implied and sometimes stated in the document that reduction or elimination of grazing will bring about a reversal of current trends to domination by sagebrush and juniper, so that plant communities with increased herbaceous components will develop. Unfortunately, current ecological theory and evidence clearly indicates that succession is much more complex and that range management to create the kinds of plant communities suggested as desirable will not result solely from grazing controls. If you want a diverse, healthy rangeland the total system needs management by application of ecological knowledge. Direct control of woody vegetation in the upland environments is necessary to achieve the rangeland structure and function as stated and implied throughout the document.

158-3 The understanding of management of livestock grazing is focused principally on total numbers of animals placed on the range. Recent knowledge of the critically important role of timing of grazing and utilization of livestock grazing to direct succession in positive ways is not adequately addressed. With current grazing management practices and theory, as presented in professional journals and other documents, the critically important environmental concerns in the area may well be preserved without doing economic damage to the permittees. These options to reduction in numbers are appropriate when sufficient usable forage exists in an allotment. And, understandable when it is measured correctly.

There are many questions this document raises such as the basis for range condition evaluation or water quality and other items. However, the process itself is really more troubling than the document. The structure of the report may be required by law or policy, but the inevitable outcome will be polarization of interests and no doubt dissatisfaction from all parties interested in the Three Rivers Area. Within and among those interested, there is a possibility to focus the energies of the BLM to manage the rangelands to maximize benefits for everyone rather than polarize the interests through allocation procedures. I hope BLM can get this statement behind them and then embark on an aggressive program to find consensus about land management among the interests and strive to fully meet all of their needs. The potential and demonstrated successes throughout eastern Oregon to do this is largely there, and good managers can put these programs together.

Sincerely,

William C. Krueger
Department Head

WCK bc



Association of
Oregon
Archeologists

159

Dedicated to the protection and enhancement of prehistoric and historic archaeological resources.

159-1 Refer to response 152-8, last paragraph.

Feb. 12, 1990

District Manager Joshua L. Warburton
BLM - Burns District
HC 74-12533 Hwy. 20 West
Hines, OR 97735

Dear Mr. Warburton,

159-1 I am writing you on behalf of the Association of Oregon Archeologists (AOA) to urge the BLM to designate the Obsidian Cultural ACEC described in the Three Rivers Resource Impact Statement, Appendix 7-12 and 7-13. The designation of this ACEC candidate should be included in the preferred alternative as the Obsidian sources included in this ACEC candidate have significant cultural and geologic values and a long history of human use from prehistoric times to the present. Current use by archaeological professionals, rock hounds and avocational flint-knappers is high, especially for example at Little Glass Buttes. Special management is needed to protect the prehistoric cultural values as well as to conserve the geologic resource for continued long-term use. If these five obsidian sources are designated as the Obsidian Cultural Area of Critical Environmental Concern, a management plan specifically addressing these sources should be developed. This management plan should include the following:

1) All current collecting of raw obsidian material from the ACEC should be by permit only. The quantity of material to

P.O. Box 40327

Portland, Oregon 97240-0327

Obsidian Cultural ACEC candidate (2)

be removed should be fixed in the permit. The number of permits issued each year should be determined based on objectives set in the management plan for assuring long-term availability of obsidian at these sources.

2) Flint-knapping should not be allowed on existing prehistoric sites. Near-by areas with no prehistoric material should be designated for replicative and/or experimental use. These replication areas should be recorded with these locations reported to the Oregon State Historic Preservation Office. Flint-knapping activities conducted on these replicative sites should be conducted on removable surfaces such as tarps. All debitage should be removed from the replication areas by the person(s) conducting the flint-knapping activities. The objective of this recording and debitage removal of replication areas is to prevent mistaken identification of current flint-knapping sites ~~with~~ as prehistoric sites, and to prevent mixing of debitage and artifacts from current-use sites with that of ~~the~~ prehistoric sites.

3) Camping and construction of firepits should be prohibited in the Obsidian Cultural ACEC.

Thank-you for your continuing efforts in managing this and other valuable cultural and geologic resources on Burns District in a positive and balanced program.

Sincerely,

Tom Connolly

Tom Connolly
President, AOA

160-1 Refer to response 2-11.

February 7, 1990

Jay Carlson -RMP/EIS
Burns District Office
Bureau of Land Management
H.C. 74 - 12533 Highway 20 West
Hines, Oregon 97738

Comments And Response to
Draft Three Rivers Resource Management Plan
And Environmental Impact Statement

I would like to endorse the letters sent to your office by the Harney County Stockgrowers, CattleWomen, Farm Bureau and the document prepared by Riddle Ranch and Western Range Service.

I have a few thoughts of my own to pass along. We have a permit in the West Warm Springs Allotment and having spent the last few years tending to our cattle and helping neighbors I am amazed to learn that a reduction in aum's is even being considered. The use of aum's is way down in proportion to the preference and the feed is abundant. There were times of range our cattle never even saw let alone grazed, just in our allocated area.

My recommendation, concerning alternatives A, B, and C should not be implemented. Our community is unstable at best and the economical impact would be gigantic.

Sincerely,

Lori Peila

March 10, 1990
Janet L. Stewart
P.O. Box 64
Antelope, Oregon 97005

District Manager
Bureau of Land Management
HC-7412533 Hwy. 20 West
Hines, Oregon 97738

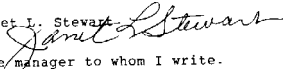
Dear Sir:

I maintain that alternative "c" BLM's "preferred" (cow) alternative of the EIS is an ecological disaster.

I demand that the BLM adopt Alternative "A" (the "Natural Values" alternative) which would at least allow a token amount of recovery to occur until such time as they complete an alternative that will allow for full rangeland, riparian and stream recovery.

- 161-1 Water quality, riparian and aquatic habitat must be improved/maintained in excellent condition.
- 161-2 All ancient forest must be identified and protected.
- 161-3 All costs of construction of new roads and other rangeland projects be included under the various alternatives along with their environmental impacts.
- 161-4 See that all crested wheatgrass seeding proposals be eliminated.
- 161-5 I demand that bighorn habitat protection and impacts be addressed in the plan and further, that forage allocations go entirely to bighorns in their home range.
- 161-6 I request that Wild and Scenic River designation be given for all of the South Fork and Middle Fork Malheur Rivers (except for the reach through the Drewsey area), all of Bluebucket Creek and all of the Silvies River.
- 161-7 I recommend that wildlife winter range forage allocations be given priority over livestock allocations.

Thank You,

Janet L. Stewart 

- 161-8 I would like to know the name of the manager to whom I write.

- 161-1 Refer to response 2-44.
- 161-2 Refer to response 12-1.
- 161-3 Refer to response 12-7.
- 161-4 Refer to responses 1-11.
- 161-5 Refer to response 2-78.
- 161-6 Refer to response 3-6.
- 161-7 Refer to responses 2-6, 2-10 and 1-13.
- 161-8 The manager at the field level who is currently responsible for the implementation of the RMP is the Area Manager, Craig M. Hansen. The manager who has the authority to approve the RMP is the State Director, Dean Bibles.

Malheur Field Station
 HC 72 Box 260
 Princeton Oregon 97721
 12 February 1990

Bureau of Land Management
 Burns District Office
 HC 74-12593
 Highway 20 W
 Hines, Oregon 97738

To Whom It May Concern,

There has been much work and research put into the preparation of the Three Rivers Resource Management Plan, and many people have made contributions. There are two areas about which I wish to comment. This is because I personally have spent a lot of time doing research on the areas, the issues involved in land use management, and the different people who benefit from how the areas are managed. I am NOT against grazing, per se; however, I am in favor of managing when areas are open to grazing.

First, in Vol I Chapter 3 page 46 and Vol II Appendix 7-11 the BISCUITROOT CULTURAL ACEC: I have spent 11 years conducting plant community research on Stinking Water in the areas where the Burns Paiute dig their spring "root" crops. This work has been done with two anthropologists with them studying the social aspects of the activities and I studying the plant dynamics and change in relation to environmental changes, human activities, and animals making an impact on the plants (antelope, rodents, rabbits, and cattle). This is a total systems approach; however, the food plants are only available and above ground from April into early June.

Elsewhere in the inner mountain West, research has been done to indicate that cattle prefer not to graze on the alternating spongy and rocky spring lithosols. This is not the case on Stinkingwater and during the past few years, the cattle have caused destruction of the small stream through one of the main collecting sites, compacting of soils with trails through the area, and actual grazing of the tops of the "root" food plants. I have photo documentation of all these influences. This is a resource that is available during a limited time every year and can not stand the competition of both cattle and humans. I recommend that if there is grazing in the area that it be excluded from early April through the middle of June.

162-1 The anthropologists working with the Burns Paiute recommended earlier that the main Pine Creek camp site not be used for a gravel pit; however, this information was not available when the decision was made or it was ignored. This is one of many lithosol areas that are rich in food plants during the spring, but are "bare rocks" during other parts of the year. This is not the first excellent root gathering site I have seen ruined by gravel pits. Now that this area has been "claimed" by the Burns Paiute as a area used for centuries by their ancestors, the gravel pit should be abandoned and no more pit expansion allowed.

My colleagues and I plan to continue our research if "outside" influences do not destroy the resource entirely. If the BLM is truly going to manage for "multiple use" in this relatively small area, which is critically important in the variety of "root plants" and has thus far demonstrated resilience in recovery from outside impacts (cattle and pit burrowing), the area should be top on the list for a CULTURAL ACEC.

page 2

162-2 Another concern of mine and one that I have studied, guarded and worked with the BLM to protect and manage wisely, is the continuation of the STEPHANOMERIA MALHEURENSIS ACEC protection. In the case of the RNAs and other plant areas of concern. The BLM nor the botanical community have enough information on these plant communities. Malheur Field Station is helping with research in these areas and those studies should continue. I concur that the ACECs listed in Vol II Appendix 7-2 should have limited disturbance and "outside" use. One of the goals of MFS is to encourage interest and scientific research in these areas by scientists from all over the USA. The philosophy in this county appears to be that grazing is a "given" and that the public must come up with reasons not to graze. That is backwards. Each area is unique and can tolerate different rates of grazing, grazing times (if any), or in some cases, the slightest disturbance is permanent damage; the natural biologists should determine the use not human assumptions.

Thank you for the time, effort, and thorough discussions of the documents for managing the Three Rivers.

Sincerely,

Lucile A. Housley
 Lucile A. Housley
 Botanist/ecologist/ethnobotanist

162-1 Refer to response 6-13.

162-2 The South Narrows ACEC designation will be retained. The Bureau expects to continue the activities begun under the Stephanomeria malheurensis study plan. The Proposed Plan presents management actions that the Bureau expects to undertake for RNA/ACECs and other special status plant species.

Burns District Office
HC 74-12533
Highway 20 W.
Hines, OR 97738
Attn. Jay Carlson, RMP/EIS Team Leader

Mr. Carlson,

- 163-1 Refer to response 4-15.
- 163-2 Refer to response 145-53.
- 163-3 Refer to responses 2-7 and 3-13.
- 163-4 Refer to response 2-46.
- 163-5 Refer to response 3-9.

Concerning the Three Rivers Resource Management Plan, here are some specific observations concerning permittees on the House Butte allotment and the effects this plan would have on their permit.

163-1 In reference to the Biscuitroot Cultural ACEC, any reduction in this area could have a negative effect on the present livestock use on the House Butte allotment #5527. The present AMP on allotment #5529 has been in place since 1983 and the condition has steadily trended upward with very little, if any, effect of the availability of the cultural plants gathered by the local Indian tribes. As near as can be detected, livestock grazing has a positive impact on the species of plants that are utilized by the Indians. The species gathered by the Indians are not palatable (except for wild onions), therefore, livestock grazing would help the species gathered by the Indians by reducing the competition these plants face.

In the 1950's and 60's, when the House Butte area had much heavier livestock use, and the Biscuitroot ACEC was grazed much more severely than it is under the present system, many more native Americans used the area for root-gathering. Since there are less livestock in this area since implementation of the AMP in 1982, a good crop of plants that the Indians gather has been maintained. We, therefore, cannot support a reduction in livestock grazing concerning the Indian root-gathering without more valid scientific research than what was used to arrive at the conclusion in the Three Rivers report.

163-2 Concerning range improvements on the House Butte allotment, the preferred alternative for this allotment presently has 2 spring developments for improvements. This falls short of a range management program. There are at least 4 springs to develop on the allotment. Three (3) reservoirs could also make for a better distribution of livestock, as well as a small bit of fencing. We as permittees would consider the cost of developing the range for the betterment of our livestock, as well as wildlife use. These practices should be considered before making a long range plan since their implementation would improve the condition of the range even more, which should be the primary goal of the BLM, anyway. Also, approximately 3,000 acres of the allotment could be utilized better with brush treatment and reseeding a more palatable grass such as crested wheat.

163-3 Another totally unacceptable idea brought forth is the idea of limiting upland utilization to 30% and to 10% in

areas with woody riparian shrubs. There is no valid scientific base behind this decision and is obviously aimed at reducing cattle numbers ever more since these percentages are totally unworkable in a good grazing system.

Removing livestock from streams entirely and the mismanagement of their wild horse program are examples of more poor decisions by the BLM that would adversely effect everyone who grazes public land.

163-4 The continual fencing of reservoirs adversely affects permittees in the House Butte allotment. These reservoirs, incidentally, were developed from funds supplied by the permittees in this allotment. This practice is in direct conflict with the BLM's objective to disperse livestock away from riparian areas and improve forage utilization.

163-5 Another concern for the House Butte permittees is the unscientific conclusion by the BLM that livestock grazing adversely affected the population of sagegrouse population. This statement couldn't be further from the truth. There are several large bunches of sagegrouse in this allotment as any researcher who might be doing a study of them would see if they had taken the time to carry out anything approaching a valid, scientific study.

The above issues summarize the concerns of the permittees on the House Butte allotment. Although some of the decisions made in the Three Rivers plan do not affect us directly on our allotment, we sympathize and completely support livestock owners who have permits in other allotments who are being affected by the arbitrary and subjective decisions made in the report - decisions that have no recognized and accepted scientific research methods to back them up.

The rancher of today recognizes the need for stewardship of the land and has cooperated with the BLM in all management decisions made to improve the public land. The current trend with the BLM - in their zeal to get the "environmentalists off their back", who want all cattle off of public land - has changed their research methods. They seem now to have the conclusion - that being to reduce livestock numbers - already established and then must re-organize all the data to fit that pre-determined conclusion. This blatant "slap in the face" of a rancher's intelligence will lead to a more unified group of ranchers who now know how to protect themselves - even if legal means must be used.

In conclusion, the rancher has done a good job in improving the rangelands and any attempt to discredit this by a report like the Three Rivers Resource Area plan, with its unscientific, biased opinions, will not be accepted.

Respectfully submitted,

Norman C. Clark	James H. Sitz	Harvey Cronin	Helen Opie
<i>Norman C. Clark</i>	<i>Betty L. Sitz</i>	<i>Harvey Cronin</i>	<i>Helen Opie</i>
Box 162	Box 34	Box 347	Box 165
Drewsey, OR	Drewsey, OR	Drewsey, OR	Drewsey, OR

Helen Opie
Troysey, Oregon
February 5, 1990

164-1 Refer to response 2-10.

Jay Carlson- RT/SIG
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

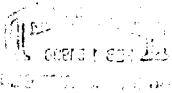
Comments Concerning Muddy Creek Allotment - 5/06

164-1 The Muddy Creek allotment has been in a process of 3 A.M. since 1983 and has completed five cycles. This system has worked well, and range conditions have improved. During this time, elk population has increased in this area. The BLM wants to take 20 A.T.M.'s from livestock and give to the elk. The elk population would not have increased over the past seven years if there was not an abundant amount of forage. Had this forage not been there, the elk would not have moved into this area.

I cannot support any reduction in livestock grazing for improvement of water quality. The majority of Muddy Creek lies on private land. I cannot believe that the water quality is poor in this stream. There is plenty of forage left in this allotment to control any erosion.

I believe that livestock grazing at the present rate has a positive impact on the range conditions of Muddy Creek.

Respectfully,
Helen Opie



P.O. Box 5
Princeton, OR. 97721
February 12, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC-74 - 12533 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson,
Let me begin by saying, I am a rancher and proud of it. I was born and raised on a ranch as was my husband. We now are raising our family on a ranch. Ranching is not only a job but a way of life. Sometimes I think people who work at a set job have no concept of just how we live. We don't have any set hours, hourly wages, benefits, etc. The amount of years we put into ranching don't entitle us to a raise or promotion. We still are dependent on some very volatile things. We are tied to the land. Therefore I feel most ranchers are good stewards of the land. We are dependent upon it for our existence. If we misuse or abuse it we are only hurting ourselves. Many ranchers are multi-generation ranchers and hope to keep the ranch in the family forever. So why would we do anything to harm the environment?

We are not part of the "back to nature" movement because we never left. We've always been in tune with nature. We are in a unique position that we not only observe the wildlife in their natural environment but we also contribute (quite heavily at times) to their very existence. The deer and antelope flock to the private haylands during late summer when the green is gone from the rangelands. This contributes not only to their winter survival but puts them in better condition for the breeding season. In the winter time they also eat right out of our haystacks, ruining as much or more than they consume. We pay a fair price to graze on the public lands yet receive no compensation for supporting the wildlife. Not even acknowledgement!

As for the wild horses, let me say many ranchers like horses; yes, even the wild ones, to a point. There have been wild horses in certain areas for years. They weren't considered a big problem until the federal government decided to manage them. First the BLM said they owned the horses. No one else could round any of them up for use, resale or whatever. This was the only way the numbers had been kept in check over the years and it worked. Now the BLM spends millions of our taxpayers dollars to run the wild horses, haul them in, feed them top quality hay, provide veterinary care, build expensive corrals, and to run the adopt-a-horse program. They release quite a few so in a few years this must be done again and again. But all this isn't enough, they want to make huge allotments to make HMA areas. Possibly even condemning private land! I can't believe the BLM would put the horses, who are thriving ahead of ranchers livelihood. It must be easy to sit in an office and say a 30% cut here and here is no big deal. But to some people it's an end of their way of life! PEOPLE, like you and I, not animals! The wildlife and horses will survive but will the family ranches?

The cattle are supposedly ruining the water quality but yet the horses and wildlife never seem to be mentioned. Personally I just don't see the problem. I'm much more turned off by the campsite litter and other human

abuses. I would really hate to see all the creeks and reservoirs fenced off. I like to fish along a creek where the cows have grazed as the mosquitos are not so beautiful and I can see a snake in the grass. God made all the creatures large and small and they can and do live in harmony if we will just quit meddling.

I want to go on record that I wholeheartedly agree and support the letters by the Harney County Stockgrowers and the Riddle/Western Range Services.

165-2 I would like to add another comment and personal concern. In the Draft Three Rivers Management Plan Vol. 2 Appendix 3-17 Table 6, Allotment Management Summaries, the allotment identification categories were mentioned and identified as M, I, & C. However, no where did it say what these stood for! After looking through both volumes several times I did find it in the glossary of Vol. 1 under SALICELINE Management Category. At this point I at least knew what the "I" stood for on our allotment. Yet I do disagree on the matter. How can it have an estimated capacity of 778aums and an actual use of 451 and need improvement?

165-3 I It is mind boggling to think how much time and money went into this draft of five "different" alternatives when common sense could do it all so much more just and efficient.

Sincerely,

Mary Jo Davies

165-1 Refer to responses 4-14 and 11-11.

165-2 This will be corrected in the PRMP/FEIS.

165-3 Refer to response 8-4.

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

166

166 No comment identified

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

~~The reallocation and/or reduction of _____ AUM's livestock forage in _____ allotment will reduce the value of our base property by approximately \$ _____ (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."~~

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

DORA M. JOHNSON
Name
424 W. D. St.
Address
BURNS OR 97730
City State Zip Code
Dora M. Johnson
Signature

Enclosure: Supplemental Comments

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

167

167 No comment identified.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

~~The reallocation and/or reduction of _____ AUM's livestock forage in _____ allotment will reduce the value of our base property by approximately \$ _____ (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."~~

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

W. Reid and Linda Taylor
Name
Box 20
Address
Diamond, Or
City State Zip Code
W. Reid Taylor (Reid)
Signature

Enclosure: Supplemental Comments

Feb. 13, 1990

Mr. Jay Carlson
Burns District Office, B.L.M.
HC 74, 12533 Hwy. 20 W.
Hines, Ore. 97738

Dear Mr. Carlson:

We just wanted to write a line or two to let you know how we feel about the reduction of Aum's on our BLM permit.

168-1 | If our permit is cut 30-35% this naturally reduces our income and our land value by this same percentage.

The water situation needs to be improved in our area so that we could utilize the feed better.

We sincerely hope that some consideration will be given to the points which we have mentioned above.

Sincerely,

Mary C. King
Mary C. King

168-1 Refer to response 2-7, 2-11, 2-49, and Appendix 3, Table 7, DRMP/DEIS.

February 13, 1990

Craig M. Hansen, Area Manager
Three Rivers Resource Area
Burns District, BLM
HC 74-12533
Hwy. 20 West
Hines, Oregon 97738

Re: Comments on Draft Three Rivers RMP and EIS

Dear Mr. Hansen:

These comments are submitted on behalf of Portland Audubon Society (PAS), and are intended to supplement those submitted on their behalf by Linda Craig. We appreciate the considerable effort expended in preparation of the Draft Three Rivers RMP and EIS, and especially the efforts of you and Jay Carlson to explain the details of the document to interested members of the public. My comments will be limited to that portion of the document that deals with the potential for gold mining on BLM lands in the Resource Area and the potential environmental impact associated with that possibility.

169-1 Given the significant developments in cyanide heap leach gold mining activities in the BLM Vale District, and the recognition that claims staking activity is increasing in the Three Rivers Resource Area (p. 9-17), we believe you should conduct a more thorough and detailed analysis of the likelihood of such activity and its potential impact on the environment within the Three Rivers Resource Area. As it stands now, the document barely acknowledges the potential for such development and associated impacts. See p. 3-53; App. 9-17.

169-2 The "generalized gold mining scenario" that you included, pp. 9-18 to 9-20, deals entirely with the economic impacts of a hypothetical gold mining and processing operation. It is interesting and informative. However, a similar analysis of the environmental impacts of such a hypothetical operation should be included. You might determine, for example, that there is insufficient surface water or groundwater available to support such an operation, which might in turn affect your management of the resource.

Experience has shown that cyanide heap leach gold mining and processing operations are likely to contaminate the land, air, and water and are likely to have at least some impact on wildlife. The availability of groundwater is a critical issue

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Craig M. Hansen, Area Manager
February 13, 1990
Page 2

169-3 for wildlife and range condition in the Three Rivers area. You stated that an analysis of the impact of the overall RMP on groundwater will not be attempted because of the lack of data (p. 3-2). With the undeniable potential impact of gold mining on the groundwater resource, through both contamination and depletion, we believe you are obligated to develop the data to support a reasonable discussion of this issue. In the absence of any such data, but with the knowledge that such developments are reasonably likely to occur and to threaten the resource, we believe you are obligated to conduct a worst case analysis of the potential impact. See 40 C.F.R. Section 1502.22.

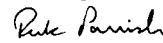
Similarly, the potential effects of mineral development on surface water quality are "impossible to predict." (App. 1, T-4) Again, if some effect is reasonably anticipated, the data must be developed or a worst case analysis conducted.

169-4 Finally, the degree of reclamation of the land disturbed by the gold mining operations would have a long-lasting effect on the wildlife in the area and on the recreational use of the area. These issues should be thoroughly explored in determining the management plan for the area for the next 10-15 years.

As you may know, the Vale District of the BLM is preparing an EIS on a gold mining and milling operation proposed for Grassy Mountain in Malheur County. Ralph Heft of that office would certainly have an abundance of information on the potential environmental impacts of such a scenario.

Again, we appreciate the opportunity to review and comment on the draft RMP and EIS. We would be happy to work with you to fill some of the gaps in the analysis, and we look forward to reviewing a more detailed analysis of gold mining prospects in the Three Rivers Resource Area in the final RMP and EIS.

Sincerely,



Richard A. Parrish
for
Portland Audubon Society

CC: Jay Carlson, RMP/EIS Team Leader ✓
Linda S. Craig, Portland Audubon

- 169-1 There presently are no plans of operation for the RA. If and when a plan of operation is submitted, an EA or EIS would be prepared as part of the process for analysis and public review prior to issuing a final decision on the plan.
- 169-2 Refer to responses 5-18 and 169-1.
- 169-3 Refer to responses 153-8, 169-1 and 169-2.
- 169-4 Refer to response 169-1. A plan of operation, as outlined in 43 CFR 3809, makes it incumbent on the operator to commence reclamation at the earliest feasible time and include, among other measures, the prevention or control of on- and off-site damage to Federal lands; saving topsoil for final reclamation; controlling erosion and runoff; isolating, removing, or controlling toxic materials; revegetating of disturbed areas where reasonably practicable; and rehabilitating of fisheries and wildlife habitat.

January 17, 1990

170-1 Refer to responses 2-1 through 2-96 which are responses to issues submitted by Riddle Range and Western Range Services.

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Warburton:

The January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Susan Otley
Name

HC 72-Box 50

Princeton OR 97721
City State zip code

Signature

Enclosure: Supplemental Comments

HC 72 Box 50
Princeton, OR 97721
February 8, 1990

Jay Carlson-RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

Dear Mr. Carlson:
I will avoid repetition and state that the 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Management Plan and Environmental Impact Statement very adequately states and stresses my concerns.

I would like to add some other comments:
First, with all these cuts in cattle grazing, the BLM will have less funds for all of its programs. Is this money going to come from the already overtaxed federal budget? Currently we have a management program that includes grazing, with the people and government managing the public lands with a generation of income. This is beneficial to both the taxpayers and permittees.

171-1 Speaking of economics, I felt the statements in Vol. I p.4-68 "sugar-coated" actuality. Many permittees cannot "absorb income loss." They carry large debts and bankruptcy may be the alternative. Due to the climate of this area change seasons of use on base property would only be a alternative for a very few. They too would have to reduce herd sizes thus their income. "Capital expenditures on base property to increase productive capacity", could be impossible with less income and less borrowing power. Diversifying crops is limited due to low precipitation and climatic conditions. Leasing of private land isn't even that available at the present. "Seek employment in non-agriculture sector" - in Harney County? Even your Impact Statement elsewhere mentions the unemployment problems. There will be some indebted ranchers too young for retirement and too old for another occupation with a ranch worth less than their debt, if the reductions are too severe. Also what about the lost revenue to Harney County for its schools, hospital, and other vital services?

171-2 I see where Riddle/Coyote has an unsatisfactory range condition. The surrounding area has a satisfactory range conditions. This area would be in the same condition had it been allotted to a permittee. The owner was in the process of trading the property consequently the fence was let deteriorate. A permittee with a permanent allotment would have kept the fence in repair. Riddle/Coyote needs to be allotted and managed.

171-3 Fencing more riparian areas has been proposed even in the preferred alternative. Who is to keep this fence in repair (cost and labor)?

If the BLM wants cattle kept off part of the public land they should provide maintenance. That is how it works in private ownership. Anyone wanting to be close to nature is sure to find the fenced creeks an unwelcome sight. If later, these fences are deemed unnecessary or not in accord with nature and the environment; is the BLM going to clean up the wire etc. or leave it as an eye-sore and a threat to wildlife?

171-4 In Alternate C (the preferred one) - "Acquisition of riparian areas and wetlands would assure water availability for horses in Kiger, Stinkingwater, and Vava Springs HMs throughout the Year". I understand this to mean horses will be grazing riparian areas and wetlands all year round, not just a few months as do cattle. They obviously are not going to be fenced off these riparian areas. Are they less damaging than a cow? "Acquisition" is private land going to be taken for the horses? The horse population if left unchecked will expand. Horses (once mature) have no natural predators or a hunting season as do the big game animals. The wild horse population must be controlled. Private land should never be condemned for the wild horse!

171-5 Our public land has remained in its near natural state for many years under the present multi-use concept. Many of the range improvements for cattle have been very beneficial to the wildlife as well. Some examples include: crested wheatgrass seedings provide more forage and water development which provides not only more water but also less concentration in certain areas. Some other management practices done solely by the permittee such as salting, hauling water in a drought, and cutting ice for water in the winter is a definite help for the wildlife.

Sincerely,
Susan Otley

- 171-1 Refer to responses 2-61 and 28-1.
- 171-2 This parcel has recently been exchanged to the Bureau. No site-specific management has been developed. Until a management plan can be developed, the preferred alternative is to not allocate Riddle-Coyote Allotment to livestock use.
- 171-3 See the DRMP/DEIS, p. 3-16, for the Bureau Range Improvement Maintenance Policy. When the Bureau deems a fence unnecessary, the unneeded fence materials are removed to prevent a hazard and/or eyesore.
- 171-4 Refer to responses 2-6 and 43-2.
- 171-5 Acquisition of any private land would be to the benefit of all resources. Also, refer to responses 4-13 and 11-11.

V DASH CATTLE COMPANY

172

DREWSEY, OREGON 97904
February 12, 1990

Jay Carlson
Bureau of Land Management
H C 74 12533 Hwy 20 W
Hines, OR 97738

Dear Mr Carlson:

You and your team are to be congratulated on the completion of the Draft Three Rivers Resource Management Plan and EIS document. It is readable and fairly understandable, but seems to be lacking in at least a couple areas, to which I will confine my comments.

One is fundamental--if we propose to manage and derive benefits from a natural resource we must stay within the bounds, and try to augment the ecological process that first made it a desirable resource.

The proposed policy of "agressively suppressing" all wildfires goes outside these bounds. Granted, life and property must be protected but to thwart the natural process in it's every attempt to cleanse and rejuvenate itself is not good resource management.

The consequences of the lack of fire this last century are like an open book if one will but read--the continuing reduction of the grass cover that holds the soil in place and allows precipitation to seep into the ground where it falls; the far too numerous watersheds covered with stagnant stands of brush that is a sorry substitute for grass in waterholding capability; the encroaching juniper thickets that are turning thousands of acres into gullied wastelands; the springs and creeks that go dry in the summertime because precipitation that should have percolated slowly through the soil to feed them has rushed off in a silt laden flood.

172-1 We can assist the natural process in many ways (this is what resource management is all about) but trying to totally eliminate wildfire while replacing it with only a minuscule amount of prescribed burning is most certainly self-defeating in the long run.

This "total suppression" policy needs to be reappraised.

172-2 Another area that might be misleading to some, is the classification of range conditions as poor, fair, good, and excellent. It should be explained just what criteria constitutes each of these ratings. To classify range allotments as poor when they don't have the potential to ever be much better would seem to be an injustice to the operators involved.

Thank you for the opportunity to comment.

Ken Bentz
Ken Bentz

172-1 Lightning-caused fires are a natural process; however, suppression policy is mandated at the Departmental and Bureau level. Refer to response 4-9. Since the overall or total suppression policy is not changeable at the District level, comments on this concern will be forwarded to the Oregon State Office.

The prescribed fire program also has established policy that must be adhered to (refer to responses 4-8 and 4-9). The proposed annual prescribed fire acres are based on limiting factors with smoke emissions and funding being two of the major factors. Yearly burning of 2,000 to 3,000 acres over the next 10 years is a definite step forward.

172-2 Refer to response 4-3.

173

January 17, 1990

173-1 Refer to responses 2-1 through 2-96 which are responses to issues submitted by Riddle Ranch and Western Range Service.

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Warburton:

The January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Steens Mountain Ranch, Inc.
Name

Darrell Otley

HC 72 Box 40

Address

Princeton, Or. 97721

City State Zip Code

Darrell Otley
Signature

Enclosure: Supplemental Comments

February 13, 1990

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Cr 97738

Review Comments For The October 1989
BLM Draft Three Rivers RMP/EIS

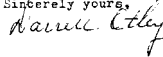
Dear Mr. Warburton:

We wish to go on record that the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. The enclosed response is our endorsement of such Riddle Ranch document. There are several other areas of concern that this letter will address.

- 174-1 The designation of the entire Kiger Active Horse Management area (36,619 acres) as an area of critical environmental concern will have a dramatic economical effect on at least one ranch. Before the change is even considered and the Final Three Rivers RMP/EIS is issued a complete "Takings Implication Assessment" should be conducted as authorized by Executive Order 12630. Livestock and wild horses have run together successfully for years. The complete elimination of livestock grazing is neither justified or proven necessary. Wild horses should not have higher priority for forage than other multiple uses. Livestock grazing preferences were legally established long before the passage of the Wild Horse and Burro Act. Involving the permittee in the decision making process would be beneficial to both the BLM and the permittee.
- 174-2 There is no scientific data that indicates that livestock use has any negative effect on the sagegrouse population. The restrictions on livestock in the sagegrouse strutting grounds are unfounded and should be eliminated.
- 174-3 The exclusion of cattle on the Biscuitroot Cultural ACEC is not supported. The report states "these areas to be a high-value resource due to the quality and quantity of roots available." Since grazing has been going on in this area for years and the quality and quantity have remained high, even with root harvesting, there is no justification to change the practice.
- 174-4 The surface water quality and aquatic and riparian habitat condition ratings appear to be inconsistent and unrealistically restrictive. If water quality conditions are as poor as BLM claims (86% of the streams are reported to have poor surface water quality) one would expect that there would be no fish left in the Resource Area. These water quality ratings (surface, riparian and aquatic) are the basis for the majority of the adverse impacts to livestock grazing.
- 174-5 All available information indicates that current upland grazing practices are having no significant adverse impact on surface water quality. There is no scientific basis for limiting upland utilization limits to 30%. The 10% utilization limit for woody riparian shrubs is also unreasonable and without scientific basis.
- 174-6 The proposal to remove livestock from streams will disrupt current, successful grazing systems and will have long-lasting adverse impacts on livestock operations. Only a portion of the streams are publicly owned. Therefore, BLM's proposed actions will have very little, if any, effect on overall stream conditions.
- 174-7 The juniper infestation in the higher elevation is one of the biggest problems facing the BLM and Rancher today. On the northern slopes of Steens Mountain the juniper population has increased at least ten times in the last thirty years, thus consuming much of the moisture that could otherwise be used for the production of forage.

Thank you for allowing me to comment.

Sincerely yours,



Steens Mountain Ranch, Inc.
Darrell Ctley

- 174-1 Refer LO responses 2-63 and 2-68.
- 174-2 Refer to response 2-6.
- 174-3 Refer to responses 3-9 and 4-6.
- 1744 Refer to response 4-15.
- 174-5 Refer to responses 2-3, 2-25, 2-44, 6-3, 6-4 and Appendix 2 of the DRMP/DEIS.
- 174-6 Refer to response 2-7.
- 174-7 Refer to responses 2-5, 2-11 and 3-13.
- 174-8 Refer to response 6-8.

175

Box 534
Hines, Oregon 97738
16 February 1990

175-1 Refer to response 73-4. Also, the limiting factor to California quail on lands within the planning area is thought to be riparian condition. The proposed improvement in riparian condition will greatly benefit California quail.

U.S.D.I. BUREAU OF LAND MANAGEMENT
Burns District Office
HC 74 - 12533 Hwy 20 West
Hines, Oregon 97738

Gentlemen:

Last nite I spent a few minutes browsing thru the Draft Three Rivers Resource Management Plan.

I would have liked you to pick Alternative B - Emphasize Natural Values With Commodity Production as your Preferred Alternative. Given the political situation you folks are in, tho, especially in dependant communities such as Burns, your choice of Alternative C was probably the wisest pick.

175-1 The one thing that really bugged me about this Plan was the lack of reference in it by name to either the Chukar Partridge or the California Quail upland game birds. I think you may not realize what an important resource these beautiful little birds are to some of us local folks. I spend more than a week every year hunting these wonderful little birds; I am certainly not alone out there when I am hunting them! And all of my hunting effort is spent on the lands that you manage, as I don't care for the hassle of seeking permission to hunt these birds on private land.

In my opinion, then, the Chukar Partridge and the California Quail deserve more than to be lumped in to the category "Nongame Animals and Upland Game Birds", a category that itself received very little analysis effort from you. I am not asking that you spend big bucks in managing these little birds; I know that that would not be realistic. But I think you need to show in your Plans some awareness of how important these birds are to some of us, and also some awareness of how important your management actions are to these birds. For example, I know the locations of coveys of Quail that exist only because you folks have developed water sources: Quail are a very water dependent little bird that rarely range more than 1/2 mile from a year around source of running water. Quail are so dependent on water, and so predictable in their dependency, that I find them by locating and hunting up the springs that you folks show on your excellent 1:100,000 scale topographic Quadrangle maps!

So please, in your final draft, don't ignore these two species. They are the main reason I moved to Hines to live!

Sincerely,

Gregory P. Elstad

176

January 17, 1990

176-1 Refer to responses 2-1 through 2-96 which are responses to issues submitted by Riddle Ranch and Western Range Service letter.

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Warburton:

The January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Larry Otley

Name HO 72

Address Box 50

City Princeton, Or State Or Zip Code 97721

Signature Larry Otley

Enclosure: Supplemental Comments

February 12, 1990

To: Joshua Warburton
Bureau of Land Management
Hines, Oregon

177

Dear Sir,

177-1 Refer to response 2-6.

In reference to the Three Rivers Management Plan we, the undersigned, encourage you to increase the forage allocated to big-game over what your preferred alternative suggests, thereby decreasing the number of domestic livestock further.

Name	Address
1. Ben Ward	2310 N Pine La Grande OR
2. Douglas Brooks	412 9th A St La Grande OR
3. Charles Z Miller	1204 Empire Dr. La Grande OR
4. Dennis J. Dean	735 W Arch Union OR
5. Gerald J. Miller	735 W Arch Union OR
6. Gerald S. Miller	59932 WRIGHT RD La Grande OR
7. Robert Zwickler	2908 N Oak St. La Grande OR
8. James H. Wright	63007 Sand Ridge Rd La Grande OR
9. Donald Decker	707 Broadway La Grande OR
10. Donald L. Dyer	510-4TH St La Grande OR
11. Samantha Lebold	214 FR #7 La Grande OR
12. Joe Morgan	505 Main L. B. OR
13. Chuck Smith	2020 Y La Grande OR
14. Bob Stephens	P.O. Box 7 COVE, OR 97824
15. Joe Burgess	2009 Walnut #15 Lag OR 97850
16. Henry M. Mearns	124 Monroe La Grande OR 97850
17. Lisa R. Mearns	10350 Lucast La Grande
18. Mike Mearns	600 W Wright Blvd La Grande OR
19. P. J. Mearns	2801 Monroe St. La Grande OR
20. W. H. Mearns	P.O. Box 266 La Grande OR
21. Ted Marshall	2413 E J Court La Grande OR
22. Ed Hall	755 N W 3rd Union OR
23. Robert W. Johnson	1510 W Ave La Grande
24. Harold C. Johnson	4717 E 2nd Ave COVE
25. Scott B. Johnson	62661 Jefferson Rd Summerville OR
26. Robert J. Johnson	309 W 1st La Grande
27. Dennis Johnson	203 W 3rd St La Grande
28. Scott J. Hall	P.O. Box 176 COVE
29. M. Johnson	475 S 4th Union 97825
30. George Hall	5923 Foothill Rd Union OR

February 12, 1990

To: Joshua Warburton
Bureau of Land Management
Hines, Oregon

Dear Sir,

In reference to the Three Rivers Management Plan we, the undersigned, encourage you to increase the forage allocated to big-game over what your preferred alternative suggests, thereby decreasing the number of domestic livestock further.

Name	Address
1. James D. Ward	57923 Foothill Rd, La Grande
2. Justin A. Ward	572 Division La Grande OR
3. Charles A. Be	1326 Cedar La Grande OR
4. Donald C. Lito	410 6th La Grande, OR
5. Larry E. Morgan	2009 Pine LA GRANDE OR
6. Keith W. Mearns	62041 A Fruitdale Rd La Grande
7. John Dick	1521 Jackson La Grande OR
8. Scott Carter	1803 Linda Lane La Grande OR
9. Dennis Johnson	205 Boston St. La Grande OR
10. John W. Mearns	Box 6400 2nd Foothill Road
11. J. Bill Johnson	7403 Birch St La Grande OR
12. Ed Hall	1509 1st St. SE La Grande OR
13. Homer M. Johnson	1201 75th St La Grande OR
14. Mark Brown	1704 K 1st St La Grande OR
15. Ed W. Hall	1333 Jackson La Grande OR
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February 10, 1990

178

Jay Carlson RMP- EIS
Burns District Office
Bureau of Land Management
HC 74 12533 Hwy. 20, West
Hines, Or. 97738

178-1 Refer to responses for letters numbered 131, 132 and 133.

Dear Mr. Carlson,

I, Alice K. Baker, would like to go on record, as to agreeing with the statements set forth by Mitch and Linda Baker. Please see attached copies.... Thank you,

Sincerely,
Alice K. Baker
Alice K. Baker
P.O. Box, 469
Burns, OR. 97730

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

179

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

179-1 Refer to response 2-63.

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

179-1 The reallocation and/or reduction of 335 AUM's livestock forage in Harding Creek Silvers allotment will reduce the value of our base property by approximately \$ 177,500. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,
Alice K. Baker
Name
PO Box 469
Address
Burns, Or. 97730
City State Zip Code
Alice K. Baker
Signature

Enclosure: Supplemental Comments

180

Drewsey, Oregon
February 12, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway West
Hines, Oregon 97738

Dear Mr. Carlson:

We would like to go on record as approving the comments expressed, by the Harney County Cattlemen, the Stockgrowers, the Farm Bureau, and the Sheep and Woolgrowers associations, in response to the Three Rivers Resource Management Plan and Environmental Impact Statement. As their documents are on record, we will not include copies of their text as presented in the Riddle Ranch document.

The proposed B.L.M. actions would lead to a reduction of cattle grazing on public lands. This would seem to be detrimental, not only to ranch operations, but also to the economy of Harney County and to the businesses that are dependent upon the stock industry.

- 180-1 Refer to response 11-11.
- 180-2 Refer to response 4-15.
- 180-3 California bighorn sheep are native to southeastern Oregon. Also, refer to response 2-78.

- 180-1 We feel that increasing wild horse and burro herds is a big detriment to the range. These animals destroy more forage than most any type of livestock as they paw out grass roots. They do this even when there is not a shortage of food as they seem to like certain types of roots. If any damage is being done to the Biscuitroot area, in the Stinkingwater allotment, it would probably be due to horses. We would therefore object to prohibiting cattle and sheep from grazing in that area. We object to the designation of the Stinkingwater Mts., Bartlett Mt. and Upton Mt. areas as Bighorn Sheep habitat. These animals are not native to the area and we see no reason to introduce them there. It seems that multiple-use should apply to animals that are native to the area.
- 180-2
- 180-3

Thank you for considering our comments and input in this matter.

Yours truly,

Chas. A. Miler - Norma L. Miler
Chas. A. Miler & Norma L. Miler

181

February 14, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

RE: Review Comments for the October 1989
BLM Draft Three Rivers RMP/EIS

Dear Mr. Carlson:

After reading the comments and responses made by the Riddle Ranch and Western Range Service to the above, wish to state that their views are consistent with mine.

After studying the management proposals I wish to make the following comments:

I feel that the proposed alternatives A, B and C, if followed, could greatly affect the economy of the Three Rivers area.

Taylor Grazing: was implemented to improve the condition of the Public Domain by stopping sheep owners who did not own base property from grazing numerous bands of sheep north in the spring and summer and south in the winter months plus controlling the numbers of cattle turned out on the range. Prior to Taylor Grazing considerable damage had already been done to the range by over grazing.

With reference to streambank erosion, if it was possible to have check dams in streams, they should stop some of the erosion especially during early spring run off. This in turn should help willows and ground cover to reestablish itself plus improving water quality. In our area reservoirs in the upper part of the Middle Fork of the Malheur River would not only control flood waters but would stop erosion of the river banks which would reduce sediment loads and improve water quality.

- 181-1 I fail to see how removing all livestock for five years from streams which have poor water quality would greatly help since you cannot control the wildlife and wild horses that would be using same. Fencing Off streams, reservoirs, springs and leaving only water gaps would only increase cattle congregating in that area and further depleting forage and causing more erosion.

- 181-2 It was my understanding that the purpose of Taylor Grazing and BLM was to assist the stockgrowers in managing the Public Domain better and not for catering to the whims of the environmentalists who do not contribute any assistance or monies toward range improvement.

- 181-3 Before any action that causes a reduction of AUM's to the permittees, please reconsider and do a complete Implications Assessment as authorized by Executive Order 12630.

Needless to say a reduction of AUM's to permittees would cause undue hardships and cause some of us to give up ranching.

Sincerely yours,

Rutha French

Rutha French
Drewsey, Or. 97904

PS: Mark Doverspike, President of Harney County Stockgrowers' comments also coincide with my thoughts.

- 181-1 Refer to response 3-13.
- 181-2 The Taylor Grazing Act of 1934, as amended and supplemented, was enacted "to stop injury to the public grazing lands by preventing overgrazing and soil deterioration; to provide for their orderly use, improvement, and development; to stabilize the livestock industry dependent upon the public range; and for other purposes."
- 181-3 Refer to response 2-63.

Box 124
Drewsey, OR 97904
February 14, 1990

Jay Carlson
Burns District Office
B.L.M., NC 74, 12533 Hwy 20 West
Henas, OR 97738

Dear Mr. Carlson:

We would like to go on record with the following comments in regard to the B.L.M. Three Rivers RMP/EIS.

182-1

Alternatives A, B, and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B, or C are considered, that prior to issuing the final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Taking Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988, Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald S. Wodel).

182-3

We would like to emphasize the fact that all allotments in the Three Rivers Draft should be restored to their original carrying capacity. We would also like to point out that much of the water described as below ODEQ quality standards originates from springs that were developed by the B.L.M.! The conclusions drawn regarding water quality are grossly exaggerated or totally false in most cases with which we are familiar.

182-4

One point not addressed in this study - who will pick up the tax bill if all the livestock is removed from the range, the B.L.M., The Quera Club or other special interest groups?? If all the ranchers are forced out of business and their private land bought up by the government who will pay the property taxes that go to maintain our schools, roads etc.? It is imperative that we look at the total picture objectively using accurate information because, like it or not, our economic destiny will be determined by the outcome of this conflict!

Very truly yours,
Patrick & Susan O'Bole -
O'Bole Cattle Co.

Jerry J. Harro

The reallocation and/or reduction of 546 AUM's livestock prags in 5531 Allotment will reduce the value of O'Bole Cattle Company's base property by approximately \$271,300.

The letters from the Rainey County Cattle Women's Stock growers, Farm Bureau, Sheep and Wood growers and the January 17, 1990 Riddle Ranch and Western Range Service Community and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments!

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

The additional comments we have are enclosed herein and are supplemental to our principal response.

182-2

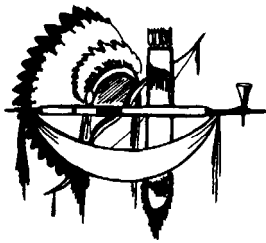
Of special concern to O'Bole Cattle Company is the proposed three miles of fence in Allotment 5524. Patrick and Susan O'Bole want to go on record as protesting this!

182-1 Refer to response 2-63.

182-2 This fence is not in the Preferred Alternative.

182-3 Refer to response 2-11.

182-4 There is no proposal in the RMP to eliminate livestock grazing from public lands. Also, refer to response 1-13.



183 BURNS PAIUTE RESERVATION

HC-71 100 PA SIG ST. BURNS, OREGON 97720
PHONE (503) 573-2088

February 14, 1990

Josh Warburton
District Manager
Bureau of Land Management
HC 74 Box 12533 - Hwy. 20
Hines, OR 97738

Dear Mr. Warburton:

The Burns Paiute Tribal Council thanks you for this opportunity to comment on the proposed Three Rivers Management Plan. From the information provided, it is difficult to fully understand the proposed management of cultural resources and your agencies' objective to "increasing the opportunity for the public's sociocultural, educational and recreational uses of the area's cultural/paleontological resources."

The Native American of the Great Basin always has maintained a strong social tie with the environment. It gives life as well as death. It provides nutrition through wildlife, vegetation and the land itself. With the coming of the white man and through monetary management and fiscal planning, many of the Native American's inherited aboriginal rights were lost.

Biscuit Root ACEC

183-1 We are very pleased to see the BLM has made an attempt in the Three Rivers Plan to address some of the cultural concerns and aboriginal rights of the Burns Paiute Indians. We agree with the 6000 acre Biscuit Root gathering grounds being designated as an ACEC, with the exceptions noted in "other concerns". Since the harvest of the Biscuit Root is usually over by the latter part of June each year, the Tribe would not be opposed to grazing being allowed in the area after July 1. However, we would be opposed to the placement of salt licks or structures, (corrals, etc.) being placed in the ACEC.

Pine Creek Material Site

183-2 The Tribe feels the Pine Creek Material Site should be removed from usage as soon as possible but no later than when the lease

expires in 1992. This site was a traditional camp site for Native Americans up until the pit was established. We feel the sooner the current use is terminated the sooner the area will recover and be available for traditional use.

Other Concerns:

183-3 In addition to the Biscuit Root ACEC, there are other non-designated root gathering, ground hog, jackrabbit, religious, and camping areas which are culturally significant and are included in the Three Rivers Management Plan. Many of these areas are "Family" specific. To ensure these areas receive protection to retain their cultural significance, the Tribe proposes they participate in the ongoing BLM Planning Process for specific projects. (i.e. prescribed burning, herbicide control, fence building, rodent control, road closure and construction, post and pole activities, vegetation control, law enforcement, land transfers, etc.).

Through the participation in the planning process, it is hoped better lines of communication between the Tribe and BLM will be established. The Government to Government relations established through the process will help develop policies and agreements to ensure the protection of archeological and cultural sensitive areas.

183-4 The Tribe is currently negotiating with the USFWS on a Reinterment Agreement on the Malheur Refuge and has negotiated a camas root set aside area with the USFS Snow Mountain District. Hopefully these agreements can be used to generate like type proposals with your agency.

183-5 In addition, the Tribe is interested in the Castle Rock and Beulah Reservoir areas on the Vale BLM District. We appreciate obtaining a contact person in that District with whom we could discuss the cultural and religious significance these areas have in relation to the Burns Paiute Tribe.

Thank you for considering our comments and for the assistance your personnel have provided on the Three Rivers Project. We feel the establishment of Government to Government communications will be beneficial to both organizations.

Sincerely,

Larry Richards
Larry Richards
Chairman
Burns Paiute Tribe

LR/r1

183-1 Refer to response 4-15.

183-2 Refer to response 6-13.

183-3 The BLM included those areas for which specific input regarding tribal interests were provided by the tribe during the planning process. The tribe may be added to the EA mailing list and provide input through the site-specific planning and analysis process for those projects or areas of unique importance to the tribe. At any time the tribe may provide information that the BLM may use to protect additional localities and natural resources, while affording confidentiality to the extent legally possible.

183-4 The BLM Burns District has been involved with the tribe in negotiations to determine acceptable procedures for consideration of the reinterment of Native American burials. The BLM intends to renew efforts to reach an accord on this issue. This and the currently proposed Biscuitroot Cultural ACEC should provide continuing interactions between the tribe and the BLM Burns District, such that more progress can be made in such areas.

To: Area Resource Manager

184-1 We the property owners along the proposed access route from Burns to Seneea (formerly known as Rails to Trails) oppose this route in the Three Rivers Plan for the following reasons.

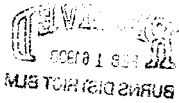
184-1 Refer to response 4-16.

- 1) This recreational proposal was earlier given to the people as an opportunity to develop, but few offered support.
- 2) The costs for development and upkeep was cited as the major reason to abandon the plan. These costs would only increase with the deterioration of the trails wooden railroad structures.
- 3) The probability of connecting the entire trail with future land trades or easements would not be feasible and highly unlikely.
- 4) Many other trail opportunities exist on public land without traveling through 36 miles of adjoining private land.
- 5) The attempt to bring alive a "dead horse" which was earlier killed from lack of public support would severely influence the credibility the BLM has with the public.

We ask that you reconsider this proposed access route and remove it entirely from the Three Rivers Management Plan.

Richard L. Calkins
Selmer Clemens
Marilyn Solomon
Randerson Ranch by
Larita Johnson, Mgr.
Arthur W. Hattwick

Thank you
Warren Raymond
John Clemens
Ronald Whitings
Lyle A. Taylor
Shirley L. Cook
Jack Morrison
Donna Otley
Rowland Ray
Richard A. Johnson
Shirley D. Anderson



January 26, 1990
Baker, Oregon

Jay Carlson- RMP/EIS
Burns District Office
Bureau of Land Management
KC 74-12535 Highway 20 West
Hines, Oregon 97738

Review Comment For The October 1989
BLM Draft Three Rivers RMP/EIS

Dear Mr. Carlson,
The Oregon CattleWomen, with a membership of over 600, would like to go on record in support of the January 17, 1990 Riddle Ranch and Western Range Service comments and response.

Until proper techniques and accurate information is gathered and documented, existing levels of livestock grazing should be maintained.

185-1 Your concern of riparian areas is also a concern of ours. However, Dr. John Buckhouse of Oregon State University (among others) has done much research on riparian zones that indicates that natural phenomena such as ice flows can have detrimental effects on riparians. Stream banks can be damaged by continuous grazing, but Buckhouse says that under proper management, grazing cattle has no detrimental effects to the riparian. Federal agencies and the livestock industry are very conscious about these fragile areas. We need water and feed for cattle and wildlife and to abuse it is not to our best interest. I believe the Harney County Stockgrowers address this issue with comments in their response.

185-2 Your management decision to restrict livestock in the Sagegrouse strutting grounds is flawed from lack of scientific data and should be eliminated. The threat to the Biscuitroot Cultural ACEC is not supported either.

185-3 We recognize that horse populations need to be managed in balance with available forage, water, wildlife, livestock, and other resource uses. It is our understanding, the BLM can demonstrate resource damage by Wild Horses and establish that an overpopulation exists and that a 5-step process for disposing of excess animals can occur. Has this process been done? Is this not a viable action rather than label it an Area of Critical Environmental Concern?

185-4 It has not been established with fact by the BLM that livestock in the Three Rivers Resource Management Plan have been detrimental to the resource. Therefore, it seems to us unwise to do away with a management tool that is beneficial and pays for the use. Why would you enlarge 2 areas (Biscuitroot and Wild Horses) who pay no fees to help administer said lands?

For the above reasons, the Oregon CattleWomen support the comments and response of Riddle Ranch and Western Range Service.

Sincerely,
Kay Markgraf
 Kay Markgraf
 OCV legislative chairman

- 185-1 The systems in the Proposed Plan are an attempt to get the riparian area grazing under proper management in areas where this is not currently the case. Also, refer to response 3-13.
- 185-2 Refer to response 4-6.
- 185-3 Refer to response 4-15.
- 185-4 Refer to response 2-68 and 124-4.
- 185-5 No wild horse herd areas have been enlarged, and adoption fees do pay for a portion of the wild horse and burro program. There was a mistake on the ACEC Table 1 in Appendix 7 in the DRMP/DEIS regarding grazing on the Biscuitroot Cultural ACEC. Livestock grazing is not being prohibited in the Biscuitroot Cultural ACEC, and the PRMP/FEIS has been corrected to reflect this change. See Appendix 1, Table 16.



February 14, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson,

The Harney County CattleWomen want to go on record that the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the text only for the reason that it would be an exact duplication of the Riddle Ranch document. There are several other areas of concern that this letter will address.

The designation of the entire Kiger Active Horse Management Area (HMA) (36,619 acres) as an Area of Critical Environmental Concern (ACEC) could have a dramatic economical effect on at least three ranches if AUM's are reduced. Before a reduction of AUM's is even considered a complete "Takings Implication Assessment" should be conducted as authorized by Executive Order 12630. Livestock and wild horses have run together successfully for years. In a recent decision the U.S. District Court for the Southern District of Nevada, Joe B. Fallini Jr., Susan Fallini and Helen Fallini, Plaintiffs vs Donald P. Hodel, Secretary of the Interior; Robert P. Burford, Director Bureau of Land Management; Edward P. Spang, Nevada State Director, Bureau of Land Management, Defendants(Fallini vs BLM), the court rejected a contention that cattle grazing on federal lands has an inferior status to wild horses as a result of congressional enactments. The elimination of any livestock grazing is neither justified nor proven necessary, and appears to be illegal. Wild horse and livestock AUM's have been distributed. Any increase or decrease of AUM's due to a change in the resource should be done proportionally to all AUM's involved. The conditions for acquiring the private holds or the authority to impose this on the private holdings is not fully addressed.

Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied, and then are extrapolated to indefensible conclusions.

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the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.

186-13 The air quality restrictions are the same for all alternatives. More alternatives need to be provided. Fire is becoming a very acceptable and economical method of range improvement. To limit this area to 3000 acres a year is unrealistic. More research is needed in this area with Fire Management Specialists. Unless there is valid scientific data to show that limits above this would permanently effect air quality these limitations should be eliminated.

186-14 The continual fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years restrict the amount of available forage and can concentrate cattle more than necessary. Livestock have a biological need for water. Access can be accomplished by building the water gaps at the deep end of the reservoir. If the enclosure is more than one-half mile square, have more than one access point to allow livestock better access to all of the forage available around the reservoir. From the Fallini vs. BLM court case "If water is developed for grazing livestock, and the range improvement permits provides for and the state permit sanctions this use then it is a viable use." It goes on to state "...Underfunding may be one reason why there has been no government order construction...But government cannot force some people alone to bear public burden which, in all fairness and justice, should be borne by the public as a whole..." Therefore livestock should have good access to this water at all times, no matter what the drought conditions are. We are not restricting other uses from the reservoirs. There is a need to make sure that livestock access to water is not excluded when range improvement money was used to develop the reservoirs.

186-15 Before any alternative that causes a reduction of AUM's is imposed, no matter what reason, a complete "Takings Implications Assessment" should be completed as authorized by Executive Order 12630.

186-16 The exclusion of cattle on the Biscuitroot Cultural ACEC is not supported. The report states "...these areas to be a high-value resource due to the quality and quantity of roots available." Appendix 7-12; Vol. 11 Appendicies. Since grazing has been going on in this area for years and the quality and quantity have remained high, even with root harvesting, there is no justification to change the practice.

186-17 The need for public access along the Silvies River and Poison Creek is unjustified. The public has access to over 70% of the county already. These two access routes through private holdings

are not needed since the public has several other routes of entering the federal lands.

The Harney County CattleWomen support a no action plan. This plan would help stabilize a local economy that over the past 10 years has had many negative impacts. The BLM has reported that significant progress has been made in obtaining management objectives under the present plan.

186-18 1.) Stated by the Burns District Manager in the 1981 Rangeland Program Summary Update for the Drewsey Grazing EIS: "To date we have made significant progress in improving the public rangelands through intensive livestock management and rangeland improvements."

2.) BLM stated in the 1983 Drewsey Rangeland Program Summary: "The specific objectives are to: improve waterfowl and fish habitat, increase available forage for wildlife, wild horses and livestock, maintain water quality and reduce soil erosion, increase recreational opportunities and quality, minimize impacts of the program on visual and wilderness resources, minimize the impact of reductions or changes in use on grazing permittees and protect cultural resources and threatened and/or endangered plant and animal species.

There has been considerable progress in achieving these objectives and this progress will be discussed in following sections."

The objectives stated in the 1983 Drewsey Rangeland Program Summary Update related to all concerns of multiple use. With the BLM stating that the EIS is successful, the Harney County CattleWomen see no reason to change something that is working that address all multiple-use concerns.

Sincerely yours,

[Signature]

Kathy Driver, President
Harney County CattleWomen
Pine Creek Ranch
Drewsey, Oregon 97904

Enclosures (1)

186-7
186-8
186-9
186-10
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186-12

186-7 Management objectives, in the absence of RMP's, are documented only in the broadest of terms making them virtually unmeasurable. No factors, other than short term wildlife, wild horse, and livestock utilization are indicated as affecting forage production, ecological status, or potential of the resource. Therefore, reductions in authorized livestock use is the primary, if not the only, remedial action recommended. Before a reduction of AUM's is considered, other management tools such as changing season of use, length of time, and deferred rotation need to be considered. Until proper techniques and accurate information is gathered existing levels of livestock grazing should be maintained. At such time that reliable information shows trend increase or decrease, proper adjustments could then be made. The ratings in the recently published Riley Rangeland Program Summary Update classify range conditions as poor, fair, good, and excellent. The RMP/EIS classifies range conditions as satisfactory and unsatisfactory. Consistent use of evaluation ratings is necessary for accurate evaluation as well as better communication with the permittee.

186-8 Fire is nature's way of improving forage by burning juniper and woody shrubs. The proposed limitations on prescribed burnings, as well as limitations and full suppression of natural fires, will continue to increase the trend of sagebrush and juniper encroachment. This will have a negative effect on the vegetation and grasses used by wildlife, wild horses, and livestock. A more open policy on prescribed burns, as well as letting natural fires burn under fire management supervision will help maintain and improve a majority of the existing range. It will also prevent fuel loads building to a point that a major fire would result. It is well known that smaller cooler fires are better for the return of native vegetation than one major hot fire.

186-11 There is no scientific data that indicates that livestock use has any negative effect on the sagegrouse population. The restrictions on livestock in the sagegrouse strutting grounds are unfounded and should be eliminated. If the sagegrouse population is declining, why did the Oregon Department of Fish and Wildlife open a season on these birds this year? If the sagegrouse population is a problem, why do birdwatchers interfere with their strutting each spring during the Waterfowl Festival?

186-12 Enclosed is a copy of the Bureau of Land Management Riparian Area Management Policy, dated January 22, 1987 signed by BLM Director Robert J. Burford. This policy has never been rescinded. Please note that the definition of a riparian area is an area of land "directly influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence." The definition continues that areas excluded from the definition of a riparian area include "ephemeral streams or washes that do not exhibit the presence or vegetation dependent upon free water in the soil." There are areas classified as riparian that do not meet these criteria. A thorough review of all creeks should be made to ensure they meet

Bureau of Land Management
Riparian Area Management Policy

BACKGROUND

Riparian areas are unique and among the most productive and important ecosystems, comprising approximately 1 percent of the public lands. Characteristically, riparian areas display a greater diversity of plant, fish, wildlife, and other animal species and vegetation structure than adjoining ecosystems. Healthy riparian systems filter and purify water as it moves through the riparian zone, reduce sediment loads and enhance soil stability, provide micro-climate moderation when contrasted to extremes in adjacent areas, and contribute to groundwater recharge and base flow.

DEFINITIONS

Riparian Area - an area of land directly influenced by permanent water. It has visible vegetation or physical characteristics reflective of permanent water influence. Lake shores and stream banks are typical riparian areas. Excluded are such sites as ephemeral streams or wetlands that do not exhibit the presence of vegetation dependent upon free water in the soil.

Riparian Area-Dependent Resources - resources such as water, vegetation, fish, and certain wildlife that owe their existence to the riparian area.

OBJECTIVE

The objective of riparian area management is to maintain, restore, or improve riparian values to achieve a healthy and productive ecological condition for maximum long-term benefits.

POLICY STATEMENTS

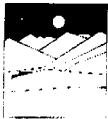
In order to meet the foregoing objective, the Bureau will to the extent practical:

- o Achieve riparian area improvement and maintenance objectives through the management of existing uses wherever feasible.
- o Ensure that new resource management plans and activity plans, and existing plans when revised, recognize the importance of riparian values, and initiate management to maintain, restore, or improve them.
- o Prescribe management for riparian values that is based upon site-specific characteristics and settings.
- o Give special attention to monitoring and evaluating management activities in riparian areas and revise management practices where site-specific objectives are not being met.
- o Cooperate with and encourage the involvement of interested Federal, State, and local governments and private parties to share information, implement management, coordinate activities, and provide education on the value, productivity, and management of riparian areas.
- o Retain riparian areas in public ownership unless disposal would be in the public interest, as determined in the land use planning system.
- o Identify, encourage, and support research and studies needed to ensure that riparian area management objectives can be properly defined and met.

R. H. J. [Signature]
Director, Bureau of Land Management

JAN 22 1990
DATE

- 186-1 Refer to responses 2-63 and 2-68.
- 186-2 Refer to responses 2-6 and 4-12.
- 186-3 Refer to response 182-4.
- 186-4 Refer to responses 2-6 and 2-11.
- 186-5 Refer to response 4-14.
- 186-6 Refer to response 2-87.
- 186-7 Refer to response 2-87.
- 186-8 Refer to response 2-11.
- 186-9 Refer to response 4-3.
- 186-10 Refer to responses 4-9 and 6-8.
- 186-11 Refer to responses 4-6 and 4-7.
- 186-12 Refer to responses 4-4 and 42-14.
- 186-13 Refer to response 4-8.
- 186-14 Refer to response 2-46.
- 186-15 Refer to response 2-63.
- 186-16 Refer to response 4-15.
- 186-17 Refer to response 4-16.
- 186-18 Refer to response 2-9.



OREGON
NATURAL
RESOURCES
COUNCIL
MAIN OFFICE
1000 BULLDOG BLVD, SUITE 100
222 SOUTH WEST BURNING
PORTLAND, OREGON 97204
503 253-5001

Protecting Oregon's lands,
waters and natural resources

187

- 187-1 Refer to responses 5-1 through 5-18.

Jay Carlson
RMP/EIS Team Leader
Bureau of Land Management
Burns District Office
HC 74-12533
Highway 20 West
Hinds, OR 97738

Friday, February 16, 1990

Dear Mr. Carlson,

ONRC concurs with and supports the comments of the National Wildlife Federation on the Draft Environmental Impact Statement for the Three Rivers Resource Management Plan.

Thank you for your attention

Sincerely,

Andy Kerr

Andy Kerr
Director of Conservation



NATIONAL WILDLIFE FEDERATION 188

Suite 606 Dekum Building 519 S.W. Third Avenue Portland, Oregon 97204 503-222-1429

February 16, 1990

188-1 Your interest status in every Allotment Management Plan and Allotment Evaluation has been noted, and your agency will be included in the analysis process for such management activities.

Joshua L. Warburton, District Manager Bureau of Land Management Burns District Office HC 74-12533 Highway 20 W. Hines, OR 97738

Re: Three Rivers Resource Area

Dear Mr. Warburton:

The National Wildlife Federation (NWF) has a vital interest in the health and rehabilitation of wildlife, waterfowl and fisheries in the State of Oregon. Due to the documented critical dependence of wildlife, waterfowl and fish on riparian and wetland ecosystems, and pursuant to 43 CFR § 4100.0-5, the NWF formally requests affected interest status on every Allotment Management Plan and Allotment Evaluation which impacts riparian and wetland systems in the Three Rivers Resource Area. Please reference the NWF comments on the Three Rivers Draft RMP/EIS sent to you today.

Thank you.

Sincerely,

Bruce Apple

Bruce Apple Director

/bas

cc: Dean Bibles

189

January 20, 1990

189-1 Refer to responses 1-13 and 12-4.

Jay Carlson BLM Highway 20 West Hines Oregon 97738

RE: Three Rivers Resource Management Plan

Mr. Carlson:

I doubt your management plan for North Harney County will survive intact. I hope not. If it does, it will accomplish what decades of bureaucratic gradualism has religiously avoided: Total mistrust of government programs. Fencing off of multiple use resources from any practical uses, such as mining, ranching or timber harvesting. Severance of communications in good faith between government and citizen. Provide abrupt exposure of undue influence of environmental zealots on government policy. Trigger a declaration of war between our grass-roots industry and your organization.

I cannot stand by in silence while sage hens, burros, horses and fish are made custodians and preferred occupants of the land that was made productive and livable for man and beast alike, through the hardships and sacrifices of the pioneers. The land has been better managed by those who lived on it than it ever will be by an empire of those who play games with the lives and futures of our people.

The "Plan" is unnecessary. It is built upon untrue suppositions of conditions which do not exist. It, if implemented, would be disastrous to the only long-term industry that can be depended upon to keep our local economy alive. The other one is already being managed to death. I see no scientific basis for the utilization limits proposed for riparian shrubs and upland grazing. The recent tour taken by ranchers and BLM theorists failed to demonstrate any effects of undue grazing practices. I do not believe it provides the spectrum of alternatives, or was conceived in an open manner as is required by law.

In short, Mr. Carlson, the "plan" would build another iron curtain...another Berlin wall. Government employees would well consider the fate of the last one.

Sincerely, Bob Carpenter



THE WILDERNESS SOCIETY
OREGON REGION

February 16, 1990

Jay Carlson
RMP/EIS Team Leader
Bureau Of Land Management
Burns District Office
HC 74-12533
Highway 20 W.
Hines, OR 97738

FAXED February 16, 1990 to 503-573-7600

The Wilderness Society (TWS) is a national conservation organization that is devoted exclusively to public lands management issues. Founded in 1935, the Society has more than 350,000 members and 15 offices nationwide. The Society's staff of more than 100 includes foresters, economists, biologists, lawyers, policy analysts, legislative specialists, and federal agency land management specialists.

TWS has three full-time, fully-staffed regional offices in the Northwest: Portland, OR; Seattle, WA; and Boise, I D . Many of our members engage in uses on Bureau of Land Management (BLM) lands in Oregon. Maintaining resource values is of vital interest to TWS. These values include biological diversity, natural beauty, recreation, water quality, wildlife habitat, and ecosystem viability.

We are pleased that you provided the Three Rivers Draft RMP/EIS for our comment. We support the Pacific Northwest Natural Resource Center, National Wildlife Federation detailed comments which have been submitted to your office. In addition, we are particularly

190-1

610 SOUTHWEST ALDER, SUITE 915, PORTLAND, OREGON 97205
(503) 248-0452

printed on 100% recycled paper

concerned with the expansion of off-road vehicle (ORV) use and call to your attention Executive Orders 11644 and 11989 (Appendix 1). Your ORV alternative to solicit ORV use is inconsistent with public policy, and must be replaced with a policy to permit ORV use at a level at least no greater than current levels.

Very truly yours,

Laurence Tuttle
Oregon Regional Director

LT/vk

APPENDIX 1
Executive Orders

EXECUTIVE
ORDER 11644

Use of Off-Road Vehicles
on the Public Lands

An estimated 5 million off-road recreational vehicles—motorcycles, minibikes, trail bikes, snowmobiles, dune-buggies, all-terrain vehicles, and others—are in use in the United States today, and their popularity continues to increase rapidly. The widespread use of such vehicles on the public lands—often for legitimate purposes but also in frequent conflict with wise land and resource management practices, environmental values, and other types of recreational activity—has demonstrated the need for a unified Federal policy toward the use of such vehicles on the public lands.

NOW, THEREFORE, by virtue of the authority vested in me as President of the United States by the Constitution of the United States and in furtherance of the purpose, and policy of the National Environmental Policy Act of 1969 (42 U.S.C. 4321), it is hereby ordered as follows:

SECTION 1. Purpose. It is the purpose of this order to establish policies and provide for procedures that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.

SEC. 2. Definitions. As used in this order, the term: (1) "public lands" means (A) all lands under the custody and control of the Secretary of the Interior and the Secretary of Agriculture, except Indian lands; (B) lands under the custody and control of the Tennessee Valley Authority that are situated in western Kentucky and Tennessee and are designated as "Land Between the Lakes," and (C) lands under the custody and control of the Secretary of Defense; (2) "respective agency head" means the Secretary of the Interior, the Secretary of Defense, the Secretary of Agriculture, and the Board of Directors of the Tennessee Valley Authority, with respect to public lands under the custody and control of each;

(3) "off-road vehicle" means any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain, except that such term excludes (A)

any registered motorboat; (B) any military, fire, emergency, or law enforcement vehicle when used for emergency purposes; and (C) any vehicle whose use is expressly authorized by the respective agency head under a permit, lease, license, or contract; and

(4) "official use" means use by an employee, agent, or designated representative of the Federal Government or one of its contractors in the course of his employment, agency, or representation.

SEC. 3. Zones of Use. (a) Each respective agency head shall develop and issue regulations and administrative instructions, within six months of the date of this order, to provide for administrative designation of the specific areas and trails on public lands on which the use of off-road vehicles may be permitted, and areas in which the use of off-road vehicles may not be permitted, and set a date by which such designation of all public lands shall be completed. Those regulations shall direct that the designation of such areas and trails will be based upon the protection of the resources of the public lands, promotion of the safety of all users of those lands, and minimization of conflicts among the various uses of those lands. The regulations shall further require that the designation of such areas and trails shall be in accordance with the following—

(1) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands.

(2) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats.

(3) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

(4) Areas and trails shall not be located in officially designated Wilderness Areas or Primitive Areas. Areas and trails shall be located in areas of the National Park System, National Areas, or National Wildlife Refuges and Game Ranges only if the respective agency head determines that off-road vehicle use in such locations will not adversely affect their natural, aesthetic, or scenic values.

(5) The respective agency head shall ensure adequate opportunity for public participation in the promulgation of such regulations and in the designation of areas and trails under this section.

68

(c) The limitations on off-road vehicle use imposed under this section shall not apply to official use.

SEC. 4. Operating Conditions. Each respective agency head shall develop and publish, within one year of the date of this order, regulations prescribing operating conditions for off-road vehicles on the public lands. These regulations shall be directed at protecting resource values, preserving public health, safety, and welfare, and minimizing use conflicts.

SEC. 5. Public Information. The respective agency head shall ensure that areas and trails where off-road vehicle use is permitted are well marked and shall provide for the publication and distribution of information, including maps, describing such areas and trails and explaining the conditions on vehicle use. He shall seek cooperation of relevant State agencies in the dissemination of this information.

SEC. 6. Enforcement. The respective agency head shall, where authorized by law, prescribe appropriate penalties for violation of regulations adopted pursuant to this order, and shall establish procedures for the enforcement of those regulations. To the extent permitted by law, he may enter into agreements with State or local governmental agencies for cooperative enforcement of laws and regulations relating to off-road vehicle use.

SEC. 7. Consultation. Before issuing the regulations or administrative instructions required by this order or designating areas or trails as required by this order and those regulations and administrative instructions, the Secretary of the Interior shall, as appropriate, consult with the Atomic Energy Commission.

SEC. 8. Monitoring of Effects and Review. (a) The respective agency head shall monitor the effects of the use of off-road vehicles on lands under their jurisdictions. On the basis of the information gathered, they shall from time to time amend or rescind designations of areas or other actions taken pursuant to this order as necessary to further the policy of this order.

(b) The Council on Environmental Quality shall maintain a continuing review of the implementation of this order.

RICHARD NIXON
THE WHITE HOUSE,
February 8, 1972

EXECUTIVE
ORDER 11989

Off-Road Vehicles on Public Lands

By virtue of the authority vested in me by the Constitution and statutes of the United States of America, and as President of the United States of America, in order to clarify agency authority to define zones of use by off-road vehicles on public lands, in furtherance of the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 et seq.), Executive Order No. 11644 of February 8, 1972, is hereby amended as follows:

SECTION 1. Clause (B) of Section 2(3) of Executive Order No. 11644, setting forth an exclusion from the definition of off-road vehicles, is amended to read "(B) any fire, military, emergency or law enforcement vehicle when used for emergency purposes, and any combat or combat support vehicle when used for national defense purposes, and".

SEC. 2. Add the following new Section to Executive Order No. 11644:

"SEC. 9. Special Protection of the Public Lands. (a) Notwithstanding the provisions of Section 3 of this Order, the respective agency head shall, whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effects, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence.

"(b) Each respective agency head is authorized to adopt the policy that portions of the public lands within his jurisdiction shall be closed to use by off-road vehicles except those areas or trails which are suitable and specifically designated as open to such use pursuant to Section 3 of this Order."

JIMMY CARTER
THE WHITE HOUSE,
May 24, 1977

Richard A. Hotchkiss Star Rt. 1, Box 132 Burns, Oregon 97720

February 14, 1990

Jay Carlson - RMP/EIS
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, Oregon 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Carlson,

Hotchkiss Company Inc. wants to go on record that the January 17, 1990 Riddle Ranch and Western Range Service comments and response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments. This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of the text only for the reason that it would be an exact duplication of the Riddle Ranch document. There are several other areas of concern that this letter will address.

191-1 The continual fencing of reservoirs is in direct conflict with the BLM objective to disperse livestock away from riparian areas and improve forage utilization. These reservoirs would not be there today if it had not been for either the range improvement funds or private funds that first developed them. The small water gaps that dry up during the season or don't allow livestock to water during low water years restrict the amount of available forage and can concentrate cattle more than necessary. Livestock have a biological need for water. Access can be accomplished by building the water gaps at the deep end of the reservoir. If the enclosure is more than one-half mile square, have more than one access point to allow livestock better access to all of the forage available around the reservoir. From the Fallini vs. BLM court case "If water is developed for grazing livestock, and the range improvement permits provides for and the state permit sanctions this use then it is a viable use." It goes on to state "... Underfunding may be one reason why there has been no government order construction. But government cannot force some people alone to bear public burden which, in all fairness and justice, should be borne by the public as a whole..." Therefore livestock should have good access to this water at all times, no matter what the drought conditions are. On our Skull Creek Allotment we have two reservoirs that are already fenced, Willow and Stata. Both of these the access is poor and in poor water years State has no access. Hotchkiss Company feels, from the above ruling that the BLM is obligated to correct these situations immediately. Also, if Greenspot is fenced that both good access and water is insured. We are not restricting

191-2 other uses from the reservoirs. There is a need to make sure that livestock access to water is not excluded when range improvement money was used to develop the reservoirs.

191-3 A copy of the Bureau of Land Management Riparian Area Management Policy, dated January 22, 1987 signed by BLM Director Robert J. Burford was submitted by the Harney County Stockgrowers. This policy has never been rescinded. Please note that the definition of a riparian area is an area of land "directly influenced by permanent water, and having visible vegetation or physical characteristics reflective of permanent water influence." The definition continues that areas excluded from the definition of a riparian area include "ephemeral streams or washes that do not exhibit the presence or vegetation dependent upon free water in the soil." There are areas classified as riparian that do not meet these criteria. One of these areas is the upper part of Skull Creek, located on the Skull Creek Allotment. We feel that the area from the head of the creek until it turns east, below the private land owned by Towery, Morgan/Young does not meet the riparian definition. A thorough review of all creeks should be made to ensure they meet the definition of riparian area. Any that do not meet the requirements should be taken out of that classification.

191-4 Hotchkiss Company Inc. supports a no action plan. This plan would help stabilize a local economy that over the past 10 years has had many negative impacts. The BLM has reported that significant progress has been made in obtaining management objectives under the present plan.

1.) Stated by the Burns District Manager in the 1981 Rangeland Program Summary Update for the Drewsey Grazing EIS:
"To date we have made significant progress in improving the public rangelands through intensive livestock management and rangeland improvements."

2.) BLM stated in the 1983 Drewsey Rangeland Program Summary:

"The specific objectives are to: improve waterfowl and fish habitat, increase available forage for wildlife, wild horses and livestock, maintain water quality and reduce soil erosion, increase recreational opportunities and quality, minimize impacts of the program on visual and wilderness resources, minimize the impact of reductions or changes in use on grazing permittees and protect cultural resources and threatened and/or endangered plant and animal species.

There has been considerable progress in achieving these objectives and this progress will be discussed in following sections."

The objectives stated in the 1983 Drewsey Rangeland Program Summary Update related to all concerns of multiple use. With the BLM stating that the EIS is successful, Hotchkiss Company Inc. sees no reason to change something that is working that address all multiple-use concerns.

5 Monitoring techniques currently in use on the Three Rivers Resource Area are insufficient, inaccurate, and improperly applied, and then are extrapolated to indefensible conclusions. Management objectives, in the absence of AUM's, are documented only in the broadest of terms making them virtually unmeasurable. No factors, other than short term wildlife, wild horse, and livestock utilization are indicated as affecting forage production, ecological status, or potential of the resource. Therefore, reductions in authorized livestock use is the primary, if not the only, remedial action recommended. Before a reduction of AUM's is considered, other management tools such as changing season of use, length of time, and deferred rotation need to be considered. Until proper techniques and accurate information is gathered existing levels of livestock grazing should be maintained. At such time that reliable information shows trend increase or decrease, proper adjustments could then be made. The ratings in the recently published Riley Rangeland Program Summary Update classify range conditions as poor, fair, good, and excellent. The RMP/EIS classifies range conditions as satisfactory and unsatisfactory. Consistent use of evaluation ratings is necessary for accurate evaluation as well as better communication with the permittee.

191-6 There is no scientific data that indicates that livestock use has any negative effect on the sagegrouse population. The restrictions on livestock in the sagegrouse strutting grounds are unfounded and should be eliminated. If the sagegrouse population is declining, why did the Oregon Department of Fish and Wildlife open a season on these birds this year?

191-7 The air quality restrictions are the same for all alternatives. More alternatives need to be provided. Fire is becoming a very acceptable and economical method of range improvement. To limit this area to 3000 acres a year is unrealistic. More research is needed in this area with Fire Management Specialists. Unless there is valid scientific data to show that limits above this would permanently effect air quality these limitations should be eliminated.

Fire is nature's way of improving forage by burning juniper and woody shrubs. The proposed limitations on prescribed burnings, as well as limitations and full suppression of natural fires, will continue to increase the trend of sagebrush and juniper encroachment. This will have a negative effect on the vegetation and grasses used by wildlife, wild horses, and livestock. A more open policy on prescribed burns, as well as letting natural fires burn under fire management supervision will help maintain and improve a majority of the existing range. It will also prevent fuel loads building to a point that a major fire would result. It is well known that smaller cooler fires are better for the return of native vegetation than one major hot fire.

191-8 Before any alternative that causes a reduction of AUM's is imposed, no matter what reason, a complete "Takings Implications Assessment" should be completed as authorized by Executive Order 12630.

191-9 The designation of the entire Kiger Active Horse Management Area (HMA) (36,619 acres) as an Area of Critical Environmental Concern (ACEC) could have a dramatic economical effect on at least three ranches if AUM's are reduced. Before a reduction of AUM's is even considered a complete "Takings Implication Assessment" should be conducted as authorized by Executive Order 12630. Livestock and wild horses have run together successfully for years. In a recent decision the U.S. District Court for the Southern District of Nevada, Joe B. Fallini Jr., Susan Fallini and Helen Fallini, Plaintiffs vs Donald P. Model, Secretary of the Interior; Robert F. Burford, Director Bureau of Land Management; Edward P. Spang, Nevada State Director, Bureau of Land Management; Defendants(Fallini vs BLM), the court rejected a contention that cattle grazing on federal lands has an inferior status to wild horses as a result of congressional enactments. The elimination of any livestock grazing is neither justified nor proven necessary, and appears to be illegal. Wild horse and livestock AUM's have been distributed. Any increase or decrease of AUM's due to a change in the resource should be done proportionally to all AUM's involved. The conditions for acquiring the private holds or the authority to impose this on the private holdings is not fully addressed.

191-13 The exclusion of cattle on the Biscuitroot Cultural ACEC is not supported. The report states "...these areas to be a high-value resource due to the quality and quantity of roots available." Appendix 7-12; Vol. II Appendicies. Since grazing has been going on in this area for years and the quality and quantity have remained high, even with root harvesting, there is no justification to change the practice.

191-14 The need for public access along the Silvies River and Poison Creek is unjustified. The public has access to over 70% of the county already. These two access routes through private holdings are not needed since the public has several other routes of entering the federal lands.

Sincerely yours,

Richard A. Hotchkiss
Richard A. Hotchkiss, President
Hotchkiss Company Inc.
Star Route 1 Box 132
Burns, Oregon 97720

- 191-1 Refer to response 2-46.
- 191-2 Refer to response 2-46.
- 191-3 Refer to responses 42-14 and 46-1.
- 191-4 Refer to response 2-9.
- 191-5 Refer to response 2-87.
- 191-6 Refer to responses 4-6 and 4-7.
- 191-7 Refer to responses 4-8 and 4-9, respectively.
- 191-8 Refer to response 2-63.
- 191-9 Refer to responses 2-63 and 2-68.
- 191-10 Refer to response 2-6.
- 191-11 Refer to response 2-49.
- 191-12 Refer to response 4-14.
- 191-13 Refer to response 4-15.
- 191-14 Refer to response 4-16.

From: Don Barnes
 Representative of
 Rex Clemens Ranch Inc.
 Diamond, Oregon 97722

To: Jay Carlson, RMP/EIS Team Leader
 Bureau of Land Management
 Burns District Office
 HC - 74-12533 Highway 20 W.
 Hines, Oregon 97738

Feb. 15, 1990

Dear Mr. Carlson:

192-1 After studying the (RMP/EIS) texts, it is evident that the BLM is blaming the cattle for all of the range problems. Contrary to your beliefs, the so called, Wild Horses, are to blame for most of the problems. First of all, government horses are not managed. They are left on the range twelve months of every year. They compete with big game animals deer, elk, and antelope. This condition is real critical to big game animals especially during the winter months.

192-2 The BLM is famous for letting their horses proliferate to the point that they devastate the landscape. A good example of that is the Yank Creek Field.

The Rex Clemens Ranch has a grazing right in the Yank Creek Field, but has not been able to use this field for several years due to the over population of government horses. The horses have abused the riparian area in this field to the point of no return.

The BLM has made no effort to correct this problem. The only way to correct this problem is to fence the horses out since this is private property.

It is my opinion that the BLM is influenced too much by special interest groups that don't make a living in Harney County. I believe the BLM should get back to the basics of land management and raise fewer government horses.

Following is a listing of the ranch allotments:

# 5219	Hamilton FFR	19	AUMS
# 5307	Smyth Creek	1,919	AUMS
# 5308	Kiger	586	AUMS
# 5321	Hamilton Individual	150	AUMS
# 5323	Clemens FFR	78	AUMS
# 5330	Deep Creek	128	AUMS
		3,150	AUMS

192-3 On the Clemens Ranch Allotments if a 30 to 50 % reduction in allowable AUM's is taken the result will be a significant reduction in the value of the base property associated with these BLM permits. At \$50.00 per AUM value, a cut would reduce the base property value by:

3,150 AUMs	3150 AUMs
x 30 %	x 50 %
945 AUMs	1,575 AUMs
x \$50.00	x \$50.00
\$47,250.00	\$78,750.00

192-4 The reductions in livestock grazing resulting from BLM proposed alternatives will force many livestock operators out of business. This is contrary to the criteria for the composition of the preferred alternative (chapter 2 page 3). The most likely effect of BLM's proposed alternatives A, B, and C is that many ranchers and long term residents of Harney County will be forced out of business.

BLM's proposed preferred alternative will reduce the value of the Rex Clemens Ranch Inc. base property associated with its BLM grazing permit. BLM's preferred alternative will cause unreasonable and unacceptable economic damage to our livestock operation and livelihood. This will reduce the total number of livestock that the ranch operation can run on a yearlong basis.

Appendix 4 - 2 Table 2

192-5 Parcels of private land have been selected for acquisition. The Yank Springs, Poison Creek, and Swamp Creek parcels, 1,040 acres, are an important part of our ranching operation and are not for sale.

Appendix 7 - 11

192-6 As stated in the draft RMP/EIS most of the water for animals of any kind, in this area is on private land, therefore it is not proper to establish an ACEC here for Wild Horses.

Water Quality: Chap. 3, Pages 2 and 27

192-7 Available references or detailed explanation should be provided for the methodology used in determining surface water quality. There are no streams in the RA that have good or better surface water quality. Does BLM have evidence to suggest that good or better BLM surface water quality ratings are possible in the Three Rivers Resource Area? I believe the water quality is adequate for the area.

RECOMMENDATIONS

192-8 BLM should begin quadrat frequency (trend) studies to determine the long-term changes in vegetation and range condition. These studies are recommended and described in BLM Technical Reference TR 4400-4 and the Nevada Rangeland Monitoring Handbook (1984). If frequency studies indicate that the trend in range condition is declining, current utilization standards, stocking levels and/or grazing management should be adjusted. Conversely, if trend improves, utilization standards and stocking levels should also be adjusted. Until such a monitoring system is implemented and data analyzed current grazing systems, stocking levels and utilization standards should be continued.

Don Barnes

Don Barnes
 Foreman
 Rex Clemens Ranch Inc.

192-1 The intent of the plan is not to show that livestock are the cause of all resource problems. Livestock use is a recognized tool for effecting changes in the range resource. Wild horses have caused resource damage in some areas just as cattle have in others. The purpose of this plan is to balance the use by all resources as outlined under the Purpose and Need section in Chapter 1, DRMP/DEIS.

192-2 A recent allotment evaluation of Kiger Allotment shows that resource conditions in the Yank Springs Pasture have declined when wild horse numbers exceeded the maximum management levels. Wild horse numbers have prevented use by cattle in the Yank Spring Pasture during several of the last 10 years. The riparian areas of Yank Spring Creek do warrant some attention as do many of the riparian areas of the RA. Fencing the private land along Yank Springs Creek may be the best option for improving riparian condition in this area.

The BLM is not in a position of managing the resources on private lands. Wild horse numbers in the Yank Springs Pasture will be managed so that livestock grazing remains a valid use for this area.

192-3 Refer to response 2-11.

192-4 Refer to response 32-1.

192-5 Refer to response 4-14.

192-6 Refer to response 2-68.

192-7 Refer to responses 2-3, 2-25, 2-26, 2-28, 2-44, 6-3 and 6-4. Also, refer to response 2-87 regarding methodology.

192-8 Refer to response 2-94.

November 30, 1989

Bureau of Land Management
Burns District Office
HC 74-12533
Highway 20 West
Hines, OR 97738

We are writing to comment on the draft Three Rivers Resource Management Plan. In short, the plan perpetuates the over-emphasis on grazing and under-emphasis on maintaining natural systems and populations. This is another BLM grazing plan (with a few minor concessions) and does not conform to the spirit of multiple use principles.

The forage allocation of 139,851 AUM for livestock is far too high. Statements that it will increase above this level are even more disturbing. Too much emphasis is placed on short-term enriching of a small number of ranchers. We disagree that habitat can be improved to the extent forecast while keeping livestock grazing at such a high level. Your actual analysis is not included in the plan but it must contain faulty assumptions.

Livestock "improvements," namely planting of crested wheatgrass should be halted entirely. The planting destroys the natural ecosystem and creates a cattle monoculture. Public land use agencies should care about biological diversity. Crested wheatgrass is also the worst in terms of multiple use. Its for cattle and cattle alone.

Forage allocations for big game should increase. A healthy big game population is worth more than sustaining a certain level of cattle. Hunting can be big business and be worth more to the public than a minor number of cows. Wildlife viewing, similarly has a value even though the BLM does not collect fees for it. The BLM places too much emphasis on commodity sales.

The absence of habitat analysis for non-game animals is a glaring omission. Non-game animals need forage for food, shelter, etc. They are an integral part of the ecosystems of the area and management of the area should reflect the impact on them. Most Americans enjoy viewing non-game wildlife and your lack of information on them is indicative of a management that is out of step with the public wishes (except for cattle ranchers). The plan should include specifics to begin studies of non-game wildlife and the impact of grazing on them.

Native grasses and other vegetation have value in

then the cut is not reduced to help wildlife because the cut would significantly effect timber supplies (page 4-7). Which is it? Timber production should be done in such a way as to minimize its impact on wildlife.

In short, the preferred plan should be revised significantly. Alternative A is the closest to the plan we support.

Sincerely,

George Ostertag
Rhonda Ostertag
George Ostertag
Rhonda Ostertag
4305 25th Ave. NE, #13
Salem, OR 97302

193-1
193-2
193-3
193-4
193-5

193-1 Refer to response 2-10.
193-2 Refer to response 1-11.
193-3 Refer to response 2-10.
193-4 Refer to responses 1-18 and 11-14.
193-5 Refer to responses 1-18 and 11-14.
193-6 Refer to response 1-13.
193-7 SRMAs are defined as areas which require greater recreation investment, where more intensive recreation management is needed and where recreation is a principle management objective for which the Bureau plans and manages. The remaining public lands are considered Extensive Recreation Management Areas (ERMAs) where recreation is not a principle management objective and where limited needs or responsibilities require minimal recreation investment. These areas, which constitute the bulk of the public lands, give recreation visitors the freedom of recreational choice with minimal regulatory constraint.

The Bureau utilizes this categorization of lands in order to set budget priorities and spend the limited recreation dollars in areas where they will do the most good and return the most benefit for the recreating public. The SRMAs are where funds are spent for development plans, interpretive plans and construction of facilities such as campgrounds, picnic areas, trails, interpretive sites, signs, parking areas, etc. The ERMAs also receive funds to enhance recreation opportunities but not to the degree as the intensive used Special Areas. Funds are often spent for signing, maps, road improvements, primitive sites, access, boundary marking, etc.

The RMP determines the management direction for each resource and, for recreation, does not go into details such as signing, map development or construction of facilities. Specific details to accomplish management decisions are developed in activity plans which address much smaller parcels of land or special areas. Please note that trail development is addressed (Desert Trail and Silvie River Access Trail) as is facility development at Chickahominy, Moon, and Warm Springs Reservoirs as well as those noted for enhancing informational and educational opportunities.

193-8 Refer to response 193-7.
193-9 Refer to responses 2-3 and 2-25.
193-10 The type of decisions sought in this comment are outside the scope of the RMP. The RMP provides comprehensive resource management prescriptions; funding priorities are not set at the RMP level.

Year-to-year funding priorities, which are the responsibility of the District Manager and the Area Managers, are influenced by commitments made in the land use plan (the RMP). Local funding priorities, however, must also respond to directives imposed at the state and national level. Also, refer to response 2-52.

193-11 Refer to responses 2-6, 2-68, 8-11, 11-11 and 15-28.
193-12 Refer to responses 2-11 and 3-13.

193-6 themselves and are not just a commodity to be sold to feed cattle. Very little emphasis is placed on repairing damage to the native ecosystem of the area (with the exception of wetlands and riparian areas). The rangeland ecosystems themselves have been greatly damaged from past grazing practices and the preferred plan does nothing to repair that damage. Additional areas should be given designations which permanently remove cattle and give the area a chance to recover from a century of over-grazing damage.

193-7 Recreation, like ecosystems, is low on your priority list. More areas should be given "Special Recreation Management Area" status. Nothing discussing additional trails, campgrounds, wildlife viewing areas, recreation maps and signs, etc. is in the plan. We are researching a recreation guidebook and had very little help from your office in finding recreation opportunities in the district.

193-a It is no wonder that more people don't visit BLM lands--you don't publicize them, develop them, or make access easy through user-friendly maps and signs. The plan should have specific plans for signing roads, developing maps (like the ones put out by the forest service), and constructing campgrounds and trails.

193-9 The rating system for water quality and habitat conditions (poor though excellent) is meaningless without knowing the criteria used to determine the ranking. I also have concerns with the tracking of these rankings. Funding for these ongoing studies often seems to be the first cut. A statement that funding for livestock grazing projects will be cut before the funding for monitoring studies to track the health of habitat and water systems should be added to the plan. Without that assurance, the assumption on page 4-2 (#2) makes the plan useless.

193-m We support special management of the Kiger horse herd. It is a special resource that deserves protection. Another herd should be started in one of the other HRMAs, however, to further protect the breed from catastrophe. Also, we support designation of the Malheur River as Wild and Scenic as outlined in your plan.

193-11 Protection of wetlands and repair of riparian systems is to be applauded. However, removal of cattle from riparian areas should be permanent. Temporary removal only solves the problem temporarily. Cattle caused the degradation and only their long-term removal (or a major reduction in numbers) will protect riparian areas and their associated attributes.

193-12 You contacted yourselves with respect to timber. It states that the timber in the planning area is insignificant to local economies because of its small volume (2000). But

194

Quintin D Myers
19344 Kiowa Rd.
Bend, Oregon 97702
503-382-4633

January 19, 1990

District Manager
Bureau of Land Management
HC-74-12533 Hwy 20 West
Hines, Oregon 97738

Dear Person;

Regarding the Draft Three Rivers Resource Management Plan and Environmental Impact Statement.

- 194-1 I am very upset with this plan and I demand that the BLM develop an alternative to restore and maintain rangeland in excellent, natural condition. Cattle grazing should be reduced or eliminated where appropriate. At a minimum the BLM should adopt alternative "A".
- 194-2 I insist that water quality, riparian and aquatic habitat be improved/maintained in excellent condition, and that all ancient forest be identified and protected.
- 194-3 I ask that all costs of construction of new roads and other rangeland projects be included under the various alternatives along with their environmental impacts.
- 194-4 I ask that all crested wheatgrass seeding proposals be eliminated.
- 194-5 I demand that bighorn sheep habitat protection and impacts be addressed in the plan and further, that forage allocations go entirely to bighorns in their home range.
- 194-6 I request Wild and Scenic River designation for ALL of the South Fork and Middle Fork Malheur Rivers (except for the reach through the Drewsey Area), ALL of Bluebucket Creek, and ALL of the Silvies River.

I also recommend the wildlife winter range forage allocations be given priority over livestock allocations.

Sincerely,

Quintin Myers

- 194-1 Refer to response 1-13.
- 194-2 Refer to responses 2-44 and 6-4.
- 194-3 Refer to response 12-7.
- 194-4 Refer to response 1-11.
- 194-5 Refer to response 2-78.
- 194-6 Refer to response 3-6.

195

Matthew Holmes - Comments on 3 Rivers Resource Management Plan and EIS.

2-15-90
MHH

Jay,

Please excuse my poor handwriting!

- 195-1 Bravo! The document is a major improvement in presenting information to all interested parties. But you still left-out some important information. When is the economic analysis of the various alternatives? No benefit/cost calculations? How can you decide on an alternative without reference to how much it will cost? I'm sure you would agree that this information is vital for a well-informed decision (by you and the public).
- 195-2 The data shows that you are over-grazing and that the majority of inventoried streams are in poor condition and declining! There is nothing in the document that tells me how soon AUM's will be reduced.

- 195-3 There is nothing in the document that tells me you're going to halt the decline of the streams. As I indicated earlier, it would be great to see how various management options pencil-out economically.

- 195-4 If I'm reduced to selecting one of your 5 management objectives, I choose the "emphasize natural values" objective - though it hardly lives up to its name.

Jay, you mentioned in Bend, about a guy from GAO. - did he produce a report or memo? If he'd could you send me a copy? or give me his name and phone number?

Thanks, Matthew Holmes

61940 Pettigrew Rd, Bend, OR 97702.

- 195-1 When comparing nonmonetary values to values commonly measured in dollars, the development of proxy monetary values is required to prepare a benefit cost analysis. Because a single proxy dollar value cannot adequately represent the breadth of subjective values held by individuals, benefit-cost analysis are of limited value where choices about nonmonetary values are being made.
- 195-2 Refer to response 28-1 and 94-2.
- 195-3 Refer to response 2-11.
- 195-4 Refer to response 3-13 and Table 4.19, p. 4-28 DRMP/DEIS.

196

Box 10
Princeton, OR. 97721
February 14, 1990

196-1 Refer to response 131-1.

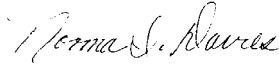
Jay Carlson
Burns District Office
Bureau of Land Management
HC74 12533 Highway 20 West

Dear Mr. Carlson:

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers, and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Plan and Management and Environmental Impact Statement are consistent with my views and comments.

196-1 I also want to comment on the Davies allotment #5215. We as a family ranch have used this allotment for many years. We have never abused it. I was surprised to find it listed in unsatisfactory condition in the Draft Three Rivers Statement. I want to go on record that I disagree with the "I" Selective Management Category strongly.

Sincerely,



Norma I. Davies

197

Box 10
Princeton, OR. 97721
February 14, 1990

197-1 Refer to response 131-1.

Jay Carlson
Burns District Office
Bureau of Land Management
HC74 12533 Highway 20 West

Dear Mr. Carlson:

The letters from the Harney County Cattlewomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers, and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Plan and Management and Environmental Impact Statement are consistent with my views and comments.

197-1 Allotment #5215, Davies Allotment has been used by my family for three generations. I just don't see it in the "needs improving category". Half of it is used as exchange of use in conjunction with private land. We certainly haven't been misusing either property. The other part of the allotment is in good range condition also. Your draft study has the capacity almost double of actual usage so I find it hard to understand it being in unsatisfactory condition.

Sincerely,



Maurice K. Davies



Ponderosa Ranch
 HC 30 Box 3439
 Burns, OR 97720
 (503) 542-2241



198

Feb. 13, 1990

Jay Carlson - RMP/EIS
 Burns District Office
 BLM
 HC 74 12533 Highway 20 West
 Hines, OR 97738

Dear Mr. Carlson;

In our review of the Three Rivers Resource Management Plan, we would like to make a few general comments followed by more specific comments related to the Silvies allotment (4143).

- 198-1 First, we believe that the development of a Plan such as this should involve the adjacent land owners/permittees in the actual planning process through one on one or in small group meetings. Not to actively involve people such as ourselves appears to us as a real lack of concern for the community. Secondly we wonder
- 198-2 if there is really much of a need for such a plan in that it is so complex, ambiguous, and cumbersome as to render itself useless. Wouldn't it be better to concentrate on the individual allotment plans making sure they meet the criteria already in force? Also, we see that there seems to be an over emphasis on the wildlife in relation to the amount of consideration given resolving wildlife/livestock/environment conflicts.


Now, more specifically in regards to the Silvies allotment, we would like to comment on the following items:

- 198-3 1. Appendix 3-21 - BLM figures show that actual use is 2,586 AUM's while the estimated capacity is 2,311 AUM's. You might be interest to note that in 1979 the BLM range staff and I established figures on an acre by acre basis what the BLM useage would be for each pasture since all of the pastures on the allotment have mixed ownership. The preferred useage of 2,500 AUM's was based on a total ranch useage of 29,000 AUM's, including the BLM and USFS allotments. Since that time the management on the ranch has added 3,000+ AUM's on USFS allotments while at the same time reducing the total AUM's used on the ranch to a maximum of 24,000 AUM's. For the past three seasons our actual total useage for the ranch has been 18,000 to 22,000 AUM's. Therefore we would seriously challenge the accuracy of your figures on actual useage.
- 198-4 2. The BLM also makes note that the wetlands habitat is

less than satisfactory condition. Should that be a priority on streams that are only seasonal at best, and make up 1 2 % of the BLM ownership in the Silvies allotment?

- 198-5 3. Charlie Smith Butte Reservoir - although our research is not quite complete, we believe that the dam is only on the east edge of the BLM line and that none of the reservoir lies within BLM ownership. Also the reservoir is not filled by natural drainage but is filled by ditches coming out Cottonwood and Bridge creeks. This water is only available when not needed on other parts of the ranch.
- 198-6 4. Dog creek, Poison creek, Mountain creek and Flat creek are short season streams only.
- 198-7 5. A reservoir on Poison creek would be complicated by the short supply of seasonal water, plus the problem of the water being needed during the irrigation season.

We believe that the Three Rivers Management Plan needs to have the above mentioned conflicts resolved along with the concerns others are voicing before it is adopted in a final form. Allotment Management Plans and range management philosophies only work when we're all working together towards the better utilization and protection of our range resources.

Sincerely,

 D. Garth Johnson, Manager
 Ponderosa Ranch

- 198-1 Refer to response 27-6.
- 198-2 Refer to p. 1-3, DRMP/DEIS for a description of the Purpose and Need for the RMP. Appendix 3, Table 6, provides a comprehensive and detailed treatment of the management needs for individual allotments.
- 198-3 Refer to response 2-11 and 2-17.
- 198-4 Refer to response 7-12 and PRMP/FEIS, Appendix 1, Table 4. Also, the disproportionately high amount of wildlife use in relative scarce wetlands makes the wetlands high priority.
- 198-5 Aerial photos and topographic maps indicate that the dam and a portion of Charlie Smith Butte Reservoir are on Bureau land. If surveys show differently the area will of course not be under BLM jurisdiction. Regardless, this reservoir has and should continue to provide brood rearing water for waterfowl.
- 198-6 Refer to response 42-14.
- 198-7 Site-specific objectives and feasibility of the proposed reservoir on Poison Creek have not been fully analyzed. Prior to any project work, a feasibility determination and EA would be accomplished.

Jay Carlson
Bureau of Land Management

199-1 Refer to response 2-11.

199-2 Livestock use is evident along Poison Creek; however, BLM administration only covers 0.25 miles of the creek. Refer to response 3-13.

199-1

Dear Mr. Carlson:

In reference to our collaboration
the Lone Pine. We feel that a
cut in AUM's is not necessary.

199-2

There is no sign of decline in game
animals, in fact they are on the increase,
especially antelope. At the end of
our grazing season last year we took
a range tour with our range supervisor,
and our range still had plenty of carry
over feed. In your range analysis of
the Lone Pine you stated we ~~are~~ over
grazing and damaging the riparian
area on Poison Creek. I believe your
study was done from a map and
not an on the ground study, as our cattle
would have to jump over a fifty foot
run to get to Poison Creek.

We believe your studies were done
by young and inexperienced personnel
who have had no practical experience

Sincerely,
Jack Dinkwale
Betty Dinkwale
Jim Dinkwale
Cheryl Dinkwale

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

200

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

200-1 Refer to response 2-63.

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

200-1 The reallocation and/or reduction of 95 AUM's livestock forage in ~~Unit 1~~ Allotment will reduce the value of our base property by approximately \$37M. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Jack & Betty Dimmick

Name

Wilkinson Rt. Box 344

Address

Burns *Or* *97726*

City State Zip Code

Jack Dimmick

Signature

Jim Dimmick
Chief Dimmick

Enclosure: Supplemental Comments

201

United States Dept. of the Interior 2-15-90
Bureau of Land Management
Burns District Office
HC 74-12533 Highway 20 West
Hines OR, 97738

201-1 Refer to response 2-11.

201-2 Refer to response 157-5.

201-1

Comment of the Draft Three Rivers Resource Management Plan and Environmental Impact Statement - "East Warm Springs Portion"

Where you state that the carrying capacity is less than the actual use - the problem does create when the diversion fence between East Warm Springs and the West Warm Springs fence was built.

This problem could be corrected by developing water on the area between Boulder Reservoir and the Eagle Nest Sealing; so the livestock could utilize that feed that is now unused.

Also the more realistic use of the Spits Field and the area to the north of it; which is presently used for the wildlife habitat only.

201-2

The wild horses should not be kept in the optimum level. The number exceed the optimum level.

There are only a few of my concerns on this matter.

Sincerely,
Larry Hoover

202

February 2, 1990

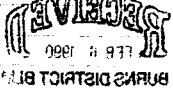
Jay Carlson
Bureau District Office
Bureau of Land Management

202-1 The Bureau frequently authorizes grazing permittees and other members of the public to construct developments on public land. Prior to authorization the Bureau prepares NEPA documentation and analyzes the proposed project. This is designed to be a 2-year process from proposal to construction. Refer to response 129-1.

Mr. Carlson;
This response is our endorsement of such letters and Piddle Ranch document. Your response has been submitted to you.

202-1

One of my main concerns is this: The BLM wants to protect creek banks and yet they (BLM) will not develop water sources and stock water reservoirs and will not authorize the ranchers to develop them on their own. I'm referring to reservoirs located away from creeks and streams. This would be a rather simple solution to over-grazed creek banks.



Sincerely,
Marvin Wharton
Alder Creek allotment
Crane, Ore. 97732

January 20, 1990

203

James D. Ward
57923 Poothill Rd.
La Grande, Ore. 97850

Joshua Warburton
District Manager
Bureau of Land Management
HC 7H-12533
Evy, West
Hines, Ore. 97738

203-1 Refer to response 3-13.
203-2 Refer to response 2-10.

Dear Sir,

I'm writing in response to you Three Rivers Management Plan. I must say that your preferred alternative, if instituted, will be a "far cry" better than current management.

203-1

Although it seems you are intending to make significant improvements to your riparian systems through the reduction of A.U.I.s in these vital areas, I don't think you are doing enough. I would like to see complete protection and restoration of all important riparian areas if it means permanent fencing or the restricting of livestock in any allotments that contain the water courses. This would include ponds, reservoirs and springs as well.

203-2

I would also like to see more emphasis on improving forage conditions for elk than the preferred alternative suggests. Although I'm aware that many area ranchers enjoy the relatively inexpensive grazing opportunities on "my" land, considering the obvious degradation of range lands in your districts, I don't understand why the public must forsake our priorities for these few.

Thank you,
James D. Ward
James D. Ward



204

204-1 Refer to response 1-13.

RESOLUTION

WHEREAS over 70% of the land in Harney County is owned and managed by the government;

WHEREAS the wealth of natural resources these public lands contain has provided the economic base upon which our communities have been founded;

WHEREAS direct payments to the county amounted to \$4.3 million in fiscal 1989;

WHEREAS these direct payments comprise a significant share of our local governmental revenue and reduce the property taxation burden on property owners;

WHEREAS the majority of the Family Wage jobs in our county depend upon the economic outputs from our Federal lands;

WHEREAS successful implementation of our Regional Strategy for the diversification of our economy relies upon the maintenance of the Wood Products Industry;

WHEREAS Federal lands supply over 95% of the raw material which supplies our local wood products plants;

WHEREAS Federal lands supply 15-20% of the forage consumed by livestock in Harney County;

BE IT RESOLVED on this 12th day of February, 1990, that the Harney County Chamber of Commerce Board of Directors can and will only support these Federal Land Management Plans which will ensure the sustenance of livestock grazing and timber harvesting at or near the levels of recent history.

Signed,
Harney County Chamber of Commerce
Board of Directors

HARNEY COUNTY CHAMBER OF COMMERCE

18 WEST D STREET BURNS OREGON 97720-503-573-2636

205

January 17, 1990

205-1 Refer to responses 2-1 through 2-96 which are responses to issues submitted by Riddle Ranch and Western Range Service.

Joshua L. Warburton, District Manager
Burns District Office
Bureau of Land Management
HC 74-12533 Highway 20 West
Hines, OR 97738

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RMP/EIS

Dear Mr. Warburton:

The January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Name Rod Otley

HC 72 Box 45

Princeton, Or. 97721

Address

City State Zip Code

Signature D. Rod Otley

Enclosure: Supplemental Comments



Joshua Warburton
District Manager
Bums District BLM
HC 74-12533 Hwy 20West
Hines, OR 97738

2/15/90

HE: Three Rivers Resource Management Plan/EIS

Dear Mr. Warburton:

The Oregon Natural Desert Association appreciates the opportunity to comment on the Draft Three Rivers Resource Management Plan. We also appreciated the opportunity to have Jay Carlson and Rob Burns of your office meet with us on February 2.

Our primary concern deals with the range of alternatives presented. Specifically, we take issue with the "arrow and biased nature of the alternatives used to portray the spectrum between the commodity and natural values alternatives. Fifty-six years after the Taylor Grazing Act mandated conservation and improvement of our western public lands, and thirteen years after FLPMA, we still have, of 95 streams identified in this planning area, "one in good or excellent condition and 62 in poor condition. Of 34 wetlands identified, 16 are as yet unsurveyed and only 4 are in good condition. Of the 1.6 million acres in the livestock grazing program, 64% are now classified in "fair" to "poor" condition. This will "improve" to 60% in the preferred alternative. A 4% improvement over the next 15 years! At that rate, how many years will it take for the entire range to be in good or better condition? None of the alternatives in this document deal with the incredible task of restoring the land to a healthy, ecological status.

206-1 The planning criteria for alternative formation (page 1-8), states that "At least one alternative among those assessed will provide for emphasizing the protection and enhancement of natural systems and sensitive resources." The planning criteria should also include a "restoration" alternative. The term "restoration" far more accurately describes the course of action you will have to follow given the poor ecological condition of the landscape.

Further, any alternative should be able to answer the following questions: What has been the consequence on natural systems and sensitive resources by livestock and what specific actions are being proposed to maintain these systems in a

P.O. BOX 1005 BEND, OREGON 97709

206-2 normal ecological condition? As a specific example, what are the specific goals and actions that will maintain bighorn sheep populations. What was their historic range? How have they been displaced? What is preventing further reproduction? Where will reintroduction occur and when?

206-3 We therefore request that the final plan include a restoration alternative that reflects a plan of action that will maintain natural ecological integrity and biodiversity.

Additional comments include the following:

206-4 Water Quality We find the condition of water quality, aquatic habitat and riparian areas to be completely unacceptable. We recommend that there be an immediate removal of all livestock from all streams in poor or fair condition.

206-5 Forage allocations The tables showing forage allocations only show the competitive amounts. What are the non-competitive wildlife allocations? Are forage allocations reserved for the habitat needs of non-game wildlife? If not, why not? How does such intense grazing affect the micro-climatic conditions for other wildlife species? How can 37% of the "competitive" forage be allocated to livestock with only 3% towards wildlife? What are the consequences on natural wildlife populations (not ODFW target populations) of this radical proposal?

206-7 Implementation schedule None of the objectives state a time period for achieving the desired condition. If the range improves by a margin of 1% over the period of the Plan, will the BLM report that as meeting the objective? We feel it is essential to state the time frame for implementing the objectives and the level of improvement that will be achieved in the stated time frame. (See comment below regarding implementation)

206-8 Areas In addition to the areas you have recommended, designate 17,100 acres to the AUCED in Diamond Craters, designate 1870 acres in the Foster Elk Complex to ENA AFD, designate 5,200 acres in the Insouciant AFD and 10,000 in the Pleasant AFD.

206-9 Wilderness The Malheur River and Stonehouse WSAs should be recommended for Wilderness.

206-10 Remaining lands identified in the original Wilderness Inventory should be recommended for primitive, non-roaded status. Motor vehicles and grazing impairments would be prohibited.

206-11 Mining and Geothermal All lands should be withdrawn from mining and geothermal exploration and development until a statewide EIS is completed on the cumulative effects of these developments.

Range improvements The full costs and adverse impacts of crested wheatgrass and other "improvements" are not fully discussed. Crested wheatgrass plantings should be prohibited unless a full EIS is conducted.

206-12 Implementation costs The ecologic and monetary costs are not displayed for the proposed alternatives. What were the historical conditions, how have they changed and why, what has been the effect on loss of biodiversity and ecologic integrity, and what will it take to achieve full ecological recovery? What are the required budgets for achieving the desired objectives under the proposed alternatives? As a baseline condition for evaluating the efficacy of the proposed alternatives (i.e. the rate of improvement), we request that you depict a cost and time schedule assuming natural recovery (i.e. if there were no livestock on the land, estimate how long would it take for the land to heal itself and what BLM's cost would be to effect this recovery. Also see comment below regarding land and water monitoring).

206-13 Native plants What is the range and health of native, sensitive, threatened and endangered plant species. To what extent have they been displaced or destroyed by past management activities and how will they be affected under the proposed alternatives? What provisions are being made in the alternatives for reestablishment and recovery? (See comment referring to the ecologic costs of the proposed alternatives)

206-14 Public input The plan should define a process for future public involvement that does not require individuals to respond to each and every allotment management plan. The general public group that should may be expected to get involved in day-to-day management activities.

206-15 Land and water monitoring A comprehensive network of watersheds should be established that would allow for long-term monitoring of natural recovery. The watersheds should be strategically placed to reflect all combinations of landscape characteristics including soils, relief, existing conditions, aspect, vegetation, etc. These areas

would provide the public and BLM to ascertain the efficacy of the BLM's land and water management activities relative to a recovering (no livestock) watershed.

206-16 Wild & Scenic Rivers Bluebucket Creek should be designated a "wild" Wild and Scenic River upstream of the WSA boundary, including the private land, which should be acquired through purchase or trade along with the private inholding on the Malheur River.

206-17 We disagree with your conclusions on all of the evaluated river reaches with the exception of section D on the Malheur River. Not only do these river reaches possess outstandingly remarkable values but also are suitable for management.

206-18 We disagree vehemently for using the rationale that because the Silvers and Malheur Rivers lack "limited rafting in springtime" that they are therefore ineligable. There is no basis for applying a recreation criteria only to a particular season of the year much less one that relies on rafting.

206-19 We request that a more thorough inventory be made of potential Wild and Scenic Rivers including all tributaries (eg Cottonwood Creek, Silver Creek, Emigrant Creek, Pine Creek, Birch Creek, etc.) and waterways that have similar flow characteristics to Bluebucket Creek which you are recommending be designated in your preferred alternative.

206-20 Old Growth A moratorium on the cutting of all remaining old growth and native forests and road building should be imposed until a complete inventory and protection program is established. (Native forests include all forests that are predominantly roadless and that have not been logged in the past. Old growth forests include all mature and overmature forest stands and may have been selectively logged and lightly roaded.)

In conclusion, we compliment the Burns District in putting together a planning document that exceeds the quality of past BLM plans. Given the number and complexity of the issues we have raised, we would appreciate the chance to review a revised draft of the Plan. We look forward to hearing from you.

Sincerely,
Alice Dishoff for AE
Alice Dishoff
President

cc: Jay Eichel (National Wildlife Federation)

- 206-1 Refer to response 12-4.
- 206-2 Refer to response 2-78.
- 206-3 Refer to response 12-4.
- 206-4 See Appendix 1, DRMP/DEIS.
- 206-5 Refer to response 2-10. Also, only competitive forage is allocated, noncompetitive amounts are available.
- 206-6 Refer to response 2-10.
- 206-7 Refer to response 9-7. See also response 5-17.
- 206-8 The Diamond Craters has been a designated ONA/ACEC for several years. An additional 400 acres being proposed for inclusions would bring the total acreage to 17,056. The area is most appropriately managed as an ONA given the public recreational uses here, while the ACEC designation affords increased protection. An RNA would be oriented primarily to research uses, rather than to public recreational values, as recognized by the ONA/ACEC status at present.
- The Biscuitroot Cultural ACEC is proposed for designation, including 6,500 acres. This acreage is incorrectly shown in several places in the draft plan.
- Also, refer to responses 3-1, 15-35 and 159-1.
- 206-9 Refer to responses 13-1 and 13-2.
- 206-10 Refer to response 60-1.
- 206-11 Refer to responses 5-18, 13-4 and 169-2.
- 206-12 Refer to response 12-7.
- 206-13 The range and condition of native plant species in the RA is not fully known because the Ecological Site Inventory (ESI) is not complete. The current extent of knowledge concerning special status plant species is shown on Map SS-1 in the Proposed Plan.
- The full extent of the impact of past management activities on plant species is unknown except in areas where vegetation conversions have occurred and the native vegetation has been replaced with other species. Completion of the ESI will provide data on the ecological status of the upland communities and this may provide an indication of past management activity impacts.
- Direct impacts to the native vegetation can be found in Chapter 3 of the PRMP/FEIS. Indirect impacts to the native vegetation will also result from changes in amount and timing of grazing use as a result of AMP implementations and AUM reductions. Protection for and potential impacts to special status plant species can be found in the Proposed Plan.
- Reestablishment and recovery of native plant species will primarily be related to improved management of livestock grazing. Upon completion of the ESI, ecological status objectives will be established. See the Proposed Plan. Monitoring and recovery programs for special status plant species are outlined in the Proposed Plan. Also, refer to response 1-13.
- 206-14 Refer to response 5-17.
- 206-15 Refer to response 2-87.
- 206-16 Bluebucket Creek will not be considered for designation upstream of the WSA boundary. The same reasons that the private land was not included in the wilderness alternative for acquisition also apply to not including this portion of the creek as "wild."
- The old haul roads along the bottom of the creek as well as the access roads off the main forest road paralleling Bluebucket Creek may downgrade the potential classification from wild to recreational. However, the strongest rationale for noneligibility is the absence of outstandingly remarkable values (which may be primarily due to previous logging, etc.).
- 206-17 An inventory of river reaches was conducted and Segment A, Middle Fork of the Malheur River was found to have outstandingly remarkable scenic and primitive values. The other segments were either non free-flowing or did not possess outstandingly remarkable values. Refer to response 3-6.
- 206-18 Rafting was only one of several recreational activities that were evaluated and this was for determination of outstandingly remarkable recreational values, not wild values.
- 206-19 The tributaries mentioned may have similar flow characteristics as Bluebucket Creek but do not possess outstandingly remarkable values or they are also part of river segments which do not possess outstandingly remarkable values and are not eligible. The exception to this may be Silver Creek which is not associated with any river. A more thorough inventory will be made in coordination with the Ochoco National Forest. The USDA-FS is tentatively scheduled to complete an EIS in June 1991, which will analyze this creek for incorporation into the Wild and Scenic River System. A recommendation for designation of the small portion of the creek under Bureau administration is contingent upon two factors: (1) that the USDA-FS finds a contiguous manageable portion of the creek under their jurisdiction as suitable, and (2) the BLM is successful in acquiring a private portion of the creek below the section of creek under Bureau administration through a proposed land transaction, and it, along with the Bureau lands, is found to be suitable.
- 206-20 Refer to response 12-1.

Victor J. Trutwin
1722 135th. N.W.
Rice, Mn. 56367

207

Mr. Craig M. Hansen

207 No comment identified.

In regard to this Kiger Horse Management Plan and Environmental Impact Statement.

I, being a member of the Kiger Horse Association, must go along with Alternative A would be the most fair to the horses.

As far as those cattle Ranchers, Well if they did not raise so many cattle, May they could git a better price for these pProduct.

I, have in the past, adopted a ELM horse and did buy one from another party. And I, am waiting for the day when I can git one of these Kiger Horses. I do raise the Spanish Mustang at the present time.

So I do hope that this letter will serve some purpose ,in aiding these horses. So i do go along with the Alternative Plan A. It does sound the most fair.

Thank you,

Sincerely



Victor J. Trutwin



February 16, 1990

Joshua Warburton
 District Manager
 Burns District
 Bureau of Land Management
 HC 74-12533 Hwy 20 West
 Hines, OR 97738

Dear Mr. Warburton:

Active participation in federal land and resource planning is a high priority for all Oregonians. The Department of Forestry appreciates the opportunity to participate with other interested parties in the review of and comment on the Draft Three Rivers Resource Management Plan and Draft Environmental Impact Statement (DEIS).

While the Three Rivers Resource Area includes predominantly high desert, sufficient forest resources are found in portions of the Resource Area to warrant Department of Forestry review and comment on the Plan and DEIS. As you know, the state depends heavily upon lands administered by the Bureau of Land Management (BLM) lands for resources critical to Oregon's economy and environment. Public Domain lands that BLM manages are important to both statewide and local economies.

The State of Oregon is committed to both economic development and environmental quality. Therefore, the Department of Forestry encourages BLM management plans to balance these objectives by allowing appropriate economic development, including intensive timber management, while being sensitive to real or perceived risks to environmental quality.

The primary objective of this response to the Management Plan and DEIS is to identify technical concerns and ensure that the Bureau of Land Management considers the "Forestry Program for Oregon" as the final Management Plan is prepared.

The Forestry Program for Oregon (FPFO) describes the Board of Forestry's guidance to the State Forester, Legislature, Governor, state and federal agencies and to the citizens of Oregon on matters of forest policy which the Board considers important. The guidance is provided in terms of a mission statement, objectives, and an action plan containing policies and programs.

Joshua Warburton
 February 16, 1990
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The FPFO encompasses all ownerships of forest land (federal, state, and private), and all resources provided by our forests (fish and wildlife, soil, air, water, recreation, grazing and timber).

The objective of the FPFO is to identify opportunities and describe actions to deal with issues related to the allocation and management of Oregon's forests.

In the FPFO, the Board of Forestry has directed the Department of Forestry to:

1. "assist the State of Oregon in the analysis of federal management plans and help develop land use recommendations that recognize that forests are dynamic and most forest uses are compatible"; and
2. "actively and cooperatively review federal management plans to improve the technical quality of the analysis and inventory information within each plan"; and
3. "aid federal public land managers in allocating land use in order to meet the Forestry Program for Oregon objectives, and will emphasize the integration of forest land uses, in recognition that most forest uses are compatible over time"; and
4. "encourage federal agencies to maintain as large and as stable a commercial forest land base as possible and to minimize future withdrawals from this land base."

Also included in the FPFO, is specific guidance which is related to the five planning issues identified by the BLM in the Plan and DEIS as significant and important. This guidance is listed below with the five identified issues for your consideration.

A. Grazing Management Issue.

The Board and Department encourage:

1. Integration of sound grazing management practices, compatible with timber management goals and wildlife habitat goals, on public and private forest lands; and
2. Development of grazing improvements, such as water, fencing, salt, etc., and utilization of sound grazing practices:
 - a. To assure additional needed protection of riparian areas or other sensitive areas; and

- b. To enable re-distribution of livestock to areas of unused or lightly used available forage; and

3. Improvement in the administration of grazing programs and permits on federal lands.

4. Adoption of programs by federal agencies that increase forage production for livestock and wildlife, while maintaining or returning grazeable forest land and riparian areas to excellent condition.

B. Land Tenure Issue.

The Board and Department encourage exchange and acquisition of forest lands that consolidate ownerships; in order to place the management of lands with special needs in the hands of those more capable of meeting those needs, and protect prime forest lands that are threatened with conversion to non-forest uses.

C. Wildlife Forage and Habitat condition Issue.

The Board and Department encourage the adoption of programs by federal agencies that increase forage production for livestock and wildlife, while maintaining or returning grazeable forest land and riparian areas to excellent condition.

D. Fire Management Issue.

The Board and Department encourage:

- 208-1 | 1. Recognition ... that fire plays a natural role in maintaining the forest environment and wildlife habitat; and
- 208-2 | 2. Cost-effective federal fire management policies that emphasize planned ignition fires over natural ignition fires and that consider impacts to the state of Oregon's forest fire protection program; and
- 208-3 | 3. That federal plans which develop and implement fire suppression policies at both the state and national levels be coordinated with the state.

E. Special Management Area Issue

The Board of Forestry recommends that habitat should be managed based upon sound research data and the recognition that forests are dynamic and most forest uses are compatible over time and that forest management standards and regulations should be established for the protection of necessary habitat based upon the best knowledge available and that are consistent with

Joshua Warburton
 February 16, 1990
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responsible forest management.

Discussion of Alternatives Presented

The Management Plan and DEIS present five alternatives. In The Forestry Program for Oregon, the Board of Forestry encourages the integration of forest uses in recognition that forests are dynamic and most forest uses are compatible. The Board also encourages the maintenance of as large and as stable a commercial forest land base as possible. These policies are to be implemented in a manner that protects soil productivity, and air and water quality, and enhances forest values where appropriate to meet the management requirements for these lands.

The Preferred Alternative, of the alternatives considered, is the most similar in composition to the policies and programs suggested in the FPFO.

Discussion of Forest Land Management

208-4 | Information provided in the Management Plan and DEIS about the current condition (volume, species and stocking information) of the RA's forest land and analysis of different possible silvicultural management techniques are not adequate. Discussion about these factors is insufficient for the Department to determine if the identified environmental consequences are correct and the proposed management directives are sufficient to meet BLM management requirements and policies and programs recommended in the FPFO.

208-5 | Though management directives related to Forestry and Woodlands contained in Table 2.1 and Appendix 2 (General Best Forest Management Practices) are generally consistent with the considered alternatives, discussion of silvicultural practices as included in these two elements of the Plan and DEIS is inadequate and should be expanded. As you are well aware, the public is becoming increasingly concerned about the selection of silvicultural systems, especially as the choice relates to long-term productivity, residual stacking and the maintenance of other values. The Department recommends that standards for selection of silvicultural systems be included in both of these elements. (This seems especially important because it appears only one system (overstory removal) is proposed for use in the Plan without any explanation of why it is the preferred method and what the consequences of its use are.) Also guidance an utilization and snag retention should be considered.

208-6 | Additionally, the "Best Forest Management Practices" are indicated to be taken in large part from the Oregon Forest Practices (ODF, 1980). In 1987, the Forest Practices Act was

Joshua Warburton
February 16, 1990
Page 5

- amended and significant changes were made to rules related to forest practices in riparian zones. I have included a copy of the current eastern Oregon Forest Practices Rules for your use and suggest that special attention be directed to rule 629-24-446. With these new riparian rules, it is unlikely that the procedures suggested to meet the Forest Practices Act under Alternative E on page 4-8 ("buffers would be maintained with non-commercial species and brush") would always result in compliance.
- 208-7 In Chapter 3 (Description of the Affected Environment), limited description of existing silvicultural practices is made. This description indicates that overstory removal and seed tree are the usual harvest and reforestation methods. Additionally, tree planting as a method of reforestation is indicate as a last resort. The two tree planting areas are described as having significant animal damage. The description of the affected environment would be significantly enhanced by including descriptions of the major forest ecotypes, their extent, current inventory, and how past and current management practices have affected the condition of the forest.
- 208-8 Additionally, discussion in Chapter 4 (Environmental consequences) should include consequences to (under either forest land or vegetation) forest tree species composition and diversity, and forest insect and disease resistance. The Department of Forestry's review of overstory removal silviculture on some federal lands in eastern Oregon has indicated that residual stocking is not always optimum and adequately protected, nor is the resultant favored species always the most desirable in terms of desired product, insect and disease resistance, and other factors (visual for instance). Therefore, information provided in the Plan and DEIS should also provide the reviewer at least some idea about the consequence of existing and proposed silvicultural practices. Discussion about what combination of silvicultural practices will optimize timber production should also be included.
- 208-9 Finally, discussion of silvicultural practices that can be used to meet timber management objectives while also enhancing other objectives should be provided. conversely, silvicultural practices that can be used to enhance other objectives (riparian and visual) while also providing some timber should be identified and discussed for possible use in those forest land areas currently set aside or proposed to be set aside from timber production.
- 208-1 It is understood that fire plays a natural role in maintaining the forest environment and wildlife habitat.
- 208-2 Consideration of both planned and unplanned ignitions (DRMP/DEIS, Chapter 1-4) has been addressed. Impacts to the State of Oregon's forest fire protection program have been and will continue to be a concern.
- 208-3 Suppression policies at State and National levels are not a function of the RMP process. The fire management program has and will continue to coordinate with the State Fire Protection Program.
- 208-4 Chapter 3-11, DRMP/DEIS gives a brief description of the major silvicultural practices and techniques used. This document is not intended to describe in detail the silvicultural practices available in the management of forests. For detailed information about silvicultural practices, see BLM Manual 5600. Also, for detailed information on how silvicultural practices affect wildlife, see "Wildlife Habitats in Managed Forests", USDA-FS Agricultural Handbook No. 553, September 1979. Both of these references will be added to the Forestlands section of Chapter 3-11.
- 208-5 Refer to response 208-4.
- 208-6 The wording in the DRMP/DEIS Alternative E, p. 4-8, should read "would allow harvesting some commercial forest products . . ." The statement, "Buffers would be maintained with noncommercial timber species and brush," should be dropped from Alternative E.
- 208-7 Refer to response 208-4.
- 208-8 Refer to response 208-4.
- 208-9 Refer to response 208-4.

Monitoring

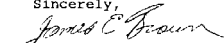
The draft Management Plan and DEIS does not include a monitoring plan, though it is indicated that the final Management Plan and

Joshua Warburton
February 16, 1990
Page 6

FEIS will include a monitoring and evaluation plan. A comprehensive system to monitor the full impacts and results of the program are essential. Failure to include a draft monitoring plan with the draft Management Plan and DEIS reduces the opportunity for reviewers to assist the BLM in developing a comprehensive monitoring system and hurts the credibility of the planning process. The Department encourages the BLM to provide adequate opportunity for interested parties to review and comment on the proposed monitoring program as it is prepared.

Thank you for the opportunity to review and comment on the Draft Three Rivers Resource Management Plan and Draft Environmental Impact Statement (DEIS). I hope our comments assist you in the preparation of your final Management Plan and FEIS. For assistance on the comments in this letter, please contact Ted Lorensen, Department of Forestry Policy Analyst at 378-5033.

Sincerely,


James E. Brown
State Forester

TLL
Enclosure

2-70-90
209

ATTN: Graig M. Hansen

I wish to voice my support for
the Kiger herd.
I feel Alternative A will
Benefit them Best.

Thank You
W. C. Richards Jr.

W. C. Richards Jr.
1131 Olds Ferry Road
Mesa, AZ 85672

I'm a member of the Kiger
Mesaño Association.

209 No comment identified.

3 Rivers

210

KMA Position response relative to
Draft Three Rivers Resource Management Plan.

The KMA encourages the BLM to
adopt Alternative A
Emphasizing Natural Values

210-1

The KMA further recommends that
a change be made on page 12 of
table 2.1, removing the word "adoption"
from #4.

Date 2/21/90

Chairman [Signature]

Vice Chairman [Signature]

210-1 This has been done. See the Proposed Plan, Wild Horses and Burros.

3 Rivers

211

2/24/90
FOY 577-7600

211-1 Refer to response 210-1.

B.L.M. - Hines, OR.

In response to the Draft Three
Hines Resource Management Plan,

I encourage the B.L.M. to adopt
Alternative A; Emphasizing Natural Values.

L. Elwin Wines
2700 Bishop Ck. Rd.
Jacksonville, OR 97530
844-7398

211-1

P.S. I furthermore recommend
the removal of the word "adoption" from
Table 2.1-12

L. E. Wines



Kiger Mestaño Association
Post Office Box 452
Burns, Oregon 97720

212

212 No comment identified.

February 21, 1990

Bureau of Land Management, Burns District Office
Attn: Craig M. Hansen, HC 74-12533
Highway 20 West
Hines, Oregon, 97738

Dear Mr. Hansen,

After careful study of the Three Rivers RMP-EIS I would urge you to adopt
alternative A for various reasons foremost of which is the fact that to me
the wild horse has as much right to the open range as any other wild an-
imal without being removed for one special interest group.

I am the owner of two Kiger mustangs for the purpose of breeding these
animals so they will not become extinct should some disaster befall the few
that are left. Thus I feel it is imperative to do all we can to help pre-
serve these wild mustangs as part of our western heritage and alternative
A would benefit the Kiger herd best.

Sincerely,

Ann C. Roda
623 W. A. Barr Rd.
Mt. Shasta, Ca. 96067



Kiger Mestaño Association
Post Office Box 452
Burns, Oregon 97720

213

623 W.A. Burn Rd
Mt Shasta California
96067

213 No comment identified.

February 21, 1990

Craig M. Hansen
Bureau of Land Management
Burns District Office
Highway 20 West
Burns, Oregon 97738

Re: RMP/EIS

Dear Mr. Hansen;

My choice of the alternatives is "A" employing natural values. My reasons are as follows:

1. Public Law 92-195 (the Wild Free-Roaming Horses and Burros Act) identifies these animals as a "living symbol of the historic and pioneer spirit of the West." This law was established by Congress to see that the wild free-roaming horses and burros be considered as an integral part of the natural system of the public land.
2. As a charter member of the Kiger Mestaño Association I will bring to your attention from the Constitution of the association Article II. The purpose of the K.M.A. is to benefit the Kiger Mustang horse, a band of free-roaming wild horses found on the range which is

managed by the Burns, Oregon District of the B.L.M. and its counterpart in captivity.

3. The first by-law to the Constitution of the K.M.A. states as follows: PURPOSE A. In cooperation with the Burns District B.L.M. to protect, preserve, promote and enhance the wild herd of Mustangs which currently inhabit the H.M.R. of E. Kiger, Longth Creek and Ribble Mountain currently referred to as the Kiger ^{WMA} Management Area.

4. I am not in favor of subsidizing a special group of business men (ranchers and farmers) who never seem to be able to make a living (according to themselves) without the help of the Federal Government. They are the only people in business in the Private sector that I know of who have never learned to stand on their own two feet and live with the rules of supply and Demand.

Sincerely yours

Frank C. Rodda

Treasurer K.M.A.

Post-it® Brand fax transmittal memo 7671		# of pages » 3
To: CRAIG HANSEN	From: JON ROBERTS	
Co:	Co:	
Dept:	Phone: 916-926-3631	
Fax: 503-573-7600	Fax: 916-926-6367	

JON H. ROBERTS
P.O. BOX 254
MT SHASTA, CA. 96067
2/22/90

ATTN: CRAIG M. HANSEN
BUREAU OF LAND MANAGEMENT
BURNS DISTRICT OFFICE
HIGHWAY 20 WEST
HJINES, OREGON 97738

RE: THREE RIVERS RESOURCE MANAGEMENT PLAN AND E.I.S.

MR. HANSEN,

I appreciate this opportunity to express my opinion on an issue I feel is of importance not only for Americans now but most of all the future generations to come. May I make clear how strong and how important I feel this issue is. We MUST NOT allow ANYONE to further compromise our Natural Heritage or Resources. I am specifically referring to the management of wild horses of the Riddle mountain and Kiger herds.

It has been the habit and history of this country to chip and chisel away at our resources until only a skeletal portion remains. Often then a Bronze plaque inscribed with a picture will be the only reminder that our lacking foresight and imagination have to reconstruct what was once a GREAT NATIONAL HERITAGE. THE POINT BEING that we must seize the opportunity to EXPAND and ENFORCE PROTECTION for the resources that remain. In this instance a herd of wild horses was discovered and documented to possess qualities that few had any notion existed. This discovery has led to effort to preserve and perpetuate these qualities by governmental and public concerns. The ONLY way to protect what is there is to develop a policy that prevents the gradual erosion of this resource and instead seeks to provide those elements that will insure their continued existence.

It has also been the habit and history of Land Management Policies to favor those who claim their economic existence is threatened unless they are allowed to further exploit public land. The cattle industry has long been the favored recipient of government assistance and historically has received continued expansion of public land use. So much so that it has become an expected ritual, hence "The louder you complain, the more you get." In light of their "needs" I must comment that I don't know any business person who isn't having a hard time in today's economy. Why we must compromise yet another Natural Resource and Heritage for the benefit of a relative few is beyond reasonable explanation.

I have been to the Burns area, seen the horses, and talked with several locals and B.L.M. personnel concerning the Kiger breed. In this I have found that the B.L.M. personnel are making a competent and honest effort to promote and provide the new found information about the Kiger herds and their special qualities. On the other hand, I found the locals lacking knowledge of the herds special traits. I was told more than once that "The Kiger horses were just strays from so and so's ranch." On the most part the horses were given no value and considered a waste of hay. I can understand the natural tendencies to resist information that there has been something important in your own backyard you had no idea existed. But I can't understand why once discovered the Kiger herd isn't afforded a secure and well buffered living zone.

214-1 The importance of the Kiger 'gene pool' is without a doubt enough to qualify them as a NATIONAL RESOURCE. The herds have survived more than a century without management and now face reduced grazing area and increased competition from commercial livestock. I find this an unacceptable solution to the cattlemen's woes. I find that I must SUPPORT ALTERNATIVE A, 214-2 the removal of livestock from all riparian areas, and exclusive use of the Yank Springs Pasture (with no forage competition from livestock). Once taken, the land will be very difficult (most likely impossible) to retrieve for the Kiger's use. I find it hard to believe that with millions of acres of public land it has become necessary to compromise and threaten a GREAT NATURAL RESOURCE AND NATIONAL HERITAGE.

I respectfully ask everyone to support Alternative A, the Kiger horses, and a chance to preserve an important and irreplaceable resource. Once gone, the Kiger breed cannot return.

SIGNED,

Jon H. Roberts
JH

2/22/90

214-1 The Kiger wild horses do not face a reduced grazing area. The Kiger HMA is the same size now as in 1971 when the Wild and Free-Roaming Horse and Burro Act was enacted. There is no proposed increase in grazing use for livestock in this area. Section 102(a)7 of the Federal Land Policy and Management Act of 1976 states that "management be on the basis of multiple use and sustained yield . . ." Exclusive use by horses in the Yank Springs Pasture would violate this mandate of multiple use. Removal of livestock from all riparian areas would also violate the multiple-use intent of FLPMA. There is no intent to exclude this land from use by either wild horses or livestock.

214-2 Refer to responses 25-2 and 214-1.

P.O. Box 254
Mt. Shasta, CA 96047
February 22, 1990

Crain N. Hansen
HE 74-12533
Highway 20 West
Hines, OR 97738

Re: Three Rivers Management Plan and Environmental Impact
Statement (RNF/EIS)

Dear Mr. Hansen,

After carefully reviewing the Environmental Impact Statement for the Three Rivers Management Plan, I choose to support Alternative A as the only acceptable management plan.

This alternative is the only plan that serves to protect and perpetuate the unique breed of horse now known as the Figer Mustang. By choosing Alternative A, not only will the Figer horses be guaranteed the opportunity to exist in their natural state but the American people will benefit by having a tribute to our national heritage.

In a country that is very proud of its history, we often pay tribute to places, buildings and objects that represent our heritage by way of plaques, books and documentaries. Let us now enjoy a LIVING HISTORY representing who we are and how we arrived here.

Thus, this alternative, ALTERNATIVE A, will put public land to its best use, that is, something which is good for all the American public today and in the future.

Respectfully,

Evo Roberts
Evo Roberts

January 17, 1990

Jay Carlson
Burns District Office
Bureau of Land Management
HC 74 12533 Highway 20 West
Hines, OR 97738

216

216 No comment identified.

REVIEW COMMENTS FOR THE OCTOBER 1989
BLM DRAFT THREE RIVERS RNP/EIS

Dear Mr. Carlson:

(If you are facing a reduction in AUM's, please include the next two paragraphs. If not, cross out second paragraph.)

Alternatives A, B and C will result in a substantial loss of our base property value. The proposed BLM actions may result in reducing the size of our operation so that it is no longer an economical unit. Therefore, we request that if Alternatives A, B or C are considered, that prior to issuing the Final Three Rivers Resource Management Plan and Environmental Impact Statement, a "Takings Implication Assessment" be completed as authorized by Executive Order 12630 (see the November 8, 1988 Memorandum to all Assistant Secretaries and Bureau Directors from Secretary of Interior, Donald P. Hodel).

The reallocation and/or reduction of _____ AUM's livestock forage in _____ Allotment will reduce the value of our base property by approximately \$_____. (Assume \$50 per AUM value). Please consider this economic loss in the requested "Takings Implication Assessment."

The letters from the Harney County CattleWomen, Stockgrowers, Farm Bureau, Sheep & Woolgrowers and the January 17, 1990 Riddle Ranch and Western Range Service Comments and Response to the Draft Three Rivers Resource Management Plan and Environmental Impact Statement are consistent with our views and comments.

This response is our endorsement of such letters and Riddle Ranch document. Their response has been submitted to you. We do not include a full copy of text only for the reason that it would be an exact duplication of the Riddle Ranch document and organizations letters.

Any additional comments we may have are enclosed herein and are supplemental to our principal response.

Sincerely,

Lyle E. Vickers

Name: Lyle E. Vickers

C-73-1166 Buchanan Rd.

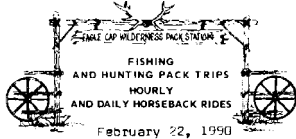
Address: Burns Or 97720

City: _____ State: _____ Zip Code: _____

Signature: Lyle E. Vickers

Signature: _____

Enclosure: Supplemental Comments



217

RT. 1, BOX 414
JOSEPH, OREGON 97844

(503) 432-4145

Bureau of Land Management
Burns District Office
Attn: Craig M. Hansen
HG 74-12533 Highway 20 West
Hines, Oregon 97738

Dear Sirs,

Enclosed are my comments on the Three Rivers Resource Management Plan and Environmental Impact Statement. Since I am a member of the Kiger Mestano Ass'n. and chairman of the Registry Committee, I am very concerned about the future of the Wild Horse Programs and the Kiger Herd in particular.

Alternative A (EMPHASIZE NATURAL VALUES) is my choice with some alteration. However, I would like to see the following concerns incorporated in what ever plan you choose as the Final Plan.

Table 2.1 page 12, WILD HORSES and BURROS:

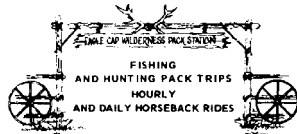
217-1

Under #4 delete one word on line two, word three, (ADOPTABLE). There is concern in our Organization that this could be interpreted to mean take out the best horses for adoption and turn all unadoptable horses back on the range.

The B.L.M. has done an excellent job managing all of the Wild Horses on the Burns District. They have done a Super job in their selection of horses put back on the range for the Kiger Herd.

After deleting (ADOPTABLE) in #4, line two, word 3, it would read (EACH H.M.A. WILL BE INTENSIVELY MANAGED FOR QUALITY HORSES).

This assures us that as new leadership takes over in the future, in the Burns District Office of the B.L.M., the Managing Agent and other people in charge of the Wild Horse Program, will put Quality horses back on the range to reproduce.



RT. 1, BOX 414
JOSEPH, OREGON 97844

(503) 432-4145

If quality horses are put back on the range, the horses will always be adoptable because the breeding stock will be top quality. If poor quality horses are turned out to reproduce, it will not be a long time until most of the horses gathered will be unadoptable.

We of the K.M.A. would like to feel assured that plans for the future will be positive in continuing a quality horse program and have this in the management plan so that it cannot be changed without public input.

Once again, we are very happy with the job that Josh Warburton and Ron Harding have done with their Wild Horse Program on the Burns District. It could and should serve as a Pilot Program for all the Wild Horse Management Programs in the West.

217-2

Since Wild Horse Sanctuaries are being phased out, I would like to see castration on all undesirable male horses turned back on the range. This would help to keep the quality in the herds and assure everyone of the quality of adoptable horses in the future. This is by far the cheapest method of control of the undesirables that I know of.

As a person who grew up with horses being one of the most important parts of my life from childhood to the present I am very interested in your programs. We rode horses to school, farmed with horses, and went on horseback and with team and wagon to social functions. My wife and I presently maintain about 100 horses and mules in our current business. Because of all of this, I feel that I can speak with some authority on horses.

I sincerely hope that as people retire and new people take over the Horse Program that you as a Managing Agency will realize that a Horse Program is unique. A person managing a horse program must have an eye for horses as well as some on hands experience. People with the ability to recognize qualities in animals are born with that ability the same as musicians and artists are born with their talent. Formal Education helps but is not the main ability.

Thank you for the chance to share my views and concerns with Agency. We look forward to a Great Future.

Sincerely,

Manford Isley
Manford Isley

217-1 Refer to response 210-1.

217-2 Refer to response 124-4.

Joseph, Oregon
February 26, 1990

Bureau of Land Management
Burns District Office
HC 74-12533
Harris Oregon, 97738

Sirs:

As a person who has adopted horses from the BLM program and also is the owner of some Keiger Mustang horses, I want to add my voice and vote to the people who are supporting alternative A. in the Three Rivers Resource Management Plan.

In my opinion it would be a shame for these or other Wild horses to be deprived of being. They are a prominent part of our history, just as much as cattle and sheep are. After all cattle and sheep were and are still tended by persons who ride horses.

Are we as a people make allowances for birds that are endangered, fish, seals, bears, and many other animals so why not the horse? I feel strongly that the Keiger herd should be preserved, in an area all its own. I also think that Oregon should be an area where the horse is protected.

We have one of the best programs as far as upgrading the herds of any state in the union. We should be proud of that and continue to select people of knowledge and ability to oversee such programs.

Please do not pass any of the alternatives that will further cause degrading and endangering of our Wild Horse Herds.

Thank you,

Vera Selley

Rt. #1 Box 416
Joseph, Oregon 97846



United States Department of the Interior 219

FISH AND WILDLIFE SERVICE
Malheur National Wildlife Refuge
Princeton, OR 97721
(503/493-2612)

219-1 The recommended changes have been made, see PRMP/FEIS Maps SS-1 and WL-1.

February 16, 1990

Bureau of Land Management
Burns District Office
HC 74 - 12533 Highway 20 West
Hines, Oregon 97738

The refuge staff has reviewed the Draft Three Rivers Resource Management Plan and Environmental Impact Statement, and we appreciated the briefing provided at our headquarters by Jay Carlson and his team.

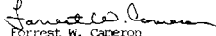
219-1 Our specific biological comments address nesting habitat for snowy plover and long-billed curlews and winter range for mule deer near Malheur Refuge. Please refer to the attached maps, SS-1 and WL-1 for our additions to your identified areas.

Our general comment is that your staff has compiled a tremendous amount of pertinent information for use in addressing the management objectives in each of five Alternatives. We especially like your method of portraying and summarizing this information in Table 2.1. Regardless of the alternative or combination of alternatives chosen, a clear management direction is stated. Our compliments to you on a comprehensive and useful product.

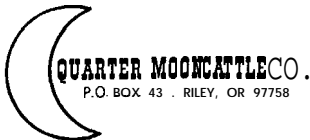
As sister Interior agencies, we share mandates and directives to manage some resource objectives like air and water quality, vegetation, wetland and riparian habitat, cultural resources and raptors. We are also mandated to place a different level of emphasis on uses such as grazing and wild horses. Regardless of the final path you choose, let us just offer to you that our staff stands ready to work with yours in facing our common challenges and opportunities.

Congratulations on a good product!

Sincerely,


Forrest W. Cameron
Refuge Manager

Attachments



220

220-1 Refer to response 2-11.

February 20, 1990

Cody Hansen
Burns District Office
Bureau of Land Management
HC 74 12533 Hwy 20 West
Hines, OR 97738

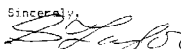
Dear Mr. Hansen:

In regards to the 1989 BLM draft Three Rivers RMP/EIS and specifically the Sheep Lake/Shields allotment, I agree that some reduction of AUM's may be necessary to improve the range condition on the entire allotment.

It is my belief that the Shields and lower Sheep Lake pastures are in good condition and were only used 30-40% of the full carrying capacity. Due to the severe drouit conditions during the grazing seasons of 1987 & 1988 and lack of stock water on Shields and lower Sheep Lake pastures, I'm of the opinion that out of necessity, due to the drouit, the upper Sheep Lake pasture was overgrazed. I believe that short term grazing on Shields and lower Sheep Lake pastures, removing all cattle from the permit during the crucial growing period (June 5th - July 5th) and furnishing a full time range rider will afford us the opportunity to more fully utilize both of these pastures while giving the upper Sheep Lake pasture a rest. We may or may not have a problem regarding stock water but are prepared to haul water as needed specifically the Shields pasture.

220-1 I feel that with proper management and some water source improvements the proposed AUM reduction may not be needed.

220-2 In closing, I strongly believe that a 3 year study period is not adequate to make the assessment and decision necessary to set the AUM's for this allotment. May I remind you that 2 of the 3 years of this study were under extreme drouit conditions and would probably not reflect the range conditions of this allotment over a ten year period.

Sincerely,

Gary Taylor
Quarter Moon Cattle Co., Inc.
493-2304

cc: Jay Carlson
Teresa Ramasco
Helen Cowan
William Cramer



February 1, 1990

Mr. Craig Hansen
February 1, 1990
Page 3

Craig M. Hansen, Area Manager
Three Rivers Resource Area
Burns District Office
Bureau Of Land Management
HC 74-12533 Hwy 20 West
Hines, Oregon 97738

Re: Draft Three Rivers Resource Management Plan

Dear Mr. Hansen:

Introductory Comments

American Rivers is a national, public interest not-for-profit corporation with more than 12,000 members nationwide. American Rivers is the only national conservation organization dedicated exclusively to the preservation of free-flowing rivers. In our sixteen-year history, American Rivers has worked intensively to protect rivers under the federal Wild and scenic Rivers Act and has actively assisted states and local groups with their river conservation efforts.

American Rivers has worked extensively with federal agencies in planning for the river resources on the lands they administer. We have assisted the planning staff of the Bureau of Land Management ("BLM") in Washington to clarify administrative direction for consideration of potential wild and scenic rivers in BLM's resource management planning, and have reviewed, commented on, and protested numerous BLM plans. We have worked similarly with the U.S. Forest Service in developing administrative direction for the evaluation and management of potential wild and scenic rivers on the National Forests, and reviewed, commented on, and appealed numerous land and resource management plans issued by that agency.

Section 5(d) of the wild and Scenic Rivers Act, 16 U.S.C. section 1271 et seq., requires all federal agencies to consider potential national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources. 16 U.S.C. section 1276(d). The planning responsibility imposed by section 5(d) plainly requires the BLM to assess the values of potential Wild and Scenic Rivers during the preparation of resource management plans pursuant to the FLPMA. Recognizing that responsibility, BLM Manual Section 1623.41A2d

801 PENNSYLVANIA AVE. SE
SUITE 903
WASHINGTON, DC 20003
(202) 547-6400

Mr. Craig Hansen
February 1, 1990
Page 2

identifies wild and scenic river recommendations as a possible determination to be made in such plans.

To provide further guidance for fulfilling BLM's planning responsibilities for potential wild and scenic rivers, the agency's Washington office on July 23, 1987 circulated Instruction Memorandum No. 87-615, containing draft guidelines for identifying, evaluating, and protecting potential wild and scenic rivers on BLM lands. That guidance was promulgated by the Director in final form in Instruction Memorandum No. 87-670 and the attached Guidelines for Fulfilling Requirements of the Wild and scenic Rivers Act (the "Guidelines"). issued September 8, 1988.

Under the directions established in the Guidelines, planning for potential wild and scenic rivers on BLM lands follows a relatively straightforward, three-step procedure. Each BLM resource management plan is to:

- (1) evaluate the eligibility of potential wild and scenic rivers within its planning area for inclusion in the National Wild and Scenic Rivers System in accordance with the criteria set forth in Section 1(b) of the Wild and Scenic Rivers Act (i.e., whether the river is free-flowing and possesses one or more "outstandingly remarkable" values);
- (2) determine the appropriate classification ("wild," "scenic," or "recreational") for rivers found to be eligible;
- (3) assess the suitability of such rivers for inclusion in the national rivers system, based upon the public values and uses that would be enhanced or foreclosed by such protection, the degree of public, state and local interest in designation, and practical concerns regarding costs and feasibility of administration.

Guidelines, Section VIII, at 9-12. Until a final decision is reached by the agency and, for recommended rivers, by Congress BLM is to protect river resource values and characteristics through specific management prescriptions established in more detailed recreation area management plans or project plans. Guidelines, section IV.C., at p. 7, Section IX, at p. 20. As a substantive decision regarding the appropriate management of a sensitive area, the planners' decision regarding suitability must be accompanied by environmental analysis pursuant to the National Environmental Policy Act ("NEPA"). Guidelines, Section VIII.B. at p. 15-16.

Specific Comments

In order to protect the resource values and character of its potential wild and scenic rivers until a decision is reached regarding their designation, BLM's Guidelines require agency planners to establish detailed management prescriptions. The Guidelines state: "[T]he RMP must prescribe the protection (interim management prescriptions) to be provided for the river and adjacent public land area pending the suitability and, when necessary, subsequent action by the Congress." Guidelines, section VIII.A.3.a., at p. 11.

1. Eligibility

American Rivers commends the Three Rivers planners for evaluating rivers not listed on the Nationwide Rivers Inventor".(NRI). See Appendix 11. A failing common to other plans is an examination of rivers only on the NRI.

- 221-1 Unfortunately, the Draft RMP provides very little information which supports the planners' conclusions that numerous streams are not eligible. E.g., RMP at 3-41, Table 3.15; Appendix 11, Table 1. For example, is the entire 68 mile length of "segment B" of the Silver River so impacted by diversions and channelization that it is not free-flowing? Similarly, there is no information within the Draft which enables a reviewer to evaluate the conclusions that certain segments of the Middle Fork and South Fork Malheur Rivers do not possess outstandingly remarkable values. E.g., RMP at 3-41, Table 3.15. American Rivers believes the Final RMP should document the facts which led to these particular conclusions.
- 221-2 Further, there is no indication that other streams which flow across the Three Rivers Resource Area were evaluated for their potential inclusion in the national rivers system. Appendix 6 identifies numerous streams within the Resource Area which possess aquatic habitat. While the presence or absence of aquatic habitat does not determine the eligibility of a river, it is one of the only sources of data within the Plan which identifies free-flowing streams. Further, areas which support aquatic habitat in the arid lands east of the Cascades provide critical wildlife habitat and may well serve as an indicator of outstanding ecological and fish and wildlife values. Additional candidate rivers may be found among those areas nominated by the planning team for ACEC consideration, including Silver Creek and Squaw Creek. See Appendix 7.

Mr. Craig Hansen
February 1, 1990
Page 4

- 221-3 The planners must undertake a serious evaluation of the free-flowing streams in the resource area to determine whether they possess one or more outstandingly remarkable values that might qualify them for inclusion in the national rivers system. The failure of the Three Rivers planners to consider all of the area's streams exposes those with high values that may be eligible for inclusion in the wild and scenic rivers system to development that can significantly degrade their values and to damming or diversion that could disqualify them for future consideration.
- 221-4 American Rivers suggests that assessment of other rivers, streams and creeks, including tributaries and headwaters, within the Three Rivers Resource Area will result in the identification of other rivers, streams and creeks eligible for inclusion in the national wild and scenic rivers system.
- 221-5 The Final RMP should expand Appendix 11 and include a separate identifiable assessment of the various streams and their values examined by the planners.
- 221-6 The Final RMP should also correct the error in Table 3.14 which indicates "segment A" of the Malheur River is not eligible. See RMP at 3-40.
- 221-7 2. River corridors
The RMP states that the proposed boundaries of the corridor for the Middle Fork of the Malheur and Bluebucket Creek are "generally one-quarter of a mile on either side of the mean high water level of the river and creek [and] follow the rim of the canyon..." RMP at 3-41. However, an examination of the referenced Map WSR-2 indicates that the boundary does not always follow the rim of the canyon. American Rivers suggests that the RMP state that the boundary is one-quarter mile on each side of the river or the rim of the canyon, whichever is greater.
- 221-8 The RMP fails to identify the particular width of the river corridors used to study whether particular streams meet the eligibility standards set forth in the Wild and Scenic Rivers Act, i.e., one-quarter mile on each side of the stream or larger if necessary to protect outstandingly remarkable values.
- 221-9 Failure to identify the width of the study corridor may seriously prejudice both the initial eligibility determinations for streams within the Resource Area and BLM's future evaluation of their suitability for designation. Eligibility determinations are required to reflect the resource values of the stream itself and the lands within the study boundary; arbitrarily narrowing, or

even ignoring, the required corridor of streamside lands may exclude resource values that should be evaluated together with the values of the stream itself.

3. Classification

American Rivers agrees that an appropriate classification of the 5.4 segment of the Middle Fork Malheur River and Bluebucket Creek is wild. See RMP at 4-41.

4. Management Standards

American Rivers commends the Three Rivers planners for setting forth in the Draft RMP detailed management prescriptions for potential wild and scenic rivers. See Appendix 11. Certain other RMPs have failed to include such prescriptions. The management prescriptions set forth in the Three Rivers RMP are consistent with the BLM Guidelines and will provide appropriate guidance to BLM and the public of those actions that are appropriate within the relevant river corridor. E.g., Guidelines, Section VIII.A.3.a., at p. 11.

221-10 Unfortunately, the RMP includes other language which confuses the relevant prescriptions. For example, the RMP states that there is a timber harvest prohibition within "perennial streams." RMP at 4-41. The appropriate standard, as is set forth in Appendix 11, prohibits timber harvest within the relevant stream corridor. Further, the RMP improperly suggests that such a prohibition would not apply to an intermittent portion of an eligible stream. Id. American Rivers suggests that appropriate changes be made to the discussion of wild and scenic rivers found at RMP 4-41.

5. Interagency agreements

221-11 American Rivers recommends that the Three Rivers planners enter into an agreement with the Ochoco National Forest (or other relevant federal or state agencies) to study rivers which flow across lands administered by both agencies, particularly Silver Creek.

6. Comments concerning Appendix 11

221-12 We understand that "Table 2" affirmatively finds "segment A" of the Middle Fork Malheur River and Bluebucket Creek to be suitable for designation. See also RMP at 3-41. However, there are statements within the discussion of suitability that suggest the BLM has not yet made a suitability determination. For example, there are contradictory statements that BLM does have the ability

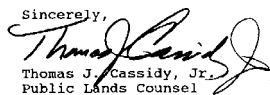
221-1 Refer to Tables 2.17, 2.18 and 2.19, PRMP/FEIS.
221-2 Refer to responses 206-17 and 206-19.
221-3 Refer to responses 3-6 and 206-19.
221-4 Refer to responses 3-6 and 206-19.
221-5 Refer to response 3-6. Additional information has been inserted. See Tables 2.17 through 2.21, PRMP/FEIS.
221-6 Table 3.14 has been corrected. Refer to Table 2.18, PRMP/FEIS.
221-7 The PRMP/FEIS has been changed to state that the proposed boundaries will follow the rim of the canyon and may be greater or less than one-quarter mile from mean high water level of the river and creek.
221-8 Refer to footnotes in Table 2.20 and the narrative in the PRMP/FEIS which describes the proposed river corridor boundaries.
221-9 Refer to response 221-8.
221-10 The impact analysis of Wild and Scenic Rivers in the PRMP/FEIS notes prohibition of timber harvest in the stream corridor.
221-11 The Burns District is coordinating with the Ochoco National Forest to complete a Wild and Scenic Rivers inventory of Silver Creek. If the analysis results in suitability of the BLM-administered segment, cooperation will be continued to ensure the creek is given consideration.
221-12 Table 2.18, PRMP/FEIS has been changed to indicate that the BLM considers Segment A of the Middle Fork of the Malheur River and Bluebucket Creek to be suitable for designation. The information in Tables 2.17-2.20, PRMP/FEIS substantiates the suitability of this river segment.
221-13 The BLM portion of Segment A of the Middle Fork of the Malheur River meets the suitability criteria when evaluated along with the entire USDA-FS segment and the private segment. Bureau guidelines for fulfilling the requirements of the Wild and Scenic Rivers Act states "Historical or existing rights which would be adversely affected as to foreclose, extinguish, curtail, infringe, or constitute a taking which would entitle the owner to just compensation if the area were included in the National Wild and Scenic Rivers System. In the suitability analysis, adequate consideration will be given to rights held by owners, applicants, lessees, or claimants."

to manage the river segment but also that it is not feasible for BLM to manage its land under wild and scenic designation. See appendix 11-6. The planners are flatly wrong to suggest that acquisition of private lands is necessary for designation; there are numerous rivers designated by Congress and managed by federal agencies, including BLM, which include segments of private land.

221-13 Confusion over whether the RMP finds "segment A" to be suitable is fueled also by the statement "(i)n the suitability analysis, adequate consideration will be given to rights held by owners ..." See Appendix 11-6 -- 11-7.

We trust the Final RMP will be clear with respect to this important issue.

We trust these comments are helpful during the Resource Management Plan process. We look forward to participating further in the RMP process. If you have any questions concerning any of the matters set forth above, please do not hesitate to communicate with me.

Sincerely,

Thomas J. Cassidy, Jr.
Public Lands Counsel

cc: Gary Marsh

Jan. 30, 1990

Dear Mr. Carlson,

As permitted in the Three Rivers Mgmt. area, I would like to take this opportunity to voice my concerns about the proposed plan.

First of all let me say I found no viable alternative presented. There was no alternative developed with grazing in mind. Recreation and wildlife are once again taking over.

Changes are probably needed, but any and all changes should be reasonable. I found a great lack of concern for the livestock industry.

I find it very disturbing to see how much private property has been proposed for acquisition by the Public. Are these potential acquisitions truly the public's voice or a few very powerful groups? This needs to be resolved before any changes are implemented. Are these acquisitions truly the best for all?

In tracking through this ill written document I find many inaccuracies. On the preferred alternative one action that is implemented is to provide for the continued opportunities for ranching operations typical of the American western heritage. If the preferred or any alternative is adopted this precious way of life is gone.

Recreation is a key issue. Too much recreation has been planned for. Not only are the private land-owners overrun by the recreationists now, there is ATV use being planned.

Water and riparian areas are greatly discussed. Poor water quality and declining riparian areas are being blamed entirely on grazing. This is very hard to believe. Extensive road systems, logging, recreation, and the use of ATVs are contributing to poor water quality. Camping in riparian areas

is very devastating to these fragile ecosystems. Have you witnessed what a herd of elk can do to a creek bottom? I find it hard to believe that grazing is the only detrimental activity to riparian areas and water quality. Grazing is also a paid activity! To my knowledge camping in a riparian area is not. Grazing should have some precedence.

ORV and ATVs are the gloom and doom of the future. We have not begun to see the damage to both public and private property. These vehicles should be kept on the roads!

Now to the specific allotments I am concerned about.

7011 UPPER VALLEY 7010 CLAW CREEK
The majority of acres in the Upper Valley allotment are privately owned. In TABLE 2 Current Riparian Habitat Condition and Trend by there is conflicting information with the information provided in Appendix 6.

One states riparian habitat is good the other says it's fair to poor. Let's get the story straight. It's either one or the other. The same type of conflicts hold true for the Claw Creek allotment.

Upper Silver Creek is said riparian values, how can this be if it is declining?

Sec. 17 in the Upper Valley is discussed in depth as a very desired acquisition. Who is the We from management recommendations in Appendix 7? Is this the true PUBLIC or a group of special interest groups?

The site description of Section 17 speaks of grazing there. How can this be trespassing when it is privately owned?

It is also stated that the Pruden investor is not willing to invest in improvements in the Upper Valley. This is not true! This is our lucky hood. We have

to invest in our future. The BLM is not willing to invest in the cattlemen's future, by the alternatives presented in this plan.

222-8

Every alternative discusses grazing reduction. I see no viable alternative discussed. I find it very hard to believe that all allotments are in such shape as to mandate reductions.

222-9

When were studies done to determine the quality of forage? Where are the results? I find it hard to believe that anymore than a drive through survey was done on the Upper Valley and Claw Creek allotments?

In summation I would like to add my support to the Horney Stock Showers, and agree with comments received from them. This plan is not only poorly written but will not work.

In order to make a plan

- 222-1 Refer to responses 2-44, 3-13, 6-3 and 6-4.
- 222-2 Refer to response 1-23.
- 222-3 Appendix 5, Table 2, DRMP/DEIS lists riparian conditions while Appendix 6, Table 1 shows the aquatic habitat conditions. These conditions, while interrelated, are not always the same. Criteria for aquatic habitat rating are listed in Appendix 6, Table 2, DRMP/DEIS and riparian inventory and condition rating system is explained in Appendix 1, Table 4.
- 222-4 Riparian habitat in upper Silver Creek is listed in DRMP/DEIS Appendix 5, Table 2 as static trend in good condition. Riparian values are high in this section of the stream.
- 222-6 In DRMP/DEIS Appendix 7, Table 2, the referenced site description for the "Silver Creek RNA/ACBC and Addition" mentions trespass grazing in a manner that does not clearly and appropriately associate such livestock trespass with only those public lands in Section 8, T. 21 S., R. 26 E. This is the existing RNA where no grazing use is allowed and an exclusion fence is in place. The public lands in Section 20, which are licensed for livestock use, are not known to have problems with trespass grazing, as was implied by the draft narrative. The privately-owned Section 17 is not subject to Bureau regulations, as may have been inferred.
- 222-7 The "prudent investor" test is based on gaining a positive return on an investment over the life of a project regardless of the source of the investment.
- 222-8 Neither Alternative D or E propose reductions in grazing AUMs from current active preference. Alternative C proposes short-term reductions that could be off-set in the long-term with vegetative treatments. Not all allotments will need reductions to balance stocking levels with carrying capacity. Please refer to Appendix 3, Table 6, DRMP/DEIS.
- 222-9 Refer to response 2-87. The Claw Creek Allotment evaluation was completed in 1989. As a permittee, you should have received a copy. If not, please contact our office. This evaluation outlines the results of monitoring. The Riley RPS Update of December 1986, classified Upper Valley as a C (custodial) category allotment. As such, an evaluation has not been completed. The Upper Valley is categorized as an M (maintain) category allotment in the PRMP/FEIS and an evaluation, based on utilization and climate, will be completed when there are at least 3 years of actual use.

that is viable, we must all work together. This document is not the voice of the public, but that of a few powerful and biased special interest groups.

J. E. Petersen A PARTNER
PETERSEN BROS.
UPPER VALLEY RCH.
RILEY, OREGON

January 30, 1990

223

Bureau of Land Management
Burns District Office
Att. Joshua L. Harburton
HC 74-12533 Hwy 20 West
Hines, Oregon 97731

To: Mr. Harburton

I am concerned about the emphasis given ACEC's, RMA's, VRM's and other special emphasis areas which apparently ignore proper resource management in the Draft -- Three Rivers Management Plan. The grazing reductions appear to be unreasonable without good monitoring and without evaluating progressive management alternatives. I feel the RMP is very damaging to Harney County's economy which is already depressed. Since 1964 the local economy has been dependent upon logging and governmental expenditures. Grazing and timber reductions will severely impact individual ranches and the local area.

Experienced ELM range personnel are better able to achieve multiple use objectives than administrative area plans. Range con's work with livestock permittees for the betterment of the range, watershed and wildlife. Good working relationships and flexibility to adapt to changing conditions are important in achieving the best possible multiple-use management, and the RMP does neither.

The RMP discriminates against livestock grazing in almost every section and this is very damaging to the livestock industry in terms of our image with the public. The bias is not based upon biological and scientific principals including the watershed sections and the description of alternatives A-E. Intensive management uses available technology to benefit and manage all resources and does not have a commodity influence or emphasis.

When sagebrush and juniper take over a plant community due to fire suppression, recent research has shown that a negative impact to the watershed occurs. Precipitation interception, evaporation and direct competition with plants beneficial to protecting the soil from erosion are negative impacts from juniper. One large juniper tree will use 100 gallons of water per day which is negatively impacting upland aquifers and springs in many parts of the RMA. If junipers are allowed to increase, our watershed will get drier and drier. The RMP should have taken a more in depth and realistic evaluation of the juniper problem especially when one looks at the number of new seedlings.

The evaluation of range condition and trend is obviously flawed and biased towards other uses. The RMP allocation of uses is ignoring good land management practices and is failing to properly evaluate long term needs of multiple use.

223-1 If possible, community allotments should be split into separate allotments and no way should an individual permittee be put in someone elses allotment. Further, a permittee should not have to allow someone to be moved into his allotment. Spread of disease, management conflicts and other economic impacts are the result. As an example, my allotment is in very good condition and on a good year is lightly grazed and it is not fair to have another operator moved into my fields.

A combination of management practices and changes in the timing

and duration of use can better solve problems and conflicts than does exclusion of grazing (e.g. streams, reservoirs and other wetland areas). Developing a RMP with flexibility is in everyone's best interest so RMP's can adapt to changing conditions and climate.

The government should not purchase any private land but land exchanges are beneficial as long as both parties are satisfied. My father said "I trade the best horse I own for a pocket knife with broken blades and both of us are satisfied then it was a good trade."

223-2 The Diamond Craters Natural Area (DCNA) should not be expanded. The eighty acre piece of land by Oliver Springs is an important part of my business (see my letter dated 1/21/1990) and the exclusion of use represents a takings of personal property. The historical use and improvements (water developments, wells, fences, stockyards, branding corral and roads) prevents it from meeting natural area criteria. In addition, this piece of ground due to location and use is important in the future for limiting the size and directing a wildfire originating in the Refuge or in the DCNA. Both areas have a large build up of fine fuels due to noxious weeds. Grazing should be implemented in the DCNA to decrease fire potential.

223-3 RMA's should not be expanded in the RMA and numbers should be kept below presently established maximum numbers. I feel select wild horse breeding programs are illegal and competes with private enterprise. The Riger Mustang (so called spanish barb) should not have been moved to the area above Diamond. I do not believe these horses are genetically spanish barbs but escaped wild crossbred wild horses. They should not be advertised as something other than what it is proven genetically by an independent research center.

In summary, I feel the RMP does not adequately meet the biological and economical needs of the area and that technical deficiencies exist in the long term management potentials of all resources. If you have any questions please give me a call. -

sincerely,

Wayne Orsley
Stamp Creek Ranch
Diamond, Or 97722
(503) 453-2463

cc Bob Shaw
Secretary of the Board
Oregon State Board

223-1 Allotment boundaries may be adjusted after consultation, cooperation and coordination with permittees or lessees and the authorized office. Procedures for apportionment of permanently-available forage are specifically spelled out by regulation and policy. Please refer to response 2-17.

223-2 Refer to responses 2-63 and 8-8.

223-3 Refer to responses 8-9, 8-11 and 11-11.



1/31/90

Mr. Joshua L. Warburton, District Manager
Burns District BLM
HC 74-12533 Hwy 20 West
Hines, OR 97738

Dear Mr. Warburton:

The following comments identify issues and related information needs integral to the Three Rivers Draft RMP and EIS.

The current condition and trend of resources within the Three Rivers RA:

- Water Quality (Stream Miles)- 81% poor or fair
- (Surface Acres)- 99% poor or fair
- Livestock Forage (Acres)- 64% poor or fair
- Deer Summer & Winter Range (Acres)- 42% unsatisfactory
- Elk Summer & Winter Range (Acres)- 16% unsatisfactory
- Streamside Riparian Habitat (Acres)- 78% poor or fair
- Aquatic Habitat (Stream Miles)- 88% poor or fair
- Western Sage Grouse- Federal Candidate species threatened or endangered

224-1 does not present a balanced picture of past managements efforts. For the public to fully appreciate the condition of the resource you need to list the baseline levels when existing plans were implemented; earlier plans; initial base property adjudication; and more recent adjudications.

Issue 1

224-2 Numerous existing planning documents (Drewsey MFP; Riley MFP and the Silvies portion of the John Day RMP) contain objectives and recommendations for management of resources within the Three Rivers RA. You note in planning issues, under Grazing Management, that "grazing management practices prescribed in preceding land use plans have not been fully implemented and it now appears that they cannot be implemented within a reasonable timeframe." In order for the public to effectively evaluate proposed alternatives advanced in the present planning effort, it is necessary to know which past objectives have been met and which past recommendations have been implemented, which have not, and why not.

"Dedicated to improving habitat for chukars and other wildlife on sagebrush grasslands"

Issue 6

224-7 A Cost Benefit analysis needs to be included for all range improvements, by allotment within the RA for the last 20 years. Benefits to wildlife as well as livestock need to be broken out. The environmental costs, e.g., soil erosion, wildlife displacement, loss of vegetation diversity, need to be noted and factored into the analysis. A Cost Benefit analysis needs to be included for planned range improvements within the different alternatives. Staff informs me that economic considerations were not included in the draft plan text because they were not raised as issues during scoping. This was an oversight on the Bureau's part. Creative new approaches to how we spend scarce dollars may be necessary if we are to get the economic asset (the land) back into full productivity. The public cannot evaluate the draft without costs and benefits being analyzed.

Issue 7

224-8 Livestock forage produced within the resource area is economically important to individuals and communities. The social and economic information in past planning efforts should be updated and expanded to include perspective on: (1) the extent to which permittees run their own livestock, or run livestock owned by others, and the amount of subleasing of permits; (2) the dollar value of the public land forage and its relative importance to each permittee; (3) the collateral and sale value of each permittee's permit; (4) the relative economic importance of Three River RA forage/permits to local communities.

224-9 NFPA case law requires an evaluation of social and economic implications for major federal actions. The Bureau cannot proceed with this draft until this information is included. See 40 CFR1508.14.

We appreciate the opportunity to comment on this draft. We are willing to help and are prepared to work with the Bureau to develop creative ways of preserving and restoring economic viability to the resource area.

Sincerely,

Edward I. Robertson Jr.

2.

Issue 2

224-3 There has been a significant investment of public funds in the Three Rivers RA. The present planning process will guide future investments. In order for the public to evaluate proposed future investment strategies the following information needs to be included in the draft: Total investment in the Burns District and portions of other BLM districts and USFS Ranger Districts that are contiguous for the past 20 years, broken out by resource area and by major budget category (e.g., range improvements, fish and wildlife, etc.); total grazing receipts from grazing fees by resource area. For the Three Rivers RA this information should be broken down by allotment.

Issue 3

224-4 The suitability or nonsuitability of lands for domestic livestock grazing has an important bearing on the planning process. These areas should be mapped and accompanied by information explaining the bases for the determination of suitability or unsuitability. The approximate percentage of each category within each allotment should be estimated.

Issue 4

224 While this planning effort focuses on the Three Rivers RA, decisions on allocation of resources necessarily must be made within the broader context of the Burns, Vale and Lakeview Districts. In addition, the potential availability or nonavailability of forage outside the Three Rivers RA might significantly influence management decisions within the RA. For each RA within the contiguous districts, you need to have the following information: (1) the carrying capacity and number of AUMs determined by the initial adjudication; (2) the carrying capacity and number of AUMs determined by the readjudication (circa 1950s-60s); (3) any reductions in licensed AUMs resulting from the readjudication; (4) current carrying capacity, licensed AUMs and actual use; (5) Suspended nonuse, why and how long this status has been in effect; (6) amount of temporary use, why and how long this status has been in effect.

Issue 5

224-6 The Three Rivers RA generally is in a condition far below its ecological potential. To effectively evaluate future management and investment strategies it is essential for the public to have a perspective on: (a) the opportunity cost of livestock forage forgone (i.e., the difference between current and potential forage- expressed in AUMs and dollar value; (b) the generalized effects on fish, wildlife, water quantity and quality, soil erosion rates, riparian areas, and overall watershed conditions.

224-1 The baseline levels utilized in the DRMP/DEIS are those which were in effect at the initiation of the RMP process. As such, they represent the results of the degree to which previous planning has been implemented. Presentation of baseline data in this manner is standard procedure for RMPs.

224-2 Past planning efforts, especially the Riley MFP, assumed that there would be substantial increases in funding of rangeland treatments and facilities in order to meet management objectives. This was the case with the Drewsey MFP where approximately \$1 million were invested in a variety of projects over a 5-year period following the completion of the MFP. However, such expanded funding support for the Riley MFP and the Silvies portion of the John Day RMP has not been realized. Because the plans are so heavily dependent on large scale investment, other conflict resolution options cannot be pursued without significant modification of the existing plans.

While an assessment of each objective in each of the three existing plans has not been performed, the reader can get an idea of which resource objectives have not been met through an examination of the Identified Resource Conflicts/Concerns sections in Appendix 1, Table 9 of the Proposed Plan. The ID team has developed this format specifically to avoid the funding dependency shortcomings of the previous plans. Within the context of the overall RMP, Appendix 1, Table 9 provides allotment-specific guidance for the resolution of resource conflicts or concerns which can utilize intensive investment if available, but also provides guidance for management where such funding is not available.

224-3 Refer to responses 11-10 and 116-1. See also the DRMP/DEIS page 3-16.

Grazing fees are set prior to the grazing year, which begins March 1, according to a formula established by Congress. Grazing fees have varied from \$0.44 in 1970 to \$2.36 in 1980. The grazing fee for 1990 was \$1.81. An estimate of grazing fees received in the RA may be derived by multiplying the grazing fee with the average actual use.

For example:

149,307 AUMs (average actual use) x \$1.81/AUM (1990 grazing fee) = \$270,245.67 in total grazing receipts. These receipts are disbursed as follows:

\$101,342.13	37.5% to U.S. Treasury
\$135,122.83	50.0% to Burns District via Range Betterment Fund
\$ 33,780.71	12.5% to Harney County via State of Oregon
\$270,245.67	Total

The amount of investment made in adjoining BLM and USDA-FS districts is available by request from the appropriate agency office.

The information requested is beyond the scope of the RMP. The planning process is designed to identify existing land use or management problems/opportunities on Bureau-administered lands within the planning area and then to consider a range alternative for resolving the problems and realizing the opportunities. Investment of public funds is dictated through a vast array of Federal law and effected through annual Congressional appropriations to BLM and other Federal agencies. Such investment is focussed through the implementation of the RMP on the problems/opportunities identified in the planning process. While considerable interagency and interdistrict cooperation is utilized to address management concerns on a more regional basis, such efforts are usually conducted through memoranda of understanding, cooperative agreements, interagency agreements or other similar vehicles. However, the scope of management prescriptions conveyed through the RMP is confined to the planning area.

224-4 The wide variation of landforms and vegetation communities found in the RA makes use of uniform suitability criteria infeasible. Allotment specific evaluations do address areas which are unusable for a variety of reasons. At this time, unusable acres have not been tabulated.

224-5 Please refer to DRMP/DEIS page 3-16. The initial adjudication, circa 1934-5, determined total preference at 169,395 AUMs. Subsequent readjudications, primarily in the 1950's and 1960's, put 18,923 AUMs into suspended nonuse and set active preference at 150,472 AUMs. Additional information on carrying capacity and actual use can be found in Appendix 1, Table 9 of the Proposed Plan.

Allocations of resources outside the planning area (see Map GEN-1, in the DRMP/DEIS) are beyond the scope of the RMP and are, therefore, not addressed in the RMP. Pertinent information on grazing permits is presented on an allotment by allotment basis in the DRMP/DEIS in Appendix 3, Table 6 and in the Proposed Plan in Appendix 1, Table 9 for allotments in the planning area.

224-6 The discussion on DRMP/DEIS pages 4-10 and 11 evaluates the effects of range improvements on forage production. Without range improvements, the short-term grazing levels could be expected. An analysis of the effects of the preferred alternative on all resource values is discussed in Chapter 4, DRMP/DEIS.

224-7 Benefit-cost analyses are performed on a project or system specific basis at the activity planning level. Overall RMP level benefit-cost analyses for the various alternatives in the DRMP/DEIS are not performed due to the lack of project-specific data, mitigations and interactions necessary for such analyses. Much of this information becomes available only after consultation, coordination and cooperation with affected interests conducted at the activity planning level.

224-8 The extent to which permittees run their own stock or stock owned by others is proprietary to the permittees and not available to BLM. Subleasing of permits is illegal and no cases have been prosecuted in the Three Rivers RA. As such, no base of information has been developed. The socioeconomic analysis in the RMP has been revised to more clearly show the potential community/region socioeconomic impacts of the RMP on an economic sector basis. Analysis of impacts to individual permittees is not performed although impacts to the livestock industry are stratified by size of operation (large and small).

224-9 The socioeconomic analysis presented in the Draft has been revised and is presented in Chapter 3, Environmental Consequences of the Proposed Plan and Chapter 4, Revision to the DRMP/DEIS.



THE AMERICAN ALPINE CLUB

Conservation Committee
4609 S.W. 29th Place
Portland, Oregon 97201

225

225 No comment identified.

January 30, 1990

District Manager, Bureau of Land Management
Mr. Josh Warburton
Burns District Office
Hines, Oregon 97738

Dear Mr. Warburton:

The American Alpine Club has a deep-seated problem with your proposed Three Rivers Resource Management Plan. As we interpret the plan, it places too much emphasis on cows and not enough emphasis on natural resources. When is BLM going to wake up to the fact that your agency is supposed to husband public land, and not just to kowtow to the ranchers?

Nearly all riparian and aquatic habitat is in poor condition. Nearly all of your range is in the same shape. Your attention to native plants and animals has been uninspiring.

In managing the Three Rivers area, we believe that the BLM should:

- repair riparian habitats
- eliminate crested wheat grass
- get the cows off sensitive lands
- adopt Alternative "A" which would at least allow some respite from overgrazing

The American Alpine Club is committed to following BLM's management process. We hope our comments will be seriously considered.

Sincerely,

Handwritten signature of Nicholas A. Dodge.
Nicholas A. Dodge