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Bureau of Land Management

Final

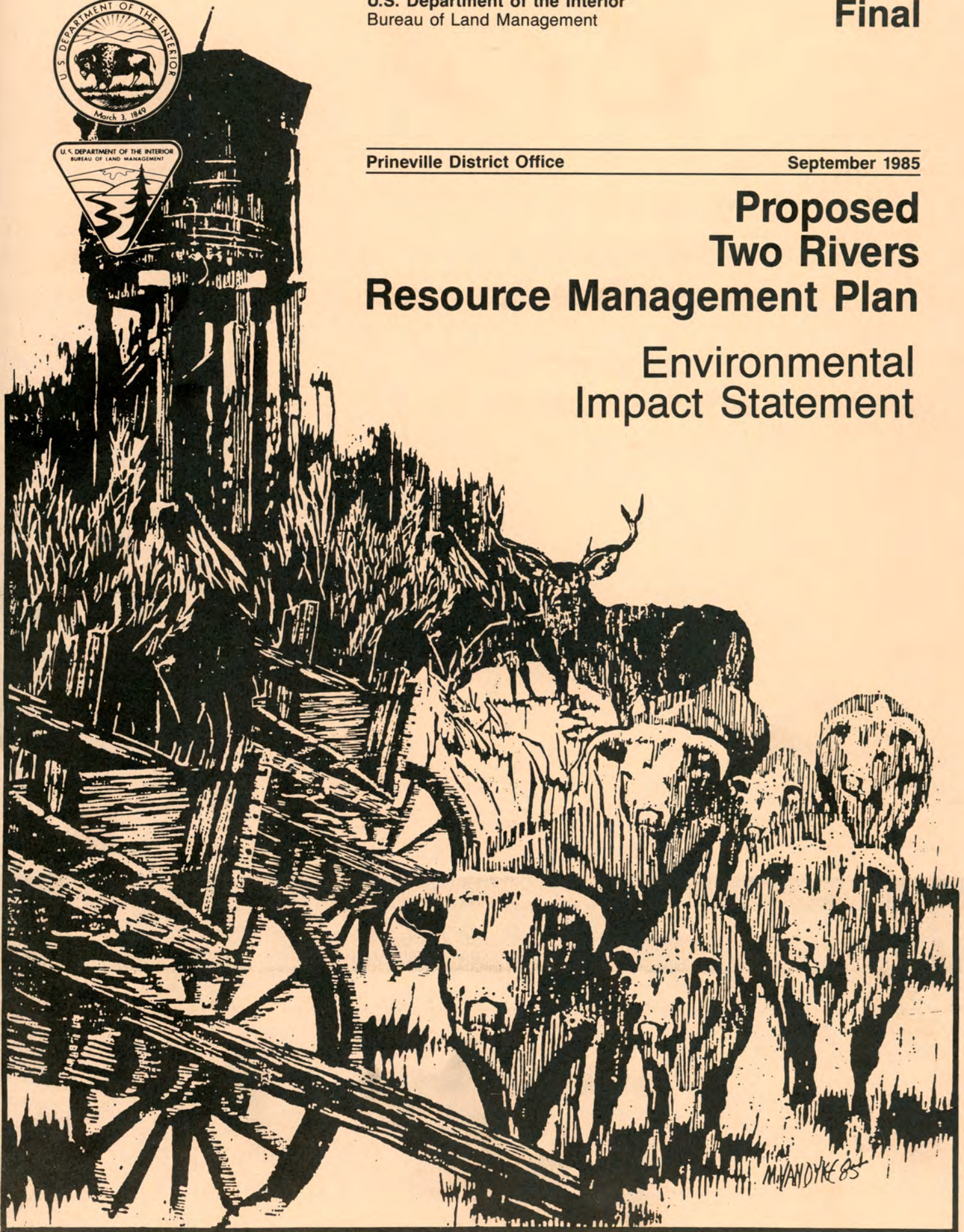


Prineville District Office

September 1985

Proposed Two Rivers Resource Management Plan

Environmental Impact Statement





United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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

Dear Public Land User:

Enclosed for your review and comment is the Two Rivers Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Two Rivers Planning Area, Prineville District, Oregon. The Bureau of Land Management has prepared this document in partial fulfillment of its responsibilities under the Federal Land Policy and Management Act of 1976 and the National Environmental Policy Act of 1969.

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

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

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

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

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

- The name, mailing address, telephone number, and interest of the person filing the protest.
- A statement of the issue or issues being protested.
- A statement of the part or parts of the plan being protested.
- A copy of all documents addressing the issue or issues that were submitted during the planning process of the protesting party or an indication of the date the issue or issues were discussed for the record.
- A concise statement explaining why you feel the decision is wrong.

Sincerely yours,


Gerald E. Magnuson
District Manager

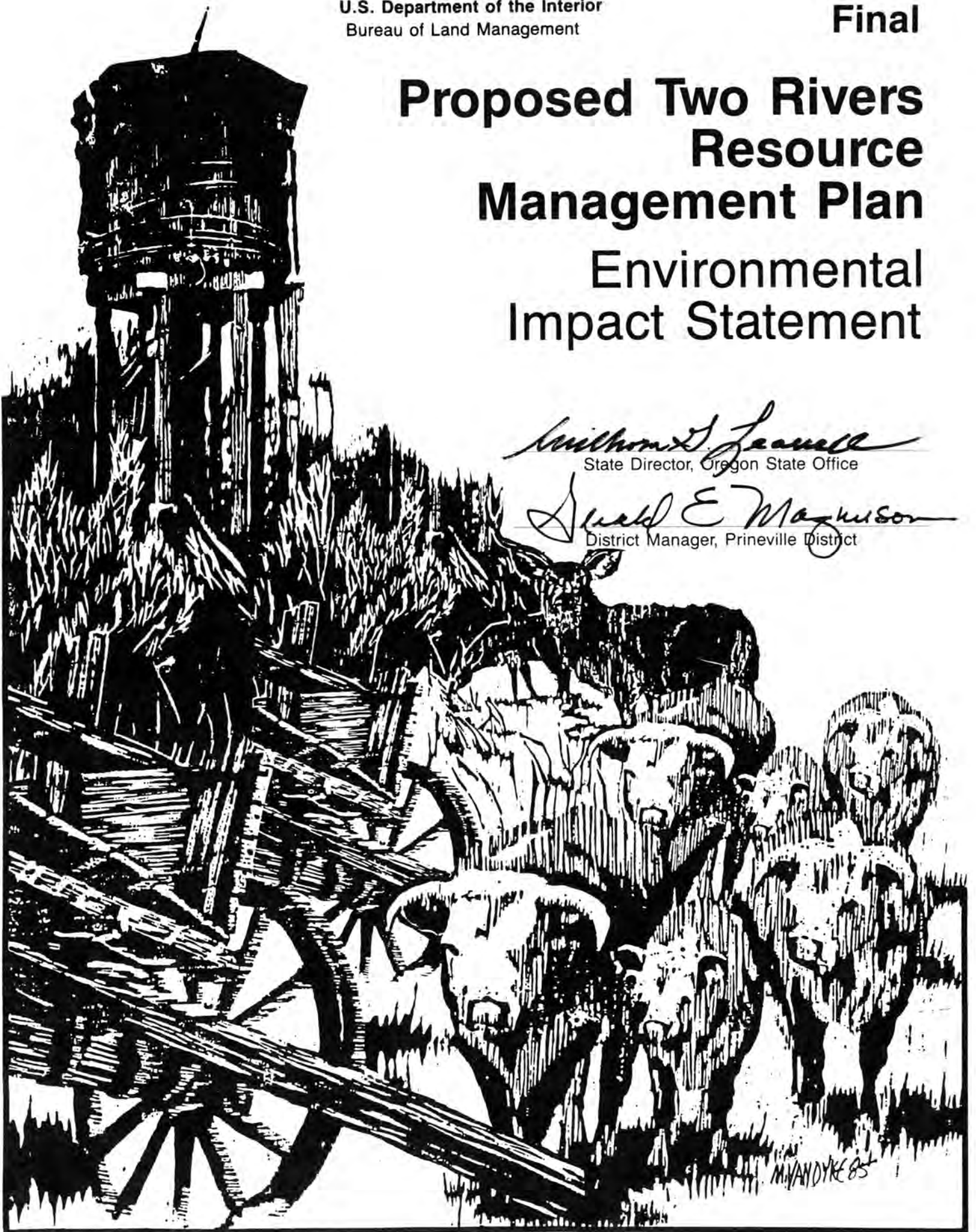
U.S. Department of the Interior
Bureau of Land Management

Final

Proposed Two Rivers Resource Management Plan Environmental Impact Statement

William J. Seavey
State Director, Oregon State Office

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District Manager, Prineville District



Proposed Two Rivers Resource Management Plan and Final Environmental Impact Statement

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

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

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

3. Five alternatives are analyzed:

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

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

5. For further information contact:

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Summary

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

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

The five alternatives considered are:

Alternative A (Preferred Alternative)

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

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

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

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

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

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

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

6. Public lands would remain open for exploration and development of mineral resources and related rights of way. Restrictive stipulations for oil and gas exploration and development would remain in effect on 132,000 acres of public land, to protect areas with high visual quality.

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

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

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

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

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

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

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

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

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

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

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

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

Alternative C. Continue Existing Management (No Action)

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

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

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

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

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

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

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

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

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

Alternative D (Emphasize Natural Values While Accommodating Commodity Production)

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

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

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

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

4. A total of 33,610 acres would be available for disposal if no apparent exchange opportunity exists and if no significant resource values are identified.

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

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

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

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

Alternative E (Emphasize Natural Values)

This alternative emphasizes the enhancement of natural values.

1. All riparian areas located on public lands would be excluded from livestock grazing.
2. Management of wildlife would receive special consideration in all areas. Deer and elk forage requirements in accordance with Oregon Department of Fish and Wildlife management objectives would be met.
3. Livestock grazing would be eliminated from public lands in the planning area.
4. No public lands would be offered for sale, however, exchanges would occur to enhance wildlife, riparian, watershed, visual and other natural values.
5. No regularly scheduled forest product sales would occur. Harvest of diseased or damaged timber would occur if it did not conflict with wildlife and fisheries habitat, visual, riparian or the protection and enhancement of other resource values. This would amount to approximately .02 MMBf/year.
6. Exploration and development of mineral resources would be allowed where no significant conflicts exist with wildlife, riparian, recreation or scenic values. Existing no surface occupancy stipulations on oil and gas exploration and development would be expanded to include 200,000 acres.
7. Approximately 200,000 acres would be limited or closed to off road vehicle use.
8. Ten areas would be designated as research natural areas, areas of critical environmental concern or outstanding natural areas. Other unique wildlife or ecological areas would be maintained or enhanced.

Summary of Environmental Consequences

Soil

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

Water

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

Vegetation

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

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

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

Wildlife

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

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

No significant impacts would occur under Alternative C.

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

Livestock Grazing

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

Forest Products

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

Energy and Minerals

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

Economic Conditions

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

Recreation

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

Cultural Resources

Appropriate measures would be taken to identify and protect cultural sites prior to ground disturbing activities. No impacts would occur to known cultural sites under any alternative.

Visual Resources

Visual quality would be enhanced under Alternatives A, D and E. While fence construction and land treatment would cause impacts in the short term, they would diminish over the long term and visual quality would improve as a result of improved vegetative condition and increased plant diversity. Overall visual quality would also improve slightly under Alternative B as a result of improved vegetative condition in spite of adverse impacts from ORV use and mineral exploration. There would be no significant change in visual quality under Alternative C.

Special Management Areas

Alternatives A, D and E would further protect the 13 identified special management areas. Overall, Alternatives B and C would have slight adverse impacts to the unique values of these areas.

Comparison of Impacts

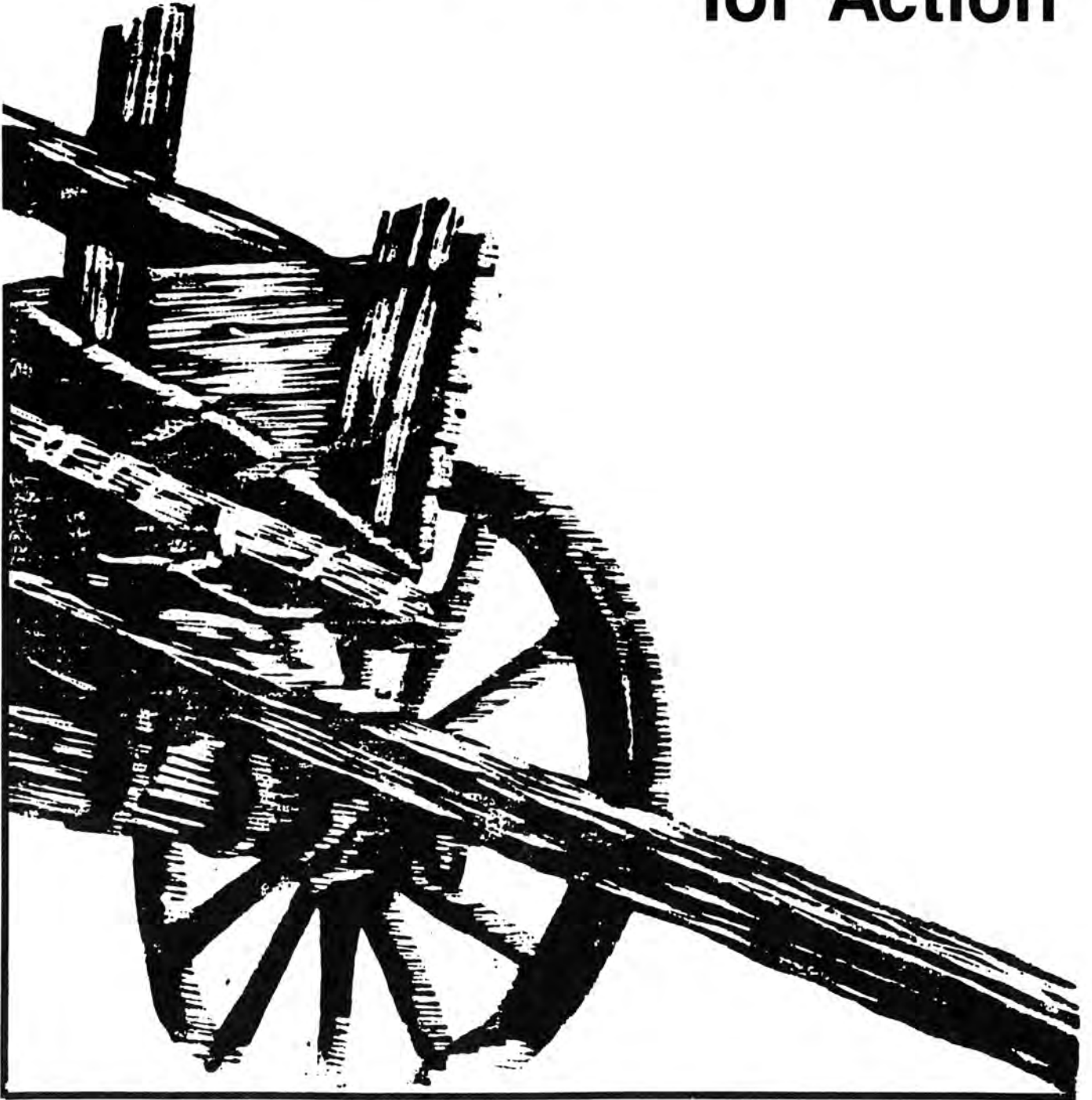
Table 1 compares the impacts of each alternative in tabular form. While impacts are described in detail in Chapter 4 of the Draft RMP/EIS. Table 1 is presented to assist decision makers and reviewers by summarizing the impacts of each alternative.

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

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

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

Chapter 1 Purpose and Need for Action



Old wagons on the banks of the John Day River

Introduction—The Planning Area

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

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

Table 2. Public Land Acreage, Two Rivers Planning Area

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

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

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

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

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

Purpose and Need

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

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

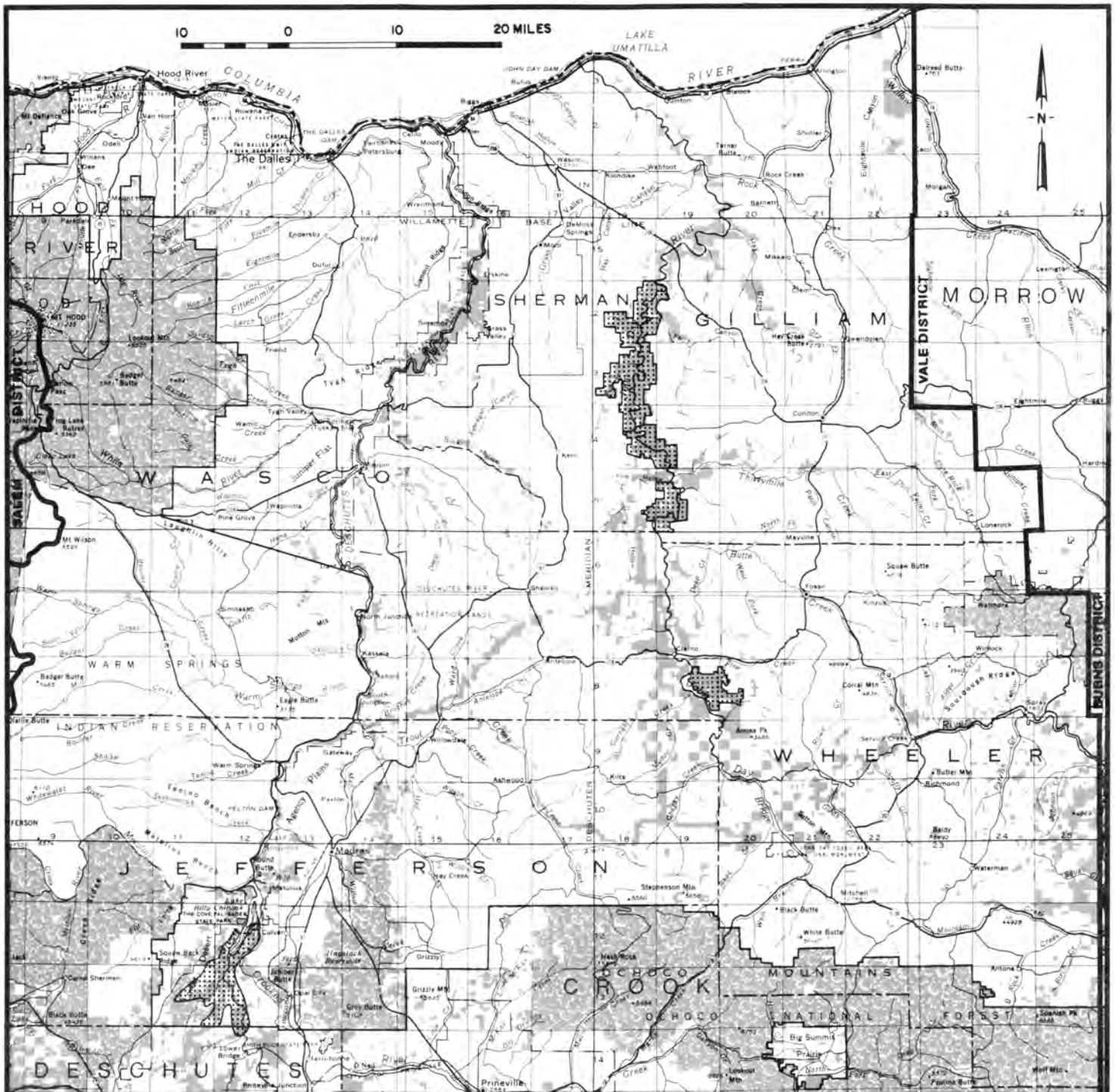
This RMP/EIS is written in compliance with the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality regulations and in specific response to litigation in the Natural Resources Defense Council et al. versus Rogers C. B. Morton et al. 1973 (U.S. District Court for the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



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

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

MAP 1
General Location



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

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Bureau of Land Management
PRINEVILLE DISTRICT
1985

MAP 2
Planning Area and
Land Status

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

Planning Process and Criteria

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

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

Issues

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

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

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

1. Wildlife Habitat Management

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

2. Livestock Grazing Management

There is a conflict of use between livestock grazing

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

3. Riparian Management

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

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

4. Forestry

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

5. Minerals Management

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

6. Land Tenure and Access

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

7. Recreation Management

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

8. Special Management Areas

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



Old railroad water tower at Harris Canyon

Chapter 2

Proposed Resource Management Plan



Old windmill in Ferry Canyon

Introduction

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

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

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

Goal and Objectives of the Proposed Plan

Goal: Provide for Commodity Production While Protecting Natural Values

Objectives:

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

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

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

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

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

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

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

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

Planned Management Actions Under the Proposed Plan

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

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

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

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

Wildlife and Fish Habitat

Livestock use on approximately 16,000 acres of deer and elk winter range and 7,500 acres of curlew nesting habitat will be managed to be compatible with, or improve, wildlife habitat values. Upland vegetation will be managed through grazing management and range/wildlife habitat development to provide maximum wildlife habitat diversity (ecological condition of high mid seral to low late seral stage) and to provide sufficient forage to meet the big game management objectives of the Oregon Department of Fish and Wildlife.

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

Implementation

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

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

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

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

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

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

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

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

The priority for implementation will be as follows:

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

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

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

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

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

Livestock Grazing

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



Mule deer near Stephenson Mountain

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

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

Implementation

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

Table 3 Existing and Proposed Grazing Systems

	Existing Situation	Proposed RMP
	No. Allot./ Acres	No. Allot./ Acres
System 1		
Improve		
1	12/50,178	59/183,692
2	22/63,243	0
3	25/70,271	0
Maintain		
1	12/15,560	32/47,284
2	14/17,514	9/5,250
3	15/19,460	0
Custodial		
1	12/3,568	66/28,043
2	57/25,078	67/28,467
3	64/27,864	0
Total		
1	36/69,306	157/259,019
2	93/105,835	76/33,717
3	104/117,959	0
Totals	233/292,736	233/292,736

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



Cattle grazing on public lands

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

The priority for implementation will be as follows:

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

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

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

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

Riparian

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

Implementation

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

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

Forestry

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

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

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



Ponderosa Pine in Johnson Heights

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

Implementation

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

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

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

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

Mineral Resources

Leasable Minerals

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

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

exploration and development will be maintained on 132,000 acres of public lands in the planning area—lands identified as nationally significant or visually sensitive.¹

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

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

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

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

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

Implementation

Table 5 Mineral Leasing Direction Under the Proposed Plan

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

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

Locatable Minerals

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

Salable Minerals

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

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

Reserved Federal Mineral Estate

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

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

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

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

Land Tenure and Access Exchange, Transfer or Sale

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

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

Agricultural Use of Public Lands

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

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

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



Wheat field on the Columbia Plateau

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

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

Public Access

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

Implementation

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

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

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

Recreation

Off Road Vehicles

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

Open Designation

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

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

Limited Designation

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



Chukar hunter in the Deschutes River Canyon

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

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

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

Closed Designation

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

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

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

Rockhounding

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



Rockhounds digging in agate beds near Antelope

Implementation

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

Special Management Areas

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

The Island in The Cove Palisades State Park

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

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

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

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

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

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

The Dalles Watershed

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

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

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

Historic Spanish Gulch Mining District

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

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

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

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

Implementation

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



The Island in The Cove Palisades State Park

Monitoring the Two Rivers Resource Management Plan

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

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

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

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

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

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

Ongoing Management Programs

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

Soil, Water and Air Management

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

Threatened, Endangered or Sensitive Species Habitat

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

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

Threatened or Endangered Plant Species

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

Fire Management

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

Noxious Weed Control

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

Withdrawal Review

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

Utility and Transportation Corridors

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

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

Cadastral Survey and Engineering Programs

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

Land Sales

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

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

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

Land Exchanges

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

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

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

Visual Resources

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

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

Cultural Resource Management

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

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

Wilderness

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

Requirements for Further Environmental Analysis

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

Chapter 3

Text Revisions



Abandoned homestead at Twickenham

Introduction

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

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

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

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

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

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

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

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

Page 28 Under Soil after second paragraph insert the following:

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

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

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

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

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

Page 34 Table 16 should be revised as follows:

Species and Habitat Type	Public Land Acres
Deer Winter Range	252,000
Elk Winter Range	4,540
Elk Year Long Range	560
Antelope Year Long Range	800
Potential California	
Bighorn Sheep Range	14,000
Long Billed Curlew Nesting Habitat	6,000
Wild Turkey Year Long Habitat	1,360
Waterfowl Nesting and Rearing Habitat	1,280
Raptor Nesting Habitat	
	Rivers & Ledges of Major Canyons

Page 35 See Revised Map 5.

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

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

Page 116 Delete parcels located in T. 5 S., R. 13 E., Sections 14, 15 and 22 totaling 300.32 from the list of potential land disposal tracts in Appendix

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

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

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

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

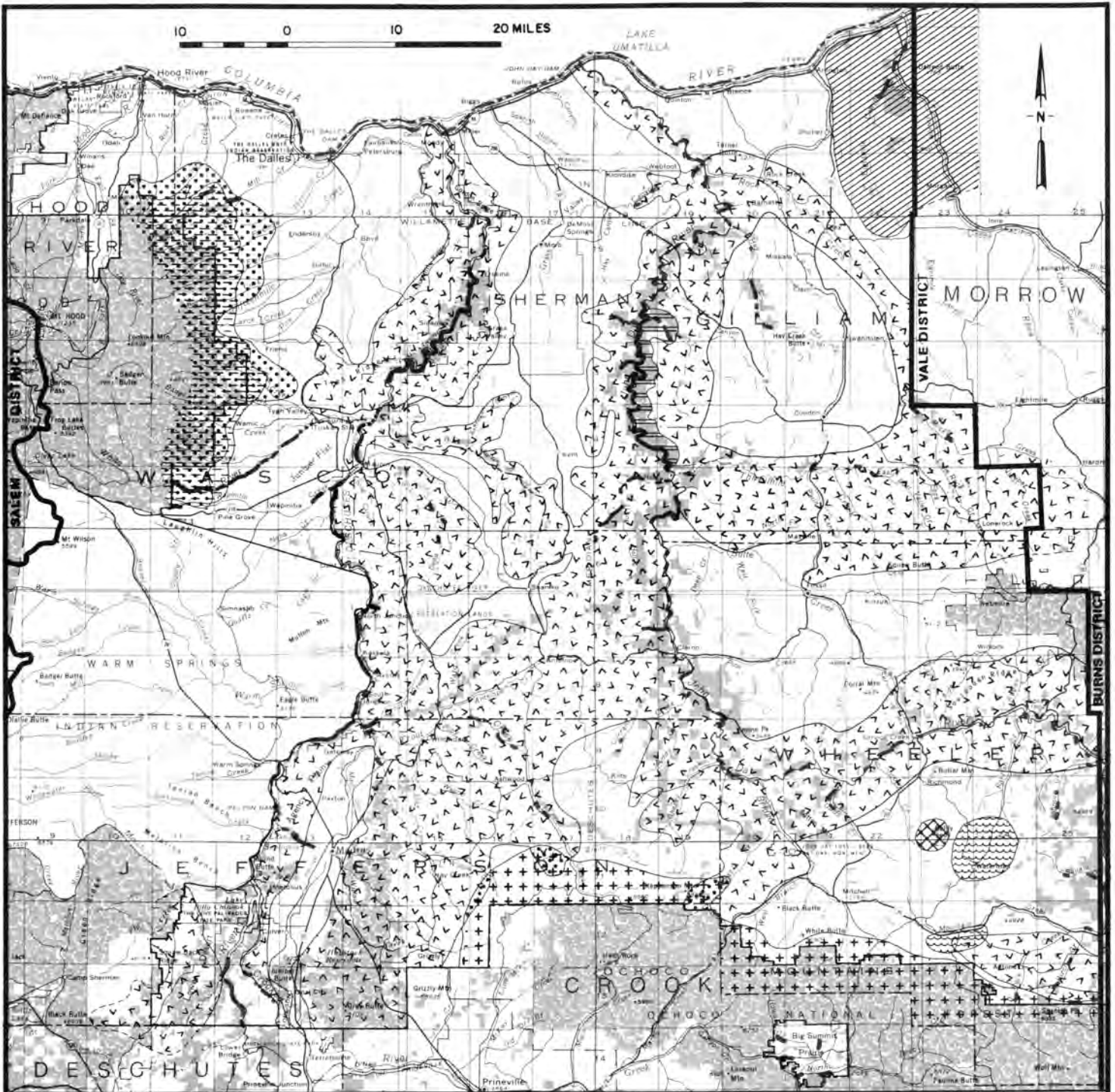
Response to comments other than direct written comments contained in the final RMP/EIS.

Comment

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

Response

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



-  Deer Winter Range
-  Elk Winter Range
-  Elk Yearlong Range
-  Antelope Yearlong Range
-  Potential California Bighorn Sheep Range
-  Deer/Elk Winter Range
-  Long Billed Curlew Nesting Habitat
-  Wild Turkey Habitat

— Riparian Areas on Public Land

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

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

Chapter 4

Consultation and Distribution



Trout Creek near Ashwood

Introduction

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

Public Involvement

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

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

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

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

Agencies and Organizations Contacted or Consulted

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

Federal Agencies

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

State and Local Governments

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

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

Organizations

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

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

Federal Agencies

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

State and Local Government

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

Interest Groups and Organizations

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

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

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

Consistency Review

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

Comment and Protest Procedures

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

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

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

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

Comment Analysis

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

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

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

1 P.O. Box 504
Stamfield, Oregon 97875
April 16, 1985.

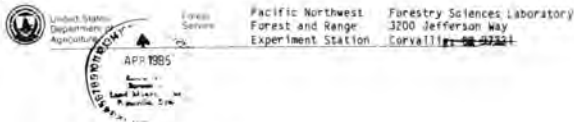
U.S. Dept. of Interior

Dear Sirs: Thank you for
sending me the Two Rivers
management Plan. I have
traveled the country men-
tioned in the Environmental
statements.

I have studied the document
thoroughly and have picked
alternative A, as the best.
Our wild lands have reached
a stage that requires plenty
of study and planning to
preserve them for future
generations.

Sincerely,
Don Child

2



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

Dear Mr. Magnuson:

I have looked over the draft Environmental Impact Statement for the Two Rivers Resource Area, and have several comments to make. I am pleased that you have decided to proceed with the establishment of the Island Research Natural Area (RNA) in conjunction with the Forest Service. The area has long been considered for RNA status, and the nearly pristine Jumper savannah will be a worthy addition to the RNA system. If there is anything I can do to facilitate communication between you and the Ochoco National Forest, please let me know. I fully support the Island RNA proposal.

2-1

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

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

Sincerely yours,

Sarah Greene

SARAH GREENE
Research Natural Area Scientist
Pacific Northwest Region

cc:
Bill Hopkins
Jim Rogers
Curt Soper

J-L We agree. The proposed designation for this 12.5 acre parcel has been changed to an Area of Critical Environmental Concern (ACEC) and is not a Natural Area.



FORM NO. 1-77



4-17-85
Derald E. Magnuson
District Manager
Bureau of Land Management
Prineville District Office
P. O. Box 550
Prineville, OR 97754

Mr. Magnuson,
Subject: Draft EIS
Two Rivers Resource Management Plan

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

Over the last 30 years I have spent quite a bit of time in various parts of this area hunting, fishing, horseback riding, hiking and just enjoying the pleasures of being in the outdoors. One of the things that has always puzzled me has been the way that the cattle have been allowed to overgraze certain areas. In some of the areas that I have hunted there has been a marked decline in the number of big game animals and I happen to believe that one of the main reasons for this reduction is due to the competition with cattle for the available forage. I have also seen declines in the quality of some of the streams in the area due directly from the fact that the cattle are allowed to graze down into the stream beds rather than being fenced away from the streams. I am aware of the fact that there has been some concern voiced in recent years with regard to the state of some of the riparian zones and that some of the areas have now been fenced to keep the cattle away from the streams, but such work needs to be done in this area. I realize that cattle need to drink, but it's unacceptable to allow them to graze into the stream beds, when there are other alternatives available.

In reviewing the figures for the grazing privileges allowed in this area, I see that there are a total of 233 allotments for a total acreage of 282,736. These allotments produced a total income in 1983 of \$24,000. Given the fact that half of this amount goes to the Counties involved, I'm wondering how you can operate this program with just \$12,000 of income. The obvious answer is that you can't. In effect, the rest of us taxpayers end up subsidizing the cattle ranchers so that they can graze their cattle on public lands. Your report states that the grazing on BLM lands provides 3% of the forage for the average ranch. The obvious question to me is "Why is grazing allowed at all on these lands, given all of

the destruction that it does, when it only provides 3% of the forage for the average cattle operation." Removal of these lands from public grazing would have a very minimal effect on the cattle industry. For those three ranches who depend 100% upon BLM forage, they should pay a market value for the AUM's that they receive without being subsidized by the taxpayer.

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

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

Sincerely,

[Signature]
158 S. W. 11th Av.
Canby, OR 97013

cc: ONRC
cc: Oregon Trout
cc: Sierra Club



Oregon Trout

27 April, 1985

From: Mike McClucas,
Northcentral Regional Director
To: Bureau of Land Management
Subject: Comment, Two Rivers Resource Management Plan

GENERAL

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

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

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

1. RIPARIAN AREAS:

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

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

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

4-1 imperative to the survival of wild salmonids, and it is our responsibility to afford these qualities. We believe that 60 per cent of vegetative potential is barely enough, and should it require 20 years to achieve that borderline protection under alternative "A," many wild species would have become extinct by then.

2. MANAGEMENT OF WILDLIFE HABITAT

Oregon Trout endorses alternative "D."

3. FORAGE AVAILABLE TO LIVESTOCK:

4-2 From the data Oregon Trout has available, we believe that the fragile desert areas of the two basins are currently overtaxed. With 59 per cent of the land's ecological condition classified as being less than late seral (good) condition by your own figures, it seems very ill advised to increase the AUM's by 12%, as proposed in alternative "A." Much of the land is currently falling under grazing stress; there is little to no justification for increasing that stress.

4. DISPOSAL OF PUBLIC LANDS:

4-3 Oregon Trout supports alternative "D," with the following modification following the words "disposed of," add, "Any sale of riparian land shall carry restrictive covenants to protect the riparian vegetation to 60 per cent of potential."

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

5. COMMERCIAL FORESTLAND:

4-4 Oregon Trout supports alternative "D." We strongly request the following steps be taken when timber is harvested near riparian areas:

- 1. Minimum management requirements be established, using salmonids as an indicator group.
- 2. Funding be made available through Knutson Vandenberg, F.R.T., or funds within the bureau for repair of any damage in the riparian zone.
- 3. A fisheries biologist or planner be included in staffing for any timber harvesting near riparian zones.

6. MINERAL RESOURCES:

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

7. OFF ROAD VEHICLE USE:

Oregon Trout favors alternative "D" as written.

8. RESEARCH NATURAL AREAS:

Oregon Trout favors alternative "D" as written.

CONCLUSIONS

Oregon Trout would like to compliment the Bureau of Land Management on a concise, thorough document. It is heartening for us to see a governmental agency belie some of the "bad press" so frequently and capriciously heaped upon agencies in general by many who give too little importance to thinking things through before opening the fiscal floodgates. We very much appreciate your efforts; you have made it easy for us to arrive at our choices, and allowed us to receive a valuable education in the process. Thank you.

We would implore the BLM to focus upon enforcement of their management policies, regardless which options are settled upon. You hold in your hands much of our quality of life, and that of our children. We fervently hope that you come to the same conclusions as we have delineated here, but whatever alternatives are mandated must be brought into reality. Oregon Trout urges that sufficient efforts and funding are devoted toward enforcement of your policies.

Thank you for the opportunity to comment.

Very Respectfully,

Mike McLucas
Mike McLucas
The Oasis Resort
P.O. Box 363
Maupin, Oregon 97037

- 4-1. See response to comment 20-9.
- 4-2. The 12 percent increase in grazing use in Alternative A is that predicted in the long term as a result of improved management and to a lesser degree, prescribed fire. Also see response to comment 22-1.
- 4-3. Public land parcels with riparian habitat would seldom be disposed of under any of the alternatives. Disposal would only occur through exchange if lands of significantly higher public value could be acquired. Public lands identified as suitable for disposal would be evaluated through a site specific environmental assessment/land report to distinguish if riparian values exist on them. If wetland/riparian areas were for some reason disposed of, restrictive language such as: "This patent is subject to a restriction which constitutes a covenant running with the land, that the portion of the land containing wetland/riparian habitat must be managed to protect and maintain the wetland/riparian habitat on a continuing basis," would be made a part of the patent.
- 4-4. The BLM does not have a process for establishing minimum management requirements or access to Knutson Vanderburg funding. A biologist on the district staff reviews all timber sale proposals as part of an interdisciplinary team.



Forestry Department
OFFICE OF STATE FORESTER
2600 STATE STREET SALEM, OREGON 97310 PHONE 378-2900

May 1, 1985

Mr. Gerald E. Magnuson, District Manager
Bureau of Land Management
Prineville District Office
P.O. Box 550
Prineville, Oregon 97720

SUBJECT: DRAFT TWO RIVERS RESOURCE MANAGEMENT PLAN EIS

Dear Mr. Magnuson:

Thank you for the opportunity to review and comment on the draft Two Rivers Resource Management Plan Environmental Impact Statement. We find that our concerns with the commercial forest segment of the draft plan and treatment of consistency with State Forestry goals have been adequately treated. The following comments are offered for your consideration.

Management Alternatives:

The Department does not support management alternatives that contemplate custodial management of productive, commercially valuable forest lands.

Affected Environment:

Table 27 (page 58) titled "Summary of Long Term Environmental Consequences for Soil and Water Resource" and Table 35 (page 71) showing impacts to "Special Unique Resource Values by Alternative" both are confusing because of the relative ranking notation. These tables would be more meaningful if a comparison standard was used.

Land Tenure Analysis:

The Department long has been an advocate of a strong program for consolidating widely scattered and isolated public lands to facilitate better land management. We suggest that an effort be made to concentrate consolidation into those areas identified as suitable for timber production (Map B) and additional areas suitable for grazing. Such an analysis would clarify program direction for both of these major land management programs.

Mr. Gerald E. Magnuson
May 1, 1985
Page two

Special Management Areas:

In our review of special management areas, we find very little difference between alternatives in the management emphasis of these areas. Acreage changes are not shown in the tables comparing alternatives (Table 1).

Because of the small parcel size and the scattered pattern of ownership, the management program selected must consider mitigation of the impacts on adjoining landowners.

I hope these comments will be useful in your planning process.

Sincerely,

G. A.
H. Mike Miller
State Forester

BMM/RM:jj
cc: Board of Forestry
Executive Staff
Fred Glat
Earl Brown
Phil Hamilton, BLM State Office

6



United States Department of the Interior

BUREAU OF RECLAMATION
PUBLIC WORKS DIVISION
1111 SOUTH OREGON STREET, SUITE 1000
BOISE, IDAHO 83725

PN 150
120.1

MAY 11 1985

Memorandum

To: District Manager, Prineville District Office, Bureau of Land Management, Prineville, Oregon
From: Regional Environmental Officer, Bureau of Reclamation, Boise, Idaho
Subject: Review of Draft EIS--Two Rivers Resources Management Plan (BLM DES 85-17)

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

John R. Woodward

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

7

EX-103 (Rev. 11-11-83)
Form No. 64 (7-78)
MAY 11 1985

Donald S. Magnuson
District Manager
Bureau of Land Management
PO Box 450
Prineville, OR 97754
Dear Mr. Magnuson:

I have not lived or worked in the Two Rivers area so I respond to the draft EIS in overall philosophy rather than in specifics.

My personal preference is alternative E emphasizing natural values. However, I realize that this would be unnecessarily disruptive to local people and politically unrealistic. Therefore, I recommend alternative D emphasizing natural values accommodating commodity production.

Through the years range lands have been largely overgrazed and mistreated. I feel that the overall human benefit would be greatest to restore, as quickly as possible, these lands to a good vegetative cover with clean streams, abundant fish, wildlife, and ecological character approaching the conditions that existed before the impacts of domestic livestock grazing. I believe that alternative D would do the job, assuming proper funding.

In general I do not support the concept of disposal of public land by sale. Exchange yes, but sale no. Disposal by sale could more easily bear the risk of wrong doing. Where do you stop? Furthermore, acres turned into private ownership are acres subject to the risk of single use management. In the long run, the public would lose with any significant land disposal program.

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

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

Sincerely,
R. Mariner Crum
R. Mariner Crum



Oregon Natural Heritage Data Base

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

May 20, 1985

Gerald Magnuson
Bureau of Land Management
P.O. Box 550
Prineville, Oregon 97754

Dear Mr. Magnuson:

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

Regarding the special management areas listed in the EIS we have some specific comments. First, we are pleased the The Island is being proposed as an RNA, in conjunction with adjoining Forest Service land. This site will make an excellent addition to the RNA system in the region and its designation will give it the protection that is needed for its management. Second, the proposed designation of the 12.5 acre parcel at Rowens Preserve as an RNA seems inappropriate for the site--perhaps listing it as an Outstanding Natural Area would suit it better. Third, the proposal of ACEC status for the 11 other sites listed on page 54 of the EIS is to be commended. We fully support this designation for these worthy areas on the Two Rivers Resource Area and feel the benefits derived from their designation will accrue for many years to come.

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

The Nature Conservancy

- 8-1. We agree. The proposed designation for this 12.3 acre parcel has been changed to an Area of Critical Environmental Concern; Outstanding Natural Area.
- 8-2. Sutton Mountain was not proposed as a special management area basically for two reasons. First, although the *Thelypodium eucomum* and unique plant communities are known to exist in the area, the exact location, and ownership, and extent of these features has not yet been documented. We are reluctant to nominate an area for special management unless a staff member has personal knowledge of the area. A survey will be conducted and if it is found to meet the criteria, it will be added in the future. Meanwhile, no actions will be taken on public land in this area that would jeopardize the unique plant communities. Second, the situation is compounded by the fact that less than half of the Sutton Mountain area is in public ownership. Efforts toward consolidation through exchange are in order, as you suggest.
- 8-3. The District has in the past and continues to work with the Oregon Natural Heritage Program. We hope to put more effort in the future into filling empty cells from the Two Rivers planning area and anticipate that some terrestrial needs will be met. The aquatic cell types, however, do not now exist on public land in the planning area, according to the intensive riparian inventories conducted over the past several years.

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

8-2

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

8-3

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

Thank you for your consideration.

Sincerely,

Dick Vander Schaaf
Dick Vander Schaaf
Public Lands Protection Planner.

8-1

MAY 21 1985

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

Dear Mr. Magnuson:

Thank you for the information on the Sutton Mountain area. I would like to see the following for the future:

1. A survey of the area to determine the extent of the *Thelypodium eucomum* and other unique plant communities.

2. A survey of the area to determine the extent of the *Thelypodium eucomum* and other unique plant communities.

3. A survey of the area to determine the extent of the *Thelypodium eucomum* and other unique plant communities.

4. A survey of the area to determine the extent of the *Thelypodium eucomum* and other unique plant communities.

5. A survey of the area to determine the extent of the *Thelypodium eucomum* and other unique plant communities.

6. A survey of the area to determine the extent of the *Thelypodium eucomum* and other unique plant communities.

7. A survey of the area to determine the extent of the *Thelypodium eucomum* and other unique plant communities.

William Berry

William Berry
Bureau of Land Management
Prineville, OR

Lawrence E. Nielsen, Ph. D.

Science Consultant and Lecturer

5208 N.W. Lynch Way, Astoria, Oregon 97103

May 27, 1985

Phone (503) 348-5381

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

Dear Mr. Magnuson:

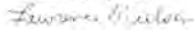
I have studied the "Two Rivers Resource Management Plan". I favor Alternative E, but I could live with Alternative D. I consider Alternatives A, B, and C to be unsatisfactory.

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

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

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

Sincerely yours,



Lawrence Nielsen

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



Department of Transportation
PARKS AND RECREATION DIVISION

525 TRADE STREET SE, SALEM, OREGON 97301

June 5, 1985

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

RE: Two Rivers RMP

Dear Mr. Magnuson:

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

Sincerely,


Alan J. Cook, Manager
Planning and Grants

ALC:tsb
6520C

cc: Gerry Lucas, Region 4
John Lilly
Larry Jacobson



Oregon Natural Resources Council

Main Office: 1161 Lincoln Street, Eugene, Oregon 97401 (503) 344-0675

Main Office
Deikum Building Suite 706
319 SW 3rd Avenue
Portland, Oregon 97204
(503) 224-0200

Eastern Oregon Field Office
Box 4
Prineville, Oregon 97768
(503) 620-3714

In reply respond to Don Tryon, P.O. Box 450, John Day, OR 97845

June 5, 1985

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

Dear Gerry Magnuson:

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

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

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

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

SCOPE OF THE PLAN

12-1 You claim that defining the intensity of management of various resources is beyond the scope of the RMP. We disagree. An RMP is supposed to be comprehensive, interdisciplinary plans that fully comply with the requirements of the National Environmental Policy Act? We feel that they should describe the affected environment and existing situation, and then allocate lands for specific purposes in the form of clearly articulated prescriptions directed at achieving the goals associated with the allocation. For instance:

LAND SALES

12-2 You state that, "A total of 55,600 acres would receive additional study to determine whether they should be sold or otherwise disposed of. Approximately 1,000 acres of land would be sold annually." Our interpretation of 33 USC 1713 is that public land sales constitute a major federal action. Sales must be tied specifically to NEPA compliance RMP's, not some unspecified "additional study"

prohibiting and curtailing Oregon's State, county, and municipal revenues.

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

1. Difficult and uneconomic to manage. The RMP doesn't analyze the existing management or management costs of the lands proposed for disposal. Or the costs of the disposal process.
2. The tracts are not required for any Federal purpose. You do not identify the existing purposes of each tract.
3. Disposal will serve important public objectives, and outweigh other public objectives and values, including but not limited to recreation and scenic values. You fail to identify existing public values or the public objectives that will be served by selling specific pieces of land.

We recommend that you:

- A. Do the necessary analysis for those lands which you realistically intend to sell over the next 10 - 15 years as part of this RMP process, or.
- B. Suspend the land sales program for this round of planning.

MULTIPLE USE

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

WILDERNESS AND RIVERS

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

Regulations require the articulation of wilderness planning with the comprehensive planning process. Since this RMP supersedes previous plans, as amended, wilderness should again be addressed in this RMP.

378,000 RVM's occur on the rivers, 86% of public land recreation within the planning unit. In terms of time, numbers of people, and public concern in Oregon, recreation use of the lands in the rivers area should be a major component of the RMP. You spend several pages discussing the allocation of 17,778 AUM's of livestock forage - worth only \$24,000.

SPRING DEVELOPMENTS

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

(2)

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

MONITORING

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

UTILITY CORRIDORS

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

MAPS

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

RIPIARIAN SYSTEMS

12-8 Table 13 is very good, but should be expanded and highlighted. You should expand on the components of the habitat condition class rating system.

12-9 Throughout the RMP you discuss riparian habitat (or recovery) in terms of biological potential. 60% of biological potential in your twenty year objective. You should discuss how you know what biological potential of a site is and how you will know when you have reached the 60% recovery level. Also, your short term recovery objective should be defined in percent of recovery that will be achieved over the life of this plan, not five or ten years beyond it.

WILDLIFE

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

12-10 The life form presentation, especially in Appendix F, is helpful. However, the RMP fails to analyze impacts to individual species, life form groupings or habitat types. It doesn't seem unreasonable to ask BLM to make an estimate of current status of each species, relationship of species status to habitat and whether populations will increase or decrease under each of the alternatives.

(3)

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

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

GRAZING

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

12-12 For each of the allotments you should identify (in addition to the information displayed) the existing and proposed grazing system. Whether a CRMP, CMA or other agreement exists; the parties to the agreement, and date of agreement. If an AMP is completed, the date of the AMP and a statement identifying whether the goals and objectives of the AMP are consistent with the RMP. If they aren't, the AMP should be revised.

SPECIAL MANAGEMENT AREAS

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

RECREATION

12-14 We object to the emphasis placed on ORV use in the plan. Only .2% of the recreational use i. the planning area is classified as ORV use. It should receive allocations of open land commensurate with the demand. We take exception to your statement that ORV restrictions will adversely affect hunting. Shooting at game from motorized vehicles is illegal in Oregon. Responsible hunters use established roads and open ways to drive to their hunting area. They don't road hunt, or worse - ORV hunt.

(4)

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

PLANNING OBJECTIVES AND PRACTICES

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

STANDARDS

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

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

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

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

Sincerely,

Don Tryon

Don Tryon

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

12-2. This RMP/EIS analyzes the environmental consequences of selling 33,110 acres of land if they meet the criteria set forth in the proposed plan. This EIS in combination with site specific environmental assessments stored to this EIS will meet the requirements of FLPMA and NEPA.

12-3. See text change for page v.

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

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

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

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

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

12-6. One time inventory information, alone, or in combination with professional judgement, will not be used as the sole basis for livestock use adjustments. Bureau policy requires monitoring studies, along with, or in addition to vegetation production inventories, prior to changing existing livestock grazing preference. Appendix H in the Draft RMP/EIS displays Initial and Long Term Livestock Forage Use, including the preferred alternative which proposes no short term increases or decreases in livestock forage use. Appendix I describes the Range Monitoring Studies that will be used to determine when livestock use adjustments are required. For analysis purposes, long term available forage for livestock is predicted to increase from 17,778 to 19,920 AUMs as a result of range developments and improving ecological condition. During the short term, monitoring data will be collected, conditions evaluated and decisions regarding livestock use adjustments made. No future livestock use adjustments, up or down, will be made unless the situation and conditions warranted such action. Range condition and trend are two of the factors used in allotment categorization and in the prioritization of rangeland monitoring effects.

12-7. The utility/transportation corridors identified by the ad hoc Western Utility Group as they affect public land in the Two Rivers Planning Area are all currently occupied and as such do not represent a new or different land use. FLPMA directs that the proliferation of separate rights-of-way should be avoided. The proposed plan recommends that existing corridors be so designated and any new rights-of-way be confined to those corridors wherever possible (See Map 10 in the Draft RMP/EIS for the location of these corridors). Section 303 of FLPMA provides that "any existing transportation and utility corridors may be designated as transportation and utility corridors...without further review."

12-8. Condition class ratings were based on the present condition in relation to potential vegetative composition and structure. Riparian systems containing high stability and several structural levels of vegetation were rated good or excellent while those with little variety were rated poor or fair.

12-9. See response to comment 20-9.

12-10. Appendix F contains an estimate of the current status or abundance of each individual wildlife species. The analysis of impacts on upland habitat and consequently on wildlife populations is contained on page 62 of the Draft RMP/EIS.

12-11. Our allocations for meeting management objectives relate only to competitive forage. There would be adequate vegetation available under all alternative allocations to support increases in populations. However, it is not the responsibility of the BLM to dictate population levels of resident wildlife species. This is the responsibility of the Oregon Department of Fish and Wildlife. The text change for page 8, Table I should also be noted.

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

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

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

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

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

12-15. The objectives for each alternative outlined on pages 20, 21, and 22 of the Draft RMP/EIS outline a general philosophy for management for the issues identified. They are not intended to be a specific statement of where and how each of the resources will be managed. This information is contained in the body of the document. The plan ties the those general objectives to specific parcels of land, as shown on Map 5 (Riparian Areas and Wildlife Habitat), Map 12 (Areas of High Visual Quality), and Map 13 (Special Management Areas). All of the areas shown on these maps are considered unique or sensitive areas where activities such as off-road-vehicle use, mineral and fossil collection or other activities may conflict with the management and protection of these areas and may need to be regulated.

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

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



Wildlife Management Institute

Box 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1600

OSWELL A. POORE
President
I. K. JAHN
Vice-President
L. J. WILDMANSHOFF
Secretary
WILLIAM W. DIXON, Jr.
Board Chairman

June 8, 1983

Mr. Brian Cunningham
EMP/EIS Team Leader
Bureau of Land Management
Prineville District Office
P.O. Box 250
Prineville, OR 97714

Dear Mr. Cunningham:

The Wildlife Management Institute is pleased to comment on TWO RIVERS RESOURCE MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT, Oregon.

We prefer Alternative D, Emphasize Natural Values while accommodating Commodity Production.

We commend you for the amount of riparian protection proposed in Preferred Alternative A. That alternative, however, has some major deficiencies.

No costs of development are given, and no cost benefit ratios are provided. Appendix L notes that there will be 60.26 miles of management fencing, 131.25 miles of riparian fencing, 13 spring developments and 7800 acres of brush burning. All are properly charged to livestock, since if there were no livestock, no developments would be needed. We could not find estimates of the cost of these developments.

On page 20 it states there will be a long-term increase of 2.14% AUM as a result of the above developments. Each of these new AUM will return \$1.00 in grazing fees to the government or \$2,785 per year. If we assume this is payment of 5 percent interest on the government investment, then the cost of the above developments can be no more than \$34,806. We know from experience that developments cost many times that amount, however.

Fencing alone probably runs in excess of \$1,000 per mile. Thus, the management plan continues and increases subsidy to leases and increases the national debt. Many of the benefits could be realized by short curtailment of grazing, with substantial decrease in public money spent for subsidy.

We know the lands are Section 15 leases, sustained and present management difficulties. Nevertheless, the standard BLM technique of no cuts in grazing is not acceptable, particularly where average operative dependence.

DEDICATED TO WILDLIFE SINCE 1911

- 11-1. A benefit/cost analysis will be done on each project before it is initiated. A benefit/cost analysis addresses only tangible benefits, such as increase in livestock forage (AUM's) and hunter days resulting from improved wildlife habitat and increased populations. Other intangible benefits such as improved nongame habitat cannot be accurately addressed in a benefit/cost analysis. Analyses other than purely economic analyses indicate that projects such as riparian fencing yield far greater overall benefits than the cost involved with construction and maintenance. Also see response to comment 13-6.
- 11-2. Forest management in the planning area is within the principles of multiple use and sustained yield set forth in the Federal Land Policy and Management Act.

Timber sales in the planning area from 1972 through 1982 totaled 20.7 MMFB and sold for \$2.7 million. Since 1983, all District timber harvest activities have been concentrated in lodgepole pine forests to the south of the planning area, near LaPine, due to the mountain pine beetle infestation there.

Mill dependency on the public forestlands within the planning area is minimal (see page 66 of the Draft RMP/EIS).
- 11-3. Historically, timber harvesting in the planning area has been done on a selective, or individual tree basis. Trees selected for cutting are judged for general health and condition. Their chance for continued longevity and possibly enhanced timber value are also assessed. Therefore, the only difference between "virgin" old growth stands and cut over stands, oftentimes, is that the virgin old growth stands contain no scattered stumps. The acreages identified under Multiple-Use Set Aside in Table 30 in addition to the 1,715 acres of nonoperable commercial forestland (Table 20, page 40), are expected to accommodate maintenance of old growth forest conditions - "virgin" or not.

It is the district policy to maintain a minimum of two snags/acre plus recruitment trees where available. We are restricted by USDA regulations which mandate snags be removed around skid trails, roads, landings and other work areas where there is a danger. Surveys which have been conducted after sales have been logged consistently show that we have exceeded our district snag policy in all cases.
- 13-4. The figures we have received from the Oregon Department of Fish and Wildlife for game populations and management goals relate to game management units only, not individual ranges as shown in Table 16 in the draft RMP/EIS.
- 13-5. Monitoring as described in Appendix F is part of the plan and will be carried out. Specific monitoring practices will be described in the upcoming Record of Decision and Rangeland Program Summary.

no public land forage is only 3 percent.

- 13-2. No justification is presented for commercial timber operations. (Page 40). What is local mill capacity? What are the historic BLM sales? How dependent are the mills on these lands?
- 13-3. "Some small but scattered stands of virgin old growth do occur." Why does not the plan provide for preservation of these? And why no snag programs?
- 13-4. Current wildlife populations and the Oregon Department of Fish and Wildlife's goals for these areas should be shown in Table 16.
- 13-5. Monitoring is described in Appendix F. It is not discussed or required in the plan itself.

"The Island" as a research national area has been of interest to us for many years. We have written numerous letters to the USDA Forest Service Regional Forester and BLM State Director about the area. We urge prompt action and classification.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Fuchs
President

Wilderness Study, December 1983
P. 100-101
March 1984 / Oregon 1983

Wilderness

Wilderness is a natural area where the land and the water resources are in their natural state, unimpaired by man's activities. It is a place where the land and the water resources are in their natural state, unimpaired by man's activities. It is a place where the land and the water resources are in their natural state, unimpaired by man's activities.

14-1

Wilderness is a natural area where the land and the water resources are in their natural state, unimpaired by man's activities. It is a place where the land and the water resources are in their natural state, unimpaired by man's activities. It is a place where the land and the water resources are in their natural state, unimpaired by man's activities.

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14-1: An analysis of the potential for wilderness designation of the public lands in Oregon is contained in the Draft Oregon Wilderness Environmental Impact Statement released for public review and comment in April 1983.

ARCO Exploration Company
Exploration Operations - Western U.S.
707 17th Street
Mailing address P.O. Box 5540
Denver, Colorado 80217
Telephone 303 576 1000



June 19, 1985

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

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

Dear Mr. Magnuson:

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

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

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

Therefore, we feel Alternative B is a more reasonable and viable management alternative. This alternative reflects site-specific decisions with regard to scenic values in that it requires NSO stipulations only on those areas which have been deemed to contain the most important value. While current NSO stipulations would be lifted from approximately 72,000 acres, leaving 268,000 acres open to leasing with standard stipulations, we do not believe that this action would cause rampant destruction of valuable scenic resources. In fact, the standard stipulations contain provisions for protecting scenic

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

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

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

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

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

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

Sincerely,
Clare Moseley
C. M. Moseley
Public Lands Analyst



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
Portland Field Office
727 N. E. 24th Avenue
Portland, Oregon 97232

Reference: LWPM

June 19, 1985

MEMORANDUM

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

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

As indicated in our memo dated October 4, 1984, we do not believe the preferred Alternative would have a significant adverse impact on fish and wildlife resources. We prefer, however, Alternative B which emphasizes natural values with commodity production. This alternative would provide important fish and wildlife benefits not present with the preferred alternative.

Russell D. Peterson
Russell D. Peterson

- 15-1. Since the RMP/EIS is expected to guide resource uses, allocations and prescribe conditions of use for the next 10-15 years, inclusion of areas where current technology would not accommodate development was done to put all users on notice that critical resource values were present and would be developed under certain guidelines regardless of changes in technology. The river canyons under consideration are of state and national significance for recreational values. The no surface occupancy (NSO) stipulation on leases is designed to reflect this significance while allowing fluid mineral development where compatible on a case by case basis. While use of a no surface occupancy stipulation may seem an "overkill" on steep canyon slopes the stipulation serves to make our proposed management policy in this area clear.
- 15-2. The concept embodied in the Fluid Mineral Leasing guidance, which is a draft proposal at this time, has been incorporated in this RMP/EIS to the extent possible. This was done by providing a map showing mineral potential (Map 9 in the Draft RMP/EIS) and placing specific acreages of federal mineral interest in 3 leasing categories (Table 8 in the Draft RMP/EIS).
- 15-3. Specific trade-offs between oil and gas potential and scenic resource values were not made in the Draft RMP/EIS due to the lack of site specific proposals for development. In the event of an application for permit to drill within the canyons, an environmental assessment would be developed to address resource trade-offs. This is similar to other resource programs where any ground disturbing operations would require a site specific analysis. The no surface occupancy stipulation placed on mineral leases is designed to notify lessees of areas of concern while allowing for limited entry evaluated on a case by case basis.



June 20, 1985

United States Department of the Interior
ATTN: Gerald E. Magnuson
Bureau of Land Management
Prineville District Office
P. O. Box 550
Prineville, OR 97754

Gentlemen:

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

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

While all alternatives contain restrictive lease stipulations on substantial amounts of public lands potentially valuable for oil and gas resources, we feel that alternative "B" is the most desirable.

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

17-1 In addition, it is important to remember that placing excessive restrictions on public lands limits opportunities to discover and develop our domestic energy resources, resulting in increased dependence on foreign sources of hydrocarbons.

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

WCD1-85/33:TPC

UNITED STATES DEPARTMENT OF THE INTERIOR

Thank you for allowing us this opportunity to express our concerns and views in this matter. Also please keep us updated on your progress in the drafting of the Two Rivers Resource Management Plan.

Yours very truly,

W. Craig Pickerson
Land Department
Rocky Mountain Division

WCD:tpc

MEMORANDUM
Charles (Chuck) Chase

CORRESPONDING SECRETARY
P.C. (Mac) MacFarland

EASTERN OREGON MINING ASSOCIATION, INC.

P.O. Box 932, Baker, Oregon 97814
503 • 523 • 3285

17-1: In the absence of any discoveries of hydrocarbons nearby, there is no evidence that the proposed plan is reducing the actual availability of energy resources. Fluid Mineral exploration and development on 112,000 acres of public land will continue to have a stipulation to protect nationally significant or visually sensitive areas. However, the stipulation provides for exceptions to allow exploration and development as long as certain criteria to protect natural values can be met. (See Mineral Resources discussions in the Planned Management Actions Under the Proposed Plan section)

If significant hydrocarbon resources are discovered within the planning area, the decision could be reconsidered through the RMP amendment process.

21 June 1985

Brian Cunningham
197715 Team Leader
Bureau of Land Management
Prineville District Office
115 East Fourth Street
Prineville, Oregon 97754

Gentle men

The Eastern Oregon Mining Association has completed its review of the Two Rivers Resource Management Plan, Draft Environmental Impact Statement.

Having reviewed the plan we would support the Preferred Alternative, Alternative A. We feel that this alternative will give the best balance between the economics of the region and the need to protect resources, habitat and the recreational opportunities.

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

Sincerely yours,

Charles Chase

CC/vee

19



6141 E.W. Backgrave St.
Portland, Oregon, 97219
June 25, 1985

Mr. Gerald Magnuson
District Manager, Prineville District Office
Bureau of Land Management
P.O. Box 550
Prineville, Oregon 97754

Dear Mr. Magnuson:

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

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

19-1 We feel that the twenty years required under Alternative A to achieve the 80% or more riparian vegetative potential as shown on Page V, Summary is excessive. If properly managed, five to ten years should be an adequate period of time. Fenced studies have shown this short time ability.

19-2 Why can't the condition of fish and wildlife habitat be shown under Table 1, Alternative C—Existing Management? Surely the present status of these species under present management is known and should be shown for an accurate comparison with the proposed alternatives. Also in Table 1, it is difficult to see how 1.4 MM bf. of timber can be removed annually as proposed under Alternatives A, B, C, and D on 11,000 acres of commercial forest without adverse impact on wildlife populations. Presumably, many of those acres include timber in steep draws extending from waterways to ridge tops. These are presumably on fragile soil types, in semi-arid areas and may be difficult to reforest. Also, the timbered draws and gullies often constitute very important travel-ways for wildlife moving from uplands to water courses. Since the EIS states that timber harvest is of relatively small economic importance to the community, perhaps the 211 acres of wildlife habitat "set aside" as shown in Table 30 could be considerably increased.

19-3 We appreciate your frank appraisals concerning livestock grazing as shown on page 4, Issues, including the fact that "there is a conflict of use between livestock grazing and other important resource uses;" an admission not often seen in federal land management statements.

In Table 3, page 8, goal #1, it is difficult to see how it is possible to meet wildlife objectives as shown in the discussion. How can this be accomplished under all alternatives—particularly Alternative B, Commercial production? According to table 1, Summary, wildlife and fish habitat would be reduced under Alternative B. Also, page 63, Chapter 4, discusses adverse impacts of forestry practices.

19-4 The Portland Chapter IMLA Public Lands Grazing Committee wants an equitable share of the harvestable surplus of vegetation allocated to fish and wildlife habitat and associated outdoor recreation. After the basic requirements of enough annual vegetative growth is left to restore and maintain plant vigor, hold soil in place, and provide a flow of high quality water are met, the harvestable surplus can be allocated among the various users. We feel that a

19-1. See response to comment 10-9.

19-2. The condition of wildlife habitat is related to the present ecological condition. Because different species respond to different ecological conditions, structure, and seral stages of succession, a description of wildlife habitat condition for 30+ species would overwhelm the summary table. The description is contained in the Draft RMP/EIS, Chapter 3 - Wildlife.

19-3. The Timber Production Capability Classification (TPCC) does not consider constraints of wildlife habitat, riparian management, etc. It determines what lands are suitable or not suitable for timber production. Many important wildlife areas (timbered draws and gullies) have already been excluded as noncommercial or nonproductive forestland (see table 20). The set aside of 211 additional acres specifically for wildlife habitat resolves all known significant conflicts between wildlife habitat and timber production identified during inventories conducted prior to the multiple use planning process. If conflicts are identified in the future they will be resolved through the environmental analysis process.

19-4. We agree. Alternative B would not meet the objectives of the State of Oregon wildlife goals. See text change for Table 3 on page 8.

19-5. Of the total forage produced, a portion is not palatable to livestock, but provides important forage for wildlife (some forbs and shrubs). The remainder of the total forage, generally grasses and some forbs, is palatable to livestock. Deer and antelope also utilize grasses as part of their diet during certain times of the year. Total use on the grass-forb part of the forage must be regulated so that enough plant material remains for plant maintenance and soil protection. The remainder of the plant is available for grazing use, and is referred to as available forage. It is the available grass used for forage which is allocated to livestock and wildlife. Wildlife have use of not only a portion of the available forage but also that portion of grasses and forbs left for plant maintenance which can be used for habitat. Forage not palatable to livestock and the woody part of the total vegetation is also available to wildlife.

19-5

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

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

Thank you for this opportunity to submit input.

Sincerely,
Ann D. Lyman
Portland Chapter
Isaak Walton League of Amer.
Public Lands Grazing Comm.

20



Department of Fish and Wildlife
506 S.W. MILL STREET P.O. BOX 3503, PORTLAND, OREGON 97208

June 26, 1985

Gerald E. Magnuson, District Manager
Bureau of Land Management
Prineville District
P.O. Box 550 (185 E. 8th Street)
Prineville, Oregon 97754

Dear Gerry:

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

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

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

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

The Department's comments to the Two Rivers Resource Management Plan, Environmental Impact Statement draft are attached.

Sincerely,

Michael C. Heland
Michael C. Heland, Chief
Environmental Management Section

mws
attachment

Upland Habitat Diversity (page 32)

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

20-2 On page 33, the discussion of the life form concept does not include the entire context of the explanation as presented in either Wildlife Habitats in Managed Forests or Wildlife Habitats in Managed Rangelands, etc. We suggest completing the thought by adding the following sentences:

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

Big Game Habitat

20-3 Some omissions and inaccuracies in designation of deer and elk winter range were found in the DEIS. Corrected maps will be provided by our district biologists to assist you in the adjustments. Changes in acreages in Table 16 were suggested to more closely reflect the actual amount of winter range within the planning area. A copy of map 5 is enclosed with additions to winter range indicated (orange) for Wheeler and Gilliam counties. These changes correspond to the respective county land use plan.

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

Riparian Management

Fish Habitat

20-7 Alternative A, item I, page 9 mentions "Deschutes and John Day Rivers and their major tributaries." "Major tributaries" were not specified in the DEIS. At the recent joint meeting, major tributaries were defined as any perennial stream. We also understand that intermittent streams and some streams which do not occur on BLM holdings were not included. For better clarification, we suggest that a brief statement including this information appear in the EIS.

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

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

20-8

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

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

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

20-5 Big sagebrush should be added to the list of cover species in the second sentence. It is about the only thermal cover in both canyons. The importance of sagebrush for winter mule deer feed is not mentioned in the EIS. "Blacktail" should be changed to "Black-tailed" where it is used in the EIS.

Appendix F Range Monitoring Studies

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

Livestock Grazing

20-6 On page 4, item 2. Livestock Grazing Management, second sentence "Some management changes may be appropriate..... to reestablish, expand, improve or protect riparian areas:....." Reestablishment of riparian areas would not be possible in most cases without protection of the systems from livestock use. It may also be extremely difficult to expand or improve poor condition riparian areas without protecting them (at least temporarily) from grazing and other controllable negative impacts.

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

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

The Department's riparian habitat standard as set forth in the "Fish and Wildlife Habitat Protection Criteria for Forest Lands" calls for a target of 80 percent potential in 10 years. The exception to this is on streams in Northwest Power Planning Council project areas, where the riparian objective is 100 percent of potential in the shortest possible time. The 80 percent level was also recommended in our response to the RMP, Proposed Land Use Alternatives in October 1984. We also restate our preference for 460 miles of riparian area protection which was included in those earlier comments.

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

The extensive inventory of stream riparian areas in the Two Rivers Planning Area is commendable. Table 12 shows 632 acres on the John Day in poor (early seral) ecological condition. Table 13 shows an ecological trend rating of stable for 623 acres along the John Day inventoried area and only 4 acres declining. These data show that the majority of the riparian acres have reached the poorest condition possible and can decline no further (stable condition).

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

Forestry

Timber Harvest

The EIS discussion of the economic influence to the local area (page 66, 67) emphasizes the insignificant contribution of the

20-10

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

Old Growth

The texts on pages 33 and 40 discuss small scattered stands of old growth and state that almost all the forest land in the planning area has been cut over. An inventory of old growth is not included in the EIS. How many acres of old growth remain and where are the stands located? This information could be included in Table 15 and on Map 5. In addition to the amount and distribution of the remaining old growth habitat, a statement of its relative importance to particular wildlife species should be included in the EIS. Does the plan provide for retaining some old growth or managing for this habitat type?

20-11

Snags, Dead/Down Woody Habitat

We found only one reference to this habitat in the EIS. On page 117, the only reference to the Wildlife Tree (Snags/Down Log Policy, Instruction Memorandum DR-84-215 is a paraphrase of the General Guidance section, first sentence. What provisions are made for this habitat type on the commercial forest land acres?

20-12

Land Tenure and Access

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

20-13

Appendix J Potential Land Disposal Tracts in Zone 3, page 116 lists several tracts which are included in the 1963 Intensive Cooperative Management Agreement between BLM and ODFW (Game Commission). The agreement describes those lands within one air mile of the Deschutes.

20-13

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

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

- (1) Lands in Township 55, Range 13 and 14E totalling 480.59 acres.
- (2) Lands in Township 65, Range 13E totalling 1,381.61 acres.
- (3) Lands in Township 95, Range 13 and 14E totalling 562.42 acres.

BLM Planning and Resource Interrelationships

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

- (1) Intensive Cooperative Management Agreement (Deschutes) BLM/ODFW, April 1, 1963. See comments in 5: Land Tenure and Access.
- (2) Lower Deschutes Coordinated Resource Management Plan (Macks Canyon to Deschutes mouth).
- (3) The Deschutes River Trout Management Plan ODFW.

20-14

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

D4-14

20-2. See text change for page 11.

20-3. See text change for page 33.

20-3. See Revised Map 5 and text change for Table 16.

20-4. We also consider all winter ranges to be important, however BLM Manual 6500 states that "critical" areas are those areas that are vital to a portion of an animals life cycle. This term also refers to sage grouse leks, heron rookeries, big game winter ranges, etc.

20-5. See text changes for pages 33, 34 and 35.

20-6. It is the goal of the Prineville District to improve riparian systems through changes in livestock grazing season of use and intensity as a first priority and secondly through protection. We also agree that this is an ambitious undertaking that must have the cooperation of the permittees and other public land users.

20-7. The BLM does not administer any land on or adjacent to these streams; consequently they were not included in the Draft RMP/EIS.

20-8. See text change for pages 130-132.

20-9. The site potential of a riparian system is based on the capability of the area to support various vegetative communities. The factors used include flow (intermittent, perennial, seasonal variations) soils (rocky, alluvial, loamy, etc.) stream gradient, aspect, sediment load, wetted area, bank stability, and the present vegetative community. Vegetative improvement is the difference between the riparian ecological potential and the present plant community. When potential was estimated for the streams in the Prineville District comparison areas that have received protection for periods of up to 20 years were used. Camp Creek, near Paulina (see photos 1 and 2) has had total livestock exclusion for nearly 20 years, however, it is estimated to only be at 40% of potential. Other areas may respond more quickly, however, many do not. The ability to produce willow is not the only factor in estimating potential and setting a realistic goal for improvement. A description of different vegetative potential is shown in photos 1 and 4.

20-10. The issues identified and discussed in the RMP are not qualified to reflect relative importance of one to another - No major versus minor issue is implied. The inclusion of forestry as an issue is based on historical precedent and the decadal extensive forest inventory for the District, to be completed during 1985. This inventory will result in the recalculation of the District's annual allowable timber harvest. By identifying appropriate land use allocations which may restrict or exclude timber harvesting activities on forestland suitable for timber production within the planning area, an appropriate sustained harvest level for the District can be derived. Table 30 in the Draft RMP/EIS recognizes and identifies acreages, by alternative, of forestland which would be set aside for other resources uses than timber harvest.

20-11. See response to comment 13-1.

20-12. The District does have a snag policy (see response to comment 13-5).

20-13. Of the lands listed, only those in Section 14 T. 5 S., R. 13 E. fall under the cooperative agreement since they are within one air mile of the Deschutes River. All other lands identified in Zone 3 potential disposal are outside the one air mile boundary and are not subject to the cooperative agreement. The proposed RMP reflects the inclusion of public lands along Vapontia Creek in Zone 1 for retention (see text change for page 116).

20-14. See text change for page 7.



Photo 1 Camp Creek Exclosure (Crooked River Drainage) 1966

Condition:

Stream gradient - less than 5%

Sediment load - high

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

Stream flow - intermittent

Elevation - greater than 4,000 ft.

Wetted area - less than 10 ft. wide

Estimated at 5% of site potential.

The full potential of the area is:

Dominant tree - Peachleaf willow, lemon willow

Understory tree - Coyote willow, McKenzie willow, whiplash willow

Herbaceous - Nebraska sedge, Baltic rush, 3 square bullrush, red top, Kentucky bluegrass

Wetted Area - More than 100 ft. wide



Photo 2 - Camp Creek Exclosure (Crooked River Drainage)
1985. 19 years of livestock exclusion (Same area as is shown in photo 1)

Currently estimated at 40% of site potential.

Present vegetation:

Herbaceous - Nebraska sedge, Baltic rush, 3 square bullrush, cattail, Kentucky bluegrass, occasional red top

Tree - Seedling coyote willow and McKenzie willow in scattered patches

Wetted area - 80% of potential



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

Present condition:

Stream gradient - less than 5%

Sediment load - low to medium

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

Elevation - 3500 ft.

Estimated at 35% of site potential.

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

The full potential of this area is:

Dominant tree - Patches of water birch/alder

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

Herbaceous - Mixed grass, sedge, rush



Photo 4 - Birch Creek (John Day Drainage) 1980

Present condition:

Stream gradient - less than 5%

Sediment load - low to medium

Debris load - medium to high

Spring flow - high

Summer flow - perennial

Soils - moderately deep.

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

Elevation - 3200 ft.

Estimated at 75% of site potential.

The full potential of the area is:

Dominant tree - Black cottonwood, white alder

Understory - McKenzie willow, chokecherry

Bitter cherry, woods rose, dogwood

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

U.S. ENVIRONMENTAL PROTECTION AGENCY



REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

JUN 27 1985

MAIL TO MAIL STOP 443
ATTN: G-1

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

Dear Mr. Magnuson:

The Environmental Protection Agency (EPA) has reviewed the Draft Two Rivers Resource Management Plan Environmental Impact Statement (DEIS) prepared by your office. The DEIS presents five alternative schemes for management of approximately 325,000 acres administered by the Bureau of Land Management (BLM) in north central Oregon. The following comments are provided in accordance with our responsibility under Section 309 of the Clean Air Act to determine whether the impacts of proposed Federal actions are acceptable in terms of environmental quality, public health, and welfare.

General

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

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

Operating Procedures will indeed be adequate to: (1) evaluate the impacts from previous harvests which used the proposed procedures under similar conditions, and (2) enact a monitoring program that is adequate both for enforcement (modifying the existing operation) and for making predictions about future operations. The Final EIS should discuss the impacts of past or ongoing timber harvests and describe the type of monitoring program that will be implemented for future harvests.

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

Threatened and Endangered Species

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

Ecological Condition

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

Water Quality

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

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

Riparian Management

We are pleased to see the recognition given to the importance of riparian vegetation to fish and wildlife habitat and water quality. Nearly 90 percent of the wildlife species in the area utilize this habitat during all seasons of the year. Fencing is discussed as one means of protecting riparian areas from livestock grazing and human use impacts. The DEIS does not make clear, however, the differences between alternatives in terms of miles of fencing. Fencing can successfully exclude livestock from grazing in these areas, but could also adversely affect wildlife. Game, for example, can be excluded depending on fence design. Game populations can also suffer if accustomed travel corridors are blocked or if access to water is limited. The Final EIS should more thoroughly discuss the fencing of riparian areas, and its consistency with what the DEIS considers to be the benefits of this type of riparian management to wildlife.

Timber Harvesting

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

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

Rating of the DEIS

Based on our review and in consideration of the above comments, EPA has rated the draft Two Rivers Resource Management Plan Environmental Impact Statement as EC-2 (Environmental Concerns - Insufficient Information). A copy of the EPA rating system for draft EISs is enclosed for your reference. In this case, the EC rating primarily reflects the adequacy rating of 2. We are unable to fully determine from the information presented in the DEIS whether significant adverse impacts which can be avoided or minimized are likely to result from implementation of any of the alternatives. The Final EIS, however, would be a substantially more useful public information and decision making document through consideration of the above comments.

Thank you for the opportunity to review the DEIS. If you have any questions or would like to discuss EPA's comments, please contact Brian Ross of our EIS and Energy Review Section at FTS 399-8516.

Sincerely,

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

21-1. Appendix M in the Draft RMP/EIS lists every stream on public land in the planning area. A detailed description of water quality for each of these streams is included.

21-2. Appendix I in the Draft RMP/EIS lists the standard operating procedures for forest practices on all public forestlands in the planning area. These procedures provide adequate buffers for fish habitat and other resource values. If any exceptions are identified during the site specific environmental analysis process which is conducted on all forest practices, they will be addressed at that time.

21-3. The table entitled Management Direction by Alternative on page 20 and 21 of the Draft RMP/EIS specifically lists not only the number of miles of riparian fence proposed but also the number of acres of riparian vegetation that would be excluded.

Appendix H in the Draft RMP/EIS discusses the specific design features of not only fences but all range developments proposed on public land in the planning area. Special considerations to be given to wildlife are also described. The benefits to wildlife from riparian management as proposed under each alternative are described on page 63 of the Draft RMP/EIS. Riparian recovery is very important to wildlife and fisheries habitat as is stated in several locations in the Draft RMP/EIS.

21-4. No significant adverse impacts resulting from past timber harvesting are known in the planning area, and no timber harvesting operation is presently occurring.

During the planning and environmental analysis of a proposed timber sale or forest development project, standard and site specific mitigating measures to minimize potentially adverse impacts are analyzed. Mitigating measures needed to protect the environment may result in changing the proposed action. Mitigating measures would then be carried through in performance standards incorporated into timber sale and project contracts.

Monitoring is accomplished through normal procedures such as contract administration (weekly field inspections) and field review to insure compliance with project goals and mitigation measures, and assess the accuracy of impact predictions. Information gained from this monitoring is also used to improve future plans.

In other instances, special systems have been developed to monitor the biological and physical impacts of actions implemented. For example, the "Periodic Forest Inventory" is designed to evaluate, on a decadal basis, established allowable timber harvest levels. The inventory data reflects impacts resulting from past actions that are accounted for in the recalculation of allowable harvest levels.

21-7. The term "range condition" is not used anywhere in the document. All predicted changes of vegetation, along with current conditions, are expressed in terms of seral stages, which reflects the current ecological conditions of vegetation within a pasture, allotment, etc., as compared to climax, as we know it. Range condition is a subjective term and refers to the condition of the vegetation as related to a specific use, i.e., livestock grazing. Early seral vegetation, an abundance of cheatgrass, for example, could be excellent range condition if the predominate use was for early spring grazing.

We do not agree that burning will maintain a sagebrush community in an earlier stage than climax. Virtually all the range sites for the John Day Resource Area, as compiled by the U.S. Soil Conservation Service in their Range Site Handbook, show native bunchgrasses to comprise in excess of 80 to 90 percent of the vegetation in climax condition. Prescribed fire, when conducted with the proper intensity and timing, removes much of the shrub canopy and results in a predominantly grassland/forb community, more nearly resembling climax than before. The effects of fire on plant communities, the historic role of fire in the ecosystem, and the use of fire as a management tool have been documented for years, even in the earliest and most basic range management texts such as Range Management, by Stoddard and Smith (1955).

21-5. There is coordination of timber harvest activities on adjacent lands outside the planning area. Interagency coordination between the BLM and Forest Service presents the greatest opportunity as is described on page 5 of the Draft RMP/EIS. Long range timber sale planning maps are provided by the Forest Service to BLM, as an adjacent landowner, and these maps are reviewed for possible activity coordination to minimize impacts, or to more effectively manage the timber resource.

21-6. For surface disturbing activities including prescribed fire, the project area would be surveyed for the presence of threatened, or endangered or sensitive plant species. Initially there would be a search of information from the Oregon Natural Heritage Plan Data Base and of previous input from the United States Fish and Wildlife Service to determine which species would be likely to occur. A preliminary identification of potential habitat would then be made using available aerial photography or other remote sensing products.

Once this information is in hand, a field search would begin, preferably during the optimum time for species identification. Depending on the size of the project area, the entire area, or just selected, potential habitats, would be searched. Any threatened, endangered or sensitive plant populations found would then be documented and marked on a map or aerial photo for easy relocation.

In the case of prescribed fire, threatened, endangered or sensitive plant populations would be protected through burning out, or blacklining the area around the plants prior to the project. This is the normal procedure to protect any fire sensitive resource, be it historic, botanic, zoologic or structural.

The effects of livestock grazing on threatened, endangered or sensitive species are not completely understood. Other than the obvious habitat destruction that can occur through improper grazing management, the literature is lacking in describing how individual species respond to various levels of grazing pressure. When threatened, endangered or sensitive plant communities are located they will be fenced if there is any doubt as to their survival. This is a continual and ongoing effort in the district. There is also danger in fencing to exclude livestock since in some cases elimination of historical grazing could be detrimental.



AUDUBON SOCIETY OF PORTLAND

A Division of National Audubon Society

18000 100000 100000 100000 100000 100000 100000 100000 100000 100000

June 30, 1985

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

Dear Mr. Magnuson:

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

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

1. No seeding of created wheat grass. Thank you for printing Table 15 on page 34. It documents the comment we frequently make--that created wheat grass plantings are not consistent with the multiple-use mandate on the public lands.

2. Extensive riparian fencing. We are pleased to see the Prineville District act on concerns for wildlife and fish habitat along and in the John Day and Deschutes Rivers and basins.

3. Special management for several important areas and ecosystems--RNA status for The Island in the Cove Fallsides State Park, ACEC status for Horn Butte Curlew Area, RNA status for The Governor Tom McCall Preserve, etc.

4. Recognition of the needs of non-game wildlife for upland vegetation.

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

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

22-1. You are partially correct. Livestock will be more concentrated in the uplands if riparian fencing occurs, but at the same time, changes in management will be required which will aid in the ecological recovery of the upland areas. Changing the amount (AUM's) of forage consumed in itself, will do little toward rangeland restoration, rather it is a change in timing of grazing that is needed. And so, an integral part of the plan is to require periodic, regular rest from grazing during the critical growing period of the plants.

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

22-2. See response to comment 20-9.

22-3. The impacts shown were intended to reflect minimal, site-specific impacts which are unavoidable, yet not significant. These activities will continue to occur because FLPMA mandates that management be on the basis of multiple use and sustained yield (Sec. 102(a)(7)), that public lands be managed for outdoor recreation (Sec. 102(a)(8)), and that management recognize the Nation's need for domestic sources of wildlife, food, timber, and fiber from the public lands (Sec. 101(a)(1)). Every effort is made to minimize impacts to our soil and water resources, but again, forestry practices, mineral exploration, and recreation are legitimate resource uses under FLPMA's concept of multiple use management and some impacts will occur.

22-4. Since the Two Rivers RMP/EIS does not analyze the Wilderness Study Area issue it is assumed you are referring to the Spring Basin Allotment (2536), which in fact does constitute approximately 85 percent of the Spring Basin WSA. Authorized use in this allotment in 1976 was 60 AUMs. The preferred alternative calls for an initial allocation of 45 AUMs which approximates the current active use. Consideration of any future increases would be subject to FLPMA and the Bureau's Wilderness Interim Management Policy. The initial allocation portrayed under Alternative D for this allotment is in error. See text change for page 117.

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

222

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

223

3. Negative environmental impacts to soil and water resources. Table 27 on page 53 shows that forestry practices, mineral exploration, and ORV use and rockhounding have negative impacts on soil and water resources. We think that any negative environmental impacts are not consistent with FLPMA's mandate to improve the public lands or at least hold the status quo. We urge that you reconsider these plans and reduce negative environmental impacts.

224

4. Planned grazing increases in Spring Basin WSA. According to FLPMA, grazing in WSAs is to be held to 1976 levels. How many AUMs were on Spring Basin in 1976? We would prefer to see grazing in Spring Basin reduced from the current levels.

5. Sales of the public lands. We prefer that none of the public lands be sold.

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

Sincerely yours,

Linda S. Craig
for the Conservation Committee,
Audubon Society of Portland
Please reply to 2423 N. W. Guisby, Portland, Oregon 97210.

BUREAU OF LAND MANAGEMENT
Prineville District Office
P.O. Box 550
Prineville, OR 97754

30 June 1989

ATTN: Gerald E. Magnuson

RE: Two Rivers Resource Management Plan EIS draft

Dear Mr. Magnuson:

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

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

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

Soil Erosion Potential	# of acres	% of total acres
1. slight		
2. moderate		
3. severe		
4. critical		

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

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

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

Habitat Type	# of Acres	Reproduction (primary use)	Feeding
Juniper-blue sagebrush			
Juniper-bunchgrass			
bin sagebrush-bunchgrass			
low sagebrush-bunchgrass			
white oak dominant			
riparian			
crested wheatgrass			
etc.			

page 2

4. Ecologic condition of nonriparian land and EIS effects on forage production, soil erosion, water quality and wildlife should be specifically addressed as illustrated in the following table:

nonriparian land ecological condition	average forage production (ALM 52/acre/yr)	soil erosion potential	water quality	wildlife abundance
climax (excellent)				
late seral (good)				
mid-seral (fair)				
early seral (poor)				

5. Economic impacts (page 46) fail to recognize major economic factors. a.) BLM administration costs for managing the lands under the various alternatives, b.) total dollars spent by BLM (in terms of administrative costs plus range development and maintenance) for each ALM grazed, c.) economic benefits of improved fishing and hunting conditions with improved ecological conditions.

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

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

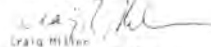
The "preferred" Alternative A is unacceptable for the following reasons:

1. The single use of livestock grazing is given priority over the multiple uses by multiple forms of life as well as human uses of fishing, hunting, hiking, etc. BLM's preferred alternative shows insensitivity to wildlife values.

2. Range condition will not be adequately rehabilitated, erosion will not be adequately controlled.

3. Under this alternative ranchers will in effect be subsidized by taxpayers to graze on public lands.

Respectfully Yours,


Craig Miller
Conservation Committee Chairman
Central Oregon Audubon Society
P.O. Box 8376
Bend, OR 97708

23-1
23-2
23-3
23-4

23-5
23-6
23-7

23-1. See text change for page 28.

23-2. Based on the relatively small amount of soil disturbance anticipated under each alternative and the overall predicted change of ecological conditions toward climax, it was determined that impacts to soil would be minor. Therefore impacts to soil are not discussed in any greater detail than what is shown on pages 58 and 59 of the Draft RMP/EIS.

23-3. While a plant community in climax condition might be the ideal for maximum livestock forage, it is generally not in the best interest of multiple use management, particularly as related to wildlife habitat. For wildlife, something less than climax will maximize habitat diversity and hence, species diversity (see page 22 of the Draft RMP/EIS). Our goal is somewhere between mid-seral and late-seral condition for most of our upland habitat. We feel this is a good compromise since at these conditions wildlife habitat diversity will be high, the soil will be adequately protected from erosion (generally somewhat less than in climax but not significantly less) and, coupled with riparian habitat improvement, water quality will improve.

23-4. The table shown on page 31 of the Brothers Grazing Management Program Draft EIS is reproduced for the Two Rivers Planning Area on page 31 of the Two Rivers Draft RMP/EIS. More detailed information concerning the habitat interrelationships of each wildlife species is portrayed in Appendix P.
The effect of crested wheatgrass seedings on wildlife needs is stated on page 32 of the Draft RMP/EIS: "Seedings have low habitat diversity." This can be further seen in Appendix P where it is portrayed that relatively few species use crested wheatgrass and even fewer prefer it. Only 2,240 acres is proposed for crested wheatgrass seeding and this only under Alternative B, which is not the proposed plan. Any acreage seeded under this alternative would be at the low end of early-seral condition which would not be expected to improve with management.

23-5. Figures relating average forage production, soil erosion potential, water quality, and wildlife abundance to ecological condition would be meaningless except in general terms as already discussed in 3) above. Some reasons for this include the extreme variability in forage production between two different range sites in the exact same ecological condition (clayey upland, for example, has about 4 times the forage potential as a siltland in climax condition) and different erosion potentials and hence, water quality for different soils, even though ecological conditions may be equal.

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

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


ASSOCIATED OREGON LOGGERS, INC.

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 F. F. (Monte) Montgomery
 (President)

July 1, 1985

 Mr. Brian Cunningham
 RMP/RIS Team Leader
 BIM
 185 B Fourth St.
 P.O. Box 550
 Prineville, OR 97754

Dear Brian,

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

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

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

24-1

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

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

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

 Loggers' Assurance Co. (LAC) - ADL/No - THE LOG - ADL Life & Health - ADL Rebo.
 AFFIRMATIVE ACTION - EQUAL OPPORTUNITY EMPLOYER

24-1. Unsuitable forestlands were identified through the timber production capability classification process (TPCC). This is separate from the land use allocation process. We believe the relationship can be better understood if they are displayed separately. Also see response to comment 19-1.

Mr. Brian Cunningham

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Overall, there are circumstances unknown to us within the Two Rivers planning unit which are probably dictating its management direction. The planning team's hard work shows in this well organized DEIS. Since there is very little variation between the existing management situation, the preferred alternative (A) and commodity production (B), we see no reason why alternative B would not be acceptable as your management direction.

Thank you for your time and consideration.

Sincerely,

 Gregory A. Miller
 Forest Planner

ceb

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

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