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

Final

Coos Bay District Office
1300 Airport Lane
North Bend, Oregon 97459

September 1994

Coos Bay District Proposed Resource Management Plan Environmental Impact Statement

Volume III

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

BLM/OR/WA/ES-94/30+1792

Appendix HH. Comment Letters on the Draft RMP from Governmental Agencies and Elected Officials

The following letters were received by the district from governmental agencies and elected officials in response to the Draft Resource Management Plan. Letters are reproduced on the pages as indicated below.

Appendix HH

U.S. Department of Transportation
Office of the Secretary of Transportation

400 Seventh St., S.W.
Washington, D.C. 20590

RECEIVED
OCT 5 1992
OCT 1 7 1992
COOS BAY DISTRICT OFFICE

Mr. Bob Gunther
RMP/EIS Team Leader
Bureau of Land Management
Coos Bay District Office
1300 Airport Lane
North Bend, OR 97459

Dear Mr. Gunther:

This office has reviewed the summary of the draft resource management plan/environmental impact statement for management of federal land in the Coos Bay District. We have no comment.

We appreciate the opportunity to review this document.

Sincerely,

Eugene L. Lehr

Eugene L. Lehr, Chief
Environmental Division

CONFEDERATED TRIBES OF
COOS, LOWER UMPQUA & SIUSLAW INDIANS
455 S. 4th • Coos Bay, OR 97420 • (503) 267-5454

November 13, 1992

Mr. Mel Chase
BLM District Manager
Coos Bay District Office
1300 Airport Lane
North Bend, OR 97459

Dear Mr. Chase:

The following pages outline our response to the BLM Coos Bay District Resource Management Plan and Environmental Impact Statement. The response is supported by unanimous consent of the Tribal Council and Planning Committee. The Confederated Tribes, while conscious of a safe and clean environment, are critically concerned about the local economies within the Tribes' territory.

In addition to our position on which alternative to support, we are including maps and information to assist you in locating our areas of interest. Also, we have commented on issues of concern to the Confederated Tribes.

Thank you for the opportunity to comment.

Sincerely,

Skip Brainard

Skip Brainard
Tribal Council Chairman

SB:db
attachments

A TRIBAL RESPONSE

TO

THE BLM COOS BAY DISTRICT

DRAFT RMP/EIS

THE CONFEDERATED TRIBES OF COOS, LOWER UMPQUA AND SIUSLAW INDIANS

A Federally Recognized Tribe Under Public Law 98-481

INTRODUCTION

The Confederated Tribes' aboriginal territory spans large areas of the BLM Eugene, Coos Bay, and Roseburg Districts. Additionally, it touches on the BLM Salem District to the north. All BLM land-related actions within the aboriginal territory and Tribal Consolidation Area, both defined in the text, are matters of concern to the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, as the Tribes' aboriginal territory is a major key to their identity. With such a long-term interest in their ancestral homeland, the Tribes offer these comments regarding the BLM Coos Bay District Draft Resource Management Plan and Environmental Impact Statement. The Tribes do so, not as members of the general public, but as a recognized tribal government pursuant to Public Laws 98-481 and government-to government relationship, as outlined by the President of the United States.

Additionally, the only document ceding tribal rights of ownership of the aboriginal territory to the United States was the Treaty of 1855, drafted by the US Government. This treaty, after being approved by Congress, but never signed into law by the President, has yet to be settled. Thus, all lands within the aboriginal territory of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians can still be considered "Indian Country".

ALTERNATIVE SUPPORTED BY THE CONFEDERATED TRIBES

Recognizing the continuing decline in revenues to local economies, the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians support Alternative B. Local economies have been eroded significantly in the recent past and cannot continue to weather the sharp decline in revenue. In reviewing the socioeconomic conditions (page S-26 of the Summary) resulting from the different plans, the "Preferred Alternative" does not provide for sufficient revenues to affected local communities. Conversely, Alternative B provides for additional income to those communities impacted by the planning areas. One should keep in mind the timber industry has been on a steady decline for several years and this does not make up for the revenues lost as a result.

In looking at jobs supported, the Preferred Alternative will only sustain a total of 1,600 jobs, which is much less than the jobs currently supported (2,590) under the No Change Alternative. Alternative B will support a total of 2,740 badly needed jobs, or a net increase of 150 positions.

GENERAL COMMENTS

Consistency with State, Tribal and Other Federal Plans

Summary, page S-11, contains a section entitled, " Consistency with State, Local, Tribal and Other Federal Plans". The Confederated Tribes appreciate tribal governments being included in this section. The Confederated Tribes are in the process of preparing a Tribal Land and Resource Management Plan. When completed, the plan will be used to compare the desired management style of the Tribes with that of federal, state, and other local governments within the Tribes' territory.

Cultural Resources

This section, although it outlines the development of Memoranda of Understandings with tribal governments, does not accurately address the governmental bodies of federally recognized Indian tribes. The appropriate tribes are listed, but instead of speaking of them as the governing bodies of federally recognized tribes, they are merely listed as "Indian groups" (page 2-14). This would be somewhat akin to listing the United States Government as a "group of white boys". BLM Coos Bay District should be reminded that federally recognized Indian tribes have a government-to-government

relationship with the United States, and should not be treated as the "general public" when issues arise on land still considered Indian Country. Additionally, page 5-7 incorrectly lists the Tribes as an "interest group" rather than government body.

Land Tenure Issues

The Confederated Tribes have concerns regarding the transfer of federal land to private ownership. Once the land goes into private ownership, it is hard to protect the Tribes' interests (cultural and other) in that parcel.

Additionally, since the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians are a governmental body, and the treaty of 1855 (the only document that would have given the United States clear title to the land) has never been ratified, it is expected that the tribes would have the opportunity to acquire the land, either by transfer to the BIA or other means, should it be considered for disposal.

Land Use Authorizations and Rights-of Way

The Tribes should contacted for review of any activity (including land use authorization, granting of right-of-way, or road construction) permanently altering the land, minerals, vegetation on, or access to its' aboriginal lands.

Cultural Resources

This section should include interaction/consultation with appropriate tribal governments regarding cultural/archaeological issues. For the convenience of the BLM Coos Bay District, maps of the areas of interest within the Coos Bay District are included with this document. The white areas in the identified sections are portions of the aboriginal territory, and the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians should be consulted regarding cultural resource issues within those areas.

Tribal Consultation/Notification

The tribal office should receive copies of Environmental Assessments, FONSIs, Environmental Impact Statements and other notifications of actions affecting the area of interest including, but not limited to timber sales, brush clearing, mineral and other leases, and any decision affecting the use of these lands. The complete Tribal Consolidation Area is defined as follows:

T. 15 S., R. 6-12 W., WM	T. 22 S., R. 9-13 W., WM
T. 16 S., R. 6-12 W., WM	T. 23 S., R. 8-13 W., WM
T. 17 S., R. 7-12 W., WM	T. 24 S., R. 8-13 W., WM
T. 18 S., R. 5-12 W., WM	T. 25 S., R. 8-14 W., WM
T. 19 S., R. 4-12 W., WM	T. 26 S., R. 7-14 W., WM
T. 20 S., R. 4-12 W., WM	T. 27 S., R. 7-14 W., WM
T. 21 S., R. 4-13 W., WM	T. 28 S., R. 11-14 W., WM

The maps on the following pages identify areas of interest within the various USGS quad

maps. White areas within the identified sections are portions of the aboriginal territory, while shaded areas within the identified sections are within the Tribal Consolidation Area. Consultation/notification should occur as shown on the table below.

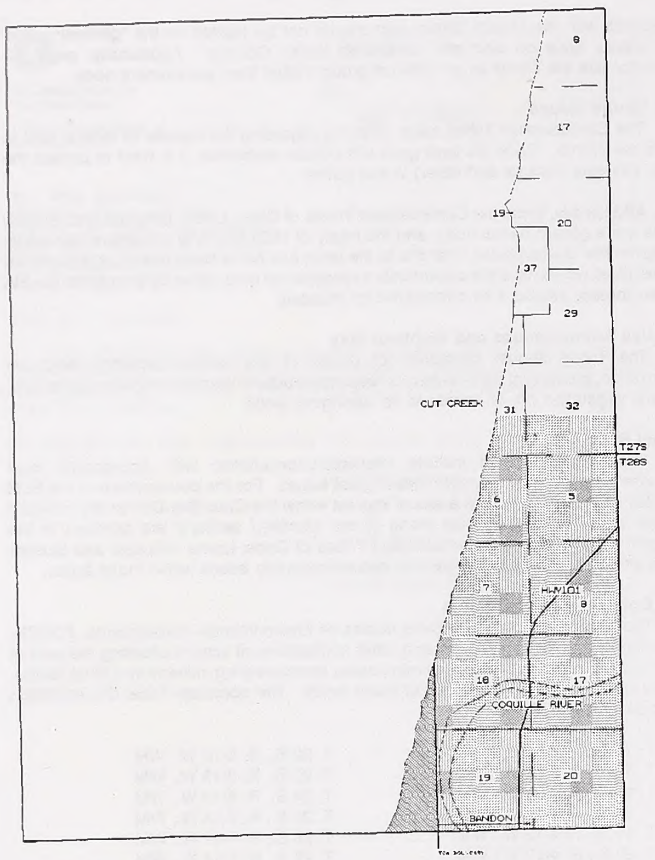
Key to BLM Coos Bay District/Confederated Tribes Consultation/Interaction

ACTIVITY	ABORIGINAL TERRITORY (White portion of sections)	TRIBAL CONSOLIDATION AREA (Shaded Identified Sections)
NEPA Notification Process	✔	
Minerals/Land Lease Notification	✔	✔
Water Rights Activities	✔	
Cultural Resource Activities	✔	
Timber Sale Notifications	✔	✔
Surplus Real Property	✔	✔
Small Forest Products Sales	✔	✔

Identification of Areas of Interest within BLM Coos Bay District

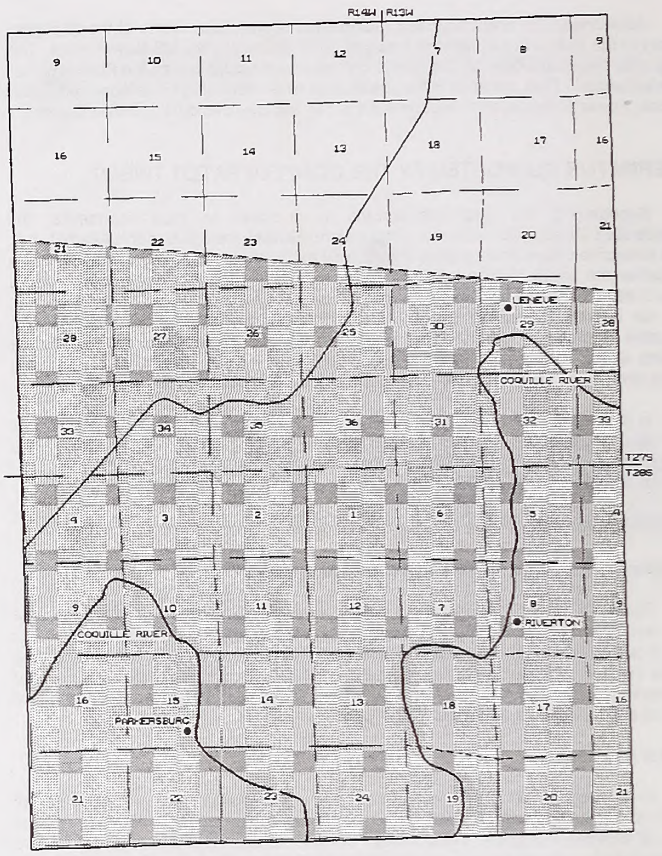
USGS Quad Map	Aboriginal Territory	Tribal Consolidation Area
Siltcoos Lake 15	All in CB District	All in CB District
Goodwin 15	All in CB District	All in CB District
Roman Nose 15	All in CB District	All in CB District
Reedsport 15	All	All
Scottsburg 15	All	All
Elkton 15	All in CB District	All in CB District
Empire 7.5	All	All
North Bend 7.5	All	All
Allegany 7.5	All	All
Daniels Creek 7.5	All	All
Coos Bay 7.5	All	All
Charleston 7.5	All	All
Cape Arago 7.5	All	All
Ivers Peak 15	All	All
Tyee 15	All	All in CB District
Bullards 7.5	See Map	All
Riverton 7.5	See Map	All
Bandon 7.5	None	See Map
Bill Peak 7.5	None	See Map
Coquille 15	See Map	See Map
Sitkum 15	See Map	See Map
Camas Valley 15	See Map	See Map

AREA OF INTEREST WITHIN BULLARDS 7.5 MINUTE QUAD



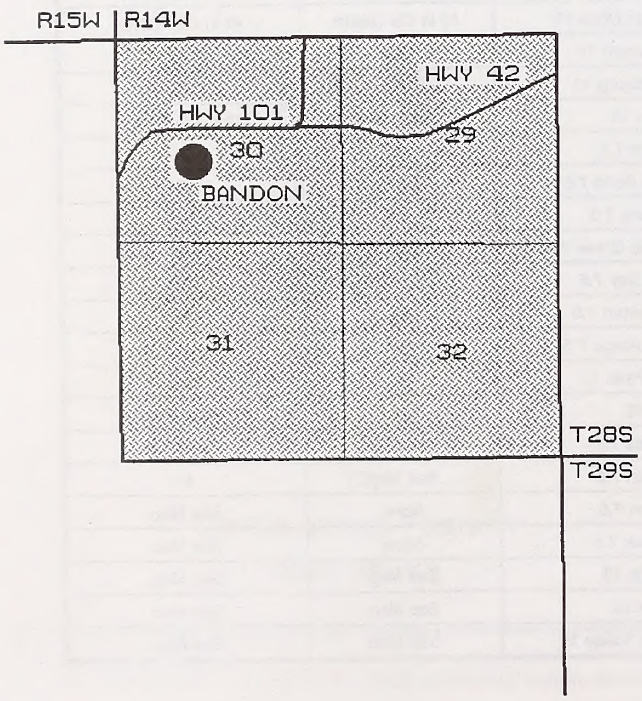
(IDENTIFIED SECTIONS INDICATE AREAS OF INTEREST)

AREA OF INTEREST WITHIN RIVERTON 7.5 MINUTE QUAD



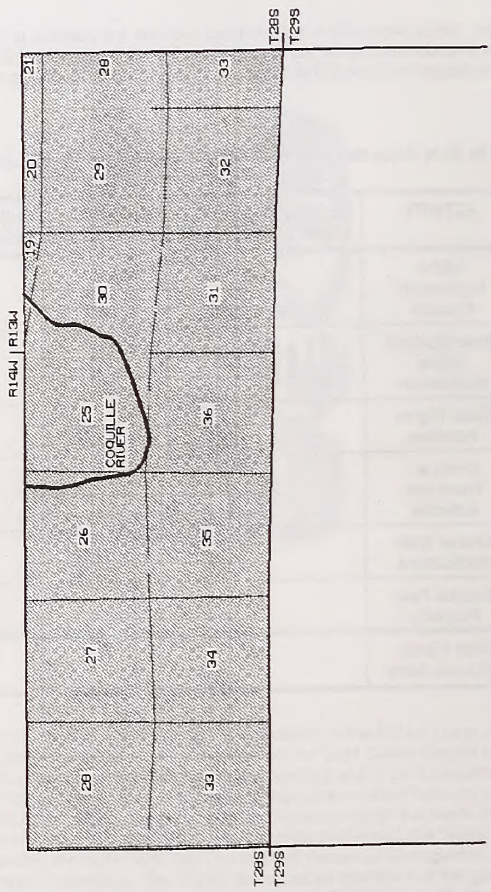
(IDENTIFIED SECTIONS INDICATE AREAS OF INTEREST)

AREA OF INTEREST WITHIN BANDON 7.5 MINUTE QUAD



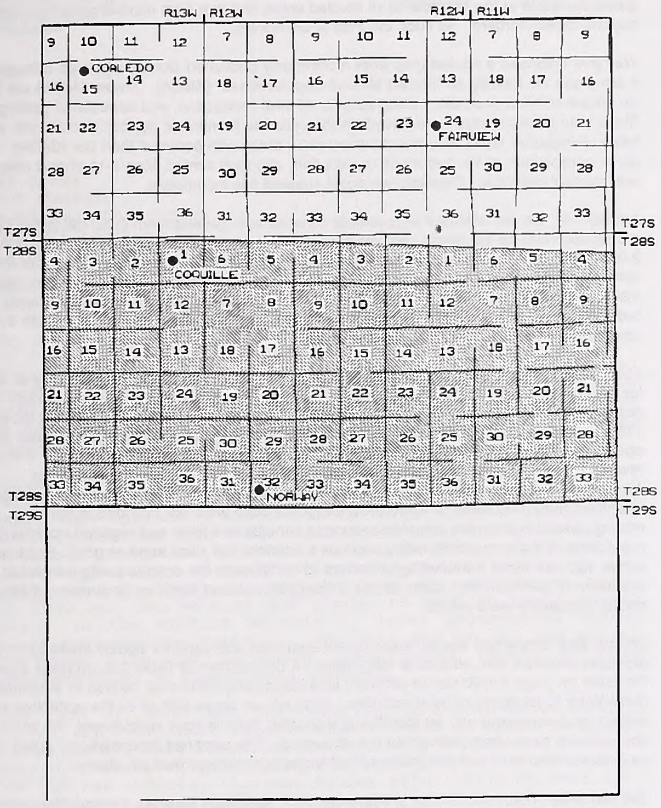
(IDENTIFIED SECTIONS INDICATE AREAS OF INTEREST)

AREA OF INTEREST WITHIN BILL PEAK 7.5 MINUTE QUAD



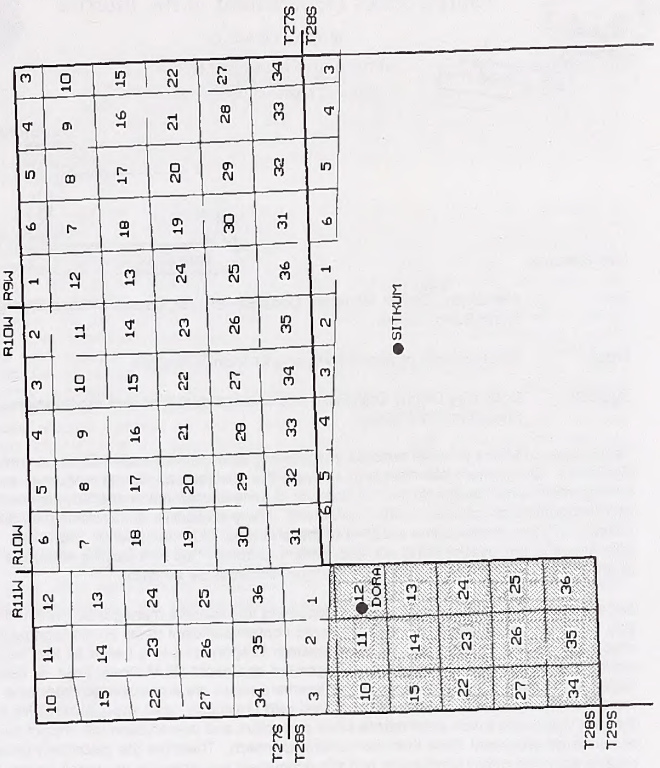
(IDENTIFIED SECTIONS INDICATE AREAS OF INTEREST)

AREA OF INTEREST WITHIN COQUILLE 15 MINUTE QUAD



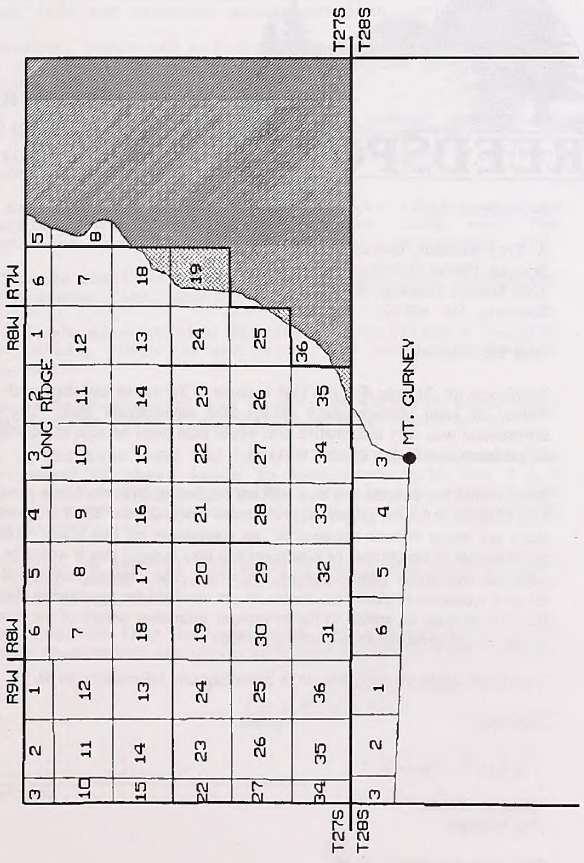
(IDENTIFIED SECTIONS INDICATE AREAS OF INTEREST)

AREA OF INTEREST WITHIN SITKUM 15 MINUTE QUAD



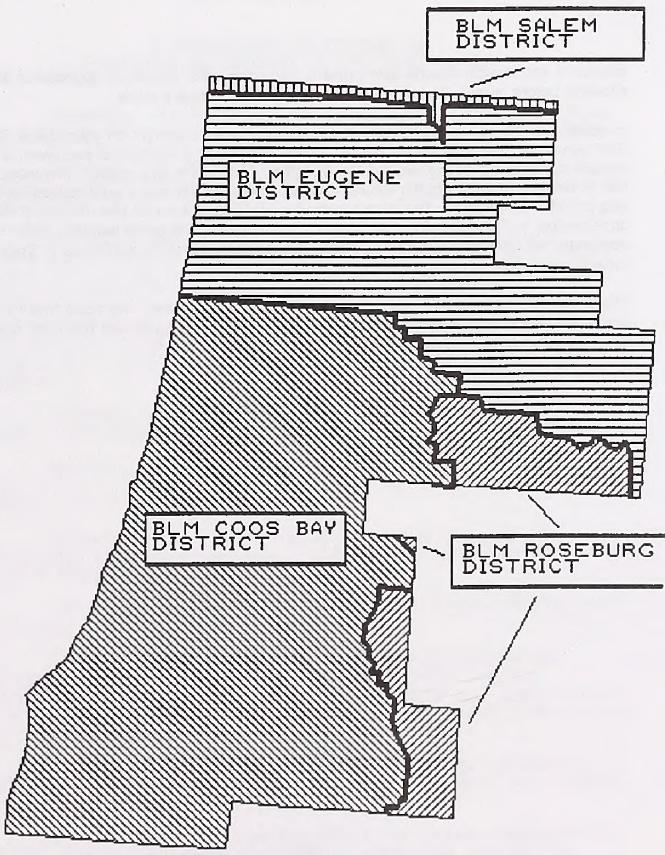
(IDENTIFIED SECTIONS INDICATE AREAS OF INTEREST)

AREA OF INTEREST WITHIN CAMAS VALLEY 15 MINUTE QUAD



(IDENTIFIED SECTIONS INDICATE AREAS OF INTEREST)

BLM DISTRICTS WITHIN TRIBAL CONSOLIDATION AREA



United States Department of the Interior

BUREAU OF MINES

WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202-1413

TAKE PRIDE IN AMERICA

November 24, 1992

Coos Bay District Office

Memorandum

To: Mel Chase, District Manager--Coos Bay District, Bureau of Land Management, North Bend, Oregon

From: Chief--Branch of Engineering and Economic Analysis

Subject: Coos Bay District Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS)

The Bureau of Mines is in the process of reviewing all of BLM's western Oregon draft RMP/EISs. Our primary objective is to evaluate the coverage of mineral resources and their management, and the assessment of impacts to mineral exploration and development created by management proposals for other resources. Many similarities are becoming evident between the mineral resource sections of these Oregon BLM documents. However differences in the level of detail are also evident, probably due to a varying emphasis from District to District on the importance of mineral resources as an issue.

Because this RMP/EIS is BLM's guiding document for resource management within the Coos Bay District for many years to come, it should contain sufficient detail on management of all resources, including minerals. RMPs for western Oregon are being hailed as the "first in the world" to "emphasize an ecosystem management approach" (BLM News, Sept. 8, 1992), but, because of missing mineral resource management detail, we are unable to determine how minerals activity will be affected as compared with previously used approaches. We suspect that any approach which emphasizes biota protection and preservation will impact mineral resource development more than the current approach. Therefore the place for mining-related activities within biodiversity and the ecosystem management approach needs to be clearly defined.

After reviewing this document we have some additional specific concerns we would like to address. Additional work is needed to refine maps, data, and procedures used to generate Tables 2-8 to 2-10, 3-M-1 to 3-M-4, and 4-M-1 to 4-M-3. These important tables do not appear to accurately reflect the overall mineral resource situation due to incomplete and inconsistent information.

To start with, there is evidence that at least one of the mineral resource potential maps used is incomplete. The maps are drawn to show potential over the entire district rather than on BLM land only. However it can be clearly seen on Map 3-11 that several of the areas of high potential for locatable minerals terminate at internal man-made survey boundaries. Since mineralization does not conform to man-made boundaries, we suspect these high potential areas terminate at the boundaries of studied areas and that high mineral potential continues beyond those borders. As such the map is unfinished.

We have enclosed a related map from a previously published Bureau of Mines document. On it are areas we identify as "Known Mineral Deposit Areas" (KMDA). These KMDAs are based on known mineral deposits, mining activity, mineral production, and associated geology. Since your potential maps are based on the potential for mineral deposit occurrence, a much more all-inclusive topic, they should show more areas with potential than our KMDAs. A quick comparison of the two maps reveals that, although similar, Map 3-11 shows less area with mineral potential. Therefore we again suspect it is incomplete.

Additionally, we are unsure if all locatable minerals with development potential in the District are represented on the maps. For example, there is a statement in the document concerning 2,000 acres of high potential for pure silica sand on the North Spit of Coos Bay, but this resource does not appear to be shown on the map. Also the lack of labels on the maps makes it impossible to identify which commodities are contained in each of the shown potential areas. Please label the locatable mineral potential areas on your map with the commodities believed to occur in those areas.

Apparently not all known data was incorporated in tables relating to the availability of lands for mineral exploration and development. Again let us refer to the 2,000 acres of high potential for pure silica sand (a locatable mineral resource). The document states on page 4-116 that this area would be withdrawn from mineral entry, thus foregoing all potential mining operations within the district for this commodity. However a quick check of Table 4-M-2 reveals 0 acres of nondiscretionary closures (except for 300 acres in the No Action Alternative) and only 1,600 acres of discretionary closures over high potential mineral areas. Therefore the 2,000 acres of withdrawn pure silica sand were not included in the table. A mining operation provides valuable economic benefits to a local and regional community regardless of the commodity being produced, whether it is silica sand or gold. Because tables such as these are used by reviewers to understand the options being presented, exclusion of pertinent data such as this is inappropriate and leads us to question if other similar omissions were made.

We are also concerned that an inconsistent approach was used to identify areas open to locatable minerals with additional restrictions. A comparison of Table 2-9, on page 2-94, with the table on page II-K-20 shows different area designations listed as causes of additional restrictions to locatable mineral activities. Although we agree with all of the restrictive areas shown, and commend you for identifying and using them in your assessment, the same list should have been used throughout the document. This apparent inconsistency again causes us concern over how well the tables reflect the actual management situation.

Our last area of concern relates to Appendix II-K-I, Locatable Minerals Surface Management. Only the standard management requirements for minerals, under 43 CFR 3809, were listed. Along with this information the additional restrictions likely needed to mitigate impacts in management areas such as ACECs, W&SRs, VRM IIs, and special status species habitat should be identified. Most companies know of the standard requirements. However many wouldn't realize the additional mitigation necessary in many special areas until well into their exploration and development plans. These additional requirements can easily preclude otherwise economical mineral development, and companies should be apprised of this situation before large exploration and planning investments are made.

In addition to the comments above, we would also like to comment on your use of GIS in the RMP process. This is by far the best approach in preparing this type of document and, despite our criticism above, we feel the Coos Bay RMP/EIS is an excellent document. Your use of GIS has allowed greater resource conflict identification and impact assessment than was possible in the past. The mineral resource work completed for this document adds considerably to the utility of the document. By addressing the areas we have cited, this document will become an extremely useful tool for both managers and users of Coos Bay's mineral resources.

Thank you for involving us in your management planning process. We hope these comments are useful to you in preparing the best RMP/EIS possible. If you should have any questions, please contact Michael Dunn at (509) 353-2700.

John R. Norberg

1 Enclosure

C 145

REEDSPORT

City of REEDSPORT
(503) 271-3603
451 Winchester Ave. • Reedsport, Oregon 9

December 1, 1992

A. Troy Reinhart, Executive Director
Douglas Timber Operators Inc.
3000 Stewart Parkway, Suite 208
Roseburg, OR 97470

Dear Mr. Reinhart:

Thank you for the time that you took to come to Reedsport and share with us information on the Bureau of Land Management's (BLM) draft management plan. The Council felt that the information was very informative and would help them be able to personally become involved in the issue should they choose to do so.

The Council has decided that they will not be placing this on a future agenda. They felt that the City Council is not the proper forum to make a decision for all of the people of Reedsport since there are many diverse opinions in the community on this issue. The Council's job is to represent all of the citizens of Reedsport and they thought that it would be difficult to determine what the will of the people was on this issue. The Council further felt that since there was already a process in place for citizens to get involved the appropriate thing to do would be for the City to place an article in the newspaper informing people of the process and encouraging people to get involved should they wish too.

Thank you again for your efforts in providing this information to us.

Sincerely,

Nolan K. Young
City Manager

CC: Cary Osterhaus, BLM

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City of North Bend
POST OFFICE BOX B / NORTH BEND, OREGON 97459-0019
(503) 756-0405

December 8, 1992

Mr. Mel Chase
District Manager
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

RE: Comments on Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. Chase:

Please accept this letter as the City of North Bend's comments to the Draft Resource Management Plan and Environmental Impact Statement for the Coos Bay District. We cannot accept this draft of the Resource Management Plan because it goes far beyond the goals and objectives for which Congress created the O&C lands.

The O&C Sustained Yield Act states that BLM lands are to provide a flow of timber and clean water. Your proposed 10 year plan goes far beyond this mandate by setting aside large areas to provide for wildlife, recreation and other resources without regard to the land's timber production capability classification. Furthermore, these O&C lands play a significant role in the well being of our community. Local county governments rely on receipts to their general fund for the sale of BLM timber to provide basic social services. In the wake of Measure 5, local governments cannot afford any more reduced revenues. Who will pay for all the social service needs with the increased unemployment caused by this proposed reduction in timber sale levels?

Over the last 40 years the O&C counties have reinvested over a billion dollars into these forest lands. After 50 years of timber harvesting the standing inventory has actually increased. Your own analysis of the timber sales programs biological potential shows that the BLM can actually increase timber sale levels by over 30%, but your proposal would reduce them by 50% without any certainty that the volume would be sold. Such a reduction is totally unacceptable.

The BLM is not the Forest Service. You operate under a different set of mandates, for different purposes, for a different cabinet department. In Oregon the BLM's relationship with its surrounding communities has been personal, practical, and purposed. Management, under the O&C Act, for the past 50+ years has not been one of resource degradation. While the Act stresses timber production it has also readily provides for all other forms of non-timbered resources.

In the last set of resource plans, the Director of the Bureau of Land Management, in his O&C Forest Resources Policy letter, stated "The BLM manages 2.1 million acres of O&C lands in Western Oregon. The revenues and employment generated by timber sales, conversion of timber to wood products, and other marketable values derived from these lands, significantly affect the state and local economies. It is further recognized that public use of these lands through consumptive and nonconsumptive recreation including sport hunting and sport and commercial harvest of salmon and steelhead produced in streams on the O&C lands also contributes to the local and state economies. The primary objectives of the Management Program on the O&C lands are to manage for a high level and sustained yield output of wood products needed to contribute to the economic stability of the local communities and industries and to provide for other land uses as established in the O&C Act and other legislation." You have operated well under that mandate. Those lands have produced a measure of economic stability to the local communities, as well as a myriad of other non-timber products for use by all the people of the State of Oregon. It is our hope that this process can focus on that successful management and those historical directives that have caused it to happen. We urge that you reject the preferred alternative as presented and redraft the plan in line with O&C management requirements.

Sincerely,

Timm A. Slater
Mayor

TS:925001

RESOLUTION NO. 2281

WHEREAS, the Bureau of Land Management has requested public input on its ten-year land and resource management plan, and,

WHEREAS, the health, peace and safety of the people of Coos County are affected by the alternative selected by the BLM for the management of O & C timberlands, and

WHEREAS, the natural resources provided through aggressive management of federal lands under the O & C Sustained Yield Act of 1937 has contributed to social and economic stability in 18 Western Oregon counties, including Coos County, and

WHEREAS, the counties have invested more than one billion dollars to fund intensive forest management on these lands with the explicit expectation of an ongoing return on this investment, and

WHEREAS, O & C lands continue to provide a reliable employment base for many Oregon communities, and

WHEREAS, O & C lands also provide diverse and sustainable habitat for fish and wildlife, clean air and water, and outdoor recreation opportunities, and

WHEREAS, these lands should continue to provide economic stability, healthy and productive forests and reliable employment base,

THEREFORE, BE IT RESOLVED THAT THE CITY OF NORTH BEND supports the continued management of these lands in accordance with the O & C Sustained Yield Act of 1937 to provide a stable and predictable level of timber harvest for Oregon communities while considering other resource values, and

BE IT RESOLVED that we support the principles of multiple use for these O & C lands which include management for timber, water, recreation and wildlife, and,

BE IT FURTHER RESOLVED that we encourage legislation that would enact a balanced management decision from the federal court system.

Mayor

ATTEST: _____
Recorder

RESOLUTION NO. 37-92

A RESOLUTION IN SUPPORT OF CONTINUED MANAGEMENT OF O&C TIMBERLANDS

WHEREAS, the Bureau of Land Management has requested public input on its 10-year land and resource management plan;

WHEREAS, the health, peace and safety of the people of Coos County are affected by the alternative selected by the BLM for management of O&C timberlands;

WHEREAS, the natural resources provided through agressive management of federal lands under the O&C Sustained Yield Act of 1937 have contributed to social and economic stability in Western Oregon counties, including Coos County;

WHEREAS, the counties have invested more than one billion dollars to fund intensive forest management on these lands with the explicit expectation of an ongoing return on this investment;

WHEREAS, O&C lands continue to provide a reliable employment base for Oregon communities;

WHEREAS, O&C lands also provide diverse and sustainable habitat for fish and wildlife, clean air and water, and outdoor recreation opportunities; and

WHEREAS, these lands should continue to provide economic stability, healthy and productive forests and a reliable employment base.

NOW, BE IT RESOLVED BY THE COMMON COUNCIL OF THE CITY OF COQUILLE:

1. The City of Coquille supports the continued management of O&C timberlands in accordance with the O&C Sustained Yield Act of 1937 to provide a stable and predictable level of timber harvest for Oregon communities while considering other resource values.

2. The City of Coquille supports the principals of multiple use for O&C lands which includes management for timber, water, recreation and wildlife.

3. The City of Coquille would encourage legislation that would enact a balanced management plan into law by the Congress of the United States of America.

RESOLUTION - 1

3. The City of Coquille would encourage legislation that would enact a balanced management plan into law by the Congress of the United States of America.

Adopted by a majority vote of the Common Council taken by ayes and nays this 7th day of December, 1992.

ATTEST:

Shirley Patterson
SHIRLEY PATTERSON
City Recorder

APPROVED BY ME:

Loren Wiese
LOREN WIESE
Mayor

RESOLUTION - 2

3. The Preferred Alternative does not appear to fulfill clearly the objectives of the O & C Sustained Yield Act. BLM and Oregon counties have consistently plowed money into reforestation and intensive forest management of these lands over the last several decades. The Preferred Alternative appears to veer sharply away from the concept of sustained yield timber management in favor of protection of ill-defined habitat areas for the Northern Spotted Owl. Alternative B more closely conforms, from our perspective, with the spirit and intent of the O & C Act.

4. The Port supports BLM's interest in pursuing ownership of the Anadromous facility and its reopening for release of fish. The Port currently leases the facility (as owner) to Paradise Bay Sea Farms. The Port would be pleased to work with BLM in support accomplishing that project.

SUMMARY:

The Port compliments BLM on a very thorough and in-depth consideration of alternatives. We believe, however, that the Preferred Alternative is ill-named, and that Alternative B is by far the preferable alternative for the reasons stated previously.

Thank you for the opportunity to comment.

Sincerely,

Rudy W. Juul, President
Board of Commissioners

AER:dcb

cc Port Commission
Senator Bill Bradbury
Representative Jim Whitty
Representative-Elect Veral Tarno
Coos County Board of Commissioners
Coos County Economic Development Department
City of Coos Bay
City of North Bend
Bay Area Chamber of Commerce
Troy Reinhart, Douglas Timber Operators

OREGON INTERNATIONAL PORT OF COOS BAY
Front & Market Streets • Coos Bay, Oregon 97420 • Telephone: 503/267-7678 • Fax: 503/269-1475

C 4557

December 11, 1992

Mr. Mel Chase, Manager
Coos Bay District
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

Dear Mr. Chase:

The Oregon International Port of Coos Bay has reviewed the draft Resource Management Plan and Environmental Impact Statement for the Coos Bay District, and offers the following comments:

1. The Port is pleased that several alternatives (A, B, C, and the Preferred Alternative) would allow for the appropriate exchange of BLM-administered lands on the North Spit of Coos Bay. Because the Coos Bay/North Bend area severely lacks suitable flat land for industrial development, these North Spit lands are crucial for the future of the area's industrial economy. Further, the lands proposed for possible exchange are already properly zoned for development in the Coos County Comprehensive Plan and the Coos Bay Estuary Management Plan, both of which are local plans that have been acknowledged by the State of Oregon to conform with the Federal Coastal Zone Management Act.

2. The Port agrees with BLM's impact analysis (page 4-127) that the Preferred Alternative (as well as Alternatives C, D, and E) would result in "reduced timber harvest in the district which would adversely affect all sectors of the local economy, most particularly the lumber and wood products industry." The impact would be serious even if BLM were the only federal timber management agency proposing harvest reductions, but that is far from the case. Instead, public lands are being withdrawn from harvest at an alarming rate. The net effect, besides additional mill closures and job losses, will be even more increased pressure on private lands to make up the difference in market demand.

   Reducing the available supply of timber in one region does not occur in a vacuum or without national and international repercussions. The United States and world market economies will likely react, first, by substituting other timber where possible, and second by bidding up the price of timber. In the first example, that will inflate lumber prices exacerbating the demand for wood products from foreign countries, perhaps even including the Amazon and other rain forests that already suffer from poor (or no) management. It seems highly hypocritical for any agency or group to promote harvest reductions in the United States that will almost certainly result in increased harvest (beyond sustained-yield levels) in rain forests where no meaningful reforestation will occur. In the second instance, housing prices will dramatically increase, adding even more American citizens to the list of those who cannot afford housing.

STATE OF OREGON REPRESENTATIVE OFFICES

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City of Myrtle Point
In the Heart of the Myrtlewoods

424 Fifth Street
Myrtle Point, OR 974
(503) 572-2626

December 15, 1992

BLM District Office
1300 Airport Lane
North Bend, Oregon 97459

Dear Mr. Chase:

The Myrtle Point City Council met on December 7, 1992 and were presented with information from the Bureau of Land Management (BLM) concerning the Draft Resource Management Plan.

The City Council was extremely concerned with the proposed reduction of timber sales on O & C lands. The draft plan, as prepared, will drastically affect Coos County and the community of Myrtle Point. The proposed alternative not only will result in the loss of jobs but also will result in the loss of millions of County O & C dollars. (Possibly repeating the near financial disaster which created the need for the O & C Sustained Yield Act of 1937.)

Through the efforts of O & C Counties and BLM the O & C timberlands have been an example of sustained yield at work. The efforts have improved the timber production on the lands. The success of the sustained yield is a direct result of aggressive forest management of water, wildlife and timber resources.

The BLM's Preferred Alternative is a substanial deviation from current forest management practices by creating preserves, concentrating harvests to a fraction of the land made available by the 1937 O & C Sustained Yield Act. The philosophy of preserves is outdated and departs from the concept that forest management decisions are best made across the whole landscape to reduce impacts on any specific area.

The Myrtle Point City Council, through the passage of the attached resolution, urges that O & C lands should be managed closer to the original intent of the 1937 Act.

If you have any questions, or need any further information please contact me.

Sincerely,

Richard Meyers
City Manager

RESOLUTION NO. 92-23A

A RESOLUTION IN SUPPORT OF CONTINUED MANAGEMENT OF O & C TIMBERLANDS.

WHEREAS, the Bureau of Land Management has requested public input on its ten-year land and resource management plan; and

WHEREAS, the health, peace and safety of the people of Coos County are affected by the alternative selected by the BLM for the management of O & C timberlands; and

WHEREAS, the natural resources provided through aggressive management of federal lands under the O & C Sustained Yield Act of 1937 has contributed to social and economic stability in 18 Western Oregon counties including Coos County; and

WHEREAS, the counties have invested more than one billion dollars to fund intensive forest management on these lands with the explicit expectation of an ongoing return on this investment; and

WHEREAS, O & C lands continue to provide a reliable employment base for many Oregon communities; and

WHEREAS, O & C lands also provide diverse and sustainable habitat for fish and wildlife, clean air and water, and outdoor recreation opportunities; and

WHEREAS, these lands should continue to provide economic stability, healthy and productive forests and reliable employment base.

NOW THEREFORE BE IT RESOLVED, that the City Council of the City of Myrtle Point, Oregon supports the continued management of these lands in accordance with the O & C Sustained Yield Act of 1937 to provide a stable and predictable level of timber harvest for Oregon communities while considering other resource values, and,

BE IT FURTHER RESOLVED, that we support the principles of multiple use for these O & C lands which include management for timber, water, recreation and wildlife, and,

BE IT FURTHER RESOLVED, that the customs and culture of the area be included in the creation any resource management plan, and

BE IT FURTHER RESOLVED, that we encourage legislation that would enact a balanced management plan into law by the Congress of the United States of America and remove management decisions from the federal court system.

Adopted this 7th day of December, 1992, by the City Council of the City of Myrtle Point.

Edward Cook, Mayor
Myrtle Point, Oregon

ATTEST

Richard Meyers
City Manager
Myrtle Point, Oregon

ASSOCIATION OF O & C COUNTIES

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December 16, 1992

Mr. Melvin E. Chase, District Manager
Bureau of Land Management
Coos Bay District Office
1300 Airport Lane
North Bend, OR 97459

Dear Mr. Chase:

We welcome this opportunity to provide written comments on the Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS) for the Coos Bay District.

Purpose of O&C Lands

By way of introduction, the Association of O&C Counties (Association) is an organization whose membership includes all 18 Oregon counties in which the 2.5 million acres of Oregon and California Railroad Revested Grants Lands are located. In order to understand the Association's point of view relative to the management of resources on these lands, it is necessary to briefly recount the unique history of these lands, which were set aside long ago for the purpose of providing local community stability through the dominant use of these lands for timber production.

Beginning with the 1866 grant, the Revestment Act of 1916, and the 1937 O&C Organic Act through the present, these lands have been statutorily recognized as having a local purpose and they are to be managed for the stability of local communities and industries through the production of timber under the principles of sustained yield.

The 1937 Act directs the Department of the Interior to manage these unique lands under the conservation principles of sustained yield primarily for timber production and only secondarily for other, limited purposes listed in the Act. The Federal Land Policy

and Management Act of 1976 (FLPMA) specifically exempts the O&C lands from the provisions of FLPMA in the event of conflict with or inconsistency between FLPMA and the O&C Act insofar as they relate to the management of timber.

The dedication of these lands to local purposes has inspired the counties, since 1953, to forego one-third of their statutory share of receipts (50 percent instead of 75 percent) through annual riders on Department of the Interior Appropriations Acts. The counties' annual relinquishment of one-third of their statutory entitlement has been based on the understanding that the foregone county monies would be appropriated for protection and intensified sustained yield timber production. This money was "invested" by the counties with the expectation that they would receive a "return" on their investment through increased harvest levels in future decades. Nearly one billion dollars of otherwise county revenue has been so appropriated since 1953. The federal government has, until recently, lived up to its part of the bargain, too. The result is that a highly productive, well-balanced forest has evolved that is second to none in the world. It has been estimated by the BLM that there was approximately 50 billion board feet of merchantable timber on these lands in 1937. The latest inventory stands at 49.7 billion board feet. With over 40 billion harvested since 1937, surely something has been done right and the concept of sustained yield timber production has been proven.

Judicial Affirmation of O&C Act

Recent judicial opinions have affirmed that the O&C lands are reserved for purposes different from other federal lands. Other federal lands are typically managed to accomplish national objectives. The O&C lands are to be managed for the benefit of the local economy and to promote community stability. Timber production is the dominant use for these lands.

This policy has been clearly and unmistakably confirmed by the U.S. Ninth Circuit Court of Appeals in the 1990 case, Headwaters vs. BLM. In that case, the Ninth Circuit stated, "...Nowhere does the legislative history [of the O&C lands] suggest that wildlife habitat conservation or conservation of old growth forest is a goal on a par with timber production, or indeed that it is a goal of the O&C Act at all."

This position has been clearly stated in previous cases by the Ninth Circuit. In 1987, the Court acknowledged "...the primary use of the revested lands is for timber production...." O'Neal vs. U.S.

This ruling was consistent with the prior statement of the Court that "[i]n 1937 Congress passed the O&C Sustained Yield Act...which provided that most of the O&C lands would henceforth

be managed for sustained yield timber production." Skoko vs. Andrus.

In 1986, the Solicitor of the Department of the Interior rendered an opinion dealing with the O&C lands, in which he said, in part:

> "The freedom conferred to the Secretary [of the Interior]...is limited in one important way on certain federally-owned timberlands in western Oregon. There, any decision about managing northern spotted owls must be measured against the dominant use of timber production.
>
> "Plainly, on lands subject to its provisions, the O&C Act creates a dominant use--the production of timber on a sustained yield basis.
>
> "In deciding whether to establish a program for managing northern spotted owls on O&C timberlands, the Secretary, then, must first decide if it is possible to do so without creating a conflict with the dominant use there--timber production... If a program for managing northern spotted owls conflicts with producing timber on a sustained basis in O&C timberlands, the O&C Act will preclude the application to that realty. As the O&C Act instructs, on revested or reconveyed realty classified as timberlands in western Oregon, timber production is dominant." [Emphasis added.]

The Association is concerned that the DRMP/EIS contains no mention of this critically important history, nor makes any reference to the important judicial decisions which have been handed down relative to the O&C lands over the years. In fact, except for a listing in Appendix 1-A, the document all but ignores the O&C Act.

Social and Economic Consequences

The Association is also very apprehensive about severe economic and social consequences which would follow from a decision by the Bureau to manage the O&C lands as set forth in the Preferred Alternative (PA) in the DRMP/EIS. Many of Oregon's communities will be devastated if the Allowable Sales Quantity (ASQ) on the O&C lands in your district is reduced as proposed in the Preferred Alternative. Thousands of individuals will be thrown out of work

and the ripple effect throughout these timber communities will be devastating. In addition, the revenues flowing to the 18 counties from sales of timber off these lands will be correspondingly reduced. At the very time when local governments need additional funds to deal with the tremendous human costs of reduced O&C harvests, those governments will have fewer funds available to meet the needs. This severe problem would coincide with rising adverse impacts from the recent property tax limitation provision of the Oregon constitution, which limits the ability of local government to raise revenues to replace lost O&C monies or other decreasing monies. (This results from the fact that many O&C counties receive a very small portion of the $10 per thousand dollars of assessed valuation available to all local governments because of their lesser dependence on property taxes historically.) This Association and the Association of Oregon Counties commissioned an analysis of the social impacts of timber harvest reductions in the O&C counties with Dr. Robert Lee of the University of Washington. (Lee, L. G., P. Summers, H. Birss, C. Nelson and J. Zientek, Social Impacts of Alternative Timber Harvest Reductions in the O&C Counties. University of Washington, 1991). Among Dr. Lee's many important findings were that the incidence of spouse or child abuse, alcohol or drug abuse and other manifestations of social stress increase in response to rising unemployment, at the same time that local providers of services in these areas find themselves with diminished capacity to respond to those in need.

Dr. Lee's findings also discuss the impact of unemployment on individuals and suggested that the quick fix of timber worker retraining advocated by many may be easier said than done. He stated, "People experiencing high levels of stress often suffer from impairment of the cognitive functioning required for retraining or making other changes in their lives. Extreme work-related stresses can produce symptoms resembling the 'delayed stress syndrome' from which so many Vietnam veterans suffered. When coupled with stress originating from the blaming of loggers and other wood products workers, loss of way of life, and betrayal by government, many individuals are likely to suffer from both a loss of self-esteem and an impaired capacity to recover. Their capacity to make rational decisions about retraining, moving, or shifting occupations can be substantially reduced by such an accumulation of stress."

But, assuming that the individual displaced worker is able to work his way through and resolve these problems, there are still severe difficulties in viewing "retraining" as the complete solution to the social and economic problems likely to result from the large reduction in the ASQ as proposed in the Preferred Alternative. The facts concerning retraining contained herein are discussed more fully in a memorandum filed with the Endangered Species Committee (ESC) on February 18, 1992, titled "O&C Counties' Post-Hearing Memorandum in Support of Exemption Requested by BLM." Affidavits and exhibits in the record of the ESC hearings

substantiate the points raised in these comments. The BLM is already in possession of these supporting materials.

Of the thousands of timber and wood products workers who have lost their jobs in the last three years, most have been unable or unwilling to obtain job retraining. There are insufficient funds to serve those currently unemployed and additional funding in significant amounts is unlikely to serve a flood of newly unemployed.

The typical worker who actually is able to enter a job retraining program is male, 43 years of age, has been in the wood products industry for over 16 years, and has a 12th grade education. Thirteen percent of those who entered such programs are high school dropouts and another 12 percent are over 55 years of age. Many workers laid off from the timber and wood products industry have spent their working careers in that industry and have lived their entire lives in communities where the wood products industry is economically and culturally dominant.

Of those who do make their way into job retraining programs, the placement success has been relatively good. Any increases in unemployment, however, will result in a reduced placement rate. One expert has stated, "Dislocated workers are already being absorbed into the job market at nearly the maximum rate possible--the job market is already saturated with dislocated workers, whether retrained or not."

In addition, for those who make it into retraining, then complete retraining, and are placed, there is almost always a substantial reduction in wages from those earned in the wood products industry. In Lane County, the average is a $2.00 per hour reduction. In Douglas County, the average is a $3.50 per hour reduction. In Coos County, the average wage reduction for those lucky few who make it into and out of retraining is $4.64 per hour.

The costs of retraining are substantial. The most obvious costs are the direct retraining costs. These range from $3,500 to $5,449 per worker trained. Other costs include PELL grants, which run from a few hundred dollars to $2,600 per worker trained, and unemployment benefits, which normally are $259 per week for anywhere from 10 weeks to 39 weeks, to exhaustion of benefits. In Coos County, the average time on unemployment is 32 weeks; that is expected to increase to 48 weeks in 1992.

From the foregoing, the following conclusions are inescapable:

- Funding is adequate to provide retraining to only one-third to one-half of those currently unemployed.
- Substantially increased funding is not available.
- For those who are served, the job placement rate may decline in the future.

- Any increase in unemployment will be met with lower retraining success rates.
- Those who are placed in new jobs suffer substantial wage reductions.
- Job retraining is expensive.

These are very real and severe economic and social consequences and all effort should be made to mitigate against these impacts.

Recommendation for Proposed Action

The O&C Act, its history, and the judicial decisions which have been rendered relative to it and the impact on local government revenue and services, lead us to the conclusion that the most appropriate alternative for the Bureau to select for the Proposed Action is Alternative B. Essentially, this would continue the current land use allocations coupled with the advantage of an updated timber inventory. We urge you to give Alternative B careful consideration when deciding upon the Proposed Action for your Resource Management Plan.

However, if it is determined that compliance with the Endangered Species Act (ESA) precludes the adoption of Alternative B, the Association can reluctantly accept the Preferred Alternative on the condition that certain changes are made to provide for an increase in the ASQ. We condition our support of the Preferred Alternative because of our view that the Preferred Alternative goes beyond the requirements of the ESA and represents an exercise of discretion by the BLM that is not allowed by the O&C Act. It is our firmly held position that the O&C Act requires that the timber harvest be set at the highest sustainable level to meet the statutory requirement for community stability and that deviations from such harvest level can only occur in response to other mandatory federal laws such as the ESA. While we are not opposed to management for non-timber values, such management should occur within this framework. As it stands, the Preferred Alternative does not appear to recognize the constraints of the O&C Act, nor does it appear to solely couple reductions in harvest levels with the requirements of the ESA.

All this having been said, it may be that the philosophy of the Preferred Alternative, "ecosystem management," can still be utilized within the proper statutory framework. This would depend in large part on whether harvest levels under the Preferred Alternative could be increased to bring them more closely in compliance with the harvest levels required by he community stability requirements of the O&C Act, while not exceeding restrictions imposed by the ESA. This would require a very careful balancing of obligations by the BLM.

Opportunities to Increase Allowable Sale Quantity

Based upon our review of the information set forth in the DRMP/EIS, we believe strongly that several opportunities do exist for moderate increases in the ASQ to the point where the required balance might be achieved. These opportunities relate to the allocation and management of riparian areas, the choice of minimum harvest age, adoption of departure from the nondeclining harvest level, and updating the timber inventory. The increase in ASQ to be expected from these opportunities should serve to lessen the impact on timber dependent communities of the precipitous drop in ASQ proposed in the Preferred Alternative. The increases, if sufficient, would also serve to insure that management is in compliance with the O&C Act. These opportunities, and projected increase in ASQ, can become reality within the planning guidance through modest changes in such guidance without upsetting the basic concept around which the Preferred Alternative was designed. We have requested the State Director to make such changes to the State Director's Guidance. Each of the opportunities will be discussed separately.

Riparian Management Areas (RMA)

We see an opportunity for change within the Preferred Alternative guidance for riparian area protection to provide for an increase in the ASQ. Under Preferred Alternative guidance applicable to riparian areas, some 29,100 acres have been allocated to RMAs and thereby segregated from acreage available for programmed timber harvest on a sustained yield basis. This large acreage dedicated to riparian area protection amounts to a near tripling of the acreage allocated for similar purposes under the current plan. According to the DRMP/EIS, all alternatives meet the minimum legal requirements for the protection of riparian areas, thus as few as 13,700 acres of RMAs as designated in Alternative A meet legal mandates. This being the case, it appears that the allocation of 29,100 acres to RMAs, as proposed in the Preferred Alternative, amounts to significant overprotection of one resource to the detriment of another. We suggest that a more reasonable and balanced approach would be to substitute Alternative A guidance for Preferred Alternative guidance with regard to RMA allocations. If Alternative A guidance were used, some 15,400 acres of forest land could be restored to the sustained yield timber production base. According to the sensitivity analysis addressing different levels of riparian protection, the ASQ could be increased by 28.4 MMBF by this action. We have recommended to the State Director that Alternative A guidance for RMAs be adopted for the proposed Resource Management Plans (RMP).

Agency Comment Letters

We have also suggested to the State Director that guidance with respect to programmed timber harvest activities within the RMAs be re-examined. As we understand the guidance, the only timber harvest permitted within RMAs is harvest of trees in support of resources other than timber and for limited crossings of RMAs for logging roads and yarding roads. In other words, acreage within RMAs is not included in the base acreage used to compute the ASQ, and a programmed timber harvest will not be taken from RMAs. We wish to point out that the Oregon Forest Practice Act Rules provide for growing and harvesting timber within riparian management areas to the extent that certain standards of protection are met. The Oregon Forest Practice Act Rules contain very specific guidelines for the numbers and sizes of conifer trees to be left per 1000 feet of stream length for riparian management areas of varying width. While full sustained yield production is not possible under the state rules, at least some timber production is permitted. If silvicultural systems applicable to the Old Growth Emphasis Areas (OGEA) and/or Connectivity Areas (CA) were applied to the RMAs, we estimate that the ASQ could be increased by an estimated 1.6 MMBF. As we understand, two key building blocks of the conceptual framework around which the Preferred Alternative was developed were that "resource use and protection can occur in harmony" and that "stewardship is essential to long term ecological health and social well being." You have implemented these concepts in your management program for both the OGEAs and CAs and have provided for the programmed harvest of timber on a sustained yield basis from such areas. If the concepts of management noted above are appropriate for OGEAs and CAs, then certainly the concepts are also appropriate for management of RMAs, including the programmed harvest of timber on a sustained yield basis. Therefore, we have recommended to the State Director that the guidance with regard to RMAs be amended to provide for programmed timber harvest from such areas subject to the rules for live tree retention set forth in the Oregon Forest Practice Act Rules.

In summary, if Alternative A guidance for RMA were substituted for Preferred Alternative guidance to allow a reduction in acreage allocated to RMAs, and if such guidance were also amended to permit a programmed timber harvest from RMAs, such changes should result in an aggregate increase in the ASQ of an estimated 30.0 MMBF.

Minimum Harvest Age (MHA)

The concept of minimum harvest age was adopted in planning for the 1980's and its use has been continued in planning for the 1990's. The only issue is the youngest age at which timber will be subjected to regeneration harvest. From our examination of the DRMP/EIS, it appears that the MHA was set at 60 years. However, a sensitivity analysis carried out shows that an increase in ASQ could be realized if the MHA constraint was released. This increase amounts to 12.8 MMBF. The data in the DRMP/EIS does not

indicate to what age the MHA would drop if unconstrained. If releasing the constraints on MHA would require regeneration harvest of timber less than 40 years old, we recommend that the MHA be constrained at 40 years. Other options to consider would be to set MHA at one age class lower than the MHA used in the Preferred Alternative or at the age of first merchantability.

We have recommended to the State Director that the guidance for the Preferred Alternative be amended to include one of the MHA options described above. Such a change could add upwards of 12.8 MMBF to the ASQ and help make a most difficult timber supply situation for timber-dependent communities and industries in the Coos Bay District more tolerable.

Departure from the Nondeclining Harvest Level

Departure from the nondeclining harvest level is not something that public land managers normally decide to do but there are times and circumstances when it may be the wise thing to do. We believe that now is the time to consider departure from the nondeclining harvest level for the General Forest Management Areas (GFMA) in order to provide for a temporary increase in ASQ during the next decade.

The amount of forest land available for intensive timber production has been drastically reduced under the Preferred Alternative. Under the current plan some 80 percent of forest lands were dedicated to intensive timber management; the Preferred Alternative for the 1990's dedicates only 45 percent of the forested acres to intensive timber management--a significant reduction indeed! The current ASQ for the Coos Bay District is 254.0 MMBF; the ASQ proposed by the Preferred Alternative is 124.0 MMBF--a 51 percent reduction! Add to this scenario the reduction in timber output from the national forests in the vicinity and timber-dependent communities in southwest Oregon are faced with a dismal outlook for the future.

One way to help alleviate the situation, and to ease the impact of such a large reduction in ASQ, is to adopt departure from the nondeclining harvest level to permit a one decade increase in ASQ. Such an action would help provide for a transition from the high harvest levels of the 1980's to the reduced harvest levels projected for the future. We note that paragraph 3 of the March 15, 1983, O&C Forest Resources Policy Statement provides, as follows, for departure from the nondeclining harvest levels:

> "3. The allowable cut determination shall be based on nondeclining harvest level over time. Departure for the nondeclining harvest level may be permitted in any direction. Any increase shall not exceed the long-term

> sustained yield capacity of the land; decreases shall be economically and/or biologically justified and timed so as to minimize impacts on dependent industries and communities." (Emphasis added.)

We do not know exactly how much the ASQ might be increased by departing from the nondeclining harvest level, but suggest that a 10.4 MMBF increase might be a reasonable estimate based on a departure of ten percent. We note that the original proposed State Director Guidance required a sensitivity analysis for departure from the nondeclining harvest level for the Preferred Alternative. However, this requirement was apparently dropped because the DRMP/EIS does not indicate that such an analysis was undertaken. It should be carried out to establish the level of increased ASQ.

We have recommended to the State Director that the guidance for the Preferred Alternative be amended to require departure from the nondeclining harvest level in order to add to the ASQ and contribute to community stability.

Updating Timber Inventory

The DRMP/EIS indicates that the inventory of forest lands to estimate the volume of timber present and the age class distribution of such timber was current as of October 1, 1988, and that the timber inventory was updated current to October 1, 1990, for purposes of computing the ASQ for the various alternatives described in the DRMP/EIS. The updating was necessary to account for depletion of existing timber inventory due to timber sales and for accretion of timber inventory due to growth in order to arrive at an updated starting inventory for ASQ calculation purposes.

If the proposed RMP is implemented on October 1, 1993, as planned, five years will have passed since the timber inventory was completed. We recommend that the starting inventory for the purpose of calculating the ASQ for the proposed RMP be updated current to October 1, 1993. This should not pose a problem because of the fact that little or no timber is likely to be offered for sale during F. Y. 1993. Also, we wish to point out that for the past five years timber sale offerings have been substantially below the volume of timber that should have been offered for sale in accordance with the timber management plan approved in 1983. Therefore, it appears that accretion of timber volume will far exceed depletion of timber volume and hence the net effect should be a starting inventory volume substantially greater than the starting inventory volume used to calculate the ASQ for the various alternatives described in the DRMP/EIS. Because a higher starting inventory volume should have a positive effect on the ASQ, we emphasize the importance of updating the timber inventory to October 1, 1993.

Opportunities Summarized

This Association is very concerned about the large drop in ASQ proposed in the Preferred Alternative. We are not convinced that such a drastic reduction in ASQ is absolutely necessary. Rather, we do believe that there are ways to increase the ASQ above that proposed in the Preferred Alternative, and still adhere to the basic conceptual framework used to design the Preferred Alternative.

We believe that modifications to the Preferred Alternative with regard to riparian area protection, minimum harvest age, departure from even flow, and updating the timber inventory to October 1, 1993, could add at the least an estimated 53.2 MMBF to the ASQ. As noted above, we have requested the State Director to revise the policy to permit the changes we have recommended.

Comments on DRMP/EIS

We have attached hereto comments specific to the Coos Bay District DRMP/EIS which are included in and make a part of this response by reference.

We are grateful for the opportunity to comment on these critically important issues. The future of much of western Oregon is dependent on the decisions which you and the other districts make relative to the management of these lands for the next decade.

Sincerely,

Rocky McVay

Rocky McVay
President

Attachment

CB - 1

COMMENTS SPECIFIC TO:

COOS BAY DISTRICT DRAFT RESOURCE MANAGEMENT PLAN

AND ENVIRONMENTAL IMPACT STATEMENT - AUGUST 1992*

VOLUME I

Summary

The allowable sale quantity (ASQ) is discussed under the topic of "Timber" (page S-6) and reported as a total for the commercial forest land base. The ASQ is also reported similarly in Table S-1. We believe it would be helpful if the ASQ were reported by land allocation and by intensive management practice. For example, we understand the total ASQ to include production from the General Forest Management Areas (GFMA), the Old Growth Emphasis Areas (OGEA) and the Connectivity Areas (CA). In addition, the production from the GFMAs is made up of the base volume plus volume derived from the several intensive management practices. We suggest a tabular display be used to report the ASQ on both a cubic foot and board foot basis; we also suggest that the long term sustained yield (LTSY) be displayed in the table. See Exhibit 1 for an example of such a table.

We believe it is important to keep the ASQ segregated by land allocation because of the difference in assumptions used to compute the ASQ for such allocations. We also believe it is important to identify for each intensive management practice the ASQ contributed by such individual practices.

Chapter 1

We were disappointed that the Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS) was published for public comment without a discussion of the O&C Sustained Yield Act of 1937 and the relationship of said Act to the Federal Land Policy and Management Act of 1976 (FLPMA). The O&C Act is a unique piece of legislation which has guided the management of the O&C lands of western Oregon for over 55 years. And as you know, the O&C Act was accorded a special exemption by Sec. 701 of FLPMA insofar as the management of the timber resource is concerned. The purposes of the O&C Act and the Sec. 701 exemption are very important to this planning effort and need to be discussed in these planning documents.

*It is not our intent to make a detailed page by page review of the entire Draft Resource Management Plan and Environmental Impact Statement. Rather, we limit our comments to several specific items/concerns that we feel need to be addressed.

CB - 2

We believe this is important because the Resource Management Plan (RMP), once adopted, will become the blueprint for managing BLM lands in the Coos Bay District for the next ten years. As new managers come upon the scene, their first action will be to become intimately familiar with the RMP in order to effectively carry out their duties and responsibilities. Without some discussion of the O&C Act in the RMP, the full significance of the O&C lands and the purpose of these lands will very likely be lost. This is of serious concern to the eighteen O&C counties, particularly after having invested nearly one billion dollars of county funds in the O&C lands during the past 40 years to pay for a level of intensive management that very likely would not have been undertaken otherwise.

We urge you to include a discussion of the O&C Act and its purpose in the plan. We suggest that you review some of the mailers published early on in this planning effort which discussed the O&C Act and the relationship to FLPMA. In our opinion, Chapter 1 seems to be the appropriate place to include such a discussion.

Chapter 2

Included in Chapter 2 is a section entitled Cost of Management (page 2-53) which addresses in a very general way the costs likely to be associated with implementing the various alternatives. A distinction is drawn between "traditional timber management" and "non-traditional timber management" with the Preferred Alternative considered as non-traditional timber management. The discussion points out that costs of traditional timber management "would be consistent with past management costs for this purpose" but that "costs of non-traditional timber management as proposed in the Preferred Alternative....would be much higher per unit of timber sold than for the other alternatives." In fact, the document states that "preliminary cost estimates indicate that these costs, in the first decade, would be about 2.8 times traditional costs per unit output."

Unfortunately, the discussion of the cost of implementing the Preferred Alternative stops at this point and the reviewer is left to ponder the question of increased costs and the budget needed to implement the plan. We feel the abbreviated discussion of costs, particularly when costs of the Preferred Alternative are projected to be so much higher, is a serious oversight in the DRMP/EIS. We recommend that you remedy the oversight in the proposed RMP/EIS with a full and complete discussion of the costs of management for the Proposed Action together with an estimate of the budget requirements needed to implement the plan.

Chapter 3

No comment.

CB - 3

Chapter 4

In the section on "Effects on Timber Resources" (page 4-101) you discuss the significance of acres of land available for timber production. You point out that "impacts to the ASQ are usually associated with the reduction of timber production land for the enhancement or protection of other resource values such as special areas, recreation and wildlife." The discussion then highlights three resources, namely, minerals, recreation and special areas with the general conclusion that none of these resources are expected to have a significant impact on timber production. What is not discussed are the impacts to timber production attributable to the allocation of land for the enhancement or protection of the other resources such as water resources, vegetation, biological diversity, riparian zones, wildlife habitat, fish, special status species, cultural resources, visual resources, wild and scenic rivers and rural interface areas. Some of the listed resources will have negligible effects on timber production but several will have very substantial effects. It is our opinion that you must address the effects of the various resources on timber production in order to meet the requirements of the National Environmental Policy Act just as you must address the effects of timber harvest on the variety of other resources being managed.

In addition to a discussion of the effects of the various resources on timber production, we recommend the inclusion in the proposed RMP/FEIS of a table showing for the Proposed Action the acreage of Suitable Commercial Forest Land (SCFL) allocated for enhancement and/or protection of each of the several resources together with the reduction in ASQ attributable thereto. It seems that the starting point should be Alternative B (acres of SCFL and ASQ) with incremental reductions of SCFL and ASQ until the level of the Proposed Action is reached. We chose Alternative B as the base for comparison because Alternative B is the alternative which most closely reflects compliance with the purpose and intent of the O&C Act. See Exhibit 2 for an example of a table to array the data. We make this request because we believe that decision makers and the public need to know with some precision the amount of timber production which will be forfeited in the enhancement and protection of resources other than timber.

Table 4-T-1 shows the ASQ for the several alternatives for five different time periods. We direct your attention to our opening discussion in the Summary. We suggest that Table 4-T-1 be restructured to permit detailing the ASQ by land allocation, i.e., GFMAs, OGEAs and CAs, and that for the GFMAs, the ASQ be disaggregated to the intensive management practices. We also suggest that the long term sustained yield (LTSY) be displayed for each alternative. The reason we ask for the LTSY is because consideration of a departure from the nondeclining harvest level is constrained by the long term sustained yield capacity of the land.

Chapter 5

No comment.

Chapter 6

No comment.

VOLUME II

Appendix I

No comment.

Appendix II

We suggest you include in Appendix II-D a description of the procedures used to compute the allowable sale quantity for the Preferred Alternative (and/or Proposed Action). We believe this is necessary in order to describe how the following components were handled in computing the allowable sale quantity: (1) retention of a portion of the stand at harvest; (2) development of stands with multiple canopy layers; (3) maintenance of wider tree spacing by means of a series of density management cuttings; (4) management on longer rotations; and (5) expected timber yields from stands so managed.

Since the current timber volume for the Coos Bay District is based on a 1988 timber inventory, we suggest you also include in Appendix II-D a description of the procedures used to update the timber inventory to the present time and a tabular display of the results of the update.

Appendix III

No comment.

Appendix IV

We suggest you include a sensitivity analysis in Appendix IV-A to determine for the Preferred Alternative (and/or Proposed Action) the ASQ for a departure of ten percent above the nondeclining harvest level, provided that the resulting increase in ASQ does not exceed the long term sustained yield capacity. We suggest you also determine the highest level of departure permissible during the first decade which is within the LTSY constraint.

Exhibit 1
Allowable Sale Quantity by Land Allocation and Practice

Land Allocation/Practice		ALTERNATIVE NA	A	B	C	D	E	PA*
GFMA								
Base	MMCF							
	MMBF							
PCT	MMCF							
	MMBF							
Fert.	MMCF							
	MMBF							
Stand Con.	MMCF							
	MMBF							
Genetics	MMCF							
	MMBF							
OGEA	MMCF							
	MMBF							
CA	MMCF							
	MMBF							
TOTAL	MMCF							
	MMBF							
LTSY	MMCF							
	MMBF							

*Preferred Alternative (and/or Proposed Action)

Exhibit 2

Effects on Timber Production Resulting From

Enhancement of Other Uses

(Alternative B Compared to Proposed Action)

	ACRES (SCFL)*	ASQ MMCF	MMBF
Alternative B (Baseline)	241,800	41.9	267.0
Less:			
Air			
Soils			
Water Resources			
Biological Diversity			
Vegetation			
Riparian Zones			
Wildlife Habitat			
Fish			
Special Status Species			
Special Areas			
Cultural Resources			
Visual Resources			
W&S Rivers			
Recreation			
Energy & Minerals			
Rural Interface Areas			
Total Reduction			
Proposed Action			

*Available for intensive management

1

COMMENTS SPECIFIC TO:

EXECUTIVE SUMMARY-WESTERN OREGON

DRAFT RESOURCE MANAGEMENT PLANS/

ENVIRONMENTAL IMPACT STATEMENTS

This Association is delighted to see an Executive Summary for the draft Resource Management Plans/Environmental Impact Statements (DRMP/EIS) for the six planning areas of western Oregon. The Executive Summary gives a good overview of the draft plans and permits the reader to develop a better understanding of such plans on a region-wide basis. The Executive Summary helps to sharpen the focus of the more significant elements of the individual plans. Though generally pleased with the summary and the presentation of data, nevertheless, we have several comments for your consideration which we think will improve the Executive Summary for the Resource Management Plans (RMP) when they are finalized next year.

Goals and Objectives for Alternatives

We suggest the goals and objectives common to all alternatives be included in the Executive Summary along with the goals and objectives for the specific alternatives. We suggest this because in many respects the goals and objectives for specific alternatives are incomplete without reference to the common goals. Guidance for riparian management areas is a case in point. All alternatives require legally-mandated protection for riparian areas. The differences between alternatives only become apparent by referring to the specific guidelines for riparian areas set forth in the goals and objectives common to all alternatives. Understanding of a specific alternative requires an understanding of the goals and objectives common to all alternatives--hence, the need to include both specific guidelines and the common guidelines in the document.

Sensitivity Analysis

Table 4 displays the results of selected sensitivity analyses for various alternatives. The text merely mentions the table without elaboration. We suggest the text include a brief discussion of the sensitivity analysis process to help readers understand the nature of such analyses and the implications thereof.

We note that Table 4 does not include the sensitivity analyses results for unconstrained minimum harvest age. We believe this is an important analyses because it highlights an opportunity to increase the allowable sale quantity. We suggest the results of the analyses be included in Table 4.

Appendix HH

We call to your attention an apparent error for the change in ASQ associated with the sensitivity analysis for "minimum legal riparian protection." The table shows a change of +4.0 MMCF. A summation of the individual draft plans indicates that the change is actually +7.7 MMCF.

We note that at one time proposed State Director Guidance required that a sensitivity analysis examining departure from the nondeclining harvest level was to be carried out for the Preferred Alternative. From our review of the DRMP/EISs we did not find that the analysis had been done for any of the planning areas and assume that the requirement was dropped. We suggest this analysis be carried out and reported in all planning documents.

Socioeconomic Conditions

We recommend that the section on Socioeconomic Conditions be expanded in order to elaborate on the predicted adverse impacts likely to occur in some timber-dependent communities of western Oregon as a direct result of reduced timber harvest levels proposed in the Preferred Alternative. You have done a good job of assessing and reporting the effects of the planned action on natural resources--you need to do an equally good job on assessing and reporting the effects on the human race.

Cost of Management

A very important topic has been omitted from the Executive Summary--that topic is cost of management; we urge that the topic be addressed in the Executive Summary for the RMPs. The cost of management as translated into the budget requirements needed to carry out the proposed program is a major consideration in deciding whether the proposed program is achievable. Unfortunately, the various DRMP/EISs are also weak, if not altogether lacking, in a comprehensive discussion of budget implications for the Preferred Alternative.

Another factor to consider is the effect new timber harvest requirements and new silvicultural prescriptions are likely to have on logging costs. We note in several of the DRMP/EISs that the unit cost to BLM of carrying out forest management activities may be as much as 2 to 5 times the traditional cost per unit of output. Will timber purchasers be faced with similar increases in logging costs and, if so, what effect will this have on stumpage values? The cost of management from the standpoint of both BLM and the timber industry, and the effects of such costs on timber receipts, need to be addressed in some detail in the proposed RMPs and summarized in the Executive Summary. At a minimum, we suggest that you prepare budget estimates for the Proposed Action together with comparisons to the current program.

Allowable Sale Quantity (ASQ)

A helpful addition to the Executive Summary would be a table which displays the Allowable Sale Quantity by planning area. Timber production is a key element of planning for the 1990's and many readers will want to know the ASQ by planning area. The table should also display the ASQ for each category of land use allocation, i.e., General Forest Management Areas (GFMA), Old Growth Emphasis Areas (OGEA), and Connectivity Areas (CA), and that for the GFMAs, the ASQ disaggregated to the intensive management practices. Also, it would be helpful if both cubic foot and board foot volumes were shown for each category. We note that three of the seven tables in the Executive Summary detail information by planning area.

Long Term Sustained Yield

The Executive Summary should include a table displaying the long term sustained yield for each planning area.

Effects on Timber Resources

Chapter 4 of the various DRMP/EISs details the environmental consequences of the several alternatives and describes such consequences in terms of "effects" on the individual resources. In our opinion, the effects analysis with respect to the timber resource was inadequate and/or incomplete in three of the six planning areas. Only the Medford and Coos Bay Districts and the Klamath Falls Resource Area approached the analysis with the objective of quantifying in terms of ASQ foregone the impact other resources have on timber production. What is needed in the proposed RMP/EIS is a discussion, resource by resource, of the likely effects that enhancement or protection of each such resource will have on the timber resource together with the estimated reduction in the ASQ. Judging from our review of the DRMP/EISs, it appears that State Director Guidance will be needed to assure a uniform approach to the analysis process.

With regard to the Executive Summary, we recommend the inclusion of a table showing for the Proposed Action the acreage of suitable commercial forest land (SCFL) allocated for enhancement and/or protection of the several resources together with the reduction in ASQ attributable thereto. Alternative B should be the starting point (acres of SCFL and ASQ) with incremental reductions of SCFL and ASQ until the level of the Proposed Action is reached. We chose Alternative B as the base for comparison because Alternative B is the alternative which most closely reflects compliance with the purpose and intent of the O&C Act. Exhibit 1 is an example of a table to array the data.

We request that this information be included in the Executive Summary because we believe that decision makers and the public need to know with some precision the amount of timber production which will be forfeited in the enhancement and protection of resources other than timber. And in the likelihood that the ultimate solution to the resource allocation question will be a Congressional solution, the information in this table would be of great value in quantifying resource trade-offs.

Exhibit 1

Effects on Timber Production Resulting From

Enhancement of Other Uses

(Alternative B Compared to Proposed Action)

		ASQ	
	ACRES (SCFL)*	MMCF	MMBF
Alternative B (Baseline)	1,615,000	225.0	1,434.0
Less:			
Air			
Soils			
Water Resources			
Biological Diversity			
Vegetation			
Riparian Zones			
Wildlife Habitat			
Fish			
Special Status Species			
Special Areas			
Cultural Resources			
Visual Resources			
W&S Rivers			
Recreation			
Energy & Minerals			
Rural Interface Areas			
Total Reduction (Acres/ASQ)			
Proposed Action			

*Available for intensive management

ELKTON PUBLIC SCHOOLS
District No. 34 Elkton, Oregon

Elkton High School
Charles "Steve" Farrell, Supt./Principal
P.O. Box 390
Elkton, OR 97436
(503) 584-2228 • Fax 584-2227

Elkton Elementary School
Bill Gehling, Principal
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(503) 584-2115

Elkton School Dist. Business Office
Julia Swearingen, Fiscal Officer
P.O. Box 390
Elkton, OR 97436
(503) 584-2228

December 17, 1992

Mr. Mel Chase
District Manager
Bureau of Land Management
1300 Airport Lane
North Bend Oregon 97459

Dear Mr. Chase:

Please accept this letter as Elkton School District's Board of Director's comments on the BLM draft Resource Management Plan and Environmental Impact Statement. We are elected members of the community and are charged with providing the best possible education for the children of our district. A reduction in Federal Forest Fees would be a further reduction in revenue for our district. In fact, the revenues we received in this fund are already down approximately $20,000 over the prior two years, i.e., $70,000 from $90,000. This does not reflect the increase in unemployment or the decline in living-standards experienced by some of our patrons who have been employed in the wood-products industry.

Our school district is already deeply affected by Ballot Measure 5 and expects to be impacted negatively even more over the next few years. Due to reductions in revenue, our district has eliminated music for grades K-12, one full time teaching position, and two instructional assistants.

Finally, we live in a rural county and are dependent upon services provided through our county. This summer, the county road department helped our district by resurfacing the grade school parking area and bus lane and charged us for only materials. Our high school students almost daily use resources from the Douglas County Library through interlibrary loan. Three of our bus routes are almost solely operated on county roads and we need these maintained for safe transportation of our students.

We, the Board of Directors of Elkton School District request that this plan be given reconsideration. The plan, as currently proposed, will have a devastating impact on our school district.

Sincerely yours,

Jeff Smith
Board Chairman
P.O. Box 390
Elkton, Oregon 97436

ELKTON SCHOOL DISTRICT No. 34 IS AN EQUAL OPPORTUNITY EMPLOYER

BOARD OF COMMISSIONERS
DOUG ROBERTSON DORIS WADSWORTH JOYCE MORGAN
Courthouse • Roseburg, Oregon 97470 • (503) 440-4201

December 18, 1992

Mel Chase
District Manager
Bureau of Land Management
Coos Bay District Office
1300 Airport Lane
North Bend, OR 97459

RE: Draft Coos Bay District Resource Management Plan

Dear Mr. Chase:

The Board of Commissioners of Douglas County would like to take this opportunity to express our appreciation for the opportunity to review and comment upon your "draft" Resource Management Plan for the Coos Bay District of the Bureau of Land Management. We encourage you to continue to seek and incorporate public review and comment throughout the planning process.

We have reviewed the draft Resource Management Plan and have developed the enclosed comments and questions. In addition we have participated with the Association of O & C Counties in a coordinated review by all of the O & C Counties. We adopt the coordinated comments of the Association of O & C Counties as part of our comments as well.

The Board of County Commissioners is committed to working with the Bureau of Land Management in the development of a final resource management plan that supports the local communities and concurrently provides for the long term sustained yield of these lands. We will continue to submit comments and participate as you develop the final plan.

Respectfully submitted
THE BOARD OF COUNTY COMMISSIONERS
DOUGLAS COUNTY, OREGON

DORIS WADSWORTH, CHAIR

DOUG ROBERTSON, COMMISSIONER

JOYCE MORGAN, COMMISSIONER

COMMENTS OF THE

BOARD OF COMMISSIONERS
OF
DOUGLAS COUNTY

AS TO THE

COOS BAY DISTRICT
BUREAU OF LAND MANAGEMENT'S
DRAFT RESOURCE MANAGEMENT PLAN

On behalf of the citizens of Douglas County, the Board of Commissioners of Douglas County ("Board") submits the following comments on the draft Resource Management Plan for the Coos Bay District of the Bureau of Land Management ("BLM"). Douglas County appreciates this opportunity to offer comments and to continue its participation in the BLM's planning process.

I.
INTRODUCTION

The BLM manages several different categories of land[1] within Douglas County, each has its own management direction and impact upon the county. The economic base of Douglas County is dependent upon these forest lands. In addition the local governments are heavily dependent upon the receipts from these lands to operate local government.[2]

With approximately 51% of the land base of Douglas County within federal ownership and over 64% of the County's operating income derived from federal lands the County, out of necessity, is very concerned over the management decisions made relative to the BLM managed lands.

The dependence upon timber receipts is clearly illustrated by comparing the funding for county government derived from federal timber receipts as opposed to the funding derived from local taxes. During 1991 the county received $50,182,067 in federal timber receipts, of which $25,858,768 was derived from the O & C lands alone. In contrast the local property taxes provided $2,959,168 to run county government during this same time period.

While historically the county had the option of raising taxes to offset a reduced timber harvest, that option is no longer available. With the adoption of the constitutional cap on local property tax (Measure 5), it is legally impossible for Douglas County to increase its tax base.[3] Therefore any reduction in timber receipts to the County will be particularly hard felt.

In addition since 30% of the property tax roll valuation is directly linked to the forest products industry (ie. sawmills), if these operations are shut down or curtailed the impacts upon the county government will be increased far beyond the loss in timber receipts.

Recently several analysis have been conducted as to the effect of declining timber harvests on Douglas County, including future economic development as well as social impacts. These reports indicate major economic and social problems for Douglas County with little opportunity to mitigate.

In the recent "Assessment of Economic Strengths, Weakness, Opportunities, and Threats (SWOTS) analysis for the south county, ECO Northwest found that "Southern Douglas County does not possess, and does not have ready access to, some key ingredients necessary for future economic growth." (P.7)

The analysis also noted that "(t)he decline in timber industry employment, payroll, and tax payments will continue to tear at the economic, social and political fabric of the community" and that "(t)he past decline in timber industry employment and payroll and uncertainty about future declines, may hamper the community's willingness to invest in its future, may generate additional social problems, such as domestic violence, and may increase the need for social services" (p. 11)

The results of the ECO Northwest report for Southern Douglas County was mirrored in the analysis of Barney & Worth entitled "Douglas County Task Force, Final Report, Douglas County Strategic

[1]. Revested Oregon & California Railroad lands, Revested Coos Bay Wagon Road lands, and the Public Domain lands.

[2]. In the period of 1984-88 the O & C lands alone contributed an average of $16,772,700 annually. These receipts have increased over the last few years to where the 1987-91 average is $24,448,300 annually. The Coos Bay Wagon Road lands have also contributed substantially to local schools and government.

[3]. Measure 5 limited non-school entities to a tax rate of $10/$1000 of valuation. While Douglas County as a taxing entity is currently only at $1.10/$1000, the combined total of all taxing entities is already above the constitutional limit. There is no legal means to increase taxes to offset a reduction in BLM receipts.

Assessment Task Force on Economic Development", wherein the authors noted that "(t)he timber industry remains the chief source of economic strength and livelihood in Douglas County. Its continued health is critical to our economic future" (1990 p.2)

While county government is heavily dependent upon the timber receipts, the general economy of the county is also timber dependent. Over 70% of the economic activity within the county starts with the harvesting of timber. Considering all industry within the county, over 75% of the jobs and 85% of the payrolls are derived from the direct, indirect, and induced effects of activities of the timber and wood products sector.

Not only are the O & C lands important for the economic health of the community, they also play critical role with respect to the social health and quality of life in Douglas County. As Dr. Robert Lee stated in his report on the O & C lands, a 15 percent reduction in O & C revenue would force the affected counties to reduce essential services thus causing a substantial deterioration in the quality of life. This curtailment of county services would coincide with a period of rapid growth in the demand for services caused by increased unemployment and economic dislocation such as human services, public health care, mental health counseling and housing assistance.

Lee Hockman, Administrator of the Douglas County Department of Health and Social Services testified recently before the Endangered Species Committee that the needs for his agency's services increase in times of unemployment and that reductions in O & C revenues to the county would result in reduction or elimination of those services.

Recently Dr. John Beuter noted that "Douglas County has a timber dependent economy. It began that way, remains so today, and likely will continue to be in the future." He was correct, timber has been the mainstay and foundation of Douglas County's economy.

Similar observations were reported in the Bureau of Land Management's "Strategies for the 1990's: Timber, Tourism, and Community Economic Stability in the O & C". This study noted: "(t)he data point to a heavily timber-dependent local economy that has suffered substantially in the recession and is slow to rebuild. The dependency of this timbershed on the BLM is high, and shows signs of continuing to be so. The Roseburg timbershed is very vulnerable to any changes in the timber market." (emphasis added)

This dependence upon timber has not been an accident. It was the result of commitments made earlier in this century by Congress relative to both the Forest Service managed lands and the lands managed by the BLM.

It is within this environment and history that Douglas

County makes the following comments:

II.
Historical Framework for Management of the O & C lands.

The revested Oregon & California Railroad lands were originally part of a grant to aid in the construction of railroads from California to Portland and from Portland to Astoria and McMinnville.[4] In 1916 title to these lands was subsequently revested by Congress in an attempt to resolve a Supreme Court case concerning the Oregon & California Railroad's violation of the covenants contained in the granting acts.[6]

Prior to revestment these lands were the subject of numerous lawsuits both in federal as well as state courts. The controversy over these lands was finally resolved by Congress via the Chamberlain-Ferris Act of 1916. Under this Act the lands were revested in the United States, however, in recognition of the claims by the State of Oregon and the various affected counties[7], the Act apportioned a percentage of the proceeds from these lands to the counties and the State of Oregon.

This apportionment has at various times been singled out as a raid by the State of Oregon upon the public treasury. However this argument ignores the history of these lands. To understand their true place in Oregon's history one must remember that the granting acts originally dedicated these lands for the purpose of settlement and upbuilding the State of Oregon. The O & C lands are in essence a trust fund to compensate Oregon for the railroad's failure to properly dispose of the land and the federal government's subsequent retention of the land, thereby thwarting the purposes of the original grants

While the Oregon & California railroad grants were obviously designed to provide the financial means for building the railroad, they had the dual purpose to aid in settling the land. The O & C

4. Act of April 10, 1869 (14 STAT 239) and Act of May 4, 1870 (16 STAT 94).

5. Act of June 9, 1916 (39 STAT 218).

6. Sen. Rept. No. 494 64th Congress, 1st Session, May 18, 1916, p.41.

7. While under the control of the O & C Railroad the annual fire assessment and local taxes were not paid. The federal government recognized that these taxes and assessments were a serious encumbrance on the land, an encumbrance that would have to be paid before the lands could be sold to actual settlers.

Railroad grant expressly required the railroad to sell the grant lands to actual settlers.[8] It could not retain them or convey them to financial institutions as had earlier railroads.[9]

When the O & C Railroad failed to sell the lands to bona fide settlers the Supreme Court ruled that the failure to sell was a breach of the settlers' covenant in the grant. The Supreme Court enjoined further land sales until Congress had the opportunity to develop legislation that would accomplish the purposes of the act- sale to bona fide settlers.[10] The Supreme Court expressly noted that if Congress did not act it would remove the injunction and the District Court could proceed with disposition of the land to actual settlers. Often overlooked in the debates over the O & C lands is the fact that the Supreme Court did not rule that the federal government could retain title, in fact its ruling was designed to get the lands into the hands of bonafide settlers in fulfillment of the original Oregon and California Railroad grant.[11]

8. ". . . shall be sold by the company to actual settlers . . . " 16 STAT 94, sec. 4.

9. in the first grants to railroads there were no restrictions upon the disposition of the lands. They were given as aid to enterprises of great magnitude and uncertain success, and which might not have succeeded under a restrictive or qualified aid. However, a change of times and conditions brought a change in policy, and while there was a definite and distinct purpose to aid the building of other railroads, there was also the purpose to restrict the sale of the granted lands to actual settlers. These purposes should be kept in mind and in their proper relation and subordinates. Oregon & California Railroad et al. v. United States 35 S. Ct. Rept. 908, 917-918 (1914)

10. Given the Government's interest in the exact observance of these covenants the Court enjoined the railroad from further sales in violation of the covenants and enjoined them " . . . from any disposition of them whatever, and from cutting or authorizing the cutting or removal of any of the timber thereon until Congress shall have a reasonable opportunity to provide by legislation for their disposition in accordance with such policy as it may deem fitting under the circumstances, and at the same time to secure to the defendants all the value the granting acts conferred upon the railroads. p. 925-926.
The Court did not rule that Congress had the authority to reserve these lands, it merely stated Congress could develop new legislation for the disposal of the lands and timber.

11. The court did not rule that Congress had the authority to reserve the lands, it merely stated Congress could develop new legislation for the disposal of the lands and timber. The suit was

During the ensuing debates Congress clearly recognized that far more than a failed railroad was at issue. By failing to abide by the settlers' clause the railroad defeated one of the purposes of Congress in making such grants, namely, to give the empire a path westward and for prosperous commonwealths take the place of a wilderness. [12]

The railroad was the agent of Congress to effect the settlement of the grant lands. By refusing to sell the grant lands to actual settlers the railroad was untrue to its trust, thereby retarding the settlement and development of the State of Oregon.[13]

In as much as the original purpose of the granting acts was the welfare of the State of Oregon, Congress desired that this purpose be resumed. This original purpose could ". . . only be accomplished by devoting the grant lands or their proceeds to the original purpose of hastening the development of the State." [14]

Congress determined that " . . . Oregon should reap the full benefit originally intended to be conferred on the State by the granting acts, viz., the devotion of the lands, or the proceeds therefrom to the upbuilding of the state."[15]

However it was obvious to everyone that due to the standing timber these lands were worth far more than the $2.50 per acre mandated in the granting act. The dilemma was how to prevent speculators from acquiring the lands, thereby preventing the original goal of the grant - settlement by bona fide settlers.

Of importance to this deliberation was the fact that the Supreme Court had not ruled that Congress could retain the lands. It merely enjoined further sales until Congress developed legislation to dispose of the lands to the actual settlers contemplated in the original act. To resolve this issue Congress directed that the timber be removed and the cutover land be sold to the bona fide settlers. The proceeds were to repay the railroad, counties, and the federal government.

to enforce a continuing covenant, not a condition subsequent. Oregon California Railroad v. U.S. 35 S. Ct. Rept. 908, 920, 922 (1914)

12. Sen. Rept. 494, p. 41

13. id. 41-42

14. id. 42

15. id. 42

While the original act called for the outright liquidation of the Government's interest in the land and the timber thereon no provision was made for the administration of the land on a conservation basis. The act provided that the timber should be sold as rapidly as reasonable prices can be secured on a normal market and the cut over lands disposed of for agricultural purposes. Clearcutting was the technique of choice with no consideration for the effect on community industries. The Supreme Court concurred with this original procedure.

This policy was later found to be wasteful and destructive of the social interests of the state and nation[16]. These findings, coupled with the fact that the counties were not being fully reimbursed for the tax monies owing, resulted in the O & C Act being amended to incorporate reservation of the lands and adoption of a sustained yield program of timber management. However with this change the counties could not reap the full benefit originally intended by the granting acts. To rectify this violation of the granting act, the receipts formula was incorporated into the sustained yield program. The formula was designed to compensate the counties not only for past taxes but the loss of these lands from settlement.[17]

While one often encounters arguments that the O & C Act is a special program for the State of Oregon, history proves that it is in fact the fulfillment of the terms of the O & C Railroad grant. This unique history distinguishes the O & C lands from both the public domain lands and the forest preserves.

Unlike the public domain lands and the forest preserves, the O & C lands are not free of encumbrances. They are, in fact, analogous to a trust - a trust between the federal government and the counties within which these lands are situated. The beneficiaries of the trust are the O & C Counties with the federal government serving as the trustee.[18]

It must be remembered that these lands were dedicated to the settlement and upbuilding of the State of Oregon. The railroad company was chosen as the agent of Congress to effect the settlement of the grant lands, it was untrue to its trust.[19] The lands have always been devoted to the original purpose of the railroad grant.

To define the true relationship between the Federal Government (BLM) and O & C counties one must refer to the laws of trust, with particular reference to similar trust relationships (ie. common school fund, indian tribes and trust territories). Without going into detail, one can generally conclude that as trustee the federal government must take all steps necessary to give effect to the trust. For example, if the federal government were to dedicate these lands to purposes not contemplated in the act then it would have acted in violation of its trust duties and could be held financially accountable.

The purposes of the various O & C Acts are very clearly stated. When called upon to address the purposes of these lands the Ninth Circuit noted [20], that the O & C Acts are clear that the primary use of the lands is for timber production. The court noted the act specified that the lands " shall be managed . . . for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal (sic) of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities."

The Court went on to note that nowhere does the legislative history suggest that wildlife habitat conservation or conservation of old growth forest is a goal on a par with timber production or indeed that it is a goal of the O & C Act at all.

With out expressly stating it, the Court was reaffirming that the original purposes of the granting act to the railroad must be attained. As long as the O & C Act is followed these purposes are met.

It is within this historical framework that the RMP must be analyzed. While the public domain lands may be managed for

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16. It is important to note that this finding was made by Congress and was not an issue presented to the Supreme Court for concurrence. Retention could only be attained by compensating the counties in some manner. Clearly, in the absence of compensation litigation would have again clouded these lands.

17. House Rept. 1119, 75th Cong. 1st Session, June 28, 1937, p. 1-2.

18. A trust relationship not unlike the trust relationship between the federal government and the indian tribes or the State of Oregon and the Common School Fund.

19. Sen. Rpt. 494, 64th Cong. 1st Session (May 18, 1916) p. 42-43

20. Headwaters v. BLM, (Ninth Circuit, No. 89-35688, Sept. 10, 1990)

multiple use concepts, the O & C lands can only be managed under the concept of multiple use if such management does not reduce the receipts to the counties.[21]

The standard for management is set by the ability of the BLM to manage these lands under sustained yield principles while abiding by the other legal mandates that apply equally to federal as well as private lands.

III.
Coordination with Local Planning

The BLM planning regulations provide clear directives that the resource management plans are to be consistent with officially approved or adopted resource related plans and the policies and programs contained therein. 43 CFR 1610.3-2 In Oregon, the resource related plans and policies are found in the local comprehensive plans.

Under the planning provisions contained within the Federal Land Policy and Management Act the Secretary is:

> "to the extent consistent with the laws governing the administration of the public lands [ie. O & C Act], coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located . . . by, among other things, considering the policies of approved State and tribal land resource management programs [ie. comprehensive plans]. . . . Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act."

Since the expression of public policy and balancing of conflicting uses is the role of the comprehensive land use planning process, the BLM RMPs must be consistent with the local comprehensive plans. Either the BLM must conduct a consistency review or make a formal request to Douglas County for such review.[22]

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21. The receipts formula was designed to not only compensate the counties for the lost tax receipts but also as fulfillment of the original Railroad Grant.

22. We note that the Douglas County Planning Department has been contacted frequently by the BLM in developing this draft. However we are unable to find in the RMP any reference to the

III.
Oregon Forest Practices Act

The Oregon Forest Practices Act ("OFPA") is imbedded in the Douglas County Comprehensive Land Use Plan, and is the benchmark which the BLM should review its own proposals for consistency.

The OFPA is the model for the rest of the nation and was crafted in an open public forum with widespread public involvement and legislative review. Given this intensive public and legislative scrutiny, any departure from the OFPA should be identified as an inconsistency.

If the BLM chooses not to act consistent with the OFPA, it is required, by its own regulations, to provide not only the rationale for acting inconsistent with the OFPA but also a range of alternatives. In developing alternatives to the OFPA, we recommend that the BLM also prepare a cost-benefits analysis relative to any departure from the Oregon Forest Practices Act.[23]

IV.
Role of FLPMA on O & C Lands

In developing the final RMP it is important to recognize that the lands under BLM management do not have a uniform history and as a result have differing management requirements. As we have noted earlier the O & C lands are to be managed strictly according to the purposes in the various O & C Acts. The RMP emphasizes that is designed to fulfill the requirements of FLPMA, however this statement oversimplifies the issue. While FLPMA is seen by some as the "organic act" for the BLM, it does not universally apply to all lands managed by the BLM.

The BLM's authority under FLPMA is limited by other provisions of the law and by the category of lands under

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inconsistencies that are present. For example we find no discussion of the Milltown Hill dam project or the impacts of varying from the Oregon Forest Practices Act.

23. There are numerous examples of where the BLM has in its discretion elected to develop management practices in excess of the OFPA. Among these is the selection of a riparian buffer zone not only in excess of the OFPA but also in excess of the actual riparian area.

consideration. While the Federal Land Policy and Management Act ("FLPMA") applies to all of the BLM managed lands, the degree to which it applies depends upon the lands in question.[24]

One must be very cautious in applying the provisions of FLPMA to the O & C act lands since Congress has clearly stated that the statutory mandates under the O & C Act override any conflicting provision within FLPMA. In adopting FLPMA, Congress noted that:

> "Notwithstanding any provision of this Act, in the event of conflict with or inconsistency between this Act and the Acts of August 28, 1937 (50 STAT 874; 43 USC 1181a-1181j), and May 24, 1939 (53 STAT. 753), insofar as they relate to management of timber resources, and disposition of revenues from lands and resources, the latter Acts shall prevail"[25]

The courts have uniformly stated that the primary use of the O & C Act lands is for timber production in conformity with the provision of sustained yield. That primary use overrides any conflicting or inconsistent provision of FLPMA.

As stated in the O & C Act these lands:

> "shall be managed, except as provided in section 1181c of this title, [since repealed], for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal [sic] of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facil[i]ties." (emphasis added)

Several court cases have clarified that the primary purpose of the act is permanent forest production. Timber is to be removed under the doctrine of sustained yield to provide timber supply, protect watersheds, regulate stream flow, contribute to economic stability, and provide recreational facilities.

These same courts have found that the O & C Act does not even suggest that wildlife habitat conservation or conservation of

[24]. The Federal Land Policy and Management Act specifies that "Notwithstanding any provision of this Act, in the event of conflict with or inconsistency between this Act and the Acts of August 28, 1937 (50 Stat. 874; 43 U.S.C. 1181a-1181j), and May 24, 1939 (53 Stat. 753) insofar as they relate to management of timber resources, and disposition of revenues from lands and resources, the later acts shall prevail. Sec. 701(b)

[25]. 90 STAT 2786, Sec. 701(b)

old growth forest is a goal on a par with timber production, or indeed that it is a goal of the O & C Act at all. The courts have repeatedly stated that the O & C Act is a dominant use statute and not a multiple use statute.

Since the degree to which FLPMA applies is governed by the respective land status, the State should recognize these differences and develop its response in accord with the specific lands in question.

V.
Old Growth Management

The improper injection of the multiple use concept into the O & C Act is clearly evidenced in the preferred alternative's inclusion of old growth emphasis areas ("OGEA"). While the Board supports the multiple use concepts as applied to the public domain lands, the Board totally opposes any old growth emphasis areas on the revested O & C lands.

Old growth for old growth sake, or for wildlife, is not an element of the various O & C acts. The Board can not underscore enough the need to closely adhere to the original purposes of the O & C Acts. Any lands that are biologically suitable for commercial timber production must remain classified as timberlands under the O & C Act.

If the BLM elects to adopt an alternative that contravenes the purposes of the original O & C Act[26], then the counties must be compensated. If society as a whole chooses to reduce timber harvest for purposes other than those embodied in the O & C Act then clearly society should compensate the counties. The counties and local communities should not be forced to bear the burden alone.

[26]. The original O & C Railroad grant had a dual purpose, one was to provide the financing necessary to build the railroad, and the second was to aid in developing the land by placing the lands in the hands of bona fide settlers. By failing to accomplish the second purpose the Supreme Court instructed the federal government to come up with a plan that would accomplish the development of Oregon. The government in turn developed the strategy of revesting the lands with the eventual sale of the land to settlers and revenues returned to the counties.

VI.
Intensive Management

In the preferred alternative the BLM proposes to establish four categories of forest management (Old-growth emphasis, general forest management, visual, connectivity management) each with a varying degree of management intensity. However in reviewing the activities within each category it appears that while the general forest management areas are described as intensive management in accord with the O & C Act, in fact these lands are considerably constrained.[27]

If the lands are to be managed for intensive timber production then management should be free of restraints to the fullest extent allowed by law (ie. OFPA and O & C Act)

VI.
Land Acquisition

The preferred alternative includes a provision wherein the BLM seeks to acquire additional lands for recreational or fisheries values. The Board expressly reserves the right to comment directly on any proposed land acquisitions or exchanges.

With the projected decrease in receipts, the county can ill afford any additional reductions in its land base. Therefore as a general policy the Board opposes any additional land acquisitions. Furthermore the Board opposes any trade of O & C lands, unless the acquired lands assume the O & C status.

We note that the State of Oregon has likewise adopted a policy against further erosion of the tax base. The Governor recently went on record opposing an Indian gambling proposal on the basis, among others, that the project included the acquisition of land and the resulting removal of the land from the tax base.

The acquisition of more land by the federal government within the county has a dramatic impact upon the county tax base. In addition due to the high degree of federal forest receipts and federal land base within the county, the county has limited

[27]. While the O &C act allows other uses such as recreation, it does not require these uses on each acre of land. By allocating other lands with these alternative uses emphasized, then the GMA should be totally free of these additional restrictions.

opportunity under the PILT program. Unless a change is made in the PILT program, the county incurs an economic hardship whenever the federal government acquires more land within the county.[28]

VII.
Endangered Species Act Consistency

In reviewing the time table for completion of the BLM plans we note that the U.S. Fish and Wildlife consultations with respect to the northern spotted owl, will not be completed until after the close of the public comment period. Since the consultation process may result in a significantly different preferred alternative then what has been developed, the Board recommends that the public comment period be extended until after the consultation results are available to the public.

While the public may have little input in the Fish and Wildlife consultation, the public has a role to play in determining the balance in other outputs and in crafting methods to achieve the recovery of the northern spotted owl. Since this balancing process can not be done prior to release of the consultation results, the public comment period should be left open to allow for additional review and comment.

VIII.
Reference Points

Typically forest management can be described as a large ecosystem experiment, however it is an experiment that has not been accompanied by scientific baseline analysis, repetitions or monitoring over time. Likewise, the proposed RMP must clearly recognize the scientific subjectivity contained within the various alternatives.

The need for sensitivity analysis throughout the planning horizon must be recognized and the appropriate funding assigned to cover the costs of this analysis. The RMP must adopt a program that establishes scientifically valid reference points and monitoring program. This need for scientific reference points is underscored by the RMP's emphasis on the new theoretical concepts of ecosystem management and emphasis on single species

[28]. We note that it is frequently asserted that the reduction in O & C Receipts can be made up by PILT payments, however in fact the O & C lands are not considered federal lands for PILT payment purposes.

management.[29] Likewise the fact that the TRIM and ORGANON models are being pushed far beyond what they were intended to do creates a need for very close monitoring and analysis as we implement the RMP.

We are very concerned that the BLM is not providing sufficient monitoring or monitoring with the requisite sensitivity to analyze the impacts of its various programs.

X.
Stumpage Prices

The expected timber stumpage prices utilized to calculate the sensitivity analysis were derived from the average timber sale price for the 1984-88 time period with an estimated real wood price increase estimated at 1.2% annually. As we indicated earlier the 1984-88 time period does not reflect the most current sale prices. We suggest that either the 1988-92 or 1976-1992[30] period be used for this analysis. Furthermore the 1.2% price increase has not been supported by recent real market values.

Given the fact that the BLM anticipates receipts will not drop significantly due to increased prices, to be consistent the anticipated price increase levels that were utilized in assuming the rising prices would counteract reduced timber harvests (p. 4-94) should be used in the sensitivity analysis.

XI.
Riparian Buffers

During the AMS process we expressed our concerns over the fact that the riparian buffers had been improperly hard wired to incorporate a one hundred foot buffer on each side of the third order and greater streams. At that time we recommended that the BLM follow the Oregon Forest Practices Act provisions relating to riparian areas. In reviewing the RMP we find that our original concerns have not been addressed.

In addition during our review of the RMP we were unable to

[29]. Under the Endangered Species Act, agencies have been placed into a position of single species management. A management philosophy that has the potential to place other species at risk.

[30]. The 1983-88 time period was some of the lowest years and therefore selecting a four year period from these years does not truly reflect the historical averages. The 1976-91 average is $22,661,000 in receipts for Douglas County alone.

determine how the TPCC and the new riparian distances as set forth in the draft RMP[31] interrelate. We recommend that the BLM either follow the Oregon Forest Practices Act or in the alternative map the specific riparian areas.

The riparian areas are of such importance that we encourage the BLM to adopt a site specific management program. With a site specific management plan, these areas could be managed with sufficient sensitivity that timber management and other uses could be accommodated.[32]

The proposed riparian management program overlooks the interactions between coarse woody debris and channel morphology. It also adopts an arbitrary standard for determining the existing condition of riparian zones. In reviewing the proposed standard based upon "mature riparian vegetation" we find that it ignores the impacts of soil type, stream channel morphology, and the value of vegetation other than large trees. We believe the proposed approach does not provide a benchmark that is in any way an indicator of riparian health.

XII.
Alternatives

The preferred alternative proposes a drastic departure from the current harvest levels at a time when other land ownerships are also experiencing drastic declines. With the current harvest pressure on private lands, we question the inventory and growth projects utilized in the timber supply analysis.

We recommend that the BLM consider adopting a ramp down process that will allow the dramatic decrease to be phased in.

XIII.
Endangered Species

It appears that the major driving force in this RMP is the Endangered Species Act. While we share with the BLM the difficulties created by the single species management direction of the Endangered Species Act, we are unable to determine from the RMP the true impacts of this management direction. The true costs of

[31]. p. 2-40

[32]. We are very concerned over the use of "ecosystem management" as means to place lands into a no-management classification. If used properly the "ecosystem management" techniques should allow these riparian areas to provide timber to support the local communities.

managing for the various species listed under the Endangered Species Act must be clearly set forth. In addition we must have sufficient baseline data and monitoring programs in place to determine the success of this program.

We recommend that the RMP clearly set forth the target populations for each of the listed species, current population status, management goals, and a detailed monitoring program.

XIV.
Technical Abilities

In reviewing the computer modeling capabilities of the BLM relative to uneven age management, we find that the current system is unable to track uneven age stands. With this technological weakness it will be difficult for the BLM to properly track and monitor the uneven age stands that will be the focus of the ecosystem management strategy.

CONCLUSION

The Board of County Commissioners appreciates this opportunity to provide these initial comments. The Board will continue to provide comments and aid the BLM in crafting the final RMP.

We close our discussion by referencing the draft RMP wherein it is noted that under the preferred alternative that employment losses will increase and in turn increase the local demand for social services. This increase in demand for county services will occur at a time when the county's ability to respond will be reduced.

While current training and support programs are estimated to provide assistance to 42% of the displaced workers, the remaining 58% will be left without assistance. This is unacceptable. Clearly if society as a whole believes it is in the nation's best interest to displace these workers, then society has an obligation to assist these workers make the transition.

If the cost to retrain and assist 60% of the displaced workers will total $34,234,000 then the cost to retrain and assist 100% of those displaced will equate to $57,000,000. When these sums are added to the lost county receipts, lowered tax base and impacts on schools, the total impact is astounding.

With the economy and social fabric of Oregon "on-the-line" it is our obligation as County Commissioners and in turn the obligation of the State to take all steps necessary to be

aggressive players in the development of the BLM Resource Management Plans. We believe the considerations outlined above will aid the BLM in the development of its final RMP.

It is our recommendation that the selected alternative incorporate these comments and fully comply with the requirements of the original Oregon & California railroad grant, and the ensuing O & C acts. At this time the alternative that most closely complies with these acts is Alternative B. We concur with the position set forth by the Association of O & C Counties and urge you to give Alternative B careful consideration when you select the proposed action.

In the event that compliance with the Endangered Species Act precludes the adoption of Alternative B, we can reluctantly accept the preferred alternative as long as the issues and changes set forth above as well as those set forth by the Association of O & C Counties are incorporated and resolved. We believe that ecosystem management which provides for the recovery of the northern spotted owl, bald eagle, as well as the various salmonid species, can be attained while maintaining consistency with the O & C Acts if these changes are incorporated.

Finally, in the event an alternative is selected that reduces the average timber harvest from the past ten year period or changes the average grade, the county requests that the change be phased in.

BARBARA ROBERTS
GOVERNOR

OFFICE OF THE GOVERNOR
STATE CAPITOL
SALEM, OREGON 97310-0370
TELEPHONE (503) 378-3111

December 18, 1992

Mr. Mel Chase, District Manager
Bureau of Land Management
1300 Airport Road
Coos Bay, OR 97459-2000

Dear Mel:

Enclosed you will find the State of Oregon's Final Coordinated Response to the Coos Bay District's draft Resource Management Plan and Environmental Impact Statement. We have also attached copies of six position papers, state agencies' final comments and the Oregon State University Report. This response represents the State's final review of concerns that eleven state agencies, the public and interest groups, and Oregon State University have expressed to us over the last several months on BLM's draft plans.

I encourage your District staff to feel free to contact the Governor's Forest Planning Team to gain a full understanding of specific concerns and recommendations that we have outlined in our response.

I thank you and your staff for the field trips and discussions afforded the Governor's Forest Planning Team over the last year. We look forward to continuing this cooperation with your District. If you have any question about the State's final response, don't hesitate to call.

Sincerely,

Anne Squier
Senior Policy Advisor for
Natural Resources

THE STATE OF OREGON'S FINAL COORDINATED RESPONSE

TO THE

BUREAU OF LAND MANAGEMENT'S

DRAFT RESOURCE MANAGEMENT PLANS

AND

DRAFT ENVIRONMENTAL IMPACT STATEMENTS

Governor's Forest Planning Team

December 1992

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EXECUTIVE SUMMARY

The Governor's Forest Planning Team has completed the Final Coordinated Response to the Bureau of Land Management's draft management plans for the Eugene, Salem, Medford, Coos Bay, Roseburg Districts, and the Klamath Falls Resource Area. Preparation of this coordinated response is part of Governor Roberts' commitment to be aggressively involved in federal forest planning and working within the spirit of cooperation outlined in the Memorandum of Understanding signed between the State, Bureau of Land Management (BLM) and the United States Forest Service.

Key issues addressed in the State's Final Coordinated Response to the six BLM plans are summarized in the following sections.

Ecosystem Management. The State endorses BLM's overall ecosystem management approach by using biological diversity to manage their lands. While biological diversity will require long-term experimentation, research and intensive evaluation and monitoring, the State believes that it will create over time a more ecologically sustainable, productive, healthy, and resilient natural ecosystem. The State believes that people and communities are key elements that must be considered when implementing ecosystem management.

Land Use. Land use conflicts between BLM and rural interface residents have increased over the years. The State recommends that BLM become more active in local land use planning. This means BLM should actively participate in Oregon's statewide land use planning program by coordinating its efforts with various state agencies and local governments.

Fish and Watershed Management. The State supports BLM's strategy to manage and monitor by analytical watersheds. Water quality and quantity, fish and wildlife habitat, and wetlands should be enhanced, maintained if in good condition and restored where conditions have been identified as declining. Sensitive fish stocks must be protected on BLM-administered lands. BLM should protect riparian areas and monitor conditions over time. Cooperation between landowners is essential within multiple ownership watersheds to achieve the desired conditions.

Air Quality. BLM plans should more specifically address how the proposed increase in use of prescribed burning will meet state and federal air quality standards. Continued cooperation between the State and BLM regarding air quality is encouraged.

Tourism and Recreation. The State recommends that BLM expand recreational opportunities on its lands. This would include increasing/expanding developed recreation sites, increasing dispersed recreational opportunities, building additional trails, and protecting scenic quality along state/federal highways and Wild and Scenic Rivers.

Timber Management. While the State supports BLM's new biological diversity emphasis, we question predicted harvest levels anticipated from various land allocations. In particular, growth and yield assumptions may not meet the timber volume expected from lands within the timber base. Increased dependence upon intensive management practices to produce the predicted allowable sales quantities must be accompanied by stable funds for implementation and monitoring. Forest health should be more adequately addressed in the final plans.

Wildlife Management. BLM needs to more explicitly explain how they intend to improve habitat (cover, forage and road management) for deer and elk. BLM should further protect other wildlife, especially sensitive, threatened and endangered species. The State supports the creation of older stand conditions through approved silvicultural practices. The State urges BLM to comply with the Final Recovery Plan for the Northern Spotted Owl and continue consultation with the U.S. Fish and Wildlife Service to reach consensus on the best way to provide for the recovery of the northern spotted owl and other threatened and endangered species.

Old Growth. BLM districts are proposing various techniques to maintain/produce older-aged forests. The State supports BLM's overall approach to maintain and protect old growth stands through biological diversity. Old growth-dependent species must also be protected when harvesting old growth in the general forest land allocation through landscape diversity and accelerating older forest conditions on adjacent BLM lands.

Livestock Management. The State recommends that BLM develop detailed allotment management plans for every grazing allotment. Of concern is livestock's impact on fish and wildlife habitat, big game, and riparian-dependent species. The State encourages range improvement projects to increase forage and water developments which should help draw livestock away from riparian areas.

Minerals and Energy. BLM should acknowledge and preserve access to state-owned mineral rights. BLM should further recognize the value of mineral and energy resources when making land management decisions.

Socio-economic. BLM's draft plans have not sufficiently addressed the social and economic implications of their preferred alternatives on Oregonians. BLM needs to more specifically address local impacts of district plans on community stability, concentrating on the social impacts. Job multipliers should be further evaluated. Monitoring of the socio-economic conditions created by implementation of the preferred alternatives needs to be addressed.

Road Management. The State recommends that each BLM district develop a comprehensive road management plan. The plans would be used to manage access which in turn would improve wildlife habitat, water quality, and recreational opportunities.

Special Plant and Tree Species. BLM should expand its inventory of sensitive plants and implement standards for protection including monitoring. BLM should aggressively follow the interim management plan for managing Pacific yew.

Tribal Concerns. Lands administered by many BLM districts were used by Native Americans and contain historically significant cultural and spiritual sites. The State believes BLM should identify, during project planning, these sites and protect them during implementation of management activities.

Standards and Monitoring. The implementation of biological diversity by BLM will mandate a comprehensive monitoring program, including a dedicated funding source. This is critical in determining whether the expected future conditions are being accomplished. Specific, measurable standards must be a component of the total monitoring package. The State recommends that BLM strengthen its standards and monitoring program in the final plans.

Budgets. Adequate funding is essential for implementation and monitoring of BLM's biological diversity strategy. Dedicated funds for expanded intensive management programs being proposed are needed. The State believes that BLM budgets should not be necessarily linked to allowable sale quantity levels.

Detailed State Final Coordinated Response. Questions regarding the State of Oregon's Final Coordinated Response should be directed to: Governor's Forest Planning Team, 155 Cottage Street, Salem OR 97310, Phone: (503) 378-8127

STATE OF OREGON'S FINAL COORDINATED RESPONSE
TO
BUREAU OF LAND MANAGEMENT
DRAFT RESOURCE MANAGEMENT PLANS
AND
DRAFT ENVIRONMENTAL IMPACT STATEMENTS

I. INTRODUCTION

The Bureau of Land Management administers 2.5 million acres of land in western Oregon including parts of Klamath County. In total, this accounts for approximately nine percent of the forest land base in western Oregon. Fish and wildlife, domestic water, timber, recreation, grazing, and minerals are just some of the many values found on these lands. Revenues from managing BLM resources contribute millions of dollars each year to Oregon counties for schools and roads. The importance of BLM lands to the people of Oregon cannot be over-emphasized.

Recognizing a need to coordinate State responses to federal resource management plans, the Governor's Forest Planning Team was created in 1987. This team, which includes representatives from twelve state agencies, has worked together over the last five years to develop coordinated responses to major federal land management planning documents.

Most recently, the Governor's Forest Planning Team has worked closely with five BLM districts (Medford, Salem, Roseburg, Coos Bay and Eugene), one Resource Area (Klamath Falls) and the State Office in Portland in an effort to better understand BLM's planning process. The State also conducted six "open houses" scattered throughout the state to solicit input on BLM's draft plans. Comments received from the publics' review of the State's Proposed Coordinated Response have also been considered. Input from the public, state agencies, and Oregon State University form the basis for the State's final response.

The following document is the State of Oregon's Final Coordinated Response to the six draft Resource Management Plans (RMPs) and Environmental Impact Statements (EISs). The State's final response represents a consolidated response to the six draft RMPs and EISs and includes comments appropriate to specific issues by districts/resource area. Individual state agency comments and Oregon State University's Report have been attached for review.

We appreciate the cooperation that BLM districts, the Klamath Falls Resource Area and the State Office have given the State Team in understanding the planning process. This kind of working relationship strengthens the ability of the State and BLM to develop resource management plans acceptable to Oregonians and the Nation.

II. MAJOR ISSUES

A. Ecosystem Management. How will BLM implement ecosystem management that responds to creating sustainable, productive, and healthy ecosystems while still producing goods and services?

B. Land Use. How can BLM better address problems encountered in managing rural interface areas? Has BLM met the federal consistency requirements of the National Coastal Zone Management Act and Oregon's Coastal Zone Management Program? Has land tenure been adequately addressed? How has State ownership of surface/subsurface ownership rights been handled?

C. Fish and Watershed Management. How will BLM use analytical watersheds to measure cumulative effects of management activities? How will riparian areas and wetlands be protected? How will fish habitat be protected and enhanced?

D. Air Quality. How should BLM address the use of prescribed fire as a forest management tool in terms of the potential impacts on air quality?

E. Tourism and Recreation. How should BLM manage for recreation, visual resources, and Wild and Scenic Rivers?

F. Timber Management. Are BLM's timber growth and yield assumptions valid? How will silvicultural practices be used to support projected harvest levels? Will BLM be able to produce the harvest levels predicted by land allocations? Has BLM adequately addressed forest health?

G. Wildlife Management. How should BLM districts manage for big game habitat? What snag levels should BLM provide for cavity-dependent birds and other wildlife? How should sensitive, threatened and endangered wildlife species be managed?

H. Old Growth and Mature Forest. How will BLM manage its forests to maintain old growth and mature forest composition?

I. Livestock Management. How will BLM manage its grazing lands to produce forage for livestock and wildlife while protecting other resource values, in particular riparian areas?

J. Minerals and Energy. How should BLM recognize and manage its mineral and energy resources?

K. Socio-Economic. How will the adopted plans affect economic opportunities in surrounding communities? What impact will the plans have on socio-economic stability in the planning area and statewide?

L. Road Management. How should districts/resource areas manage their road networks to promote compatibility with resource uses?

M. Special Plant and Tree Species. How should BLM protect special status plant and tree species?

N. Tribal Concerns. How should BLM districts protect traditional Tribal cultural and spiritual sites?

O. Standards and Monitoring. Does BLM have measurable standards and a comprehensive, aggressive monitoring program to determine whether plans are meeting short and long-term expected future conditions?

P. Budgets. What budget will BLM districts need to carry out the preferred alternative? How should the districts react if a smaller budget allocation occurs?

--DISCUSSION OF MAJOR ISSUES--

A. Ecosystem Management. How will BLM implement ecosystem management that responds to creating sustainable, productive, and healthy ecosystems while still producing goods and services?

1. Concepts and Principles

Managing lands and resources based on ecological principles has been emerging as a new view in scientific literature, research, and in public policy. This view is seen as being not only biologically sound, but also more attuned to public expectations and values of doing a better job at managing our natural resources. It makes sense for programs and organizations to work under a systems concept which includes people, animals, soils, plants, water, climate, with the processes of nature working together as a whole.

The concepts presented in this section and in the State's paper, titled, Ecosystem: A Coordinated State Response To BLM's Resource Management Plans (Appendix 1), were derived from literature searches, field trips, and discussions with researchers and land managers on defining principles and implementation strategies for ecosystem management.

The State believes that the guiding principle of ecosystem management is to create a more ecologically sustainable, productive, healthy, and resilient natural ecosystem. How to meet this objective is a complex issue land managers must face. One thing is certain, however, a change is needed on how we have traditionally managed our resource lands. We believe that change may be achieved through the careful application of ecosystem management.

The Revested Oregon and California Railroad Grant Act (O&C Act) and the Federal Land Policy and Management Act are the two major pieces of legislation that govern the management of BLM lands in Oregon. Within these laws, ecological principles define management constraints, management approaches, and predictions of those ecosystem responses necessary to ensure proper maintenance of sustainable systems. People will continue to play a major role in this ever-changing ecological system.

Another law which has influenced management on not only BLM lands but other federal, private and state lands is the Endangered Species Act. This Act requires the protection and recovery of species determined to be endangered or threatened, regardless of other legal mandates.

2. Goals of Ecosystem Management

The State's comments on BLM's biodiversity strategy are based on the following five objectives:

a. Maintenance and restoration of biological diversity at four levels of organization: geographic scale, genetic composition, communities and ecosystems.

b. Sustainability of components and processes of ecosystems over time and long-term productivity and resiliency of such ecosystems.

c. Contribution to the basic needs of people and communities who depend on the land for subsistence, livelihood, and social and spiritual development.

d. Consideration of sensitive ecosystems such as wetlands, riparian zones, and fragile sites.

e. Provide consistent linkage between forest health and ecosystem management.

f. Intensively monitor and evaluate implementation of biological diversity to determine if short-term goals are leading to long-term expected future conditions.

3. Consistency with Legal Mandates and Authority

BLM manages 84 percent of its land in western Oregon/Klamath Falls Resource Area under the Revested Oregon and California Railroad Grant Act (O&C lands) and Coos Bay Wagon Road (CBWR) lands. The remaining 16 percent are referred to as Public Domain lands managed under the direct authority of the Federal Land Policy and Management Act (FLPMA). The O&C/CBWR and Public Domain lands have different legal mandates on how they should be managed. BLM has stated in its preliminary planning documents that it would make planning decisions consistent with these laws.

While it is conceivable that, with the requirements of the Clean Water Act, the Clean Air Act, and the Endangered Species Act, Public Domain and O&C/CBWR lands could be managed similarly; it is not obvious that they should be so managed. The mandates are different; the management approaches to protect and enhance may be different; and, the beneficiaries of these approaches are different.

BLM draft plans have not explained the rationale on how their biological diversity-based preferred alternatives are consistent with its legal mandate for O&C/CBWR lands. The relationship

between the preferred alternatives' ecosystem management concepts and existing laws governing the management of O&C/CBWR lands need to be clearly articulated in each final plan.

4. State's Recommendations

Biological diversity principles used by BLM in developing their draft plans represent a holistic approach to managing resource lands. We commend BLM on this effort.

The State's comments on biological diversity, found in the draft plans, are based on principles found in our position paper (Appendix 1). These principles are described below.

a. **Expected Future Condition.** BLM RMPs should identify and examine the expected future condition for biological diversity. Expected future condition goals should relate to the compositional, structural, and functional attributes of ecosystems and should include a regional perspective. BLM districts need to express in greater detail what the expected future conditions will be from implementing the preferred alternatives.

b. **Prescriptions.** RMPs should include specific, measurable prescriptions or standards which when implemented would work toward meeting the expected future condition. While prescriptions are part of each draft plan, it is not clear how they will meet the biological diversity short- and long-term goals.

c. **Ecosystem Condition.** RMPs should provide information on the current condition of ecosystems and their compositional, structural, and functional attributes to establish "baseline conditions." Plans need to identify areas of concentrated biological diversity and ecosystems (e.g., old growth) at high risk due to human activities. "Baseline conditions" should be used to monitor trends in biological diversity over time and to make necessary adjustments in plans. Standards and monitoring plans for evaluating whether they are being met need strengthening.

d. **Research and Adaptive Management.** The RMPs should detail how BLM plans to integrate management, monitoring, and research to continually apply adaptive management and improve the scientific basis for ecosystem management. This has not been sufficiently addressed in the draft plans.

e. **Ecosystem Monitoring.** RMPs should include specific monitoring questions for measuring whether management prescriptions are meeting the expected future conditions. For example, is forest age class distribution within a certain forest allocation moving toward or away from the

expected future condition? BLM plans should integrate management, monitoring, and research to continually apply adaptive management and improve the scientific basis for ecosystem management. BLM districts need to develop more comprehensive, monitoring plans to measure the long-term commitment of ecosystem management.

f. **Ecosystem Dependency.** BLM operates under laws and regulations which require production of goods and services of all types. People are part of, and are dependent on, BLM-managed ecosystems. BLM plans should describe the linkage and dependency (social, economic, spiritual) of local and regional communities, groups, industries, etc., on ecosystems within each land allocation.

g. **Threatened and Endangered Species.** RMPs should reflect the special considerations BLM is providing for ecosystems that contain endangered, threatened, and sensitive species. This includes meeting the requirements of various recovery plans, as well as ecosystem management provisions for preventing species from being listed. Special emphasis should be placed on the recovery requirements of the spotted owl and provisions for anadromous fish. BLM has developed its strategy for meeting the requirements of the Endangered Species Act for the spotted owl and other species. Whether this strategy is sufficient to meet the upcoming legal mandates is unknown at this time.

h. **Silvicultural Practices.** BLM plans should identify the silvicultural practices and the cause-and-effect relationships which will lead to the goals of biodiversity/ecosystem management. This includes guidelines for: timber harvest and road management, achieving species diversity, retention and restoration of old growth and other successional stages, rotation ages, vegetation control, stand conversion, artificial regeneration and genetic improvements, hardwood management, fertilization, and prescribed fire. BLM has presented some innovative forest management approaches to managing its lands in response to protecting sensitive, endangered and threatened species plus other resource values.

i. **Coordination.** BLM should clearly specify methods for coordinating biodiversity and ecosystem management goals with adjacent forest landowners. Specifically, BLM must coordinate with the Forest Service and relevant state agencies to assure that activities to achieve regional/landscape biodiversity are compatible with plans

and activities of these agencies. BLM plans should explain in more detail how they plan to coordinate their biological diversity program with adjacent landowners and more broadly on a landscape level.

5. Summary

The State applauds BLM's biological diversity strategy as it recognizes the forest ecosystem from a holistic perspective rather than the traditional single-emphasis management. Each draft plan evaluates the important components of biological diversity and attempts to predict both short- (10-year) and long-term (100-year) expected future conditions. The concern over fragmentation, due to ownership patterns and past intensive management practices, may be mitigated by the application of the Designated Conservation Areas (DCAs) grid, Old Growth Emphasis Areas, Conductivity Areas, special areas, and other allocations which promote an older forest structure. Intensive long-term monitoring will be essential to determine if BLM's biological diversity strategy is meeting expected future conditions.

Many questions remain to be answered by the scientific community and land managers on how to successfully manage lands using ecosystem management. BLM's ecosystem management approach will be very helpful in answering these questions over time.

B. **Land Use.** How can BLM better address problems encountered in managing rural interface areas? Has BLM met the federal consistency requirements of the National Coastal Zone Management Act and Oregon's Coastal Zone Management Program? Has land tenure been adequately addressed? How has State ownership of surface/subsurface ownership rights been handled?

1. Rural Interface

BLM has identified the management of rural interface areas as one of eleven major planning issues to be addressed by each district and the Klamath Falls Resource Area.

The term "rural interface" refers to those areas where BLM-administered lands are adjacent to or intermingled with predominately privately owned lands zoned and/or used for agricultural, forest, rural residential, and other resource and nonresource purposes.

Owing to the close proximity of BLM holdings with other lands and population growth in these areas, BLM, private and other public landowners are expected to experience increasing levels of conflict with one another over the management and use of their respective ownerships.

Taken together, the draft resource plans state that rural interface conflicts affecting the management of BLM lands in Oregon are becoming greater, with the most extensive problems occurring in the Medford District. One of the most visible results of this development is that wildfires over the last several years, particularly in southern Oregon, have destroyed and/or threatened increasing numbers of lives, resources and structures in rural interface areas.

Statewide, BLM has calculated there are approximately 194,000 acres of BLM land lying adjacent to private lands currently zoned to allow development on 1 to 20 acre lots.

a. BLM's Response to Rural Interface Problems

The preferred alternative in each district's draft plan conceptually treats the rural interface issue in the same manner. Each district proposes to establish a buffer area on its lands which lie adjacent to private lands zoned with minimum lot sizes ranging from 1 to 20 acres.

Within these buffer areas, BLM management activities would be altered where feasible to mitigate the concerns of nearby residents. Examples of the kinds of special management practices undertaken by BLM in the interface buffer include restrictions on public access, road building, harvesting methods and frequency, and application of herbicides and pesticides.

b. State's Recommendations

The State's review of BLM's interface strategy is based principally on a policy paper titled, Recommendations to BLM For Managing Rural Interface Areas, transmitted to BLM from Governor Roberts in December 1991. (Note Appendix 1) The paper, which BLM encouraged the State to produce, formally acknowledges that the problem of rural interface areas involving BLM lands is a matter of critical State concern.

The paper calls upon BLM to enter into a special partnership with the State of Oregon so that the rural interface problem can be addressed comprehensively rather than in a fragmented, uncoordinated manner. Unlike other states, Oregon presents BLM with a unique opportunity through its recognized statewide land use program and related initiatives by the Department of Forestry and other agencies to deal with rural interface areas.

The State's paper contains six specific recommendations aimed at enabling BLM to join with state and local governments in achieving significant progress on various aspects of the interface problem, including policy development, agency coordination, information exchange, and conflict resolution.

Unfortunately, after review of the six draft RMPs/EISs, it is disappointing to note that BLM apparently rejects a **proactive** approach described in the State's paper for dealing with rural interface areas.

The State believes that BLM's passive strategy of relying on uniform buffering of federal lands will do little to alleviate new inappropriate developments in rural interface areas. This strategy further will severely limit BLM's opportunities to implement effective forest management programs on these interface lands.

The State urges BLM to incorporate the following recommendations, as described in the State's interface paper and the Department of Land Conservation and Development's comments to the RMPs (Appendix 2), into the final resource management plans.

(1) BLM should act consistently with Oregon laws, policies, and programs adopted to protect the State's forest land base for timber production and other forest uses.

(2) BLM should increase its participation in Oregon's statewide land use planning program. This could be accomplished through establishing joint State and BLM working groups to further BLM's involvement in the statewide land use program and other related State efforts to address rural interface problems.

(3) BLM's State Office should provide policy guidance to districts for addressing rural interface issues.

(4) BLM, in cooperation with the State of Oregon, should establish and apply a revised definition of rural "interface areas" which takes into account existing uses; current federal, state and local plans; and other land use factors.

(5) BLM should incorporate the rural interface issue into its agreement with the State of Oregon for monitoring the implementation of BLM management plans.

2. Federal Consistency

Four BLM districts (Salem, Coos Bay, Eugene and Roseburg) administer lands covered under the federal consistency requirement as provided in the Coastal Zone Management Act. Under the Act, any federal activity, within or outside the coastal zone that affects any land or water use or natural resources of the coastal zone must be carried out in a manner which is consistent, to the maximum extent practicable, with the enforcement policies of the State's federally approved coastal management program. The mandatory enforcement policies contained in the Oregon Coastal Management Program are:

a. The Statewide Planning Goals adopted by the Land Conservation and Development Commission;

b. Acknowledged city and county comprehensive plans and land use regulations; and

c. The statutory authorities and regulations of selected state agencies.

A preliminary analysis of a federal agency's consistency determination is made by the State following review of the draft plan or project being proposed. The final consistency determination by the State of Oregon is made following release of the final environmental impact statement on the adopted plan or project.

Based upon preliminary analysis, it appears that the draft RMPs for the four districts are consistent with Oregon's Coastal Management Program.

However, formal State concurrence with BLM's determination of consistency cannot be made at this time due to a lack of specific documentation in the RMPs which demonstrates that all of the applicable mandatory state authorities listed in the Oregon Coastal Management Program have or will be met.

For the purposes of its final federal consistency determination, BLM will need to document in the final EISs how the selected management alternative for each RMP complies with the statutory authorities and regulations of the Oregon Coastal Management Program. Until such an analysis is conducted and incorporated into the final RMPs, full concurrence by the State on BLM's consistency determination with the Oregon Coastal Management Program cannot be made. (See Department of Land Conservation and Development's comments on federal consistency -- Appendix 2.)

3. Land Tenure

BLM districts have inventoried and categorized their lands according to resource value (e.g., timber, wildlife, wetlands), land status (e.g., O&C or Public Domain) and ownership pattern (e.g., scattered or blocked). We have three concerns on how districts have addressed land tenure.

First, there seems to be no uniformity on how districts have categorized their lands. Coordination between adjacent districts is lacking and land tenure maps included in the plans are difficult to interpret. We strongly recommend districts develop common criteria and coordinate among themselves land tenure decisions to interject uniformity into the process.

Second, an In-Lieu Land selection settlement has occurred between the State and BLM within the last year. The State, according to the Courts, is allowed to select 5,202.29 acres of BLM Public Domain land. Our concern is the lack of mention of this settlement in the Land Tenure section for the preferred alternatives. We request that language be inserted which clearly states BLM's responsibility to accommodate the State's selection within the requirements of the law. (Note Division of State Lands response -- Appendix 2.)

Lastly, O&C and Coos Bay Wagon Road lands that are suitable and available for timber production should not be exchanged for unsuitable or single use lands. These lands should be retained for forest production.

4. Navigability

None of the draft plans acknowledge existing or potential State ownership claims on navigable waterways within BLM districts. Language, noted in Division of State Lands response, should be include in each final plan regarding navigability.

C. **Fish and Watershed Management. How will BLM use analytical watersheds to measure cumulative effects of management activities? How will riparian areas and wetlands be protected? How will fish habitat be protected and enhanced?**

One of the State's goals is to ensure that BLM restores and protects riparian-dependent and upland resources. This is consistent with BLM's direction in the Federal Land Management and Policy Act, the O&C Act and other federal and state laws. It is also consistent with BLM's long-term objective to maintain and enhance watersheds that currently are in good condition while improving those identified as declining. The comments and recommendations that follow are based on this goal.

Rivers, streams and lakes, and their riparian areas are valuable resources. Within their area of influence, they provide habitat for wildlife and fish and furnish domestic water and recreational opportunities such as boating, swimming, and fishing.

BLM's Fish and Wildlife 2000 -- A Vision For The Future has set several objectives for improving water quality and riparian area and watershed conditions in Washington and Oregon. The goal, according to this plan, is to improve nearly 656 miles of streams. Evaluation and monitoring is also emphasized as a major component of the program.

Maintaining and enhancing fishery resources, as noted in all of the draft management plans and the BLM's Fish and Wildlife 2000, is an admirable undertaking. Careful management of riparian

areas combined with manipulating harvest schedules in watersheds and instream improvements should help protect the fishery resources in western Oregon. As a general rule, BLM should not substitute restoration, enhancement projects or mitigation for adequate protection of riparian dependent resources except when damage from essential activities is unavoidable. BLM's proposed biological diversity strategy should help to achieve the expected future conditions desired in watersheds.

1. Fish

A State goal is to restore and protect fish stocks. Declining fish stocks in the Columbia, Snake, and several southern Oregon rivers will require an unprecedented effort by resource managers to reestablish acceptable wild fish populations. This effort must include cooperation by all landowners on the management of watersheds and, in particular, riparian areas. BLM needs to be an active player in this long-term program.

Many studies are underway (some 270 on the Columbia River system alone) to examine the causes for declining fish runs in the Northwest. Preliminary theories on why fish runs are declining range widely from dam construction to deteriorating conditions of our watersheds. Many believe it is a combination of many factors, all interrelated, which have led to the problem.

The types of fish habitat enhancement projects over the next decade are generally not enumerated or described in the draft plans.

Fishery concerns which BLM can influence in their land management decision process include: watershed management (including riparian area protection), forest management practices, and grazing.

Sensitive Fish Species

Several of the listed sensitive fish stocks, which have been noted by the Oregon Department of Fish and Wildlife (ODFW) as occurring on the various BLM-administered planning areas include: chinook salmon (Lower Columbia River and South Coast fall run stocks), chum salmon, coastal cutthroat trout (anadromous Columbia River basin stock), coho salmon (Lower Columbia River and South Coast stocks), Oregon chub, Jenny Creek sucker, redband trout, Lost River and Short-nosed sucker just to name a few.

Of particular concern is declines in fish production in the Illinois River. Winter steelhead are of special concern as this stock has been petitioned for threatened or endangered status under the Endangered Species Act. The basin's fall chinook salmon and coho populations have also declined.

BLM has surveyed its lands and has concluded that aquatic habitat on some of its lands is not in good condition. These conditions will seriously influence BLM's ability to improve habitat for sensitive fish stocks occurring on their lands.

The State recommends that BLM conduct a survey to identify declining fish populations and develop recovery plans for high risk populations. BLM should take aggressive action to improve sensitive fish habitat working closely with the State, other federal agencies, Tribes, and interest groups. BLM should describe more completely how their preferred alternatives will impact sensitive fish stocks, and what steps would be taken to mitigate adverse impacts.

2. Water Quality and Quantity

a. Water Quality

A State goal is to ensure that BLM meets or exceeds state and federal water quality standards. The draft BLM plans have stated that they meet federal and state water quality standards; however, several districts have identified streams that do not currently meet these standards. Best Management Practices (BMPs) have been included in each BLM plan which present general prescriptions for meeting water quality.

The State believes that the BMPs listed in the draft plans contain few measurable standards and varied widely between districts. Furthermore, standards are neither clear nor specific enough to be used in monitoring water quality. No information is provided in the plans to show how managers will make determinations regarding water quality and erosion potential for forest management activities.

Further concern has been expressed over the lack of information on landslides. Landslide prevention is a critical component to maintaining water quality on forest lands. BLM has identified fragile sites (unstable soil areas) through its Timber Production Capability Classification inventory. While we assume that the inventory included the identification of potential landslide areas, protective standards for these sites have not been clearly described in the draft plans.

We believe BLM districts have not sufficiently addressed potential landslide problems. The draft plans surprisingly lack information regarding slope stability which is needed for, among other things, the location of waste disposal sites.

The State recommends that BLM districts strengthen their commitment to water quality through the following:

a. BLM needs to make BMPs more specific to assure that water resources objectives are being met. BMP language should include conditions for which BMPs are applicable. Supporting policies and documents also need to be consistent with the BMPs.

b. Consistency through coordination in implementation and monitoring are needed not only within a district but also between districts. The State recommends that BLM develop more comprehensive standards utilizing such expertise as the Forest Service (Siuslaw National Forest), State Department of Forestry and others in identifying (using GIS) and protecting potential landslide areas.

c. Where streams do not meet State water quality standards for temperature, BLM should not allow activities, (e.g., grazing) which would increase temperatures over the long term.

Temporary (one-season) temperature increases would be permissible from the following activities: restoring or improving riparian areas or in-stream habitat; stream bank protection; required transportation system crossings; harvest corridors; structures associated with putting water to beneficial use; or other essential activities such as fire suppression, flood control, or administering BLM lands. Water temperature increases from these activities should be minimal and adequately monitored, especially for cumulative effects. Temporary disturbances should be scheduled when adverse effects to beneficial uses would be minimized.

d. BLM should evaluate future road design, construction, and maintenance standards to ensure protection of water quality. As noted in the Oregon State University response, adequate culvert sizes (consider 25 and 50 year flood) are necessary for draining runoff. Catastrophic road failures from poor road design and plugged culverts, can have a major impact on downstream channels, riparian area values and fisheries resources. The Oregon Forest Practices rules are currently being revised to consider larger culvert sizes on private lands.

The Department of Environmental Quality (DEQ) has conducted intensive monitoring of water quality in several basins in western Oregon since publication of BLM's Analysis of the Management Situation. BLM is encouraged to contact DEQ for the results of these monitoring programs especially on streams running through BLM lands. (Note DEQ comments in Appendix 2.)

3. Water Quantity

A State goal is to provide a sustainable amount of water to meet the needs of Oregonians and fish and wildlife resources.

Successive years of drought statewide have elevated concerns over the availability of water. Most BLM plans have addressed streamflows, beneficial uses, community watersheds, and BLM wells. However, additional information is needed to strengthen the discussion on water quantity.

The State makes the following recommendations:

a. The final plans should acknowledge the limits on the availability of surface water and address surface water quality problems.

b. Districts should describe watershed improvement and stream restoration activities which increase low season flow.

c. District plans should address ways to conserve and reduce water consumption and soil compaction.

d. BLM should expand their discussion concerning the availability of groundwater and groundwater quality problems.

e. Final plans should provide a more thorough discussion of the potential effects of the alternatives on water yields and streamflows. Other recommendations are outlined in Water Resources Department's response (Appendix 2).

4. Watershed Management

Oregon's Strategic Water Management Group has developed a watershed management goal for the State. This goal, in part, notes that a watershed management strategy must enhance and restore watershed ecosystems in order to optimize the natural resources of the State for all beneficial economic, environmental, and social uses.

BLM districts have divided their lands into analytical watersheds using a watershed condition index to measure current and future conditions. The State supports this strategy, in principle, as it should help BLM to achieve State objectives for water and wildlife resources on lands they administer.

Planning by analytical watersheds serves several very important functions. First, it allows district specialists the opportunity to plan management activities on a much smaller, more workable,

geographic setting. Second, districts have a better opportunity to monitor the cumulative effects of all management activities on water quality and quantity, fish, wildlife, and recreation, plus other resources.

BLM's methodology of using an index to measure the cumulative effects of various current and future management practices within individual watersheds has merit. The condition of watersheds could be used to determine where forest management activities could or could not occur. However, the State is unclear how the key watershed condition indicator used in the plans (the watershed condition index) was generated; how it was used in management planning; how it will be used in standards, guidelines, and monitoring; and how it will be validated.

The State is concerned about predictions in the draft plans' preferred alternatives that some watershed conditions will decline over the life of the plans or even worsen from existing poor conditions. For example, the Salem District predicts that in 18 of its 27 analytical watersheds (67 percent), conditions will either decline to a "minor" or "significant" degree over the short-term under the preferred alternative. According to BLM's Executive Summary: Western Oregon Draft Resource Management Plans/Environmental Impact Statements, 45 watersheds "probably" will have declining conditions over the next ten years under the preferred alternatives.

The State fails to understand how declining watershed conditions will meet water quality and other resource objectives set forth in the draft plans or even state and federal water quality standards. It would seem that basin-specific prescriptions to restore or enhance water quality (e.g., sediment and temperature) and aquatic habitat have not been adequately addressed.

Recommendations on watershed management and condition index that BLM districts need to consider when they develop their final plans are listed below.

a. In order to obtain more significant data from evaluation and monitoring, BLM should subdivide analytical watersheds greater than 10,000 acres into smaller, more manageable units.

b. BLM should set watershed impact standards to help guide forest management activities. Standards should address maximum soil compaction, erosion rates, equivalent clearcut area, and relative percentages of seral stages. If standards are projected to be exceeded, proposed projects within a watershed should be reevaluated. Similar adjustment would also occur if monitoring determined standards are not being met.

c. BLM should display severely impaired streams identified by DEQ's 1988 Oregon Statewide Assessment of Nonpoint Sources of Water Pollution within analytical watersheds. This would better indicate existing on-the-ground conditions in the many subwatersheds within a single analytical watershed and provide more meaning to BLM predictions of future watershed condition.

d. Watersheds should be classified and prioritized according to current functional and ecological conditions and importance for maintaining viable wildlife populations. Watershed-specific standards should be developed, in cooperation with adjacent landowners, to restore or maintain watershed conditions. A proactive approach may be used which would include establishing riparian management areas of sufficient width to achieve restoration on streams in poor condition. Districts should place a high priority for restoration on these watersheds. The State and other interest groups should be included in restoration plans. We commend the Medford District for adopting an aggressive approach to watershed/riparian area restoration by developing watershed management plans for 28 streams.

e. BLM should analyze the relationship between calculated watershed condition indices and current flow and water quality conditions. This should enable BLM to test the validity of the rating system. BLM should use existing environmental assessment information to validate watershed condition index values as much as possible. Additional discussion on how BLM developed and used the watershed condition index in their planning process should be included in the final plans.

f. Management activities should be monitored in each watershed to determine the cumulative effects on water, soil, fish, wildlife, and other resources. It will be difficult to accurately monitor watersheds where BLM manages only a small portion of the land base. The State strongly encourages cooperation and communication between landowners in multiple ownership watersheds. Cooperative ventures should involve evaluation of watershed condition, land management planning, and watershed monitoring for protection of water supply, water quality, and fish and riparian-dependent wildlife. Monitoring of multiple ownership watersheds further would serve as a benchmark for comparison with other watersheds with greater BLM ownership.

We commend the Medford District for recognizing watersheds and riparian areas with high cumulative effects. The district has deferred some 28,000 acres from harmful activities for the next ten years because of poor watershed conditions.

5. Riparian Area Management

Water and associated streamside vegetation supply a unique ecological function. Riparian areas have their own distinctive environment and provide habitat for many fish and wildlife species inhabiting BLM lands. Riparian areas also function as corridors between BLM's Old Growth Emphasis Areas and other anchors of biological diversity within a landscape context.

The State's goal for riparian areas is to protect, maintain and restore (where necessary) long-term aquatic productivity and the functional and ecological values of adjacent terrestrial areas directly influencing aquatic systems. This should be accomplished by establishing standards for relevant factors which affect attainment of the State goal.

BLM districts have inventoried streams within their specific administrative area. Stream miles by order, acres of riparian area (mostly order 3 and above), pollution type and severity, and vegetative classes have been identified and summarized in the draft BLM documents. We commend the districts on this effort, as it should set the stage for programs designed to improve watershed/riparian ecosystems.

We would recognize the Klamath Falls Resource Area's commitment to produce a Watershed Management Practices Guide. While the content of this guide was not outlined in the draft plan, it could serve as an innovative approach toward meeting desired water quality goals. One item that we would encourage the resource area to reevaluate in their guide is the protection standards proposed around lakes which is less than other western Oregon BLM plans.

The importance of protecting riparian areas cannot be over emphasized. Several recent studies by a combination of federal and state agencies, Tribes, and others have surfaced in response to the declining fishery resource in Oregon. Studies by COPE through Oregon State University, Scientific Panel on Late-Successional Forest Ecosystems Report to the House Of Representatives, Forest Service (Upper Grande Ronde River Plan, Riparian Management Guide for the Willamette National Forest), and the State of Oregon (Draft Water Classification and Protection Project, and Anadromous Fishery Study) are just a few of the many studies recognizing the need for a greater understanding of watershed/riparian ecosystems and the fishery resource.

Considering the importance of riparian areas on BLM lands contributing to water quality, water quantity and fish and wildlife habitat, the State makes the following recommendations:

a. BLM needs to define an expected future condition for their riparian management areas and provide management directed at maintaining or restoring this condition. The State recognizes that riparian systems are dynamic and change with time due to catastrophic floods, wind, and other natural ecological processes.

b. Standards should be established for all stream orders and should reflect functional and ecological differences between stream orders. At a minimum, these factors should ensure: long-term supply of large woody debris recruitment, snags, shading, water quality (temperature, turbidity), microclimate, floodplain protection, and critical habitat for wildlife and sensitive species.

c. Riparian area management needs to be addressed at the watershed or landscape level and should reflect the current conditions of watersheds.

d. Restoration of riparian areas identified in "poor" or deteriorating conditions should be a high priority.

e. Riparian areas in "good" condition should be maintained in good condition.

f. Riparian management areas (RMAs) should be an appropriate width to meet water quality standards, supply potential large woody debris (loading of complex wood structure in stream) and down wood (tons/acre in riparian management areas), and recognize and manage for sensitive riparian-dependent species within a landscape context.

Buffer widths may vary depending upon overall watershed condition, stream order, beneficial uses, ecoregion, impact to sensitive species, and physical characteristics within/adjacent to streamside area. Critical components that should be considered when developing buffer widths include, but are not limited to, overall watershed condition, shading (water temperatures), sedimentation and turbidity, nutrient recycling, large woody debris, snags, and critical habitat for wildlife and sensitive species. BLM recognized some of these important ingredients when developing their riparian area protection policies.

g. Concern has been expressed over protection of intermittent streams, mainly stream orders 1 and 2. Some have suggested (more accurate mapping is needed) that these streams may comprise as much as 79 percent of the total stream miles on BLM lands in western Oregon. The State recognizes that these smaller streams serve an important function for fish, wildlife and water quality. Greater knowledge through research on the importance of these streams to fish,

wildlife and water quality is needed. We believe that individual forest project plans should map and evaluate order 1 and 2 streams existing within the project boundary before a plan is implemented. If it is determined in pre-project planning that channel integrity or identified beneficial uses need protection, then appropriate protection (including riparian buffers) should be applied. Project planning should also evaluate the potential cumulative effects that activities could have on the beneficial uses outside (subbasin level) of the project area.

Intermittent streams should be managed according to specific standards established for large woody debris recruitment, snags, shading, water quality (temperature and turbidity), microclimate, and critical habitat for wildlife and sensitive species. Disturbance of streamside vegetation and soil must be kept to a minimum. The standards may be accomplished by a variety of techniques depending upon the beneficial uses in question. These include but are not limited to: leaving conifer wildlife trees along these streams; leaving hardwoods, nonmerchantable conifer trees and brush that occur along them; having large woody debris placed in them during forest management activities, including logging; avoiding logging through them; and overall, maintaining and protecting the integrity of the watercourses.

h. Riparian area buffers identified on-the-ground for protection of specific riparian area resources would have no-scheduled harvest planned. Harvesting within these riparian buffers might occur for in-stream/streambank improvement projects, harvest corridors, fire control or other specific, short-term projects. Salvage logging within the riparian management areas should be discouraged except where detrimental environmental and/or structural (e.g., bridges or culverts) damage would be anticipated from leaving downed trees.

i. While the State recognizes that the primary focus within riparian management areas on BLM lands will be streamside and associated vegetation, taking no action may not improve conditions within these areas, especially for large woody debris recruitment. As an example, the State is concerned about the large amount of alder-dominated riparian areas on BLM lands. These hardwood stands currently do not have the near-term potential for producing effective types and quantity of coarse woody debris nor will they likely have that potential in the future unless restoration measures (e.g., planting conifers within hardwood-dominated riparian areas) are taken.

For both woody debris and water quality problems, restoration projects, if implemented, should use adaptive management combined with intensive evaluation, monitoring, and data evaluation to determine long-term and short-term tradeoffs. Strict project standards followed up by evaluation and monitoring are the keys to a successful stream restoration program.

j. Exclude livestock in grazing allotments where poor riparian area conditions have been identified until such time as the riparian area reaches good condition.

k. Mining activities in or adjacent to streams should be managed in a way not to adversely impact riparian area vegetation and water quality.

6. Wetlands

BLM should increase its recognition of wetlands as a riparian resource in a manner consistent with the Bureau's Riparian-Wetland Initiative for the 1990's. Recommendations that the State would suggest be included in the final plans are:

a. Specifically name wetlands as features for which riparian management areas will be established.

b. Specifically identify wetlands that will be restored or enhanced.

c. Acknowledge the need to coordinate and cooperate with public and private landowners (via Statewide memorandum of understanding) in order to 1) develop a common inventory of wetlands; 2) establish criteria for determining wetland significance for protection or restoration; and 3) develop coordinated priorities to protect and restore public wetlands.

d. Acknowledge that the preservation of wetlands on BLM lands makes a major contribution to the attainment of the Oregon Benchmark goals on wetlands (i.e., 100% of 1990 Oregon wetlands still preserved in the year 2000).

The State endorses the Medford District and the Klamath Falls Resource Area inventory of wetlands and recognition of smaller one- to three-acre sites. This should set a standard that other districts should follow in their final plans.

7. Summary

BLM districts should develop and utilize comprehensive watershed management plans to improve water quality, water quantity, and fish and wildlife habitat within riparian areas. Continued

research and cooperation among federal, state, Tribes, and the private sector should improve/maintain acceptable riparian area conditions. Best Management Practices setting measurable standards and the identification and protection of unstable areas would further help maintain water quality. Monitoring, using measurable standards, is the key feedback mechanism for BMP implementation, effectiveness, and cumulative effects analysis.

D. Air Quality. How should BLM address the use of prescribed fire as a forest management tool in terms of the potential impacts on air quality?

The State supports a balanced ecological strategy for managing forests in Oregon. An ecological approach to forest management may entail a greater use of prescribed burning. If prescribed fire is going to be utilized by BLM as a forest management tool, state and federal air quality requirements must also continue to be met.

The draft BLM plans have stated that prescribed burning will be done in accordance with the Oregon State Implementation Plan administered by DEQ and the Oregon Smoke Management Plan (OSMP) administered by the Oregon Department of Forestry. Incorporated into the OSMP is a goal for reducing emissions from prescribed burning by 50 percent by the year 2000.

1. PM10 Nonattainment Areas

Prescribed forest burning and wildfires in west-side districts can affect air quality in both western and parts of central Oregon. Of particular concern are areas which do not meet state and federal health standards for small particulate matter (PM10). Currently these areas are Medford-Ashland, Klamath Falls, Grants Pass, Eugene-Springfield, and Oakridge.

Although prescribed burning is not a significant contributor to PM10 levels in the areas noted above, there is still a need to minimize smoke impacts, in order to ensure that air quality standards are attained by the federal deadlines specified in the Clean Air Act. DEQ has developed PM10 burning smoke impacts in these areas. The Department of Forestry's OSMP is directly tied into these PM10 control strategies.

2. Prevention of Significant Deterioration

The State is also concerned about maintaining clean air in areas currently meeting air quality standards. Contributing prescribed burning impacts could aggravate PM10 levels in these areas leading to the nonattainment designation and development of control strategies as discussed above. In addition, the federal Clean Air Act contains pollution limits known as Prevention of

Significant Deterioration Increments which limit the amount of emissions that can be added to a "clean" airshed. If the allowed deterioration increment is consumed, then further growth must be restricted, such as new and modified major industrial sources of pollution.

3. Visibility Protection

The State recognizes the importance of protecting federal Class I areas (wilderness areas and Crater Lake National Park) from smoke impacts as a result of BLM prescribed burning in western Oregon. The federal Clean Air Act requires states to improve visibility in these Class I areas. Air quality monitoring in the Cascades has shown a 65-75 percent improvement in visibility in recent years. The Oregon Visibility Plan, developed by DEQ in 1986, is largely responsible for this progress and is closely linked to the OSMP.

4. Summary

The State believes that the final BLM plans should specifically address each of the three issues outlined above in cases where smoke impacts from prescribed burning could potentially occur. Any increases in prescribed burning including "understory" burning should be analyzed from an air quality standpoint.

In addition, the recent emergence of the forest health problems in central and eastern Oregon may expand the role of natural and prescribed burning on some of the forested land administered by BLM. The extent to which this could occur needs to be assessed prior to the start of any increased burning to ensure consistency with the Oregon's State Implementation Plan and OSMP. Continued coordination and communication among federal and state agencies in addressing these air quality concerns should be stressed.

E. Tourism and Recreation. How should BLM manage for recreation, visual resources, and Wild and Scenic Rivers?

BLM lands contain a variety of significant natural resources of recreational value, including wildlife, wilderness, lakes, and rivers. These resources have existing and potential values for local residents and also serve as an attraction for tourism from outside a specific BLM district.

As Oregon's and the nation's population grows, the demand also grows for tourist attractions and outdoor recreation. At the same time, the State, in an effort to expand its economic base and to mitigate the cyclical nature of an economy heavily dependent upon timber and agriculture, increasingly emphasizes

tourism, recreation, and the service industries which accompany them. Any long-range plan for BLM lands in Oregon should give more weight to diversified use of these lands if Oregon is to have balanced growth.

The State has addressed recreation uses and needs through statutes and state land use planning goals. The Oregon State Comprehensive Outdoor Recreation Plan (SCORP), with the Oregon Outdoor Recreation Plan 1988-1993 and the Recreational Supply Bulletin and Recreational Needs Bulletin, provide comprehensive technical information and assessments for analyzing recreational growth and needs throughout the state. Furthermore, the State's recreation paper (Appendix 1), titled Recreation on BLM lands - State Position Paper, presents recommendations on improving recreational and tourism opportunities on BLM lands. We encourage districts to incorporate the State's recommendations and technical expertise when developing their final RMPs/EISs.

1. Recreational Tourism

Many proposed recreational developments and management actions have direct impacts on the future of recreational tourism in Oregon. Several of these actions which BLM should consider in its final plans include:

a. Coordination with State and local governments on actions which may influence our Regional Strategies and Community Initiatives Programs.

b. Development of a multiple-agency recreation planning program to promote regional recreational development and tourism.

The development of recreational/tourism strategies by State and federal governments and the private sector is one essential component of Oregon's plan to diversify its economy.

2. Dispersed Recreational Demand

The 1988 SCORP projects demand for a variety of dispersed recreational activities. As identified in this document, merely considering activity demand is insufficient to address recreational diversity. Equally important is to consider the desired characteristics of the setting for a given activity. Those characteristics in SCORP have been defined in terms of the Recreational Opportunity Spectrum (ROS).

The Klamath Falls Resource Area was the only plan which recognized ROS to identify recreational opportunities. We commend them on this effort and recommend that the five westside BLM districts incorporate this rating into their final plans.

The SCORP analysis has identified a need to supply more "primitive" and "semiprimitive" recreational opportunities. While it may be difficult to furnish this specific kind of recreational setting because of BLM's checkerboard ownership, Special Recreational Management Areas, Areas of Critical Environmental Concern, Outstanding Natural Areas, Research Natural Areas, scenic areas, plus other special sites may possess some of the characteristics needed for "primitive" and semiprimitive recreation. The State encourages districts, where appropriate, to use the ROS to identify "primitive" and "semiprimitive" recreational opportunities.

3. Wilderness

Soda Mountain Wilderness Study Area. -- BLM completed its Record of Decision for the Oregon wilderness study areas in October 1991. BLM's final decision package, which must be approved by Congress, recommended that 49 study areas encompassing 1.3 million acres be designated as wilderness. All but three of the wilderness study areas (two are islands) are located east of the Cascade Mountains.

Soda Mountain is the only mainland BLM study area recommended for wilderness west of the Cascades. Located in the Ashland Resource Area of the Medford District, it encompass some 5,895 acres of which 5,867 acres are being proposed for wilderness.

Soda Mountain - Pilot Rock area is an extremely unique transition zone where coastal, high desert, Cascades and Sierra ecosystems converge. Because of its geographic location and geologic history, many plant and animal species, not found anywhere else in Oregon, have become established. Soda Mountain also provides an important habitat for summering and wintering big game with much of the area identified as a "Designated Conservation Area" by the U.S. Fish and Wildlife Service in the Draft Recovery Plan for the Northern Spotted Owl.

Ever since BLM began evaluating sites for wilderness consideration, there has been strong public interest in expanding the Soda Mountain area. The Governor's Forest Planning Team visited Soda Mountain earlier this year to get a first-hand look at the area and discuss its status with local citizens and BLM.

Since the area is ecologically unique and due to a strong interest by the public, the State recommends that the proposed boundaries of BLM's Soda Mountain wilderness be further evaluated to determine if additional land should be wilderness beyond what has been recommended in BLM's Wilderness Study Report -- Record of Decision. This evaluation should be conducted before final legislation is drafted for Congressional approval. BLM is

encouraged to carefully manage the entire area of public interest, outside of BLM's proposed WSA boundary, in order to protect its current ecological values and suitability for wilderness.

4. Trails

The draft plans propose significant additions to recreational trails on BLM lands. The State supports this direction especially for those trails linking recreational sites, those allowing access to Special Recreation Management Areas, and those providing connectors to other recreational trails.

The State encourages each BLM district/Klamath Falls Resource Area to review recommendations for trail management in our recreation paper (Appendix 1). Some of the recommendations noted in the paper include: develop trail plans within each proposed project area, buffering, appropriate signing, rerouting, and implementing silvicultural practices to mitigate impacts. We urge that these recommendations be considered in the final plans.

5. Developed Recreation Sites

The preferred alternatives propose substantial increases in camping and day-use sites, in many cases more than doubling current provisions. We are very supportive of this increased emphasis. High priority for such development should be given to those sites supporting local recreational and tourism strategies.

6. Wild and Scenic Rivers

The State gives a high priority to the Federal Wild and Scenic River program. It, along with the State Scenic Waterways program, is critical in maintaining the natural resource and recreational values on Oregon's waters.

The following concerns have surfaced with all of the draft plans:

a. The draft plans do not make it clear whether federal land management actions that potentially could have impacts on designated waterways in the State system will be coordinated with the State.

b. Technical procedures for determining river suitability were not sufficiently explained in the draft plans. Issues include percent of land ownership by BLM; the criterion used for ranking rivers as suitable; use of "Outstandingly Remarkable Values" (ORV) in rating; and use of economic costs and local support criterion.

Given the considerations noted above, the State believes that the methodologies used to determine suitability of wild and scenic rivers should be reviewed in preparing the final plans. We recognize that all the rivers found eligible are not necessarily suitable. But we believe that the current method used by BLM may not be adequate for making that determination.

Criteria that BLM districts should consider when analyzing suitability of rivers should include:

a. Aggregated values of a given stream.

b. Importance of aggregated values on both a statewide and SCORP regional level.

c. Importance of smaller streams to program.

d. Non-local as well as local support for a given stream.

Visual management on scenic rivers is best determined through the river planning process. This provides for comprehensive development of management standards for all values appropriate to a given river. Such standards should be based on the identified ORVs regardless of river designation. In terms of visual resource management, the State recommends the following management/protection standards:

a. No scheduled harvest (visual resource management I) in river corridors, under its administration, designated as **wild**.

b. Rivers or segments of rivers designated as **scenic** should be managed to maintain and provide recreation opportunities in a near-natural setting. While silvicultural practices could occur within the 1/4 mile corridor, these practices should not substantially impact the river or its immediate environment. Where scenic is an ORV currently meeting visual resource management (VRM) I, maintain the visual quality; likewise, where VRM II exists maintain and protect its scenic value. When VRM III exists, BLM should attempt to enhance visual quality to VRM II.

c. River or segments of rivers designated as **recreational** should be managed to maintain ORVs for which they are designated while providing river-related recreational opportunities in a recreational setting. On rivers where scenic or recreation is identified as the ORV, standards should be implemented which would protect and enhance existing scenic conditions.

Where neither scenic or recreation is an ORV, the VMR class should be determined through the individual planning process. For these rivers, visual resource management class III should be considered the minimum.

d. In areas where more restrictive land allocations are already in place (e.g., primitive recreation, ACECs or Special Recreation Management Areas) the more restrictive standards should apply.

e. BLM should concentrate on 1/4-mile corridor along rivers in designing plans for stream with wild and scenic designation. BLM should also manage adjacent lands beyond the 1/4-mile boundary, where necessary to protect ORV.

f. All values on eligible rivers should also be maintained at their current level for the plan period (10-15 years) or until Congress acts.

The State strongly encourages BLM districts to work with adjacent landowners, the State and the public when analyzing streams for designation. Additional pertinent comments regarding wild and scenic rivers can be found in the Department of Parks and Recreation's response found in Appendix 2.

7. Off-Road Vehicles

Various forms of off-road driving are projected to increase in many of the draft plans. With their nearness to major population centers, BLM lands are a major provider of this type of recreation in western Oregon.

Off-road vehicle recreation, while enjoyed by individuals and clubs, has created some land use controversy over the years on federal and state lands. To mitigate these potential problems, the State recommends that BLM districts include provisions in their final management plans for designating areas to meet off-road vehicle demand. We strongly recommend that off-road vehicles use be included in a comprehensive road management plan which should be developed by each district.

BLM should strengthen its standards and guidelines for off-road vehicle use. Brochures should be published for public distribution showing locations where off-road vehicle use is permitted and explaining regulations on use.

8. Scenic Highways

The public's perception of how BLM lands (and other ownerships) are managed is in many cases determined by what people see as they travel the highways and hike the trails. This is a major reason for maintaining visual quality along roads, trails, developed recreational areas and other visually sensitive sites.

Scenic quality contributes to the increasing tourist industry in western Oregon. Hundreds of miles of State highways run through BLM-administered lands. Highways 22, 26, 34, 38, 42, 62, 126, 138, 140, 199, and Interstate 5 are just a few of the routes passing through BLM lands that are used by Oregonians and out-of-state visitors. With this in mind, BLM districts should carefully consider scenic quality in their RMPs/EISs.

It is recognized that maintaining continuity in visual quality on BLM lands is somewhat complicated by its checkerboard ownership. In many cases adjacent ownerships are intensively managing their resources without a high degree of visual quality in mind. This, however, has changed as revisions to the Oregon Forest Practices Act rules (ORS 527.630 Sections 10 and 17) have set visual standards and identified specific highways for visual protection. Visual quality most likely would be enhanced if the six draft plans preferred alternatives were implemented.

BLM's draft plans have classified and are proposing visual protection standards for many sensitive areas: ACECs; SRMA; Wild and Scenic Rivers -- McKenzie and Rogue; travel corridors -- Mt. Hood Corridor, I-5, Marys Peak Road, plus other recreational sites. The State supports the visual protection of sites presented in the preferred alternatives, and suggest BLM provide adequate visual protection along other visually sensitive highways.

The State recommends the following regarding visual quality:

a. BLM districts should more precisely inventory and reevaluate their visual protection recommendations in the final plans for major highways that pass through BLM lands. The analysis should identify those highways or highway segments appropriate for visual management. Existing visual conditions along these highways should be described, as well as the directives to develop management plans to achieve expected future conditions.

b. Scenic values along the major highways, cited above, should not fall below visual resource management (VRM) Class III. The State believes that VRM Class IV (modification) would not retain the visual quality objectives along these important travel corridors. The application of new silvicultural concepts by BLM may help mitigate visual concerns.

c. Long-term visual management objectives should consider the use of silvicultural practices (e.g., uneven-aged management or underburning) in order to accomplish the VRM objectives.

d. BLM should work with adjacent landowners and others to maintain visual continuity.

The State supports BLM's Backcountry Byway Program.

We also support Salem District's special protection for the Mt. Hood Highway corridor including land exchanges to promote visual quality.

With an increased interest in driving-for-pleasure, these designated routes will give the public sightseeing and wildlife viewing opportunities on lands administered by BLM.

9. Technical Issues

a. Estimates of Recreational Use

We understand that BLM does not currently estimate recreational use on lands under its jurisdiction. Therefore it used activity occasions derived from SCORP, adjusted based on BLM's proportional forested recreational land base for this planning period. We concur with this methodology, but urge BLM to develop methods of use estimates more appropriate to BLM lands in the future.

b. Economic Valuations of Recreation

Analysis of the economic benefits of recreation use should be developed with values appropriate to BLM lands. For example, we understand current methodologies do not place economic values on recreational activities occurring within a BLM district produced by residents within that district. This would miss the transfer payments of recreation produced by a resident of one county recreating in another county. We urge that current recreational economic methodologies be reconsidered so the full value of recreation can be described in the final RMPs.

F. **Timber Management.** Are BLM's timber growth and yield assumptions valid? How will silvicultural practices be used to support projected harvest levels? Will BLM be able to produce the harvest levels predicted by land allocation? Has BLM adequately address forest health?

Timber harvest from lands administered by BLM has been and will continue to be a major source of logs available to local mills throughout Oregon. Over the last ten years, 11 percent of the total volume harvested in Oregon has come from BLM lands. In

1991, over 486 million board feet was harvested from Bureau lands which represents eight percent of the total volume harvested statewide. Forest management activities not only furnish jobs for local economies but also are an important revenue source for counties to support schools and roads.

BLM's legal mandate for managing its lands has come from the O&C Act and the Forest Land Policy and Management Act. These laws, which were discussed in the Ecosystem Management section of this paper, directly address the management of lands administered by BLM. The O&C lands have been intensively managed over the last fifty years as directed by congressional mandate. Public Domain lands administered under the Forest Land Policy and Management Act consider more multiple use policies.

1. Forest Land Management

Under the current plans, forest management entails implementing mainly even-aged management (clear-cutting) followed by the application of intensive management practices (e.g.,burning, planting, fertilization, thinnings, and controlling competing vegetation) on short rotations (40-60 years). The primary objective is to intensively manage forest stands to reestablish and perpetuate the growth of Douglas-fir/hemlock stands on a sustained yield basis. Other species are favored depending upon the ecoregion within districts.

Implementation of this strategy represented accepted forest management practices for managing western Oregon forests in the past. Recently, however, these practices have been questioned due to air and water quality problems and protection of sensitive, threatened, and endangered species plus other concerns. This has required BLM and other forest landowners to reassess their approaches to resource management.

In the draft plans, BLM is proposing to meet this challenge by adopting an ecosystem approach to forest management known as biological diversity. Biological diversity represents a significant change from BLM's current management philosophy. While there are questions about the legal sufficiency of this new strategy in meeting the O&C Act, the State believes that biological diversity goes a long way toward addressing concerns about forest health and maintaining productive ecosystems.

The preferred alternatives are designed to produce mature and older forests over time. Because less older forests will be provided on adjacent private lands, we are concerned that the checkerboard ownership pattern makes it unlikely that the objectives for management will be achieved. In order to produce the desired future condition of major forest areas, nearly complete watershed-level ownership is necessary.

A variety of techniques have been used to provide older age class forest. Old Growth Emphasis Areas (OGEAs) 1's use 300 year rotations and density management to accelerate older forest characteristics. Connective Areas (CAs) are managed using 150- or 200-year rotations. Due to the numbers of overstory leave trees planned, we anticipate that management in the General Forest management area will produce characteristics similar to older stands for about 2/3's of the rotation. BLM's efforts are innovative in that they attempt to maintain spotted owl habitat over time while still producing timber from the same land. This strategy is not without controversy, however, as concerns have been expressed over the sufficiency of this strategy to maintain dispersal habitat for spotted owls. (Note wildlife management section of this coordinated response for a further discussion.)

The Medford District has divided its planning area into southern and northern management units based on site productivity, plant community, and forest condition. Proposed forest management prescriptions have been tailored to each area to better fit conditions on the ground. Variations in conventional forest management practices are also being proposed in frost-prone areas. The State compliments the district for this effort.

Implementation of uneven-aged management, especially in the Klamath Falls Resource Area's ponderosa pine and pine-associated stands, is also supported by the State. Both the Medford District and Klamath Falls Resource Area mention using uneven-aged management as a silvicultural management tool. A more comprehensive explanation would be helpful on how these, and possibly other districts, will implement uneven-aged management and how this differs from the various green tree retention standards being proposed in the preferred alternatives.

Our concern, which will be reiterated again in following sections, is the uncertain outcome of applying untested silvicultural prescriptions through biological diversity. It will take highly trained professionals to implement and monitor biological diversity to determine if the program is successful in meeting each district's (including western Oregon as a whole) expected objectives.

Adequate funding is necessary for a successful program. BLM is proposing a much higher level of intensive management (e.g., more genetic plantings and pruning) than ever before. Historically, monies have not been available for intensive management programs. Furthermore, timber receipts have been used to fund many of the activities. We question how BLM intends to obtain the necessary funds to implement biological diversity with reduced harvest levels and higher predicted costs. BLM should evaluate the possible impacts on management programs and outputs (e.g., allowable sales quantity) of lower funding levels.

We direct your attention to the Department of Forestry's response (Appendix 2) and Oregon State University's Report (Appendix 3) for more detailed comments specific to individual BLM districts/resource area.

2. Land Suitability

BLM districts have inventoried their lands by using a system known as the Timber Production Classification System (TPCC). GIS mapping has helped identify the various TPCC classifications. According to the draft plans, this inventory identified the physical and biological capabilities of the lands to support and produce forest products on a sustained yield. Some 2 million acres were identified as suitable in Western Oregon/Klamath Falls Resource Area of which 1.7 million acres would be managed for varying degrees of timber harvest. Less than 1 million acres would be allocated to general forest under the six preferred alternatives. Other land allocations (e.g., Old Growth Emphasis and Connectivity areas) would allow less intensive timber production as compared to the general forest allocation.

The State recommends that BLM, using data obtained from the Forest Intensified Research project, Department of Forestry, and other studies, continue to validate the accuracy of data obtained from its inventory program and further evaluate lands currently determined to be unsuitable. If it can be determined that some of these lands can be managed for timber production, they should be returned to the suitable base. Likewise, lands in the suitable base which are determined to be unsuitable through monitoring, should be taken out of the base.

Comments regarding BLM's TPCC inventory system are found in Appendix 3 -- Oregon State University's Report (page 43).

3. Growth and Yield Assumptions

Estimation of the sustainable yield level is highly dependent upon a number of assumptions regarding land bases, timber inventory, management activities, and growth and yield assumptions. If the assumptions are not correct, one may find in the decades ahead that either the harvest level was not sustainable or that the harvest level was less than could have been realized.

The allowable sales quantity (ASQ) on each BLM district was calculated using a computer program named TRIM-PLUS. Districts used a combination of two growth and yield models (Stand Projection System -- SPS and ORGANON) for estimating future yields from managed forest stands.

Several questions have been raised regarding BLM's extensive inventory system including sampling selection, unit design, and intensity methods. Concerns have also been expressed regarding BLM application of SPS (an even-aged Douglas-fir or western hemlock calibrated model), to stands where green trees will be maintained.

Some of the draft plans noted that the preferred alternative includes many elements which are recognized to be substantially untested modeling of sustained yield as compared to other alternatives presented. It is further noted that the level of confidence in yield and harvest values is lower than other alternatives.

The State is concerned that ASQ levels predicted in the draft plans may be inflated estimates of the actual volume that can be expected. Questions regarding inventory design, site index equations, volume and taper equations, growth and yield from intensive management practices, minimum harvest ages, and empirical yield tables need to be discussed in more detail in BLM's final plan. Further analysis should also be conducted on the allowable cut effect of deferring for 80 years some of the OGEAs even though they remain in the timber base.

The State would direct BLM's attention to Oregon State University's Report on growth and yield in Appendix 3.

4. Forest Health

Deteriorating forest health conditions can be visually detected as one travels in eastern Oregon. Forest health is also a serious concern in western Oregon forests where insect and disease mortality is very common. Forest health conditions influence the amount of timber yield sustained over time, the ability to maintain critical fish and wildlife habitat, and the maintenance and development of recreation opportunities on all forest lands regardless of ownership.

BLM's draft plans fail to adequately address forest health issues which have recently received both public and political attention. In most of the plans, forest health is not mentioned in the goals or objectives of the proposed management alternatives. Medford and Klamath Falls draft plans come the closest to addressing health problems and solutions.

The State recommends that BLM's final plans set specific goals and objectives including monitoring detailing how management strategies of the preferred alternatives will address forest health problems and what mitigative measures will be implemented to improve unhealthy forest conditions on BLM lands. We encourage BLM to work with other forest landowners to improve forest health.

5. Timber Supply

The primary driver of BLM's socio-economic analysis is timber supply. BLM used an innovative approach to model timber supply. This approach has much merit. However, some basic assumptions need to be revisited and the analysis for the final plans should reflect a more uncertain picture of timber supply in Oregon. In addition, BLM should explain how the timber supply analysis was used in formulating its draft alternatives and how it will be used in formulating the record of decision. Please review the Department of Forestry's draft response found in Appendix 2 for more details.

A summary of the concerns and recommendations regarding timber supply include:

a. Due to the uncertainty in timber supply, it is reasonable to assume that stumpage prices will increase substantially more than has been predicted in the draft plans. We encourage BLM to reevaluate the stumpage prices used in its analysis to better align them with current projections.

b. Overall, analysis of the timber supply situation is more optimistic than warranted. The draft plans portray what is likely to be an upper level of timber supply. Additional scenarios should be portrayed reflecting lower potential harvests from private owners, the Forest Service, and forests managed by the Oregon Department of Forestry. Uncertainty about the probability of implementing planned BLM timber sale levels should also be documented.

c. The public's sensitivity toward harvesting younger stands (50-60 years) of timber may force BLM to reconsider later decadal management regimes. Current restrictions on federal lands have caused increased harvesting of smaller diameter logs on private lands. This may translate into longer rotations on BLM lands than would otherwise be the case. BLM should evaluate the effects of longer rotations and higher minimum harvest ages on all lands managed by BLM.

d. Timber sale quantities are highly dependent upon intensive management activities yet, historically, BLM management activity accomplishments are well below planned levels.

   Levels of management practices on BLM forest lands are dependent upon levels of federal funding. These appropriated funds have, most of the time, been sufficient to insure adequate regeneration of cutover stands but have often been insufficient to take advantage of opportunities to significantly increase growth levels of the Bureau's Oregon forest lands. Planning for socio-economic impacts of projected timber supply levels should consider the unstable

   nature of federal funding of forest management activities and the difficulties of securing funding for these activities over the next several decades.

e. Timber supply is the primary driver of the BLM socio-economic analysis but does not appear to be an important part of alternative formulation in the draft plans. One would have expected BLM to use this analysis as an integral part of developing plan alternatives; the potential exists to use the analysis as a key decision criterion for the record of decision.

f. The Bureau appears to have used a harvest flow constraint know as Sequential NonDeclining Yield. The basic concept is to find a harvest level that can be sustained over time. This process is a fairly rational approach to regulation when trying to balance stability goals with forest regulation goals. BLM did not do any sensitivity analyses on alternative flow constraints. In light of concerns for community stability, BLM might want to present a "departure alternative" in its final plan.

G. Wildlife Management. How should BLM districts manage for big game? What snag levels should BLM provide for cavity-dependent birds and other wildlife? How should sensitive, threatened and endangered wildlife species be managed?

1. Deer and Elk Habitat

Big game is an extremely important resource which depends on cover and forage found on BLM administered lands. Big game provides recreation to the public in the form of hunting and viewing opportunities. The Dean's Creek Elk Viewing area is an example of BLM's commitment, in coordination with the State, to develop an interpretive roadside program for elk and other wildlife.

BLM districts have appropriately utilized the Wisdom Model in determining big game habitat conditions. However, BLM has not stated how it would improve habitat effectiveness (HE) for big game in areas with low HE indices.

a. Cover

Cover is one of the critical components that needs to be available on BLM lands if management objectives (i.e., HE indices and number of animals) set by the Oregon Department of Fish and Wildlife (ODFW) are to be achieved. Cover, which includes the subcategories of optimal, thermal, and hiding cover, has been evaluated in the draft BLM plans. Existing cover conditions were rated as marginal in most of the elk management emphasis areas.

The reason given for these marginal conditions is past forest management practices on BLM and adjacent private lands. Under their preferred alternatives, BLM districts are predicting no change in the short term for cover conditions. Cover conditions would improve in the long-term in the OGEAs but would remain marginal in the general forest area. The State is concerned about long-term marginal conditions in the general forest.

The final RMPs should address how BLM proposes to improve marginal cover conditions and to meet HE and herd number objectives. BLM should work with ODFW on meeting these management objectives.

b. Forage

Forage quality and availability are also important elements necessary for big game survival. Like cover, BLM draft plans indicate marginal current conditions in most of the emphasis areas/analytical watersheds. Lack of forage or poor forage quality has led to deer and elk migrating onto private lands thus leading to land use conflicts. BLM districts have mentioned the use of forage seeding on harvested units and road rights-of-way. Coos Bay, in particular, is planning to seed up to 50 percent of the acres harvested each year.

BLM districts should consider the following recommendations on forage in their final plans:

(1) The final RMPs should address how BLM proposes to improve marginal forage conditions and to meet State HE and herd number objectives. BLM should work with ODFW on meeting these management objectives.

(2) Expand, where feasible, the forage seeding programs to benefit big game. BLM should increase its effort to search out and/or create native grass and legume seed sources for forage seedings palatable to big game species.

(3) BLM should fund forage seeding through timber sale receipts.

(4) BLM districts, in particular the Klamath Falls Resource Area, should structure grazing allotment plans to mitigate forage conflicts that may arise between livestock and big game. Alternatives such as shortening livestock grazing periods in the fall to allow green-up for winter forage may be helpful in defusing forage problems.

c. Roads

A plan to manage roads in a responsible manner is perhaps the most powerful management tool BLM has to benefit big game in western Oregon. Open roads allow easy access to big game herds

and other wildlife. This accessibility has exposed deer and elk to greater human-caused disturbances. Big game must expend more energy to seek hiding cover from hunters and others when open road densities are high.

Open-road densities exceeding 4 miles/square mile are common on all of the BLM districts. Declines in big game habitat caused by a high density of open roads has been well documented. We direct your attention to the roads management section, Appendix 1.

2. Snags and Dead-and-Downed Wood

Dead and down woody material is increasingly recognized as an important component of the forest ecosystem. BLM should provide enough "wildlife trees" to maintain viable populations of birds and other wildlife. Additional steps should be taken to ensure the development of snags over time.

Green trees should be left on regeneration units to provide future snags. BLM districts are commended for proposing to leave 6-20 green trees per acre. However, residual green trees left on harvest units may not be long lived or may blow down such that snags may be unavailable in the future. Thus, it may be necessary to girdle or blast out the tops of some of these trees over time in order to produce snags to support desired population levels.

BLM should have concrete proposals to create snags including estimated budgets and work-month requirements. BLM should also adjust ASQs to account for these created snags over time. BLM should fund research to determine whether artificially created snags have the same utility for wildlife as those produced naturally.

The State supports BLM's proposals for retention of dead-and-downed wood. Where feasible, BLM should provide downed logs greater than 24" diameter at a minimum rate of 2/acre. BLM should include the retention of target levels of dead-and-downed wood in contract stipulations for planned timber sales. BLM should establish a monitoring system to ensure that target levels are attained.

3. Sensitive, Threatened and Endangered Species

a. Spotted Owl

The northern spotted owl was listed as a threatened species on June 26, 1990 as it was determined that declining habitat conditions were leading to possible extinction. Several conservation strategies have been developed, most notably the Interagency Scientific Committee's (ISC) Report and the Draft Recovery Plan, to address the northern spotted owl's recovery.

A Recovery Team was appointed by Secretary of the Interior Lujan to develop a recovery plan that would consider the habitat for the spotted owl and other species plus the economic effects of implementing a recovery plan. The State has a member on the 18-person Northern Spotted Owl Recovery Team and has contributed support, from several State agencies, to the process.

BLM's draft preferred alternatives propose to address spotted owls and other critical species through application of ecosystem management principles. The overall intent of this strategy according to BLM is: "To manage lands to contribute to community stability consistent with maintenance of ecosystems and a diversity of species; contribute to long-term recovery of the northern spotted owl; and maintain fish and wildlife and recreation, scenic and other resources." The objective is to maintain many of the old growth/mature forest components necessary for the spotted owl and other species while permitting the production of a certain level of goods and services on lands available for timber harvest.

As noted in the Old Growth and Mature Forest section of this coordinated response, districts have taken various approaches to maintaining and producing mature/old growth stand conditions. The concepts revolve around creating Old Growth Emphasis Areas (OGEAs) and Connectivity Areas (CAs) and Klamath Falls Resources Area's Protected Habitat Areas (PHAs) scattered throughout the districts.

BLM's Salem District has identified three classes of OGEAs and two types of CAs in an effort to maintain/create older forest structure. The preferred alternative strategy for OGEA 2 (Nestucca block) is calling for more intensive management than in OGEA 1 blocks. Due to the current stand structure existing in the Nestucca block, there is a need to accelerate older forest conditions. While this need is recognized, there is a concern that the management scenario being proposed is untested and possibly too aggressive thus it may not meet the intent of the spotted owl recovery plan. The Governor's Planning Team and state agencies recently visited the site with BLM resource area managers to discuss proposed management prescriptions under the preferred alternative.

Other concerns have also surfaced regarding the retention of existing stands of old growth and whether or not BLM's older forest strategy will be sufficient to meet dispersal habitat needs of the spotted owl. Furthermore, BLM has not done a risk analysis and developed contingency plans for OGEAs and CAs that potentially could be destroyed by a catastrophic event.

The effectiveness of CAs as corridors for wildlife movement has not been adequately addressed in the draft plans. Some of the factors that may affect the utility of these areas include: their

width, current fragmentation of habitat within the corridors, the effect of timber harvest on current and future habitat mosaics including anticipated patch size, land ownership pattern, and different dispersal needs of wildlife. BLM should address these factors in their final plans.

Intensive management of the forest landscape has created the current stand conditions that exist today. To reach conditions we desire in the future may require some manipulation (less intensive than in the past) of forest stands to hasten old growth/mature forest conditions.

It is the responsibility of the US Fish and Wildlife Service to determine whether BLM plans comply with the Endangered Species Act. The State supports the general principles and overall approach taken in the Draft Recovery Plan for the Spotted Owl as a means toward resolving the present impasse. The Final Recovery Plan for the Northern Spotted Owl, due to be released in 1993, should be adopted by BLM unless the U.S. Fish and Wildlife Service determines that BLM's land management strategy is adequate for protecting the spotted owl.

b. Bald Eagle

The State concludes that the implementation guidelines for the bald eagle recovery plan have been met by the districts. However, ODFW is specifically concerned about the bald eagle roosting area in the Scappoose block which has apparently received no special protection in the Salem draft RMP. We would ask BLM to contact ODFW regarding this specific bald eagle site.

c. Marbled Murrelet

With the recent listing of the marbled murrelet as a threatened species under the Endangered Species Act, BLM must provide an in-depth analysis of the effects of the alternatives on this species. The definition for suitable habitat as currently used by BLM must be further refined to reflect the latest scientific information. From an operational context, the State recommends that BLM expand murrelet inventories and take interim measures to protect suitable habitat.

d. Other Sensitive Wildlife Species

Additional concerns have been expressed by ODFW and others on populations of other Oregon sensitive species (e.g., neotropical migrant birds) that may be impacted by BLM preferred alternatives. This concern especially applies to the general forest management area where the impacts of timber harvesting on these species may be severe, but applies to other allocations as well. The final RMPs need to provide clear direction for site-

specific protection of these species including information on protection of nest sites and other important habitat areas. BLM should take no action which would contribute to the listing of sensitive species. BLM should inventory sensitive species occurring on their lands, mitigate impacts on sensitive species resulting from management actions, and monitor to assess the impacts of actions on sensitive species.

H. Old Growth and Mature Forest. How will BLM manage its forests to maintain old growth and mature forest composition?

When people think of forests, they may envision majestic old growth. These old growth stands provide habitat for many wildlife species and furnish a variety of recreational experiences.

Old growth is also still important to the timber industry. Because of its size and the quality of the wood, these trees are especially prized by industry.

According to the BLM's 1988 extensive stand inventory, there are over 290,000 acres of existing old growth (200 year old) in the western Oregon districts. While various land allocations being proposed in each district's preferred alternative set-aside some of these stands (e.g., Special Areas, wild and scenic river corridors, riparian areas, and wildlife habitat) many old growth stands would remain in the general forest allocation. According to the draft plans' preferred alternatives, some 40,000 acres of old growth in total would be harvested in the first decade of plans.

BLM districts are proposing several different techniques to maintain/produce older-aged forests. OGEAs 1's use 300 year rotations and density management to accelerate older forest characteristics. CAs are managed using 150- or 200-year rotations. Klamath Falls Resource Area's preferred alternative calls for a system of 80-100 acre protected habitat areas each surrounded by a 1/4 mile buffer to maintain old growth in the western portion of their resource area. Residual trees (6-20 depending upon the land allocation) and other old growth components (snags and downed woody material) are to be left on units within the general forest allocation or nondeferred OGEAs and CAs.

BLM's biological diversity proposal is innovative but untested in that it will attempt to maintain old growth characteristics for species such as the spotted owl while still producing timber. According to the BLM's Executive Summary, 324,000 acres of old growth would be remaining after 10 years; 475,000 acres after 100

years would be considered old growth. This would be an alleged increase in total acres from the current inventory of 290,000 acres.

While the State supports BLM's approach to maintaining and protecting old growth stands through biological diversity, we are concerned about the impact that harvesting will have on old growth dependent species. We further realize that the harvest from these stands represent the most predictable portion of the allowable sales quantity in these uncertain times of timber supply.

The State's concern focuses on BLM's proposed harvest of old growth in the general forest allocation for the preferred alternatives. More specifically, there is currently a shortfall of biological diversity opportunities existing in the Coast Range due to human and natural disturbances. Most watersheds in the Eugene, Salem and Coos Bay Districts lack older-aged components necessary to maintain ecosystem management. Harvesting of old growth within the general forest allocation will further exacerbate the problem unless mitigative measures are considered.

The State believes that one solution to this problem would be to maintain within each third-order watershed example(s) of ecologically significant older forest stands. These stands should represent PNW 447 criteria, or if no stands having these characteristics are present, include natural stands without significant salvage or thinning histories. Protection of such stands will offer refugia for associated wildlife species, and may allow them to expand their distribution and populations as younger stands in the surrounding area mature over time. Other possible solutions should also be analyzed in an effort to address this concern.

The State recommends that BLM further evaluate the impacts on biological diversity (genetic, species, ecosystem, landscape) in the Coast Range from harvesting old growth in the general forest allocation in the preferred alternatives. BLM should further develop and analyze other alternatives which retain biologically significant old growth stands while still producing economic opportunities. Conceptually, Alternative E's old growth strategy could act as a benchmark for other alternatives regarding old growth retention.

I. Livestock Management. How will BLM manage its grazing lands to produce forage for livestock and wildlife while protecting other resource values, in particular riparian areas?

Ranches located near land administered by BLM and the Forest Service, in many cases, depend upon livestock grazing from these lands. Historically, nearby cattle ranching operations use public lands as summer pasture and utilize home ranches to grow

irrigated hay for winter feed. Declines in livestock forage from the BLM could have an effect on local ranches. A decline in the economic stability of local ranches would create economic hardship on the communities in the surrounding area.

The State's recommendations outlined below recognize the economic and cultural facets of the livestock industry by proposing a program that we believe will ensure the long run, sustainable use of BLM lands by livestock while protecting sensitive resource values located on these lands. Most western Oregon BLM districts have limited grazing programs on their lands, with the exception of Klamath Falls Resource Area. While most of the following comments and recommendations refer to the Klamath Falls Resource Area, they are also applicable to all BLM districts where grazing is permitted.

The Klamath Falls Resource Area currently has some 95 grazing allotments (81 permittees/lessees) producing 13,869 Animal Unit Months (AUMs) of forage annually. An additional 5,096 AUMs are classified as suspended non-use. According to the draft Klamath Falls RMP/EIS and personal communications with BLM staff, range managers (using a core team) have evaluated the impact of grazing on other resource values, especially streamside habitat and big game forage needs.

The Klamath Falls Resource Area has identified some 14 allotments in need of improvement. These allotments represent over 61 percent of the total allotted grazing acres on the east side and 28 percent on the west side. In total, this represents some 57 percent of the allocated AUMs.

Klamath Falls' draft preferred alternative proposes that 13,185 AUMs per year be available which represents a decline of 5 percent from the current level. Justification for the decrease is based upon a need to develop upland water developments, improved riparian area conditions and improve forage for both livestock and wildlife.

We have several concerns regarding livestock management. First, there seems to be a large number of allotments which lack comprehensive allotment management plans. Without a plan for each allotment, combined with an aggressive monitoring program, how can the Klamath Falls Resource Area hope to improve unsatisfactory conditions in allotments currently needing rehabilitation? Will allotments identified as (I) in the plan become high priority for improvements when funding is available? While the core team approach used to identify resource conflicts in allotments is a good start, it should not be considered a substitute for allotment managements plans. Without allotment management plans and monitoring, degradation of the very values the Klamath Falls Resource Area is trying to protect or maintain could continue unchecked.

Furthermore, the Klamath plan permits annual grazing in riparian areas with currently less than good conditions. BLM should not allow grazing in such degraded areas except under strictly controlled management. If BLM cannot document initial recovery, they should change their grazing strategy or consider no grazing until recovery is achieved. The Governor's Watershed Enhancement Board wants to promote cooperative projects between the BLM and private owners where riparian areas cross mixed ownerships.

The State is also concerned about livestock impacts on fish and wildlife, with special emphasis on the Lost River and Short-nosed Suckers, big game, sage grouse, and other riparian dependent species.

The State supports a livestock management program which allows grazing while protecting resource values (i.e., water quality and fish and wildlife habitat). Considering the need to more carefully control livestock grazing in riparian areas and improve forage conditions on several of the allotments, we believe the proposed short-term decline in AUMs seems justified. The State favors additional reduction of AUMs when resource degradation is apparent.

As part of the range management program BLM should:

1. Develop allotment management plans for every allotment.

2. Monitor allotment plans on a regular schedule.

3. Activate range improvement projects (seeding, water development, and prescribed burning) that will both increase forage productivity and draw livestock toward lands not currently grazed and away from those in poor condition.

4. Implement grazing systems such as seasonal use and deferred rotation grazing that better fit the livestock to the resource.

5. Attract livestock away from riparian areas by:
   - Developing other water sources
   - Placing salt blocks away from riparian areas
   - Planting other palatable vegetation

6. Limit livestock use in riparian areas to periods when forage and soils are most resilient and to uses determined by site-specific conditions.

7. Exclude livestock until the recovery of riparian area vegetation (to a good condition) is enough to allow managed grazing.

8. Maintain and protect streams in "good" condition; restore streams in "poor" condition.

9. Secure a stable funding source for livestock management program.

Short-term declines in AUMs may occur on specific sites, but production should stabilize and, perhaps, even increase over the long-run once stream and rangeland conditions improve and problems of redistribution and grazing administration are addressed successfully. Frequent monitoring of allotment plans, as proposed by BLM, will detect resource problems. Grazing strategies should then be adjusted where needed.

BLM already has one key to success for balancing forage use with the protection and rehabilitation of the resource base: the generally improving flow of information and ideas among its staff, the Forest Service, permittees, and other resource users.

Two other success factors in this effort are the rapport between BLM and most allotment holders, and the expert help available from local soil and water conservation districts and conservation groups. Several BLM sponsored grazing projects in eastern Oregon (e.g., Camp Creek) have shown that proper grazing management can support livestock while protecting other resources.

The State believes that local people continuing to work together in a cooperative spirit, watershed by watershed, will pay off in better resource management and an improved livestock economy.

J. Minerals and Energy. How should BLM recognize and manage its mineral and energy resources?

Mineral and energy resources can be found on many lands administered by BLM. These valuable resources may include leasable minerals (oil and gas), locatable minerals (gold and other precious metals) and salable minerals (rock and aggregate resources). The location/extent of mineral resources depends upon the physiographic region. BLM administers both mineral estate and split estate lands.

While districts have discussed mineral and energy resources in their draft plans it is difficult to determine the location of these resources. In particular, State-owned mineral rights underlying BLM surface ownership have not been identified.

The State makes the following recommendations to BLM regarding minerals and energy which should be considered when developing the final RMPs/EISs:

1. Each one of the final plans should: a) acknowledge any state-owned mineral rights (list legal descriptions); and b) preserve, whenever possible, access to existing valid mineral rights.

   At the very least, the State believes that the management of severed estates with state-owned mineral rights should be specifically addressed and that the management direction offer the greatest possible latitude to the State.

2. BLM districts should recognize energy and minerals as an important resource when making land management allocations. Land available for mineral and energy exploration and development should be kept at the highest level environmentally possible in the preferred alternatives. Decisions to withdraw lands should be based on an open analysis with proper accommodation of current environmental protection and reclamation requirements.

3. There is a need to better quantify the value of the resources and to factor the resource value into the BLM alternatives. Specifically, mineral withdrawals have been made without the benefit of a mineral inventory. Such an inventory should be conducted before withdrawals are recommended.

4. For all districts, the State encourages BLM to provide realistic opportunities for mineral exploration and development. Mining overlay zones and explicit standards and procedures to allow mining in other land allocations are viable mechanisms to use to mitigate conflicts.

While budgeting for mineral assessments has been a problem for BLM, the Department of Geology and Mineral Industries stands ready to assist districts in assessing the mineral potential on their lands.

K. Socio-economic. How will the adopted plan affect economic opportunities in surrounding communities? What impact will the plans have on socio-economic stability in the planning area and statewide?

The long-term socio-economic goals of Oregon's state government and its people are spelled out in Oregon Benchmarks: Setting Measurable Standards for Progress. The State recognizes the need to diversify its economy, particularly in nonmetropolitan areas. The plans as specified in the draft EISs are not inconsistent with this goal. However, without a coordinated policy response to the impacts of the proposed timber harvest reductions, the State's highest priority strategic planning goals (Key and Lead Benchmarks) in two major areas are put at substantial risk.

1. Economic Benchmarks -- the goal of reaching the national average in per capita income particularly for regions outside of Portland metropolitan area and regional job distribution are severely impacted by the preferred alternatives.

2. Social Benchmark (specified as Benchmarks for People) -- achievement of goals relating to drug use, social harmony and job skills are adversely impacted by the structural economic change which will result from the preferred alternatives.

The State calls on BLM to provide the analytical ground work for an effective policy response to the fundamental social and economic changes which would follow the implementation of the preferred alternatives.

The economic and social conditions throughout Oregon are a major concern for the State. The management decisions taken on federal lands affect the economic and social welfare not only in nearby communities, but also the State as a whole.

Lands administered by BLM in western Oregon make a significant contribution to the economy of Oregon. State and local governments receive monies from management activities (mostly timber harvest) on BLM lands. BLM manages both Public Domain and Oregon and California (O&C) lands. Some 50 percent of revenues generated by timber receipts on O&C lands is given to western Oregon counties.

Many Oregon counties are very dependent upon revenues from federal lands which help finance schools, roads and local government. Douglas County, for example, derives over 60 percent of its revenue from BLM and Forest Service timber receipts; Josephine County, 16 percent; and Coos County, 14 percent. In 1991 alone, Oregon counties received some $90 million from timber receipts from O&C lands. The five-year average (1983-1988) of O&C payments to counties was $61 million a year.

Other direct revenue payments are also generated from the management of BLM lands. These revenues include mineral and grazing leases and in lieu of tax (public domain lands only) payments. Recreation (fishing, hunting, other recreational activities) on these lands also generates indirect revenues to local communities.

Declining timber harvests over the last two years have meant increased unemployment in timber-dependent communities throughout the State, increased social problems, and decreased county revenue. To address these problems, the State responded to BLM's Analysis of the Management Situation noting our concerns and making recommendations on how to analyze socio-economic impacts.

Over the last year the Governor's Forest Planning Team has worked with BLM at the State and district levels to better understand and make recommendations on socio-economic impacts of proposed BLM management decisions. The State's review of BLM's socio-economic analysis is based upon a paper titled: Socioeconomic Issues and Bureau of Land Management Planning transmitted to BLM from Governor Roberts in May 1991. (Note Appendix 1) This paper describes the economic and social analysis the State would like to see presented in each BLM plan. Note additional comments in Appendix 2 (Employment Division) and Appendix 3 (Oregon State University Report).

1. Socio-Economic Conditions

The State commends BLM for analyzing migration trends, unemployment rates and the economic structure of the regional economy. We question, however, the multipliers used by BLM in calculating direct timber and timber management jobs. To strengthen this analysis, we recommend the following additions and further evaluations:

a. Simple economic base analysis showing export base for counties in each district.

b. Demographic and occupational profiles for communities likely to be impacted.

c. Occupational profile of displaced workers.

d. Reevaluate (using a consistent set of models) the impacts to total employment of harvest reductions.

e. Expand mitigation discussion to include the adverse socioeconomic impacts of the plans and ways to lessen impacts.

The final BLM plans should also update the economic data presented in the draft plans to reflect more current information. (Note Appendix 3 for a more detailed discussion.)

2. Community Stability

We agree with BLM that impacts on communities will vary within each district and across districts. A more detailed analysis is needed which would allow BLM to systematically evaluate the impact of harvest reductions on areas not only within but also outside the districts. In other words, the plans should estimate the preferred alternatives impact on community stability based on the structure, occupational mix and demographics of communities.

3. Social Impacts

Social impacts are briefly mentioned in the plans, but there is no effort to systematically analyze the likely impacts. We recommend using appropriate models (note comments from State Economists -- Appendix 2) to measure the social impacts. The key ingredient that needs to be addressed is an inventory of social impacts.

4. Recreation/Tourism Industry

In an attempt to diversify the economy of Oregon, the State supports an aggressive recreational/tourism program on BLM lands. While the recreation/tourism industry will not fully replace the personal income levels and employment opportunities that timber industry jobs produce, it still should help isolated communities in this transition period. Retraining programs sponsored by the State and federal governments will play a major part in this transition.

An alternative which emphasized recreation opportunities could have served as a benchmark from which to compare jobs gained from the various alternatives presented in the plans.

5. Monitoring

Monitoring should be an especially important part of the final BLM plans. While the draft plans include provisions for monitoring of natural resources, it should also include provisions for monitoring of socio-economic conditions and for modification of the plan based on changes in these conditions.

6. Summary

BLM districts have addressed the socio-economic impacts created by their preferred alternatives. BLM districts should strengthen their analysis and discussions in the final RMPs/EISs to include a better analysis of: district economic base and the impact on this base of the alternatives; dislocated timber worker skills and reemployment opportunities; social impacts; consistency in modeling, job multipliers, mitigation recommendations and monitoring.

Please review Economic Development Department, Department of Forestry, and the State Economist responses found in Appendix 2 and Oregon State's University's Report for specific recommendations.

L. Road Management. How should BLM districts/resource area manage their road networks to promote compatibility with resource uses.

BLM's western Oregon road system is a valuable component of Oregon's overall transportation network. The road system serves the citizens of Oregon by providing access for timber, fish and wildlife, and watershed management. BLM roads also provide numerous recreational opportunities and are essential for forest fire protection.

Realizing the importance of road management on federal lands, the State developed a position paper titled, State of Oregon Recommendation on BLM's Road Management Program. (Note Appendix 1) We trust that BLM will consider recommendations presented in this paper when developing its final RMPs/EISs.

The road paper states that BLM should develop comprehensive road management plans. That is, in addition to road maintenance and construction goals and objectives, BLM should address the various resource concerns (i.e., recreational, fish and wildlife, timber, water resources) potentially impacted by roads. These resources are interrelated and road management plans should deal with them in an integrated fashion. Watersheds would be the ideal framework in which to develop road management plans.

BLM districts have inventoried their road networks and recognized the impact that these access routes have on natural resources. The draft plans express a need for access management in special areas, critical big game areas, old growth emphasis areas, and other areas. However, there seems to be no action plan to meet these broad objectives.

We commend the Salem District on its recognition that a comprehensive road management plan needs to be developed. They have made a commitment to develop a comprehensive road management plan soon after approval of their RMP.

The following is a brief summary of our recommendations to BLM on road management.

1. The State recommends that BLM continue to aggressively pursue funding for its road management program.

2. The State recommends that a comprehensive road management plan be completed within the framework of the RMP/EIS or shortly after approval of the plans. (Note road management paper for suggested content of management plan.)

3. The State recommends that a maximum 1.5 mile/square mile road density objective (i.e., roads open to vehicular traffic) be instituted for: sensitive watersheds; watersheds

with high road densities (i.e., greater than 4 miles/square mile); watersheds with high off-road vehicle use resulting in unacceptable environmental damage; and sensitive wildlife areas. (Coos Bay and Klamath draft plans include this recommendation.)

4. Road density objectives for other areas would likely vary based on decisions made in the comprehensive road management plans.

5. The State recommends that BLM attempt to achieve a reasonable reduction (10%) in open road density over the next decade. This target may be difficult to achieve given the scattered ownership pattern of BLM lands. However, we encourage BLM to work together with adjacent landowners in an effort to accomplish this goal.

6. The State recommends that BLM's road management program be modified as needed to address the State of Oregon's recommendations for limiting development in rural interface areas.

Each BLM district is urged to coordinate with adjacent landowners and others in the development and implementation of a comprehensive road management program.

M. Special Plant and Tree Species. How should BLM protect special status plant and tree species?

1. Special Status Plant Species

BLM's draft plans have listed plant species found on each district. The State commends BLM on its commitment to protect those plant species that are either state and/or federally listed on public lands under its jurisdiction. To continue protection of existing threatened, endangered, and sensitive plant species while keeping other species from being listed, the State believes that BLM should consider the recommendations noted below.

a. BLM needs to expand the inventory of its lands to identify all existing sites for listed and candidate species, including areas not currently slated for timber sale or harvest. BLM should work with other state and federal agencies to prioritize the study and monitoring of listed and candidate species to best facilitate knowledge of habitat requirements.

b. Prioritized management plans should be developed for special status plants that outline how particular species will be protected, especially those located in land allocations that

allow timber harvest and domestic grazing. Emphasis should be placed on improving or restoring critical habitats rather than merely maintaining existing often degraded conditions.

c. Long-term monitoring of special status species, especially listed plants, is essential in determining whether plant populations are recovering or declining. Recent advances in technology should be used to develop monitoring program.

d. Maintaining species at the level of minimum viable populations may not be sufficient to guarantee survival over the long-run. It is important to recognize that a minimum viable population is essentially on the brink of catastrophe, therefore, population levels above the minimum are recommended.

BLM districts in general should be complimented on their review of listed and other special status species. These species have been listed in the draft plans. Moreover, the State applauds the recent history of cooperation BLM has shown in promoting the study of many special status species, through joint cost-sharing projects with the Oregon Department of Agriculture and other agencies. Additional comments on special plant species can be found in the Department of Agriculture's response (Appendix 2).

2. Yew Bark

Bark from the Pacific yew tree is a source of taxol which has shown promise in treating certain forms of cancer. BLM in cooperation with the Forest Service is in the process of developing an EIS for managing Pacific yew. Lands have been inventoried to determine the amount of Pacific yew. An interim strategy is being used to guide BLM and the Forest Service on Pacific yew management until the EIS is finalized.

We encourage BLM to carefully follow the interim guidelines for Pacific yew management in order to collect the maximum amount of yew bark feasible from current forest management projects

N. Tribal Concerns. How should BLM districts protect traditional Tribal cultural and spiritual sites?

Lands administered by BLM's Klamath Falls Resource Area traditionally were utilized by the Klamath, Modoc and Shasta Tribes. The Siletz and Warm Springs Tribes used lands administered by the Salem BLM District.

The State supports the protection of identified Native American sites sacred to, or of cultural significance to, the various tribes mentioned above. The Tribes' cultural history contributes to the State's heritage and should be protected. BLM should,

through close coordination with the Tribes, act to inventory, evaluate, and protect sites of cultural, religious, and historic value as required by federal laws. As additional sites are located, BLM should alter its plans in order to protect them, while remaining sensitive to other uses of the lands.

O. Standards and Monitoring. Does BLM have measurable standards and a comprehensive, aggressive monitoring program to determine whether plans meet short and long-term expected future conditions?

The implementation of biological diversity/ecosystem management will mandate comprehensive monitoring programs for each district, including a dedicated funding source in order to evaluate: a) whether the scheduled activities are being implemented as per plan guidance; b) whether the implementation of activities is effective in meeting the expected future conditions; and c) determining if activities are causing the effects identified in the EIS.

Ecosystem management and its effects on resources within the forest environment is a long-term investment. Research monitoring will be necessary in order to apply adaptive management on the ground. In a sense, ecosystem management is an experiment requiring close evaluation and monitoring of thousands of short-term projects which should lead to the final desired condition.

In order for each RMP and EIS to stand alone and meet the test of public and legal scrutiny, it must include standards followed by a monitoring plan to measure results. Standards must be measurable to be meaningful. There is little purpose in defining standards for which there are no methods for measuring the degree of compliance or attainment. The true judicial litmus test for the final plans, we believe, rests with the standards that must support the resource management direction found within the RMPs.

BLM's draft plans fall short of meeting the State's expectations for adequate standards and comprehensive monitoring plans. Even though the plans note a need to include the three phases of monitoring noted above, implementation seems to be the only element covered in the monitoring sections. As an example, how will the general monitoring questions for socio-economic conditions presented in the draft RMPs surface problems with plan effectiveness?

Other questions BLM should address in their final plans include:

1. Why aren't monitoring standards presented for each land allocation (i.e., Old growth emphasis areas, General Forest, connectivity areas)?

2. Why haven't the monitoring questions presented in district plans been tied to measurable management standards?

3. Is a threshold level of plus/minus 10 percent appropriate for changes in all resource outputs or impacts to resources?

4. Where are specific, measurable standards found in the districts/resource area monitoring plans?

5. Is there a tie between implementation and effectiveness which is necessary for meeting the expected future condition (e.g., ecosystem management)? Does BLM have a long-range monitoring framework which will direct the agency over the next 100 years in order to meet these expected future conditions?

The State believes that BLM districts/resource area should develop more specific standards and comprehensive monitoring plans. Of special note would be the Forest Service's approach to monitoring effectiveness and validation. We feel that without comprehensive monitoring plans for each district/resource area, RMPS/EISs will not meet the public's expectations and legal challenges that the agency will face.

Annual Program Summary monitoring reports, being proposed by districts, are a positive way to allow the public an opportunity to track and assess the progress districts are making on implementing their plans.

P. Budgets. What budget will BLM districts need to carry out the preferred alternative? How should the districts react if a smaller budget allocation occurs?

BLM districts project a need to increase their budgets in the new plans in order to meet implementation and monitoring requirements. Due to the complexities of the plans and the new biological diversity approach proposed, the State agrees that more money will be needed for training personnel, research, implementation and monitoring.

If funding for intensive management practices under the current plans are any indication of expected future funding, the State is concerned that the new plans may not be implemented. BLM's biological diversity is an experiment in land management which relies on many as yet unproven concepts.

With the uncertainty in past and present funding levels, the State recommends that BLM address the likelihood of funding for proposed actions and the impact of BLM's resources if expected funding does not materialize. This element in and by itself stands between a successful and unsuccessful outcome. Biological

diversity management will require a long-term commitment in funding to test programs and practices which accomplish the expected future conditions.

BLM budgeting should not be necessarily linked to ASQ levels. For example, the State suggests that BLM consider establishing a fund for density management activities in Old Growth Emphasis Areas that is separate from the ASQ derived source available for more traditional harvesting as proposed in the General Forest Management Areas. This approach would institutionally recognize the major goal of Old Growth Emphasis Areas which should be their utility in providing answers to critical wildlife/silvicultural questions through the application of research and monitoring.

III. DRAFT PLANS ORGANIZATION

The State agencies have found BLM's draft Resource Management Plans and Draft Environmental Impact Statements very difficult to review because of the way plans were organized. Some of the issues of concern to readers were:

A. Difficulty in distinguishing the draft RMP from the draft EIS. For example, implementation standards were scattered throughout the documents.

B. Lack of definable links between broad goal statements and specific actions (e.g., standards, guidelines, inventories, monitoring, evaluation).

C. Difficulty in identifying BLM plan policies in the RMPs.

D. Lack of substantiation to support claims of consistency with the plans and policies of other agencies affected by the RMPs.

E. Inadequate/incomplete tables of contents and indexes.

F. Numerous errors in tables and incomplete data.

G. Maps showing land allocations are too small a scale with few reference points to decipher where allocations begin and end.

The State encourages BLM to reorganize their final plans to make them more readable to the public and land managers who will be implementing the final preferred alternatives.

IV. FINAL COMMENTS

The State of Oregon's Final Coordinated Response represents the State's review of the six draft Resource Management Plans and draft Environmental Impact Statements. Twelve state agencies have submitted their recommendations to the Governor's Forest Planning Team for consideration in the development of the coordinated response. Input from six "Open Houses" held around the state this year, public comments on the State's Proposed Coordinated Response, discussions with various interest groups and individuals, and Oregon State University's Report were all considered when developing the State of Oregon's final response.

The State will work with BLM districts and the State Office, between their draft and final, to help them better understand our recommendations presented in this document.

CITY OF COOS BAY

Office of the City Manager

December 18, 1992

Bureau of Land Management
Mel Chase
1300 Airport Lane
North Bend, Oregon 97459

RE: BLM DRAFT RESOURCE MANAGEMENT PLAN

Dear Mr. Chase:

On behalf of myself and the Coos Bay City Council, I wish to thank you for attending our last council meeting and presenting the Bureau of Land Management's preferred alternative for the Draft Resource Management Plan. As you know, the Council did not feel that BLM's preferred alternative was in the best interests of the residents of Coos Bay. With that in mind, I would ask that you add this letter to those you receive as written response to your request for comments on the Draft Resource Management Plan.

The Bureau of Land Management has taken a brave approach in its choice of alternatives in the Draft Resource Management Plan. This preferred alternative is an obvious effort to appease both sides of the logging issue by attempting a compromise. However, the Coos Bay City Council feels that a compromise, if it were even feasible, would not be the correct action to take.

If the preferred option were implemented, it is estimated by BLM the O&C receipts would drop from 18.48 million dollars to 10.08 million dollars in the Coos District (three counties) alone. The county and city governments, already facing severe financial problems as a result of Measure No. 5, cannot afford to lose an additional 8.4 million dollars. If the preferred alternative were adopted, the BLM estimates that personal income dependent on BLM timber in our three county area would drop 22 million dollars annually. The number of jobs lost because of the adoption of the preferred alternative, and the loss of funds to the local governments, would devastate this area. This is simply not acceptable.

The Coos Bay City Council is unanimous in its recommendation that the Bureau of Land Management use Alternative A as its Resource Management Plan. This option does allow for some increase in timber production over the next 10 years. But even the increase in personal income dependent on timber production (estimated at $7.2 million annually over the current level) does not keep up with the present cost of inflation.

Further, our City Forester advises us that current stumpage values are considerably higher than that used in developing the comparisons of consequences of the various alternatives. Therefore we believe the negative impact on O&C revenues to be far greater than estimated if the preferred alternative were adopted.

As Mayor, and speaking for the Council, I ask that you consider the magnitude of the impact this decision will have on the lives of everyone in this county. Although attempting to diversify our economic base, our city and county continue to be primarily dependent on the timber industry. Our future is in your hands.

Sincerely,

Joanne Verger
Mayor

LS:smb

500 Central Avenue • Coos Bay, Oregon 97420 • Phone: (503) 269-1181 • Fax: (503) 269-5788

RESOLUTION 92-29

A RESOLUTION IN SUPPORT OF CONTINUED PRUDENT MANAGEMENT OF O AND C TIMBERLANDS.

WHEREAS, the Bureau of Land Management has requested public input on its ten-year land and resource management plan, and

WHEREAS, the health, peace and safety of the people of Coos County are affected by the alternative selected by the BLM for the management of O & C timberlands, and

WHEREAS, the natural resources provided through aggressive management of federal lands under the O & C Sustained Yield Act of 1937 has contributed to social and economic stability in 18 Western Oregon counties, including Coos County, and

WHEREAS, the counties have invested more than one billion dollars to fund intensive forest management on these lands with the explicit expectation of an ongoing return on this investment, and

WHEREAS, O & C lands continue to provide a reliable employment base for many Oregon communities, and

WHEREAS, O & C lands also provide diverse and sustainable habitat for fish and wildlife, clean air and water, and outdoor recreation opportunities, and

WHEREAS, these lands should continue to provide economic stability, healthy and productive forests and reliable employment base, and

WHEREAS, the BLM preferred alternative if implemented would result by their estimate in a loss of $8.4 million annually in revenues to Coos, Curry and Douglas Counties and a loss of 1,040 timber-production jobs as compared to current practice, and

WHEREAS, the BLM preferred alternative as compared to Alternative A represents, by BLM's projection, $10.2 million less annually in receipts to the affected counties as well as 1,390 fewer timber-related jobs and $28.5 million less personal income for Coos, Curry and Douglas Counties.

THEREFORE, BE IT RESOLVED that the City Council of the City of Coos Bay supports the continued management of these lands in accordance with the O & C Sustained Yield Act of 1937 to provide a stable and predictable level of timber harvest for Oregon communities while considering other resource values, and

BE IT RESOLVED that we support the principles of multiple use for these O & C lands which include management for timber, water, recreation and wildlife, and

BE IT FURTHER RESOLVED that the City of Coos Bay strongly endorses Alternative A for the management of O & C timberlands and opposes selection of the BLM "preferred alternative", and

BE IT FURTHER RESOLVED that we encourage legislation that would enact a balanced management plan into law by the Congress of the United States of America and remove management decision from the federal court system.

ADOPTED by the City Council of the City of Coos Bay, Oregon this 15th day of December, 1992.

Joanne Verger, Mayor

Gail George, Recorder

COOS COUNTY PLANNING DEPARTMENT
Coos County Courthouse Annex, 290 N. Central, Coquille, Oregon 97423
(503) 396-3121 Ext 210 Fax 396-2690

Bill Grile, AICP
Planning Director

Patty Evernden
Ordinance Administrator

December 18, 1992

Daryl Albiston
Bureau of Land Management
Coos Bay Shorelands Plan
1300 Airport Lane
North Bend, Oregon 97459

RE: Draft - Coos Bay District Resource Management Plan and Environmental Impact Statement

Dear Mr. Albiston:

Coos County supports plans in the draft for the North Spit which are consistent with the industrial development policies and plans for the North Spit contained in the Coos County Comprehensive Plan. The County also supports the land exchange between BLM and the Port of Coos Bay.

Sincerely,
COOS COUNTY PLANNING DEPARTMENT

Bill Grile, Director

lb/mos

United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle WA 98101
Alaska
Idaho
Oregon
Washington

EPA

REPLY TO ATTN OF: WD-126

DEC 18 1992

Mel Chase, District Manager
Coos Bay District
Bureau of Land Management
1300 Airport Lane
North Bend, Oregon 97459

Dear Mr. Chase:

The Environmental Protection Agency (EPA) has reviewed the **Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Coos Bay District**, Bureau of Land Management. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, which directs the EPA to review and comment on all federal draft and final EIS's. We provided scoping comments on the Proposed State Director Guidance on July 18, 1988 and on the draft Prototype Monitoring Plan on November 15, 1991.

The draft RMP/EIS presents seven alternatives that could direct BLM land management activities on the District's 329,583 acres in Coos, Curry, Douglas, and Lane Counties, Oregon for the next ten years. The goal of the Preferred Alternative (PA) is to manage BLM lands to contribute to community stability consistent with maintenance of ecosystems. It includes provisions for an annual sale quantity (ASQ) of 124 million board feet of timber, a 50 percent decrease from current levels.

EPA is pleased to see discussions regarding biodiversity and global climate change issues in the draft RMP. These are difficult issues to address in a programmatic document, and the BLM should be commended for addressing them as a part of its planning process. In addition, the discussions comparing alternative proposals with the 50-11-40 dispersal criteria proposed by the Interagency Scientific Committee was very informative.

However, EPA has several concerns with other aspects of the proposed action. EPA is rating this draft EO-2 (Environmental Objections-Insufficient Information). Our environmental objections are based on the lack of sufficient development of best management practices (BMPs), a monitoring plan, and a cumulative watershed effects analysis process that provide adequate safeguards to assure that site-specific projects implementing the RMP will not adversely impact currently degraded watersheds. More specifically, our environmental objections include the following:

- The high potential for further water quality effects and beneficial use degradation in the Coquille River which has existing severe nonpoint source pollution problems, and which is water quality limited;

- The lack of riparian zone protection for first and second order streams which represent a high percentage of the BLM stream miles and may contribute to violations of water quality standards and impairment of beneficial uses;

- The potential for adverse effects to fisheries related to the prediction that two of the seven analytical watersheds in the planning area will decrease in condition under the PA and to the fact that the majority of habitat for all salmonid species is in minimal or fair condition;

- The lack of RMP direction regarding future environmental analysis for site-specific project proposals;

- The direct health and safety effects of prescribed burning in rural interface areas and the indirect air quality effects of the District firewood program;

- The potential for effects to threatened species listed under the Endangered Species Act, including the northern spotted owl and the marbled murrelet; and

- The arbitrary use of a ten year timeframe to distinguish between short-term and long-term resource effects regardless of the lifespan associated with specific resources.

The following additional information and clarification is requested:

- Development of adequate management guidance, BMPs, monitoring, and cumulative effects analysis guidance for site specific projects to facilitate water quality analysis and to ensure waters currently exceeding water quality standards and beneficial use impairment do not experience additional degradation;

- Establishment of adequate riparian zone protection for first and second order streams;

- Clarification of the need for and criteria for use of prescribed burning in rural interface areas and an expanded discussion of mitigation measures related to the District firewood program;

- Documentation of consultation activities under Section 7 of the Endangered Species Act; and

- Clarification and direction for future project environmental analyses to be tiered to the RMP.

We appreciate the opportunity to review and provide comments on this draft RMP/EIS. An explanation of the EPA rating system for draft EISs is enclosed for your reference. This rating and a summary of EPA's comments will be published in the Federal Register. If you have any questions about our comments, please contact Wayne Elson in our Environmental Review Section at 206/553-1463.

Sincerely,

Charles E. Findley
Director, Water Division

Enclosures: Review Comments
Impact Definitions
Riparian Policy
Rating Outline

cc: D. Dean Bibles, BLM State Director
Roger Wood, ODEQ

U.S. Environmental Protection Agency (EPA)
Review Comments

Coos Bay District, Bureau of Land Management (BLM)
Resource Management Plan (RMP)
and
Draft Environmental Impact Statement (EIS)
Oregon

December, 1992

INTRODUCTION

As noted in our transmittal letter we have several concerns about the proposed action. We have identified several issues in the draft RMP/EIS that need clarification, revision or an expanded discussion. We offer these comments in an effort to strengthen the EIS and provide the public with a clearer picture of the environmental consequences of the proposed action and the opportunities for future public involvement with site-specific projects. A detailed discussion of our concerns and recommendations for the final RMP/EIS are presented on the following pages.

WATER QUALITY

Water Quality Standards (WQSs) and Beneficial Uses

There are several streams that are listed as having a "severe" nonpoint source (NPS) problem in the *1988 Oregon Statewide Assessment of Nonpoint Sources of Water Pollution* (NPS Assessment Report) and/or are listed as being "water quality limited" or lack beneficial use support in the *Oregon's 1992 Water Quality Status Assessment Report* (305(b) Report) where timber harvest and road construction is proposed in the draft RMP/EIS.

We have objections to any timber harvest and road construction in the Middle Fork Coquille River until channel stability improvement has been documented through monitoring and cumulative effects can be evaluated. A comprehensive water quality monitoring program needs to be in place that better describes the impacts of past logging practices before new harvests are allowed. We note that the Middle Fork Coquille would have timber harvest emphasis (Table 4-W-2) in Alternatives C, D, E, and the preferred alternative (PA). The Middle Fork Coquille has less channel stability than the District Average among analytical watersheds (AWSs) in the Coos Bay District.

According to the NPS Assessment Report, water quality conditions are considered to be severe with data. The Middle Fork Coquille in particular has severe NPS problems by observation for temperature and turbidity (Note: this is listed incorrectly in Appendix E of the NPS Assessment Report). Other problems within the basin include turbidity, low dissolved oxygen, nutrients, erosion and sedimentation, bacteria, viruses, lack of instream structure, and low flow. The Coquille River is a water quality limited stream with the development of the total maximum daily load (TMDL) well under way. The parameters of concern are elevated populations of bacteria and algae, with decreased concentration of dissolved oxygen. Timber harvest must be limited to minimum impact areas in the Coquille basin.

Timber harvest and road construction in these watersheds may be implemented without exceeding WQS or beneficial use impairment. However, the primary methods for preventing standards impairment in the context of a RMP are not included. The basis for our environmental objections is that timber harvest and road construction may occur without an adequate watershed cumulative evaluation (WCE) analysis for site-specific projects and that timber harvest deferrals may not occur in degraded streams as an outcome of site-specific WCE effect analyses. We are also concerned that water quality monitoring plans are not sufficiently developed to verify that best management practices (BMPs) are preventing adverse effects.

Federal Consistency, Clean Water Act (CWA), Section 319

The federal consistency provisions of Section 319 represent an opportunity for state and federal agencies to more closely coordinate their activities and cooperate in achieving state water quality goals.

The draft RMP/EIS appropriately utilizes the NPS Assessment Report to disclose existing water quality conditions on the district and compares them to those estimated by the Watershed Condition Index (WCI), a BLM cumulative effects analysis. This is an appropriate use of the NPS Assessment Report that we strongly support. There are additional uses for the NPS Assessment Report that need to be developed for the final RMP/EIS. The NPS Assessment Report, together with the 305(b) Report and other data, need to be used in the final RMP/EIS to establish:

1. Desired future condition on a stream by stream basis from which RMP accomplishments can be measured.
2. Priorities and criteria for project specific WCE analyses.
3. Priorities for district water quality monitoring programs.
4. Sub-district plans for riparian and watershed or "activity level plans."
5. Priorities for district watershed rehabilitation programs.
6. Best management practices for implementing watershed deferrals.

Watershed Cumulative Effects

RMP Implementation

The draft RMP/EIS properly discloses the potential adverse water quality effects associated with WCE. However, we are concerned that the draft RMP/EIS did not specifically describe the nature of WCE analysis to be conducted for site-specific projects during RMP implementation. Until the WCI is validated and peer reviewed, it cannot be used for site-specific projects. Road construction and timber harvest may need to be deferred pending the outcome of WCE analyses for site-specific projects. Any WCE analysis used for site-specific projects should be scrutinized to the same extent as the WCI and also be subject to the scientific process. To be meaningful, WCE need to be considered and watershed protection measures implemented by all major land owners in a watershed.

Additional Information

The final RMP/EIS should include the following:

1. A description of the WCE analyses that will be used for future site-specific projects during RMP implementation. A "cumulative effects assessment" was referenced in the monitoring plan. The extent of peer review and validation should also be included. If not, a schedule for completing a scientific process should be included.

2. A BMP with priorities and specific criteria for when WCE will be analyzed for site-specific projects. For example: water quality monitoring results, equivalent clearcut area, road density, or beneficial use impairment identified in the NPS Assessment Report and the 305(b) Report.

3. A BMP that provides for a more conservative site-specific project planning approach when WCE tools are not available, under development or have not been validated. We believe that when adequate WCE tools and monitoring data are not available to predict the extent of future water quality effect and beneficial use impairment, timber harvest and road construction activities need to be reduced to provide for an extra margin of safety.

4. A description of how WCE coordination will be implemented. Examples: annual meetings to coordinate road construction and timber harvest plans with other land owners, developing agreements with all land owners on desired future condition for water quality, riparian zone protection, and deferrals.

5. A BMP with a clear commitment to deferrals for any size project when WCE analyses demonstrate probable beneficial use impairment.

Water Quality Monitoring Plan

Concerns

A monitoring plan with water quality elements was included in the draft RMP/EIS. This element is critical for long-term successful implementation of BMPs and resulting water quality and beneficial use protection. While BMPs are intended to protect water quality, they must be monitored to verify their effectiveness.

We are concerned that the monitoring plan be well thought out. Sampling parameters and sample sites need to be carefully chosen. Coordination with other local, state, and federal agencies is important to avoid duplication and make efficient use of limited resources. Sampling priorities should be consistent with problem areas identified in the NPS Assessment and 305(b) Reports and other data.

We are concerned with the draft RMP/EIS's level of commitment to monitoring. The demands among competing resources can result in needed monitoring not being carried out. We believe that the importance of monitoring is of such a magnitude that timber sale volumes and associated programs should be reduced proportionately if annual funding is not sufficient to support monitoring. We are concerned as a practical matter how this commitment will actually be carried out. The criteria for "not sufficient" must be clearly defined.

Additional Information

The final RMP/EIS monitoring plan should address the following:

It should include types of surveys, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups.

It must have written standards for sampling design, parameters, analytical techniques, statistical methods, and reporting units, location of sampling, indicator species, budget, and procedures for using data or results in plan implementation.

It must have a clear feedback mechanism which can use monitoring results to adjust standards and guidelines, BMPs, standard operating procedures, monitoring intensity, and timber sale administration at first detection of adverse effects. Provision

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of such an adjustment process will help ensure that BMPs and management strategies will improve in the future and that unforeseen adverse effects are identified and minimized.

It should include validation of the WCI and any other WCE model or index intended for predicting the water quality effects of site-specific projects.

In July 1991 Oregon adopted narrative biocriteria as part of its WQS. The state is in the process of developing the implementation guidance for the biocriteria and is selecting appropriate reference sites in various ecoregions in the state. Once this framework is in place, BLM should coordinate its monitoring locations and protocols to allow comparison with the reference site conditions. This is necessary in order to determine whether the WQS for protection of biological integrity of the waters are being met. Provisions for this coordination should be spelled out in the final RMP/EIS. In addition the state expects to adopt numeric biocriteria in 3-5 years. The BLM activities will be expected to meet these WQS once they are adopted.

Other suggestions for improving the monitoring plan include:

Establish a desired future condition for each stream or subwatershed which adequately protects the beneficial uses. (This should be reflected in Appendix II-L) This can be expressed in terms that best describe the beneficial use (e.g., percent fish habitat capability). This is needed to ensure that the goals for site-specific projects are clear and future water quality accomplishments are measurable.

BMP implementation should be monitored through on-site inspection by appropriate specialists as well as timber sale contract administration. Site review may be randomized (e.g., random number table).

The riparian zone question on page II-O-8 relating to "RMP-approved disturbances" should be clarified. A 25 percent disturbance is excessive. Riparian management areas (RMAs) should be monitored to assess long-term large organic debris contribution to stream systems (e.g., quantity, size, species, delivery rate).

A fisheries monitoring protocol based on identification of sensitive populations and habitat types should be included. Systems should be prioritized/stratified based on stressors and resource risks.

Research/monitoring to determine the effect of dispersion logging (i.e.,spatial and temporal segregation of harvests) on sediment and hydrologic effects as well as cumulative effects should be conducted.

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On page 3-27, Table 3-W-8 the surface water monitoring results are summarized. The text explains that the analysis has not been completed. The monitoring plan should include a schedule of completion and scope of the analysis. Have any water quality trends been detected?

We assume that Table 3-W-8 is listing the same "six to eight baseline watersheds referred to on page II-O-6 of the monitoring plan. How were these watersheds selected? Are all the significant watershed types represented in the Coos Bay District? Are there monitoring stations maintained by other agencies that will form the basis of the water quality monitoring plan? Are the stations on the Middle Fork Coquille given the concern for its present degraded condition?

On page II-O-2 the monitoring plan refers to the "U.S. Environmental Protection Agency's Environmental Monitoring and Assessment Program." We are not sure what is being referred to here.

Riparian Zone Protection - First and Second Order Streams

Concerns

We are concerned that WQS will not be met and beneficial uses will not be protected because the draft RMP/EIS provides inadequate protection for RMA in first and second order (headwater intermittent and perennial) streams. The final RMP/EIS needs to include full protection of first and second order streams.

These first and second order streams are important in maintaining downstream system integrity and water quality as well as providing fisheries and amphibian habitat/refugia. Refugia are habitats or environmental factors that convey spatial and temporal resistance and/or resilience to biotic communities impacted by biophysical disturbances. Landscape features associated with refugia may include localized microhabitats and/or zones within the channel, unique reaches, riparian vegetation, floodplains, and groundwater. These areas may serve as source areas for recolonization following natural or anthropogenic disturbances (Sedell et al. 1990). Disturbed first and second order streams may become sediment sources to downstream areas. In addition, loss of woody vegetation along these headwater streams may eventually lead to reduced large organic debris in downstream reaches. We agree with the Medford draft RMP/EIS which states that the greatest opportunity for improving stream conditions through RMA prescriptions is on first, second, and third order streams.

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Our concern for first and second order streams is based on the fact that:

1. The largest percentage of riparian removal is along first and second order streams. Most of BLM administered land is along these headwater streams. A significant portion of the stream miles are along first and second order streams on the Coos Bay District.

2. The RMA widths are too narrow. Under several alternatives first and second order intermittent streams would have no buffer zone. RMAs could also be weakened further through road and yarding corridor development. The Roseburg draft RMP/EIS states, for example, that RMAs less than 95 feet are considered inadequate for proper riparian function and RMAs less than 150 feet are considered to be functioning at less than optimum level.

3. The draft RMP/EISs overall policy relegates first and second order streams to a lower level of protection. This idea is inconsistent with the Oregon WQS and with EPA's regional Riparian Area Management Policy.

We recommend that the final RMP/EIS include full protection of all beneficial uses to first and second order headwater intermittent and perennial streams.

Additional Information

Tree diameter was selected as a surrogate measure of riparian zone health. The final RMP/EISs should indicate whether diameter thresholds were selected based on reference locations within the managed area. Tree species and density data should also be provided. In addition, factors that may limit future riparian zone maintenance and production (e.g., water table alteration) should be described. These parameters should be incorporated into the riparian index of the WCI. To assess management effects, the riparian index must be sensitive to species, diameter, density, and environmental modifiers/stressors. The draft RMP/EISs determine RMA age and size based on the Timber Operations Inventory for adjoining upslope trees. The final RMP/EISs should address inventory accuracy in predicting RMA parameters.

The final determination of RMAs widths is unclear. Will the allocation to RMAs in the PA, for example, be met after the on-ground-analysis? How will the average widths shown for RMAs be utilized for the on-the-ground analysis? Are the widths considered a site-specific minimum or maximum? Are they a guide from which the RMA could be narrower or wider?

Different methods of rating riparian zones should be resolved and/or consolidated for the final RMP/EIS. Consistent rating systems will facilitate and simplify implementation of the RMP and monitoring strategies.

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Watershed Condition Index

Concerns

The WCI is a reasonable method for comparing watershed effects among the RMP/EIS alternatives. It is probably the most complex approach we have reviewed for evaluating watershed effects in a programmatic land management plan.

Our greatest concern is that should not be considered a substitute for evaluating cumulative effects on a project by project basis as the RMP is implemented. It also may be inappropriate to compare the index among different watersheds. The large spatial scale of Analytical Watershed Areas (AWA) used in applying the WCI could mask significant resource degradation. For example, sensitive species are not dispersed randomly throughout the AWAs.

Because of the way in which the WCI may be used it is essential it be subject to the scientific process. This should include extensive peer review by those outside BLM. Until then it should not be used as the basis for important project level decisions.

Additional Information

The WCI does not provide an adequate assessment of synergistic/cumulative effects for disclosing effects on site-specific projects. The WCI appears to be quite subjective and may produce variable results. The final RMP/EIS should provide greater explanation regarding WCI assumptions as well as selection of index constants. In addition, several index factors may distort actual resource effects.

The major component which is missing is a way of characterizing the uncertainty in the estimates. Standard methodologies we suggest for propagating uncertainty are Monte Carlo methods, Latin hypercube methods and first-order uncertainty. Monte Carlo methods are becoming common in risk and uncertainty analyses; references abound in the environmental literature (e.g., Smith and Freeze, 1979). Latin hypercube methods are a subset of Monte Carlo methods (Iman and Shortencarier, 1984) and first-order uncertainty methods are described in Benjamin and Cornell (1970). These methods all require actual data from the systems to evaluate uncertainty in the independent variables (the components of each index).

References

Benjamin, J.R., and C.A. Cornell, *Probability Statistics and Decisions for Civil Engineers*, McGraw-Hill, New York, 1970.

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Iman, R.L., and M. Shortencarier, *A Fortran 77 program and user's guide for the generation of latin hypercube and random samples for use with computer models*, Rep. NUREG/CR-3624, SAND83-2365, prepared for U.S. Nuclear Regulatory Commission by Sandia National Laboratory, Albuquerque, N.M., 1984.

Smith, L., and R.A. Freeze, *Stochastic analysis of steady state ground-water flow in a bounded domain, 2. Two-dimensional simulations*, Water Resources Research, 15(6), 1543-1559, 1979.

Best Management Practices

Concerns

The achievement of WQSs for NPS activities occurs through the implementation of BMPs designed to achieve WQSs. WQSs criteria are the measures by which BMP effectiveness is measured. While BMPs are intended to protect water quality, they must be monitored to verify their effectiveness. If found ineffective, the BMPs must be revised. Therefore, the draft RMP/EIS should not rely solely on the application of BMPs to satisfy the CWA. Since the use of BMPs does not guarantee compliance with WQS, the final RMP/EIS should discuss the effectiveness of BMPs with illustrations of specific project examples and/or monitoring results. For example, the final RMP/EIS could discuss the degree of risk of BMP failure as well as any history of BMP success, as illustrated via effectiveness monitoring in similar project areas.

Additional Information

Watershed improvement planning and implementation is dependent on the availability of future funding on page II-C-1. The long term watershed condition implications to lack of funding needs to be disclosed. Are these funds needed to restore watersheds with programmed harvests? Will planned harvests be affected if funds are not available for watershed restoration? The BMPs should be designed to accommodate this possibility.

The water quality and riparian BMPs frequently include caveats such as "as much as possible" or when "possible." This leaves the impression that water quality is a secondary consideration to commodity concerns. This language needs to be removed such that water quality concerns will be avoided. This emphasized the point that the final RMP/EIS include a clear commitment to deferrals for any size project when WCE analyses demonstrate probable beneficial use impairment. This should be included as a BMP.

Fisheries

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Concerns

We are concerned that fish production potential was tied in part to the installation of fish habitat improvement (e.g., instream structures). Beschta et al. (1991) determined that the restoration of vegetation adapted to riparian environments and the natural succession of riparian plant communities is necessary to recreate sustainable salmonid habitat and should be the focal point for fish habitat improvement programs. They further state that because of frequent negative effects, structural alterations to stream channels should generally be eliminated as a fish improvement strategy. Studies have not shown a relationship between stream improvement projects and salmonid population. Therefore, fish production should not be related to capital investment in "stream improvement" projects. Rather than provide short-term solutions to habitat degradation, landscape level planning should be undertaken to reduce further habitat degradation and implement district-wide restoration strategies (e.g., restoration of off-channel habitat).

The Coos Bay District manages land in drainages where four of the American Fisheries Society stocks of concern (Nehlsen et al. 1991) are naturally spawning and rearing. The draft RMP/EIS states that these salmonid species at risk or of special concern would improve under various treatment alternatives. However, the mechanisms by which resource increases would occur should be more clearly explained.

Retention of riparian areas along third order and greater streams and the placement of instream structures will not lead to anticipated population increases. The fish habitat assessment assumes that riparian tree size and fish production are directly related. However, acute and chronic stressors such as upstream sediment inputs may continue to degrade fish habitat. Effects such as sedimentation persist and accumulate in downstream, low-gradient habitats over periods of decades or even centuries. In addition, migratory species may be limited by habitat utilized at a single life history stage.

Additional Information

The District is responsible for the maintenance of sensitive species habitat and the restoration and sustainable management of the resource. To address these issues, EPA supports development of coordinated activity management plans. The final RMP/EIS should provide greater detail regarding plan coordination and implementation mechanisms.

In addition, chronic system stressors (e.g., unstable slopes, landslides, roads, mining) that may further degrade systems prior to recovery are not addressed. For example, the Eugene draft RMP/EIS indicates that debris torrents and landslides have affected channel integrity. The final RMP/EIS should indicate whether these inputs are

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ongoing and whether further logging would occur in the same geomorphic setting. The final RMP/EIS must address both past and future management scenarios to adequately assess long-term enhancement of anadromous fish streams.

The draft RMP/EIS lists several fish species of concern. However, information and documentation (e.g., genetic integrity, diversity) regarding these species are absent. the final RMP/EIS should include: (a) a comprehensive biological survey; (b) identification of watersheds supporting productive or valuable remnant populations or communities of native fishes, amphibians, and other aquatic biota; and (c) delineation of a well-distributed network of least disturbed watersheds for conservation of biotic diversity.

Adequate fisheries information is needed to realistically evaluate management alternatives. For example, depressed or declining populations may be unusually sensitive to habitat alteration and degradation. Specific information and analysis as well as recommended solutions (e.g., seasonal restrictions on road construction, stabilization methods, restoration of temporary spur roads). Final RMP/EIS coverage of fisheries resources should be comparable to that provided for terrestrial species. Sensitive and priority habitats should be identified.

Recovery and restoration plans should be developed based on a watershed analysis and NPS Assessment and 305(b) Reports. In addition, fish habitat and sediment yield should be utilized to establish/predict habitat quality. Treatments that may further induce population declines should be avoided.

Frissell (1992) states that preliminary analysis of spawner count data available from the Oregon Department of Fish and Wildlife for the period 1986-1990 suggests that watersheds having a high proportion of their drainage basins within roadless areas support a disproportionately large percentage of southwest Oregon's remaining viable wild salmon stocks and much of its important chinook salmon fishery. In addition, recent research indicates that chum salmon are perhaps the most sensitive of the anadromous salmonids to logging effects. Restoration plans should include identification and preservation of potential refugia. In addition, management treatments should be based on the location of sensitive species and current watershed conditions.

An explanation of the statement "BLM ownership in watersheds would be blocked up to improve watershed management for federal candidate fish and amphibian species" should be provided.

12

References

Beschta, R.L., W.S. Platts, and B. Kaufmann. 1991. *Field review of fish habitat improvement projects in the Grande Ronde and John Day River Basins of Eastern Oregon.*

Frissell, C.A. 1992. *Water quality, fisheries, and aquatic biodiversity under two alternative forest management scenarios for the west-side federal lands of Washington, Oregon, and Northern California.* A report prepared for The Wilderness Society.

Harr, R.D., B.A. Coffin, and T.W. Cundy. 1989. *Effects of timber harvesting on rain-on-snow runoff in the transient snow zone of the Washington Cascades. Interim Final Report for the Timber, Fish, Wildlife Program.* Pacific Northwest Research Station, Seattle, Washington.

Nehlsen, W., J. E. Williams, and J. A. Lichatowich. 1991. *Pacific salmon at the crossroads: stocks at risk from California, Oregon, Idaho, and Washington.* Fisheries, Vol. 16 No.2 pp.-4-23.

Sedell, J.R., G.H. Reeves, F.R. Hauer, J.A. Stanford, and C.P. Hawkins. 1990. *Role of refugia in recovery from disturbances: modern fragmented and disconnected river systems.* Environmental Management Vol. 14, No. 5, pp. 711-724.

Drinking Water

The draft RMP/EIS states on page 2-7 that, "For those watersheds that provide surface water used by public systems serving municipalities, the management goal would be to provide treatable water at the system's point of intake."

This should be rephrased to read as follows: The goal of watershed management in watersheds providing surface water to public systems serving municipalities, is to assure the needs of the users are addressed and to protect comprehensive water quality. Public water systems must meet increasingly stringent public health criteria required by drinking water regulations. A drinking water treatment cost strategy that protects the public health and is economically and environmentally sound is a necessary component of a watershed plan. The interests and concerns of watershed managers, water system owners/operators, and the drinking water consumers must also be incorporated into a water management plan. Consequently, watershed plans will be prepared in conjunction with community water systems where BLM administers a significant portion of the watershed.

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Another important consideration in providing drinking water would be mining. If mining activities on BLM lands cause significant increases in the concentrations of metals in streams that supply public water systems, this could force these systems to install expense treatment systems to remove these metals.

AIR QUALITY

The air quality analysis is based primarily on compliance with the Oregon State Smoke Management Plan (OSMP) and the State Implementation Plan (SIP). Broad statements regarding compliance with applicable plans and regulations do not inform the public or decision makers of actual anticipated air quality effects. A screening level quantitative assessment of air quality effects is needed to illustrate that burning can be done in compliance with applicable plans and regulations.

Sensitive Air Quality Areas

The draft RMP/EIS (page 3-10) states that "The Oregon Smoke Management Plan (OSMP), a part of the state implementation plan, identifies strategies for minimizing the effects of smoke from prescribed burning on the densely-populated, designated, non-attainment, and smoke sensitive areas within western Oregon . . ." The text needs to discuss in greater detail and define what is meant by the terms non-attainment, designation, and smoke sensitive. If these terms have regulatory significance they should be discussed in detail in the final RMP/EIS.

Map 3-2 in the draft RMP/EIS shows the sensitive air quality areas in western Oregon. The map and the discussion in the final RMP/EIS could be improved if each of the sensitive air quality areas were labeled. The text should identify the sensitive areas that are most likely to be affected by the future site-specific activities in the Coos Bay District. This discussion should also clearly describe why each area has been designated and the significance of each designation.

Regulatory Requirements

The final RMP/EIS should provide a description of all applicable regulatory and/or permit requirements. The Clean Air Act (CAA) and SIPs require that prescribed burning not cause or contribute to violations of National Ambient Air Quality Standards (NAAQS) or Prevention of Significant Deterioration (PSD) increments. In addition, burning may not cause visibility impairment in federally-designated Class I areas. The air quality discussion must demonstrate that the proposed action will not cause or contribute to any violations of the NAAQS, that it will not cause air quality to degrade by more than any applicable Class I or Class II PSD increments, and it will not cause or contribute to visibility impairment.

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Oregon Smoke Management Plan

The draft RMP/EIS indicates that all prescribed burning activities will comply with the OSMP. The final RMP/EIS needs to fully describe what the OSMP is, what it allows, what it prohibits, and what is protected. The final RMP/EIS should discuss how effective it has been, since its implementation in 1972, in reducing air quality effects not just intrusions. Any monitoring that has been completed to document the effectiveness of the OSMP should be described. Although most problem burns or intrusions can be attributed to unpredicted shifts in meteorological conditions compliance with the OSMP could still result in intrusions. For example, drift smoke from a prescribed burn can be carried by night time drainage winds into designated areas. The final RMP/EIS should discuss whether the OSMP contains provisions to prevent or minimize these types of scenarios.

Another detail about the OSMP that needs to be discussed is whether different permissible burning conditions exist for different subareas within western Oregon and more specifically within the district. Different burning conditions could affect the amount of allowable burning activity under the OSMP and SIP. This in turn would affect the kinds of site preparation that could be considered at the site-specific stage. Any potential burning restraints of this type need to be discussed and fully disclosed in the final RMP/EIS.

State Implementation Plan

The final RMP/EIS should also describe the SIP and its provisions for prescribed burning. The relationship of the SIP and OSMP should be clearly presented. Any restrictions that the SIP could impose on prescribed burning, separate from the OSMP, should be discussed.

The draft RMP/EIS states that "air quality, under all alternatives, would not deteriorate to a point that ambient air quality would be adversely impacted due to prescribed fire." The final document needs to provide the basis for this statement. How do the predicted tons of biomass consumption compare to emissions of regulated air pollutants. More importantly, how do the predicted tons of emissions compare to the amount of particulates from prescribed burning that are assumed in the current SIP calculations?

Prescribed Burning

The draft RMP/EIS presents a breakdown of the kinds of burns included in prescribed burning activities. Table 4-A-1 shows the biomass consumption by alternative as well as acres of broadcast and pile and burn. The air quality discussion in the final RMP/EIS should be expanded to fully describe these types of burning. Which types of burns are hot and which types are cooler. The temperature of the fires has an effect on smoke dispersion characteristics.

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Finally, alternative burning techniques exist that can be used to reduce the effect of prescribed burning on air quality. These techniques optimize fuel arrangement, fire ignition for rapid and complete combustion, and mop-up techniques. We believe that the air quality discussion would be improved by including a more expanded discussion of what mitigation measures BLM has been using and any additional techniques that could be used in the future to minimize air quality effects associated with prescribed burning. This expanded discussion should focus on the different types of burning proposed in the RMP.

Rural Interface Areas (RIA)

We are concerned that the OSMP and the PA will put people in the RIA areas at risk. RIAs are defined as BLM land within 1/4 mile of 1 to 5-acre lot. Alternatives A, B, C, D, and PA will permit prescribed burns in these areas. Another related concern is that one of the primary purposes of the OSMP is to keep smoke from forestry burning activities out of densely populated areas. Compliance with the OSMP will direct smoke plumes away from large urban centers and potentially into smaller communities, individual residences, recreational areas in the rural environment.

Particulate concentrations that exceed human health standards have been measured up to three miles downwind of a prescribed burn. The final RMP/EIS needs to discuss human health standards and the effect of prescribed burning on people living in RIAs and other downwind communities. We believe that this is a significant issue due to the provisions of the OSMP and the PA RIA policy.

Alternatives to Burning

The draft RMP/EIS indicates that not all timber harvest units require treatment by prescribed burning. This discussion should be expanded in the final RMP/EIS. A number of alternatives for removal of slash exist that do not involve burning. A general discussion of the types of options would provide useful information.

The draft RMP/EIS indicates that no treatment or mechanical treatment could result in a higher fuel hazard. We agree that this a possibility. However, logging residue can be reduced by harvesting systems directed toward maximum utilization of slash material recovery (excluding the trees/fiber left for ecosystem/biodiversity purposes). We suggest that the final RMP/EIS consider including a goal to improve harvesting systems to provide economic incentive for increased slash utilization. Use of slash material is dependent on the capability and efficiency of the forest industry to process low grade fiber. The final RMP/EIS should provide some discussion of the economic and technological feasibility of improved slash utilization and the effect on fuel hazard.

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Finally, the final RMP/EIS should present a brief discussion about how the decision to burn or not to burn is made. Is this a market driven decision? What are economics of forestry burning? An analysis of the cost of burning compared to the costs of mechanical removal are warranted. The decision criteria that have been used in the past should be described. More importantly the final RMP/EIS should present the criteria (e.g., cost, silvicultural considerations, air quality considerations, market demand for low grade fiber, ecosystem considerations) that should be considered in the future when a born/no burn decision must be made.

Firewood Program

On page 2-9 the draft RMP/EIS discusses giving educational information on reducing woodstove particulate emissions. The Wenatchee National Forest, Naches Ranger District *Personal Use Firewood Environmental Assessment (EA)*, included several additional innovative mitigation measures to reduce the emission of particulates associated with woodstoves. The mitigation measures have been implemented and they include: (1) a requirement that pieces larger that 8 inches in diameter must be split at least once prior to removal to facilitate drying of the wood; (2) the gathering season is closed on September 30th to assure that firewood is not collected when wet, and some curing time is available prior to burning; (3) a requirement to implement a cooperative arrangement with the local air quality agency on public information and education on firewood use and/or enforcement efforts on woodstove burning regulations. These mitigation measures should be considered in the final RMP/EIS.

IMPACT DEFINITIONS

The draft RMP/EIS uses the life of the RMP as the basis for defining short-term and long-term time frames for impact conclusion as required by the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA). The draft RMP/EIS defines short-term as ten years or less and long-term as greater than ten years. However, application of a ten-year time frame is not universally appropriate for all resource categories. Our primary concern is for the biota found in BLM administered lands. A considerable range in life spans exists. Using ten years to define short-term effects means that some populations of fish and birds, for example, could experience adverse effects for several generations. This could result in major population and community level effects.

The definitions of short-term and long-term impact would be greatly improved if the time frame for adverse/beneficial effects were tied to the natural life spans of individual species rather than the arbitrary number that has been chosen. The Department of Interior has consistently used such an approach in the Outer Continental Shelf (OCS) lease sale EISs. These OCS lease sale EISs are not site-specific, they cover large planning areas and the activities in those areas for

several years so they are analogous to a RMP/EIS. The OCS impact definitions are based partly on the length of one generation for each species or group of species evaluated. Thus, the time frame of the impact is tied biologically to the species affected. We are enclosing a copy of the OCS impact definitions for your information and consideration for the final RMP/EIS.

In the case of air quality and water quality effects ten years is not an appropriate time frame for assessing effects to air and water quality or aquatic habitat. A ten year time frame does not comply with regulatory definitions. We suggest that a definitions for short-term water and air quality effects be developed that are consistent with state WOS and the state implementation plan (SIP). At a minimum, short-term air and water quality effects should exist during the course of specific activities and should be held to the shortest practicable period of time.

SPECIAL STATUS/THREATENED AND ENDANGERED SPECIES

Management Direction

Direction given in the Federal Land Policy and Management Act (United States Code, Title 43 - Public Lands) states that the public lands should be

> "...managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife..." [section 1701 (a) (b)].

With this in mind, the final RMP/EIS should explain the rationale for providing different levels of protection for special status plants and animals on Oregon and California railroad lands (O&C) and Coos Bay Wagon Road (CBWR) vs. public domain lands:

> "BLM management and permitting actions would also be designed to protect habitats of Federal Candidate (Category 1 and 2), state Listed and Bureau sensitive plant and animal species on other O&C and CBWR lands where mitigation would not diminish commercial use such as timber production from land allocated to such use." (pg 2-36).

Since the District is 85 percent O&C/CBWR land, the final RMP/EIS should also discuss what implications this policy could have on these species and their habitats.

The draft RMP/EIS states that the "... alternatives do not assume that required levels of protection of listed or proposed species are known unless there was a recovery plan in effect before the alternatives were formulated." (page 2-10). Since the

BLM is currently involved in informal consultation with the FWS regarding the draft RMP/EIS, it seems reasonable that the alternatives presented in the final RMP/EIS could incorporate FWS information about special status species, particularly federally-listed threatened or endangered species, in order to better illustrate the potential effects of BLM management, project, and protection activities regarding these species. The CEO Regulations for Implementing the Procedural Provisions of the NEPA address the issue of incomplete or unavailable information in 40 CFR § 1502.22. The scope of the final RMP/EIS alternatives and analysis should not be limited to the existence of recovery plans.

Consultation with U.S. Fish and Wildlife Service (FWS)

Since activities conducted under the RMP could affect threatened or endangered species, the final RMP/EIS should include the Biological Assessment and the associated FWS Biological Opinion for the following reasons:

- NEPA requires public involvement and full disclosure of all issues upon which a decision is to be made;
- The CEQ Regulations for Implementing the Procedural Provisions of NEPA strongly encourage the integration of NEPA requirements with other environmental review and consultation requirements (40 CFR 1502.25); and
- The Endangered Species Act (ESA) consultation process can result in the identification of mandatory, reasonable, and prudent alternatives which can significantly affect project implementation.

The potential effects on listed species are relevant to the subsequent project-level decisions. Both the Biological Assessment and the EIS must disclose and evaluate the potential effects of the proposed action on listed species. Information and related management guidance regarding the recent listing of the marbled murrelet should be added to the final document.

The final RMP/EIS and Record of Decision should not be completed prior to the completion of ESA consultation. If the consultation process is treated as a separate process and the FWS identifies necessary changes in plan implementation which have not been evaluated in the draft RMP/EIS, a supplement to the RMP/EIS could be warranted.

Coordination and Consistency

The draft RMP/EIS presents a great deal of information regarding the northern spotted owl. Since the concern and controversy regarding this species has spanned a number of years, federal agencies, and court cases, there are a number of plans and proposals that address owl populations, habitat, and management. The document should better outline how the alternatives and management direction compare to existing and draft reports and recommendations, such as the Draft Recovery Plan for the Northern Spotted Owl, FWS (1992); Final Environmental Impact Statement on Management for the Northern Spotted Owl in the National Forests, USDA Forest Service (1992); Endangered Species Committee Record of Decision (1992); Alternatives for Management of Late-Successional Forests of the Pacific Northwest, Scientific Panel on Late-Successional Forest Ecosystems (1991); A Conservation Strategy for the Northern Spotted Owl, Interagency Scientific Committee (ISC) (1990).

For example, the final RMP/EIS should compare how the connectivity areas in the RMP compare to the 50-11-40 rule outlined in the ISC report. The draft document states that

> The ISC originally developed the 50-11-40 criteria as a standard to evaluate dispersal habitat across the landscape. This approach works well in the case of the U.S. Forest Service where there is contiguous federal land ownership. However, over much of the planning area, the BLM administers only a portion of the forest lands.

The implication of this discussion is that the 50-11-40 criteria do not apply well to Bureau lands. However, the ISC was convened through the cooperation of three federal agencies, one of which was the BLM. Presumably, the ISC was aware of federal land ownership patterns as it formulated its recommendations. Therefore, the final RMP/EIS should clarify the similarities and differences between the RMP connectivity areas and the expected results of application of the 50-11-40 rule and the rationale for choosing one strategy over the other in the final RMP/EIS.

Finally, the final RMP/EIS should address management direction for timber sale areas exempted by the Endangered Species Committee in 1992.

TIMBER MANAGEMENT AND SILVICULTURE

The final RMP/EIS should clarify the BLMs philosophy regarding the annual sale quantity (ASO) and identify whether it considers the ASO a goal or a mandated level of timber production. In addition, the draft RMP/EIS assumes that there will be sufficient funding for forestry activities, such as reforestation, thinning, tree improvement, and fertilization, in support of the ASO level. Since these activities contribute to the ASO,

the final RMP/EIS should identify silvicultural management priorities that could guide activities should they not be sufficiently funded during plan implementation. This is particularly important since it has been estimated that management costs under PA and C could increase 2.8 times above current levels (page 2-56) and the draft RMP/EIS assumes that reforestation under the PA will use only genetically improved reforestation stock.

The final RMP/EIS should consider timber sale economics as a management concern for analysis in response to the full public disclosure intent of NEPA and in response to the national controversy regarding below-cost timber sales. The draft RMP/EIS notes that growth enhancing practices, such as commercial thinning and forest fertilization, will be utilized where research data and economic analysis indicate such investments are warranted. However, it also notes (regarding intensive management practices) that each alternative considers the application of such practices, even where they may be uneconomic, for the potential purpose of promoting timber growth and harvest. The Sensitivity Analysis on indicates that both precommercial thinning and fertilization tend to have negative present net values. Therefore, the final document should provide clear descriptions of key assumptions regarding intensive management practices, Interdisciplinary Team costs, sale preparation, timber pricing, product valuation, discount rates, rotation lengths, road and access costs, and road maintenance.

EPA supports the proposal in Alternative C encouraging agreements that could be "...pursued with private landowners and other land management agencies to optimize the extent and distribution of old growth restoration and retention areas while minimizing undue impact on multiple resource use." (page 2-34). EPA would also like to encourage coordination with adjacent landowners regarding timber management practices, particularly harvest activities. For example, many pubic agencies and some private companies have adopted guidelines requiring regeneration on adjacent parcels to be of a certain size (e.g., trees 4 1/2 feet tall) or stocking level before adjacent timber sale units may be harvested.

ACCESS

The draft RMP/EIS discusses easements and reciprocal right-of-way agreements for access to agency lands (page 2-19). It would be helpful if the final RMP/EIS also gave an indication of how much access the BLM provides to intermingled landowners through federal license agreements, easements, and reciprocal right-of-way agreements. One of the assumptions used in Chapter 4 in the comparison of the alternatives is "[D]uring the ten-year life of the plan, new roads would be constructed across BLM administered lands by private parties under the terms of existing reciprocal right-of-way agreements." (page 4-6). The final RMP/EIS should estimate of the miles of road that might be constructed by private parties.

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The final RMP/EIS should outline how the BLM will coordinate and cooperate with adjacent and intermingled landowners in order to plan, build, and maintain the permanent road system and accomplish road management objectives. For example, similar to the BLM's authorization for cooperative road programs, the Forest Service Road Right-of-Way Construction and Use Agreement (Cost Share) program is also based on authorization from the Federal Land Policy and Management Act of 1976. The Forest Service program includes requirements for annual meetings with road use partners in order to discuss timber management activities; road use needs; road construction plans and standards (including surfacing); and maintenance obligations. The final RMP/EIS should clarify whether the BLM road program includes similar coordination methods that assist in accomplishing road management objectives.

The draft RMP/EIS mentions road closures in a couple of contexts throughout the document in conjunction with various management objectives. For example, on page 2-22, the documents notes that "[I]f required to alleviate significant resource damage, road closures would be implemented using standard analysis, public involvement, and notification procedures." and on page 2-54, the document addresses roads for timber management notes that if "Some alternatives, in addition, involve substantial costs of closure of roads..." The term "closure" appears to be used in two ways in the draft RMP/EIS; it can mean either administratively closed (using such means as gates or other barriers) or obliterated (restored to the natural land contour and vegetation). Since both the economic costs and environmental costs of the two methods of closure may differ substantially, the final RMP/EIS should clarify which method of closure is appropriate related to specific issues and objectives. In those cases in which the road will remain on the permanent transportation system but in which road use will be restricted by an administrative closure, the final RMP/EIS should address non-traffic-generated maintenance needs that will ensure that culverts remain unobstructed and ditches are cleaned in order to prevent road "blow outs" during winter storms. In addition, the document should address road maintenance priorities that can guide decisionmaking when funding is not adequate for complete road system maintenance.

The discussion of road issues for Alternative C notes that where

> "Logging without additional road construction would be done where resultant timber sales could be sold above the cost of sale preparation. Where road construction is needed,m road density would not exceed that needed were clearcut harvesting planned" (page 2-35).

Partial cut and shelterwood systems often require greater road densities than clearcut systems. In addition, partial cut and shelterwood systems may have higher per unit sale preparation costs. Therefore, the final RMP/EIS should further explain how this road density objective will be achieved. For example, the document should clarify whether use of helicopters is an option for accessing and harvesting timber

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sales. If so, the final RMP/EIS should include a discussion of noise effects that could be associated with helicopter use, including the noise levels that might be experienced by those who live or recreate in the vicinity. This is important because helicopters at 500 feet are comparable to sound levels of heavy trucks and city buses heard from the street. This could be significant in areas of very low ambient noise levels. One source of information on helicopter noise effects in non-urban areas is the draft and final *National Surface Water Survey - Western Wilderness Area Lakes, Environmental Assessment*, EPA 910/9-85-125 and EPA 910/9-85-126, March 1985 and April 1985. [Copies may be borrowed from the EPA, Region 10 library at (206) 553-1259.]

WILD AND SCENIC RIVERS

The draft RMP/EIS recommends different numbers of wild and scenic river segments for designation under the various alternatives. Alternatives NA, A, B, and PA recommend no river segments, and Alternatives C, and D recommend one segment each. In contrast, Alternative E recommend nine river segments for designation (page S-18). These differing recommendations raise a question regarding how river segments are evaluated and recommended for wild and scenic river designation. The differences in the alternatives are in management direction and objectives; the physical qualities of each of the river segments under consideration would seem to be the same under each of the alternatives. Therefore, if a river segment is both eligible and suitable for designation, the final RMP/EIS should clarify how it is possible to recommend a given segment in one alternative and not in another.

In addition, not all streams eligible for wild and scenic river designation are studied for suitability in the draft RMP/EIS. The document notes that there will be interim management of BLM land within a half-mile corridor of these streams in order to protect their Outstandingly Remarkable Values (page 2-12). While the text describes some of the elements included in this interim management, such as exclusion of timber harvest in riparian areas and restriction of leasable and salable mineral development, it does not give a timeframe for the "interim." The final RMP/EIS should define the expected time during which these streams will be managed under RMP interim management direction and identify when suitability studies and possible recommendations will be made regarding these streams.

In September 1991, Oregon revised its WOS to add an antidegradation policy under 340-41-026. The policy defines what will be considered Outstanding Resource Waters (ORW) and sets forth a process for nominating and designating such waters. This process is ongoing. The language in the standards states that "The Commission may specially designate high quality waterbodies to be classified as Outstanding Resource Waters in order to protect the water quality parameters that affect ecological integrity of critical habitat or special water quality values that are vital to the unique character of those waterbodies." Priority water bodies for nomination include Wild and

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Scenic Rivers. With the potential listing of various salmon species as threatened or endangered, it can be expected that critical habitat for these species will be designated as ORW. Waters so designated may not have their water quality lowered except on a short-term basis. In addition, land managers will be expected to fully participate in the development of management plans to protect those waters.

SOCIOECONOMICS

The CEQ Regulations state that "When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." (Section 1508.14). The proposed action will affect small timber communities in western Oregon, the entire state and the Pacific Northwest region. The draft RMP/EIS has evaluated the environmental consequences of the proposal. EPA is providing comments and suggestions on ways to improve the analysis of the social and economic effects.

The socioeconomics analysis concludes that the reductions in timber harvest associated with the PA would be expected to result in significant reductions in employment and income in the affected area. The Klamath Falls draft RMP/EIS provides a somewhat more complete picture in that it provides an estimate of the state-wide effects of the BLM and Forest Service land management alternatives. We recommend that the final RMP/EIS for the Coos Bay District include an analysis similar to what is found in the Klamath Falls RMP/EIS. We would also recommend the analysis be expanded to include more information on other sectors of the economy.

The current analysis appears to be a static analysis; it implicitly assumes that other sectors of the economy do not change over the analysis period and thus shows the potential effects of the BLM and Forest Service activity in isolation from the rest of the economy. The analysis would be substantially more useful if BLM entered as inputs to its input-output model current forecasts of how other sectors of the Oregon economy are expected to change over the next decade. It is entirely possible that this more holistic economic analysis would show that the regional economy is likely to be employing more people over the next decade; jobs lost in the timber industry may be replaced by jobs created in other sectors of the economy.

A secondary benefit of doing the type of expanded analysis suggested above is that it might provide a picture of what types of jobs might become available in the future and what types of job training or vocational training would assist displaced timber workers in finding new long-term employment. This, in turn, would allow the final RMP/EIS to discuss and evaluate options for Federally sponsored displaced work assistance that might be used to mitigate the adverse employment impacts of the selected management plan. Although such assistance may well be outside the scope

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of the authority of BLM or the Forest Service, it is not outside the scope of the authority of Congress. The CEO Regulations encourage the evaluation and consideration of alternatives not within the jurisdiction of the lead agency [1502.14(c)].

Finally, the final RMP/EISs could also be improved if the degree to which the economic activities on BLM managed lands are likely to be economically self-supporting was addressed. A quantitative analysis of each "revenue and cost" stream would allow the audience of the RMP/EIS to understand the magnitude of the subsidies involved and to determine whether continuing these subsidies would be good public policy. In addition to timber harvest revenues, this analysis should include such items as grazing fees and mineral royalties.

CONSISTENCY AND COORDINATION

While Appendix IV-O discusses agency efforts to work with state agencies and counties on ways to make the RMP consistent with plans, policies, and programs, of other agencies, the document does not discuss what effort was made regarding National Forest Land Management Plans for adjacent Forest Service lands. If other federal lands are key to the success of an alternative, the final RMP/EIS should clearly outline what types of coordination and cooperation will be a part of plan implementation.

Another concern arises regarding the Consistency Table in Appendix IV-O for Big Game Population Management Objectives. Under Alternatives A and B cover on BLM lands is expected to decrease. However, the document states that "...private lands are expected to provide adequate forage." (page IV-O-2). Other parts of the document specifically exclude private lands from consideration because of jurisdictional differences, but in this case, the BLM appears to be using private land as a mitigation vehicle or buffer for the agency's activities. It is important to show a consistent approach regarding adjacent private landowners.

Finally, the document briefly discusses agreements that "...would be pursued with private landowners and other land management agencies to optimize the extent and distribution of old growth restoration and retention areas while minimizing undue impact on multiple resource use." (page 2-34). This presents a strong incentive for the BLM to pursue coordination, and if possible, consistency efforts with its adjacent landowners, both public and private. The final RMP/EIS should further outline and discuss the purpose, scope, and specific management activities that could be covered in such cooperative agreements.

FUNDING

The draft RMP/EIS states that "timber sale volumes and associated programs would be reduced if annual funding is not sufficient to support the relevant actions assumed in the plan." We are concerned that the PA and alternative C will be costlier to implement since they both contain more nontraditional timber management approaches. The draft RMP/EIS indicates that for these two alternatives the costs of nontraditional timber management would be approximately 2.8 times higher per unit of timber sold than for the more traditional timber management alternatives.

The final RMP/EIS needs to describe in greater detail: how BLM funding levels are established each year; whether allocations are based solely on the amount of timber cut; whether each yearly allocation is "ear marked" for specific uses; and what effect this more costly nontraditional timber management will have on the funds available for a variety of nontimber harvest activities. Management of BLM administered lands involves a variety of activities including; data gathering, research, monitoring, cooperation with agencies for management of resident wildlife; completion of management/activity plans; maintenance of recreation facilities; and education programs. The final RMP/EIS needs to describe in greater detail how a funding shortfall will affect the variety of activities included in this plan. Will all activities be cut back equally if funding is not sufficient? Do some management activities have a higher priority for completion than others? Will all resources be equally or adequately protected if funding is less than anticipated or needed?

TIERING AND NEPA COMPLIANCE

The CEQ regulations encourage tiering of NEPA documents.

> Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review (§ 1508.28). Whenever a broad environmental impact statement has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site specific action) the subsequent statement or environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action. (40 CFR § 1502.20)

While programmatic documents, such as RMPs, provide important management direction, they do not contain sufficient site-specific detail to substitute for site-specific analysis for individual projects implemented under RMP direction. For example, in the

draft RMP/EIS, under all alternatives, "...air quality impacts associated with BLM-administered activities are normally of very short duration and would have no short or long-term impacts on regional air quality." (page 4-8). While the programmatic RMP partially addresses potential air quality effects in the region, its brief analysis should not be used as the basis for concluding that future site-specific prescribed burning proposals will have no effect on local sensitive air quality areas or RIAs.

The draft RMP/EIS implies that there may be a second level of planning activity between the RMP level and the individual project level. If activity level planning is another decision-making point in BLM activity scheduling, such decisions are subject to the provisions of NEPA, as are individual project decisions, such as new land use authorizations, timber sales, land adjustments, mining activities, and consideration of silvicultural treatments (including site preparation and prescribed burning proposals).

Further, the final RMP/EIS should provide specific direction regarding the preparation of tiered NEPA documents. The draft RMP/EIS refers a number of times to future tiered EAs, but this should not be construed as a directive to prepare solely EAs for individual projects. In some cases, EISs or categorical exclusions (CE) will be more applicable. Therefore, the final RMP/EIS should identify the criteria for determining what sort of NEPA documentation will be required for future projects (EIS vs. EA vs. CE). In addition, it should provide guidance for the scope of analyses expected in these tiered documents to clarify what analyses and issues are considered completely addressed in the RMP/EIS, and what analyses and issues should be further considered based on site-specific resources and conditions.

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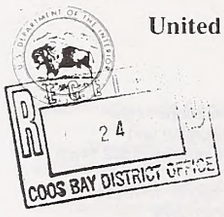

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Portland Field Station
2600 S.E. 98th Avenue, Suite 100
Portland, Oregon 97266

December 21, 1992

Memorandum

To: District Manager, Coos Bay District, Bureau of Land Management
Coos Bay, Oregon

From: Field Supervisor, Portland Field Office, Fish and Wildlife Service, Portland, Oregon

Subject: Review of Draft Coos Bay District Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS)

We have reviewed the subject draft document and provide the following comments for your consideration in developing the final RMP and EIS.

GENERAL COMMENTS

The BLM has in general produced a document with much detailed analysis of several alternative RMP's. It appears that with the exception of the No Action Alternative and Alternative A there would be a more balanced approach to resource management, which is to be commended. More emphasis should be placed on first restoring the watersheds to permanent stability and then maintaining them through management and harvest of all resources at a level that will not degrade the long-term productivity of the system. Timber harvest levels and methods that produce a variety of productive wildlife habitat, high water quality, quality riparian corridors and optimal fishery habitat on a permanent basis should be employed.

None of the alternatives presented describe a plan that will clearly guarantee complete restoration and maintenance of fish and wildlife resources to their maximum carrying capacity in concert with timber production and other uses over the long term. Part of the problem may be due to treatment of landscape types rather than whole watersheds. Alternatives D and E with additional input described below could perhaps be modified to meet what can be described as a much more "Holistic Natural Watershed Management Plan" (HNWMP) which should become the Approved Resource Management Plan (ARMP). Under this alternative goals would be set to fully restore watersheds to produce sustainable water quality, vegetation, riparian corridors, and habitat diversity necessary to maximize fish, wildlife and timber production within the natural range of timber stand types similar to the watershed/landscape pattern present before European settlement. Timber production, utilizing a variety of harvesting methods, could be employed, but only to the point where long-term watershed productivity for timber, fish, and wildlife would be permanently maintained.

Much of the information used in analyzing the alternatives presented could be used in developing the HNWMP, in addition to the detailed input from other agencies and individuals responding to the subject draft EIS. In their comments on the draft document, the Oregon Department of Fish and Wildlife describes these same conditions as those they want to see under a long-term goal or desired future condition (Oregon Department of Fish and Wildlife, 1992). It is understood that there can be some minor tradeoffs where there are conflicts between timber production and other uses. However, most long-term uses are generally compatible. For example, maintaining high soil productivity, water quality, riparian corridors, wetlands, fishery and wildlife habitat diversity can, after restoration, be sustained at or near maximum levels and still allow timber production and harvest. Over the long term much of the watershed should take on mature and old growth characteristics that would allow more selective harvest of higher quality timber. We believe it is BLM's responsibility to analyze, describe, implement, and monitor a plan that will achieve, over the long term, fully restored and stabilized watersheds with high quality fish and wildlife habitat and other compatible uses, including timber production.

We suggest additional information be utilized in developing an HNWMP. This would include riparian corridor widths and other provisions prescribed in the watershed/fish emphasis option described by the Scientific Panel on Late-Successional Forest Ecosystems of the Pacific Northwest (Johnson, Franklin, Thomas and Gordon, 1991) and publications on Individual Tree Selection (Reeder, M, 1988 and Kennedy, D., 1989).

Under the HNWMP plan we believe BLM can meet its responsibility to restore watershed productivity on lands under its control and set the example for other public and private land managers.

An economic analysis of the long-term overall benefits and costs of the HNWMP alternative compared to the other alternatives should be made. It is likely that economic benefits to fishery and other resources will significantly offset reduced timber revenues which have been higher than could be sustained without degrading the ecosystem. For example, if the restoration of economically important fish and wildlife stocks, including those threatened with extinction would take place, the potential for some further logging restrictions may be eliminated and fish and wildlife economic benefits would be far greater than at present in concert with long-term sustained timber production of higher quality older trees. Other limiting factors such as fish passage, harvest rates, agricultural practices, etc. not under BLM control, will need to be addressed. However, it is clear that for the HNWMP to be successful, BLM must do its part on lands it controls. As a public agency, BLM needs to set the example and do everything within its power to bring about the results we all want and can be achieved through the HNWMP.

A table of contents should be located at the beginning of the document for easy reference. Also, the page headers should be labeled as to what each chapter is covering.

Since many acronyms and abbreviations used in the draft documents may be unfamiliar to the reader, we suggest moving the list of acronyms and abbreviations to the front of the documents for quicker reference.

SPECIFIC COMMENTS

Page S-5, fifth paragraph. The RMA's proposed need to show that riparian resources will be fully restored. There is no clear indication that proposed riparian stream corridors widths will achieve this. The ARMP needs to include corridor widths necessary to restore the long-term maximum riparian corridor productivity along with stabilizing watersheds surrounding the RMA's.

Page S-10, 2nd full paragraph. The fishery resource needs to be fully restored. A 58 percent increase of salmon and steelhead in streams over current severely depressed levels for the long term obviously is not adequate. The final document should state to what degree a 58 percent increase would be of the maximum potential of a fully restored fishery.

The adopted RMP should, through natural watershed restoration, produce long-term productive high quality habitat for the entire planning area rather than just implementing "projects" that improve 20 miles of the several hundred miles of stream habitat. The emphasis should be on long-term natural restoration more than small-scale and often short-term artificial efforts.

Page 4-45, sixth paragraph. It is not clear that proposed riparian corridor widths on perennial streams, no protected corridors on intermittent streams, and surrounding watershed/landscape management will produce the stated results. The adopted RMP should over the long-term result in optimal riparian corridor conditions on all streams on BLM administered land.

Page 4-5B, sixth paragraph. It is difficult to understand how priority fish species can reach optimum levels if some stream habitat is in less than optimal condition as stated on page 4-45, sixth paragraph. More importantly, it is not clear exactly what "optimum" levels are. We support the view that "optimum" levels are the maximum potential, similar to levels present prior to European settlement as reflected by early historical catch records. The final EIS should reflect an adopted RMP that will insure these conditions are attained.

Page 4-61, Table 4-F-2, Potential Fish Production and Population Trends. Current populations of all species listed are severely depressed. Yet over the long term fish populations are only shown to increase by 55 percent for coho, 65 percent for chinook, 48 percent for steelhead and 43 percent for cutthroat. The table needs to show how close these figures are to "optimum" (maximum potential) levels. Further, the table and previous discussion should be expanded to illustrate the status of individual fish stocks, some of which may be near extinction. See also our previous comments related to pages 4-45 and 4-58.

THREATENED AND ENDANGERED SPECIES

GENERAL COMMENTS

The following comments are provided as part of informal consultation (1-7-93-I-100) pursuant to Section 7 of the Endangered Species Act of 1973, as amended. The Bureau has requested informal consultation on the Resource Management Plans. The Service will be providing an informal consultation document by January 15, 1993. The Service anticipates that formal consultation will be initiated by the Bureau once an alternative is selected. It is our understanding that a biological assessment (BA) will be forthcoming

on the listed species prior to initiation of formal consultation. We recommend that the BA include an evaluation of effects to proposed species, and Category 1 candidate species.

The Federal status of several species are incorrectly noted in the Draft EIS. The changes which are needed are noted under Specific Comments. The final document needs to reflect the recommended corrections and reevaluate effects of the alternatives for each species with an incorrect federal status.

The document states that Recovery Plans for the bald eagle and peregrine falcon are being implemented on Bureau lands. Development of site-specific management plans have been recommended in the bald eagle Recovery Plan and are equally useful in the management of peregrine falcons. The biological assessment should clarify whether site-specific management plans will be developed for these species and when. Because management on BLM lands alone may not be sufficient to reduce threats to Federally listed species such as the bald eagle and peregrine falcon, the Service encourages the development of site-specific management plans in coordination and cooperation with adjacent private landowners and the Oregon Department of Fish and Wildlife wherever practicable.

The Draft EIS states that bald eagles may be negatively affected by road management, recreation development, and off-road vehicles and that peregrine falcons may be negatively affected by road management, recreation development, mineral exploration and development, and off-road vehicles. The Service also perceives that timber harvest activities, grazing allotments, and increased recreation pressure and/or development have the potential to adversely affect listed and proposed species. The biological assessment should indicate what measures, (i.e. conducting inventories, development of buffers or site-specific management plans, consultation with the Service, etc.) will be implemented to assure that these actions would not adversely affect listed species.

The sections covering marbled murrelets need to be expanded and corrected, now that the murrelet is Federally-listed as threatened. More information needs to be presented on what habitat characteristics are important for murrelets. The current definitions used for suitable murrelet habitat are much too narrow and simplistic. The analysis across BLM districts for murrelet habitat changes needs to be more consistent. When discussing future habitat condition scenarios, the impacts on BLM lands as a result of the alternatives need to be clearly stated and not intermingled with the future murrelet habitat conditions on both Federal and private lands.

Monitoring of the species status on Bureau lands will be important to provide early warning of adverse change. More specificity is needed in outlining monitoring programs for listed, proposed and candidate species. The biological assessment should indicate how listed, proposed, and candidate species status will be monitored and funded, the frequency of monitoring, and purpose of monitoring (e.g. occupancy, productivity, and/or specific threats).

GENERAL COMMENTS - Spotted Owls

Several portions of the draft RMP are not consistent with the draft Recovery Plan for the Northern Spotted Owl (draft Recovery Plan) and raise potentially serious concerns for the survival and recovery of the spotted owl. These include management activities within the large areas managed for older forest

species (OGEAs), dispersal within the network of OGEAs, and supplementing critically low populations in some of the large OGEAs. These issues will be discussed separately, though they contribute to the overall impact of the RMP on spotted owls.

Several activities are proposed in deferred OGEAs that appear inconsistent with the draft Recovery Plan and other proposed management schemes. These include management activities within older second growth that currently meets at least dispersal condition and deferral of regeneration harvest for 80 years rather than withdrawal of the large blocks. The RMP appears to allow harvest within currently suitable habitat, as long as the habitat is not reduced below old growth characteristics or can recover these characteristics quickly. The RMP states that management in deferred OGEAs will improve the future diversity of the stands, may speed the recovery of suitable spotted owl habitat, and will only occur in currently non-suitable habitat. Standards or guidelines should be provided to ensure actions will be limited to appropriate situations.

The RMP does acknowledge the increased risk to spotted owl caused by the uncertainty associated with the human management of forests to speed the development of older-forest characteristics and the uncertainty that silvicultural systems will be successful in recreating suitable habitat. Similar risk and uncertainties apply to the management proposed in the deferred OGEAs and connectivity areas. This risk should be evaluated and discussed. Again, standards or guidelines should be provided within the RMP to allow evaluation of the risk and impacts to the recovery of the spotted owl.

Large scale salvage within the OGEAs also carries uncertainty for the future condition of habitat within the OGEAs. Given the lack of knowledge concerning the development of forests following catastrophic events, it is difficult to determine the amount and condition of stand legacy necessary to mimic natural recovery or speed development of natural condition. Therefore, large-scale salvage increases the uncertainty and risk of development of future old growth characteristics. The RMP should include an evaluation of the potential impact of salvage on future habitat condition.

Given the currently low populations of spotted owls, especially in the Oregon Coast Ranges physiographic province, dispersal between the large deferred OGEAs and between provinces is critical to maintaining distribution and viability of spotted owls. The preferred alternative allows reduced dispersal condition to continue for several decades and may never allow some capable quarter townships to reach 50-11-40 condition. This impact on potential dispersal corresponds with the period of lowest suitable habitat and spotted owl populations, exacerbating the concern for dispersal. The potential synergistic effects of low habitat, low population, and reduced dispersal on the survival of the spotted owl should be addressed in the plan.

One of the weakest links in the connection between spotted owl population clusters in the Oregon Coast Ranges province lies directly west of the city of Roseburg along the Williams River. The extremely limited Federal ownership in this area and current condition of habitat on private land creates a likely barrier to movements between the southern portion of the Oregon Coast Ranges and Klamath provinces and the remainder of the Oregon Coast Ranges. Failure to provide dispersal across this area increases the pressure on the South Willamette/North Umpqua Area of Concern, leaving this area as the only

potential connection between spotted owl populations in the Western Cascades and Oregon Coast Ranges. The existing connectivity area appears inadequate in size, scope, and management condition to meet the intent of such areas, especially given the low Federal ownership in the area. Failure to improve dispersal condition in this area increases the risk of isolation of the southern portion of the Oregon Coast Ranges. To improve dispersal conditions in this area, all lands within the Coos Bay District north and east of DCA OD-27 and the north connectivity area should be managed for maximum habitat quality. This area should be designated a non-deferred OGEA.

The draft Recovery Plan includes provisions to provide additional habitat and protection for spotted owl pairs outside of the large blocks of habitat, where populations within the large blocks are too low to ensure short-term stability. This concept should be incorporated into plan. The current and short-term population condition within the deferred OGEAs should be evaluated to determine the internal stability of these population clusters, and supplemented at levels to ensure cluster stability. Additional sites should be provided to maximize the cluster effect. Short- and medium-term cluster stability is even more critical in light of the already limited dispersal condition in the Oregon Coast Ranges and impacts of the preferred alternative to the development of dispersal condition.

The concept of promoting the dispersal of mobile old growth species by providing connectivity areas between OGEAS with some level of old growth characteristics is intriguing, but the function of these areas is difficult to evaluate given the lack of standards and guidelines in the preferred alternative. The RMP should include information on the species expected to benefit from the connectivity areas, particularly listed species; the expected function of the area for each species; and evaluate the ability of the area to provide these functions. This should include rationale for the location, width, and proposed management of the areas. To fully evaluate the function of the connectivity areas, the RMP should address the lowest condition expected in the connectivity areas relative to old growth characteristics and its relation to the future desired condition.

The location and width of the connectivity areas in the Coos Bay District appears inadequate to provide connectivity within the network of the OGEAs. The connectivity areas should be expanded in size and new areas added to interconnect the OGEAs in a network, rather than a single strand of connectivity areas. This would increase the chance of successful movement between OGEAs, decrease the risk of isolation of OGEAS, and decrease the risk of single catastrophic event severing the connectivity.

The document should contain an assessment of the viability of the spotted owl under the preferred alternative. The assessment should evaluate the viability of the spotted owl in the short term, lowest point in the habitat development, and long term. Improved habitat amounts and conditions 100 years in the future are of little value if the spotted owl populations are extirpated before habitat recovery. While the document included mention of risk in several areas, it contains no evaluation of spotted owl viability. The McKelvey model is used only to compare the alternatives, not evaluate viability.

The monitoring section of this document should be expanded and increased to include specific proposals with thresholds, trigger points, and courses of action. With this plan, the BLM is attempting to manage forests is a manner

different from all previous efforts. As a result, management prescriptions include numerous theoretical components that are as yet untested. Many of these prescriptions have the potential to affect listed species, particularly if the prescription fails to produce the desired condition. Therefore, the risk of failure carries serious consequences. The BLM discusses the concept of adaptive management in the plan, but fails to carry that discussion to specific monitoring. Given the consequences of failure, monitoring plans should have specific thresholds and trigger points, and specified courses of action if thresholds are exceeded. In addition, experimental and theoretical procedures should not be implemented unless monitoring is included. If monitoring is not funded, harvest should not proceed.

The final rule designating critical habitat for the northern spotted owl (final rule) was published on January 15, 1992. The RMP should contain a discussion and evaluation of the impacts of the plan on designated spotted owl critical habitat.

SPECIFIC COMMENTS

Page S-9, Table S-3: Changes in species status have occurred since the table was put together. The entire table should be rechecked and updated.

Page 2-1D. Special Status Species Habitat: The Service recommends that the population status and threats to Federal candidate category 1 species on Bureau-administered lands be monitored to provide early warning of adverse conditions.

Page 2-77, Table 2-5 gives a good overview of habitat protection by alternative. The BLM's other RMP should include a similar table.

Page 3-47, Table 3-SS-1: Lillium occidentale was proposed for listing as endangered on October 26, 1992.

Page 3-49 to 3-56, Special Status Species: The current level of survey, monitoring, and inventory work which is done regularly should be noted for each special status species. In addition, the status of species-specific management plans should also be noted where completed and in implementation.

Page 3-49, Plants: The statement that there are no proposed plant species on the Coos Bay District needs correction. See comments for Page 3-47.

Page 3-49, Table 3-SS-2: The western snowy plover was proposed for listing as threatened on January 14, 1992. The Service recommends that the status of this species should be rechecked and corrected in the table prior to publication of the Final EIS. The northern goshawk, fisher, western pond turtle, Del Norte and Siskiyou Mountain salamanders, long-billed curlew, Gold Beach and Pistol River pocket gophers, and several invertebrates are Federal candidate species which should be given consideration as special status animal species occurring in the planning area.

Page 3-49, Animals: Species which occur within planning areas, but with no known occurrence on Bureau lands, may be reflecting a lack of survey work. These species should be suspected as occurring on Bureau lands unless adequate inventory work can be documented to show otherwise.

Page 3-54, Bald Eagle: The Draft EIS states that inventories of wintering bald eagles generally find about four birds using the district. These numbers seem questionable. The Service recommends that the Bureau check additional sources of information regarding winter bald eagle use. Available sources of information include the Oregon State University, Cooperative Wildlife Research Unit which has coordinated the National Wildlife Federation bald eagle winter inventories, the Oregon Eagle Foundation, and Oregon Department of Fish and Wildlife.

Page 3-54, Snowy Plover: The western snowy plover was proposed for listing as threatened on January 14, 1992.See comments under Page 3-49, Table 3-SS-2.

Page 3-55, Marbled Murrelet: The marbled murrelet was listed as threatened on October 1, 1992. The Final EIS should include this updated status. Murrelet habitat should be fully described.

Page 4-29 to 48, Effects on biological Diversity, Vegetation, and Riparian Areas: The preferred alternative differs significantly from several of the other alternatives in the number of Resource Natural Areas and Areas of Environmental Concern to be designated. The Service supports the Oregon Natural Heritage's recommendations for Resource Natural Area designations for Hunter Creek bog and North Fork Hunter Creek for their botanical and ecological uniqueness.

Page 4-80, Bald eagle: This section only evaluates the availability of potential habitat for the bald eagle for each alternative. Since increases in recreation, road construction activities, and activities related to timber harvest may contribute to harassment and disturbance of bald eagles, measures which will be implemented to avoid and minimize impact should be addressed in the Final EIS and in the Bureau's biological assessment.

Page 4-81: Text states that murrelet habitat loss is based upon amount of old growth proposed for harvest. Murrelets can be found in areas not categorized as old growth. Areas of mature forests with some old growth trees may also be murrelet habitat. Therefore, the changes of murrelet habitat in the future may not be accurate and are likely to under-estimate habitat losses.

Page 4-82, Peregrine falcon: As recovery of this species progresses, there is potential for additional eyries to be established. To assure that new pairs are adequately considered during the evaluation of project impacts, there will be a need for periodic inventories of potential habitat. The Bureau should cooperate and coordinate with the Oregon Department of Fish and Wildlife on conducting periodic inventories and monitoring of productivity at existing eyries.

Page 4-83, Snowy Plover: The Draft EIS states that snowy plover may be impacted by recreational use on the North Spit and in the New River area. The Service recommends that additional information regarding anticipated impacts to snowy plover be presented in the Bureau's biological assessment. The biological assessment should also address the status of management plans for the control of beach grass.

Page 4-84, Aleutian Canada Goose: The Draft EIS states that the highest potential for conflict would be between Aleutian goose habitat management and some forms of recreational use. This statement suggests that Bureau actions may affect listed species. The Service recommends that additional information

regarding the types, timing, frequency, and magnitude of potential impacts to Aleutian Canada goose and its habitat needs to be presented in the Bureau's biological assessment for further consultation.

Page 4-87, Effects on Special Areas: The Service recommends favors the approach for special areas as presented in Alternatives D and/or E. Additional research is particularly important in areas which have not been adequately inventoried, such as the North Fork Hunter Creek area. The preferred alternative may result in irreversible and irretrievable commitment of resources.

SPECIFIC COMMENTS - Spotted Owls

Page S-5. Column 2. Paragraph 3. Density management in the OGEAs should be conducted only if it accelerates the development of old growth characteristics, the intent of the OGEAs. It should not be applied to situations already on the way to old growth characteristics, even if it can be designed to quickly re-establish old growth characteristics. It is likely that most stands in the 12D to 150 year age classes are already developing many of the characteristics of old growth. Given our limited understanding of and experience with, forest management for old growth characteristics, there is a higher risk of failure of these techniques. Therefore density management should not be applied to late successional forest in deferred OGEAs.

Page S-9. Column 2. Paragraph 2. The discussion of the discrepancy between the population model's projection of current population and the observed population should include potential problems with the model. The magnitude of the discrepancy is unlikely to be fully attributable to "packing".

Page S-10. Column 2. Land Tenure. O & C forestland should not be excluded from exchanges for lands to be managed for single use management purposes relative to listed species. Such a limitation appears to conflict with section 7(a)(1) of the Act that requires all Federal agencies to "...utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation..." of listed species. The Act further defines conservation as "...the use of all methods and procedures which are necessary to bring an endangered species or threatened species to the point at which the measures provided pursuant to this Act are no longer necessary. Such measures and procedures include, but are not limited to ... habitat acquisition and maintenance..." (also relative to Page 2-15, Table 2-5)

Page 2-15. Column 1. Acquisition Criteria. The criteria should include "facilitate the recovery of threatened and endangered species" as described in section 7(a)(1) of the Act.

Page 2-45. Column 2. Paragraph 1. The RMP describes the management of the deferred OGEAs to include providing habitat for old growth dependent species and to forestall the listing of additional old growth dependent species and encourage the delisting if species currently listed as threatened or endangered. However, the size, location, and distance between these large blocks is based on the biology and behavior of northern spotted owls. The RMP should include a list of the species expected to benefit from the OGEAs and how the OGEAs will contribute to habitat, forestalling listing, and/or delisting of each species.

Page 2-48. Column 1. Paragraph 7. The RMP indicates that the connectivity areas will be managed to "provide dispersal and foraging habitat for those species requiring old growth or mature habitat" and "provide connectivity and avoid genetic isolation for old growth dependent species". However, the document does not list the species expected to utilize these areas and whether connectivity areas are considered sufficient to prevent isolation of these species in OGEAs. The RMP should identify the species expected to use the connectivity areas and how the connectivity areas will function for these species. This is of particular concern relative to listed, proposed, and candidate species, given that the distance between OGEAs is based on the dispersal capabilities of spotted owls, not other species.

Connectivity areas are also expected to forestall the listing of additional old growth dependent species and encourage the delisting of species currently listed as threatened or endangered. The document should identify the species for which the connectivity areas might forestall listing and how connectivity would assist the conservation of these species.

Page 2-46. Column 1. Paragraph 2. The prescription for regeneration harvest in the last sentence seems inconsistent with the intent of managing the OGEAS for older forest related species. Explain how 10-acre clearcuts with minimal retention, even on a 300-year rotation, result in the maintenance and enhancement of old growth characteristics.

Page 2-78. Table 2-5. Spotted Owls. This table indicates that 80 to 100 acres will be "protected" around known nest sites. The RMP should provide the standards under which these sites will be protected. Eighty to 100 acres of suitable habitat, not just acres, should be protected around each core area through withdrawal, not deferral. Core areas should be maintained regardless of the occupancy of the site. This will provide opportunities to manage spotted owls in the landscape. These core areas should be protected in all land allocation, even OGEAs. Management, particularly regeneration harvest, should not occur within these core areas.

Page 2-78. Table 2-5. The adequacy of connectivity areas for spotted owl dispersal should be demonstrated. This concept is contrary to the current knowledge of the dispersal behavior of juvenile spotted owls.

Page 2-81. Table 2-5. Big Game. The maintenance of permanent openings within OGEAs to provide big game forage seems inconsistent with the stated purpose of the OGEAs to provide habitat for old growth associated species. Interspersed private lands are likely to provide early seral stage habitats. Explain the rationale for providing permanent openings in the OGEAs, given the intent of the OGEAs.

Page 4-65. Table 4-SSW-2. Check the values in the table relative to the time at which managed forests are expected to attain suitable habitat condition for spotted owls. As is, the table indicates that this condition may be attained more quickly in the General Forest Management Areas (GFMA) than in the Connectivity Areas under the preferred alternative. This seems counter-intuitive given the intended purpose of the GFMA for maximum timber production and the lower level of legacy retained during regeneration harvest.

Page 4-65. Column 1. Paragraph 3. Rather than assume that density management in the preferred alternative would not negatively affect attainment or retention of suitable habitat condition, the RMP should be contain an

assessment of the risk of negatively affecting suitable habitat, in light of the experimental nature of the density management prescriptions.

Page 4-66. Column 1. Paragraph 2. Provide information on the quality and distribution of suitable habitat beyond simply stating that there will be more suitable spotted owl habitat under the preferred alternative after 100 years than currently available. Replacement of nesting quality habitat with forests meeting minimal foraging quality may still result in a reduction in the viability of spotted owls. This problem is intensified if a substantial portion of this habitat is scattered, and further exacerbated by the checkerboard ownership pattern common to BLM lands. Provide information on the extent to which this development of habitat is dependent on the ability to create or speed the development of suitable habitat through silvicultural practices, an as yet unproven assumption.

Page 4-66. Table 4-SS-3. As demonstrated in this table, while the amount of habitat may increase in the long term, there is a short-term loss of suitable habitat extending to at least 50 years. The accompanying text should include a discussion of the effect of the short- and medium-term loss of suitable habitat in the planning area on spotted owl viability. While the long-term conditions are of interest, the short-term impacts and an evaluation of conditions at the "lowest" point are critical to assessing the impacts to the species. Future habitat is of little use to the species unless adequate populations survive to take advantage of the habitat.

Page 4-67. Column 1. Paragraph 1. Given the BLM's lack of experience in developing and maintaining old growth characteristics capable of supporting viable populations of spotted owls and the lack of detailed knowledge on the components of structurally diverse forest important to spotted owls, the prediction that as much as 40 percent of the OGEAs may be subject to density management increases the risk of catastrophic failure of the network concept. The 8LM should evaluate the risk of failure of the techniques and the potential impact on the species of such a failure.

Page 4-70. Column 1. Paragraph 4. This section should provide an assessment of the effects of the preferred alternative on spotted owls in the Oregon Coast Ranges province, rather than simply highlight the importance of BLM lands to spotted owls in this province.

Page 4-70. Column 2. Paragraph 1. This paragraph discusses the importance of concentrating spotted owl habitat in large blocks to promote clusters of owls close enough to each other to ensure successful movements of individuals between territories. This is only one aspect of the cluster concept. Clusters were designed to be large enough to support populations sufficient to provide some level of internal stability in the short term. The paragraph should include a discussion of the capability of the OGEAs, and the management proposed within the OGEAs, to maintain populations levels sufficient to provide internal stability.

This paragraph and the following discussion mention the need for successful dispersal between these large habitat blocks. As discussed in the general comments, the RMP does not indicate how this critical dispersal will be maintained.

Page 4-73. Column 1. Paragraph 2. Provide a discussion of the impact of the preferred alternative on all quarter townships, not just those in connectivity

areas. The draft Recovery Plan and ISC Strategy both provide adequate dispersal by providing 5D-11-40 condition on all quarter townships, not only in corridors between large blocks. This is based on the dispersal behavior of juvenile spotted owls. If the BLM believes that adequate dispersal may be maintained by providing 50-11-40 conditions in connectivity areas alone, provide the data or basis for this belief.

The RMP should go beyond simply describing the level of quarter townships meeting 5D-11-40 to an evaluation of how the deficient quarter townships are distributed and how the location affects inter- and intra-provincial dispersal. The fact that the deficient quarter-townships generally lie outside the connectivity areas does not negate their importance to dispersal. Given the dispersal behavior of juvenile spotted owls, any dispersal habitat within the probable dispersal distance of an OGEA is important to dispersal.

The number of deficient quarter-townships adjacent to OGEAs and the delay in attaining 50-11-40 condition compared to alternative D raises serious concern for the adequacy of dispersal conditions. As mentioned in the general comments, the greatest deficiency in dispersal condition corresponds to the period of low owl populations and suitable habitat.

Page 4-73. Column 1. Paragraph 3. Provide the rationale or basis, in terms of spotted owl biology, for the statement that "these [connectivity] areas could provide adequate dispersal habitat between OGEAs proposed in the planning area and on adjacent Federal lands."

Page 4-77. Column 1. Paragraph 2. The RMP indicates that there is a low point in the carrying capacity projections sometime between 10 and 70 years. It should also discuss the potential impact of this low point on the viability of spotted owls.

Page 4-78. Column 1. Para 3. Provide rationale or documentation for the statement that isolation "is not thought likely to be a factor" under the preferred alternative. Currently no grounds or basis are provided for this statement. Given the previous discussion of dispersal condition and the level of "management" in the area of concern, isolation appears to be a legitimate threat.

Page 4-78. Column 2. Paragraph 3. This RMP does not appear to meet the assumption of the Forest Service EIS that the BLM would adopt a long range plan similar to the ISC Strategy, as stated in the last sentence. This RMP differs from the ISC Strategy in several key areas, including management operations in suitable spotted owl habitat within the large reserve areas and delay of recovery of adequate dispersal condition or losses of dispersal condition in the near to medium term.

Page 4-79. Column 2. Paragraph 2. The RMP should include an evaluation of the level of risk to the stability of spotted owl populations under the preferred alternative, rather than simply qualify the risk as higher than Alternative D. Risk is critical to the determination of whether the preferred alternative is sufficient to meet the BLM objectives of contributing to the recovery of the northern spotted owl.

Page 4-79. Column 2. Paragraph 4. Many of the concerns for the suitability of habitat under Alternative C, such as the uncertainty associated with the human management and the uncertainty of the success of the proposed silvicultural

systems will be successful in recreating suitable habitat also hold for the Preferred Alternative. This should be evaluated relative to the risk of failure of the plan.

APPENDICES:

Page II-M-3. Connectivity Areas. Describe how the maintenance of the 50 percent of the connectivity areas in forests over 8D years of age provides dispersal habitat for old growth dependent species and which species are served by these areas.

Describe the design features that assure the retention of desired levels of habitat connectivity for old growth dependent species within the general landscape. The only apparent design feature is the location and width of the connectivity areas. No information was presented on the reason for the placement and width. Compared to the other districts, the connectivity areas in the Coos Bay District are limited in scope. Connectivity areas should be strengthened in the area of the Williams River, and between DCAs OD-29, OD-31, and OD-32. A network of interconnectivity zones should be provided to increase the chance of successful dispersal, rather than a single chain of areas that is easily broken by a single catastrophic events.

Page II-M-3. Old Growth Emphasis Areas. Explain how the management objectives of silvicultural prescriptions for OGEAs meets the intent of maintaining old growth dependent species. The description in this section allows 50 percent of the OGEA to be in a condition below old growth characteristics. This appears inconsistent with the modeling provided for spotted owl populations and may invalidate the results of the model runs. Given the checkerboard ownership pattern in this area, the maintenance of only 50 percent old growth characteristics would likely result in very few hexagons meeting the minimum habitat levels even under optimistic assumptions.

Explain why old growth characteristics can be developed in 120 years under the connectivity area prescriptions, but not until 150 years in the OGEAs. The description of the regeneration harvest is insufficient to allow evaluation of the impact on spotted owls.

Page II-O-13. Special Status Species Habitat Monitoring. The BLM should provide its own monitoring program for spotted owls in the event that a recovery plan is not adopted immediately. Monitoring is a critical part of any plan, but carries even greater weight in a plan that incorporates numerous untested procedures that potentially impact listed species. To be effective any monitoring plan must include thresholds that will trigger re-evaluation and explicit courses of action if thresholds are exceeded. Monitoring plans should be developed prior to the adoption of the RMP to allow adequate evaluation of impacts of the monitoring to all aspects of the plan. All actions should be tied to adequate monitoring. If monitoring is not funded, actions affecting the listed species should not proceed.

Page IV-A-6. Table IV-A-1. The sensitivity analysis should evaluate the impact of meeting 5D-11-40 everywhere, not just within the connectivity areas. The draft Recovery Plan calls for dispersal condition on all quarter-townships.

SUMMARY COMMENTS

The BLM has made progress in moving toward a more balanced resource management approach. However, none of the alternative RMP's described would clearly result in fully restored watersheds producing optimal fish and wildlife habitat in concert with timber harvest levels to be maintained over the long term. The ARMP should include modification of Alternatives D and E and additional information to describe a more "Holistic Natural Watershed Management Plan" (HNWMP) similar to what the Oregon Department of Fish and Wildlife describes as their recommended long-term desired future condition. The ARMP goals would be to implement and monitor short- and long-term management actions that would result in fully restoring watersheds and maintaining them over the long term to produce water quality, vegetation, riparian corridors and habitat diversity necessary to maximize fish, wildlife and timber production within the natural range of the watershed/landscape pattern present before European settlement.

An economic analysis of the HNWMP should be made that would include greatly increased commercial and sport fishery benefits and sustainable yield of higher quality timber products.

The final EIS needs to reflect our recommended corrections for endangered species and reevaluate effects of the alternatives for each species whose Federal status is incorrectly stated in the Draft EIS.

The Biological Assessment the 8LM will prepare for the formal consultation on the Approved Resource Management should clarify whether site-specific management plans will be developed for bald eagles and peregrine falcons. Site-specific management plans in coordination and cooperation with adjacent private landowners and the Oregon Department of Fish and Wildlife wherever practicable should be developed.

The biological assessment should indicate what measures (i.e. conducting inventories, development of buffers or site-specific management plans, consultation with the Service, etc.) will be implemented to assure that negative actions noted in the Draft EIS would not adversely affect listed species. The biological assessment should also indicate how listed, proposed, and candidate species status will be monitored and funded, the frequency of monitoring, and purpose of monitoring, e.g. occupancy, productivity, and/or specific threats.

Relative to the threatened northern spotted owl, the RMP differs significantly from the draft Recovery Plan. Specifically, the Service is concerned about the impacts of proposed management activities within the deferred OGEAs, provisions for dispersal between the OGEAs, the lack of a viability assessment in light of the continuing loss of habitat in the intermediate-term, and the failure of the RMP to address impacts to designated spotted owl critical habitat. The Service recommends that the preferred alternative include limitations on the management in OGEAs and thresholds for dispersal condition. Given the untested nature of many of the proposed silvicultural prescriptions, the Service recommends that a detailed and sensitive monitoring plan be developed and required prior to implementation of the plan.

Patrick D. Wright

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A Resolution in Support of Continued Management of O & C Timberlands

Resolution Number 93-43

Whereas, the Bureau of Land Management has requested public input on its ten-year land and resource management plan, and,

Whereas, the health, peace and safety of the people of Coos County are affected by the alternative selected by the BLM for the management of O & C timberlands, and

Whereas, the natural resources provided through aggressive management of federal lands under the O & C Sustained Yield Act of 1937 has contributed to social and economic stability in 18 Western Oregon counties, including Coos County, and

Whereas, the counties have invested more that one billion dollars to fund intensive forest management on these lands with the explicit expectation of an ongoing return on this investment, and

Whereas, O & C lands continue to provide a reliable employment base for many Oregon communities, and

Whereas, O & C lands also provide diverse and sustainable habitat for fisb and wildlife, clean air and water, and outdoor recreation opportunities, and,

Whereas, these lands sbould continue to provide economic stability, bealthy and productive forests and reliable employment base,

North Bend SD #13

Therefore, be it resolved that the Board of Directors supports the continued management of these lands in accordance with the O & C Sustained Yield Act of 1937 to provide a stable and predictable level of timber harvest for Oregon communities while considering other resource values, and,

Be it resolved that we support the principles of multiple use for these O & C lands which include management for timber, water, recreation and wildlife, and,

Be it further resolved that we encourage legislation that would enact a balanced management plan into law by the Congress of the United States of America and remove management decision from the federal court system.

By [signature]

Chairman

This 14 day of December 1992.

Return by December 21 to:

Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

COOS BAY DISTRICT OFFICE
Dec 18 11 12 AM '92

United States Department of Agriculture | Forest Service | Pacific Northwest Research Station | Forestry Sciences Laboratory 3200 S.W. Jefferson Way Corvallis, Oregon 97331

COOS BAY DISTRICT OFFICE
DEC 24 9 28 AM '92

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Reply To: 4060-3

Date: December 21, 1992

Mel Chase, District Manager
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

Dear Mel:

I have recently gone through the Draft Resource Management Plan for the Coos Bay District of the Bureau of Land Management and have some comments to make in regards to the plan. My comments pertain to established and/or proposed Research Natural Areas on the district.

As we discussed on the phone my concern is that the four RNA proposals for the District - Wassen Creek, Hunter Creek Bog, North Fork Chetco, and Upper Rock Creek - do not appear in the plan as proposed RNAs. Further, limited timber harvest is allowed in Hunter Creek Bog. All four of the ACEC/RNA proposals have been screened, documented and supported by the Pacific Northwest Interagency Natural Area Committee, the Oregon Natural Heritage Program, and Dick Vander Schaaf (The Nature Conservancy), contractor to the BLM.

My understanding is that the District has decided not to go with RNA designation as it would like to leave its options open for future recreation development in all four areas. I appreciate the fact that the District recognizes that active recreation use is not usually compatible with an RNA designation, but in turn I am very concerned that the District wants to consider recreation development in areas that have long been proposed for RNA status.

The main focus behind the RNA program is to set up areas in as natural a condition as possible, to serve as baseline areas for similar areas that are managed for timber, ORVs or other recreation uses, grazing, plantations, etc. Because there are so few tracts of federal land left for RNA designation, current proposals are especially valuable. As the available resource base shrinks, due to other management activities, there is a tendency to look to RNAs as potential sites for recreation use. If we encourage recreation use in RNAs, their utility for baseline information will quickly become compromised. Once recreation use patterns are set, they are nearly impossible to change or curb.

There is an understandable perception that RNAs are set aside and then not used. There is no ongoing research at Cherry Creek RNA at this time, but the area has been used in the past, and was an important coastal site for the vegetation classifiction of old-growth wildlife habitat work done by Tom Spies et al. (see Wildlife and Vegetation of Unmanaged Douglas-fir Forests, Pacific Northwest Research Station General Technical Report 285, 1991).

There is also tremendous value in just having baseline sites available for future monitoring and research. It is like money in the bank. As an example, numerous RNAs, many of which have not seen research up to this point, are being used to look at the structural and temporal development of snag habitat. If the time comes when you need a baseline site and you don't have it, there is little you can do about it.

I recognize that the pressure for recreation use of public lands is growing, especially along the Oregon Coast. I also must believe that there are other places to develop trails besides RNAs proposals. I encourage the District to designate the four RNA proposals as ACEC/RNAs and not just as ACECs. If you would like to discuss this issue further, please feel free to get in touch with me (750-7360).

Sincerely,

Sarah Greene

SARAH E. GREENE
Research Natural Areas Scientist
Pacfic Northwest Region

cc C. McCaffrey
R. Pullen

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RECEIVED
DEC 21 9 25 AM '92

A Resolution in Support of Continued Management of O & C Timberlands

Resolution Number #1

Whereas, the Bureau of Land Management has requested public input on its ten-year land and resource management plan, and,

Whereas, the health, peace and safety of the people of Coos County are affected by the alternative selected by the BLM for the management of O & C timberlands, and

Whereas, the natural resources provided through aggressive management of federal lands under the O & C Sustained Yield Act of 1937 has contributed to social and economic stability in 18 Western Oregon counties, including Coos County, and

Whereas, the counties have invested more that one billion dollars to fund intensive forest management on these lands with the explicit expectation of an ongoing return on this investment, and

Whereas, O & C lands continue to provide a reliable employment base for many Oregon communities, and

Whereas, O & C lands also provide diverse and sustainable habitat for fish and wildlife, clean air and water, and outdoor recreation opportunities, and,

Whereas, these lands should continue to provide economic stability, healthy and productive forests and reliable employment base,

Therefore, be it resolved that the GLENDALE SCHOOL DISTRICT #77 supports the continued management of these lands in accordance with the O & C Sustained Yield Act of 1937 to provide a stable and predictable level of timber harvest for Oregon communities while considering other resource values, and,

Be it resolved that we support the principles of multiple use for these O & C lands which include management for timber, water, recreation and wildlife, and,

Be it further resolved that we encourage legislation that would enact a balanced management plan into law by the Congress of the United States of America and remove management decision from the federal court system.

By Chris W. Beuch
Board Chair

This 22 day of Dec 1992.

Return by December 21 to:

Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

C 940

United States Department of Agriculture | Forest Service | Pacific Northwest Region | P.O. Box 3623, Portland, OR 97208-3623 | 333 S.W. First Avenue, Portland, OR 97204

Reply To: 1920

Date: December 21, 1992

Mr. D. Dean Bibles
State Director
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

Dear Mr. Bibles:

I appreciate the opportunity to review and comment on the six draft Resource Management Plans/Environmental Impact Statements you recently sent out for public comment. I have attempted to coordinate and consolidate the reviews of the documents done by Forest Supervisors and by this office; the enclosed papers and letters constitute my response to the draft documents.

Overall, I am impressed with the depth and thoughtfulness of the draft plans; your staff and all those involved are to be commended. However, I do have some concerns about how the draft Resource Management Plans deal with the northern spotted owl. The draft Resource Management Plans propose to adopt a different approach for management of the northern spotted owl than either the ISC strategy or the draft Recovery Plan. Because of this we expect to have to compensate with a new alternative in our Supplement to the FEIS on management for the northern spotted owl.

I believe either the ISC strategy or the draft Recovery Plan provides a common basis for cooperation in meeting spotted owl recovery needs and achieving our agency land management goals and objectives. As you develop your final plans, I recommend that we work together to develop plans that will be compatible with the Recovery Plan developed by the Fish and Wildlife Service, and thus avoid differences or impacts between our agencies that could result in less than optimum results for both spotted owl recovery and effective management of public lands.

Sincerely,

JOHN E. LOWE
Regional Forester

Enclosure

Caring For the Land and Serving People
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ENCLOSURE

COMMENTS FROM THE U.S.D.A. FOREST SERVICE, REGION 6
ON THE SIX BUREAU OF LAND MANAGEMENT
WESTERN OREGON DRAFT RESOURCE MANAGEMENT PLANS
AND ENVIRONMENTAL IMPACT STATEMENTS

December 21, 1992

Contents:

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1. Northern Spotted Owl

Commendations:

The BLM should be commended for the major shift toward a more multiple-use management emphasis.

We wish to thank those BLM employees who helped us with information during our review. In every case, that assistance helped us understand more of the protection being offered to the spotted owl.

We appreciate and commend BLM for their continued support and conduct of spotted owl-related research, both within the BLM and cooperatively with others including the Forest Service.

Background:

In January 1992 the Forest Service completed a Final Environmental Impact Statement (FEIS) with a preferred alternative to manage according to the ISC Strategy. The FEIS contained a spotted owl viability assessment for each of the five alternatives analyzed. A primary element of that assessment was the assumption that the BLM would "...manage their lands with a level of spotted owl protection similar to that of the ISC Strategy" (FEIS 3&4-40). The Supplement to the EIS now being prepared will use a viability assessment based upon the assumption that the BLM will manage according to the Preferred Alternative in the Draft Resource Management Plans (RMPs). As a result, a modification of the Preferred Alternative will likely be necessary.

We have compared the Preferred Alternatives for the Draft RMP's with the ISC Strategy. Relative to the ISC Strategy, the Draft RMPs:

* Result in 62,000, or 8 percent, fewer acres of owl habitat at year 10 and 71,000 fewer acres at year 50. Similarly, there is a 4-percent reduction in old-growth after 10 years, a 6-percent reduction in old growth after 100 years, and a 6-percent reduction in "blocks" of habitat in 10 years;

* Do not protect home-range size areas (Category III HCAs) for all currently known and future pairs of spotted owls in the Oregon Coast Range Area of Concern;

* Do not adopt the 50-11-40 rule but instead describe management that will delay, for 40-50 years, the development of forest stand conditions which meet the dispersal standards set forth in the ISC Strategy. This results in 385 fewer quarter townships meeting the 50-11-40 rule at years 30-40, and;

* Schedule timber harvest on 143,000 acres within HCAs. The scenario put forth for the silvicultural creation of suitable habitat for the northern spotted owl over a number of decades is presented as if the outcome is certain. Some acknowledgement of the risk should be included. It is uncertain whether biologists can adequately describe owl habitat, whether prescriptions can be written to achieve that habitat, whether such prescriptions can be successfully implemented, whether monitoring will be designed and implemented that will measure success of the implementation,

and whether monitoring will result in appropriate adjustments to treatments.

Viability Rating and Mitigation:

It appears that these differences will affect the viability of the northern spotted owl on the National Forests. The ISC "...concluded that the owl is imperiled over significant portions of its range..." and "..in some portions of the owl's range, few options for managing habitat remain open.." (ISC page 1). The ISC also reported that "The situation for dispersal habitat on BLM lands is not good and getting rapidly worse. We consider the BLM lands to the weak link in the proposed strategy..." (Q&As on A Conservation Strategy...., question #66.) Thus, because of the breakup of normal dispersion patterns and the resultant risk of isolation of the coast range, substantial corrective actions in order to ensure long-term viability on National Forests may be required. If so, mitigation would likely focus on increasing the size of HCAs on the Siuslaw National Forest and at critical links between physiographic provinces to increase the future population of spotted owls in order to increase probabilities of successful movement of owls among physiographic provinces.

Recommendation:

The Forest Service and BLM are currently working on EIS's that include management strategies for the northern spotted owl. We recommend (1) that the BLM adopt a strategy for managing the northern spotted owl which is consistent with the ISC Strategy and/or the Recovery Plan, and (2) that strategy be incorporated into the Resource Management Plans.

2. NEPA-Related Comments

Since all of the RMP's/EIS's are similar, comments apply to all of the documents.

A. Documents seem to be well written, easy to understand, and have all of the parts mandated by the CEQ regulations for implementing NEPA (40 CFR 1500-1508). They also make good use of maps, charts, graphs, and pictures.

B. Documents are set up to make a wide variety of decisions, much the way the Forest Service did during the first round of Forest Plan development. With a purpose and need of providing a "... comprehensive framework for allocating and managing the natural resources in the area within the principles of multiple use and sustained resource yield" (Klamath Falls Resource Area RMP and EIS), the BLM is forced to look at a broad list of issues and a broad range of alternatives. Had they been able to build on previous planning efforts and narrow the scope of this analysis to the "things that need changing," they may have had a much less cumbersome planning process.

C. The documents never spell out clearly what decisions will be made as a result of this analysis. At a glance, it appears that decisions are being made about management direction for a variety of resources, land allocations are to be made, areas of critical environmental concern are being selected, and possibly some recommendations are to be made regarding Wild and Scenic River suitability but a reader must really search to figure these things out.

D. The EIS's discuss effects on global climate. We have taken the approach to date that this is outside the scope of our analyses and that there is too little information available to provide a reasonable estimate of effects.

3. Timber Modeling and ASQ Calculation (Salem District Draft Resource Management Plan)

The methods used to model timber are described in Chapter 2 and Appendices 2-A to 2-D. In general these sections are well organized, clear, and concise. The methodology for estimating empirical yields, projecting future yields, and assigning timber harvest methods and silvicultural treatments for a given alternative appear logical and sound. The explanation and rationale for the genetic "tree improvement" program is written in terms that the general public should understand.

Appendix 2-D describes the Best Management Practices and the classification system used to identify unsuitable and restricted ground. The recommended practices for each classified area are also clearly explained. There is no table showing the acreage within each land classification, however. This table would help the reader determine the significance of these restricted areas.

The harvest scheduling and ASQ calculations for this Draft Plan are based on a premise that the Non-Declining-Yield constraint limits harvests for the first decade. Given the emerging concerns over threatened and endangered species, watershed protection, and other cumulative effects, this premise may be false. On most National Forest lands in western Oregon, the first-decade harvest acreage is most limited by the requirements to meet existing standards and guidelines. In the past few years the available timber management acreage has declined, with the removal from the base of relatively undeveloped areas (e.g., spotted owl HCA's, etc.). The areas that remain in the base are generally heavily impacted by past cutting and cannot be harvested now at their long-term sustained-yield level. On BLM lands, which are often intermingled with private ownerships, these short-term harvest limitations may be as severe.

For Alternative D only, a data base model was used to ensure that the 50-11-40 requirement for spotted owls was met. We recommend that you expand this model to include other "cumulative effect" factors which may limit your harvest level in the coming decade. This model could calculate the allowable harvest acreage for each relevant subarea of the District for the coming decade(s) and be used in conjunction with the TRIM-PLUS model. Alternatively, a short-term linear programming model (FORPLAN or SARA) could be used to determine the potential harvest acreage by subarea and type in the first few decades of the plan.

4. Forest Pest Management

A. GENERAL COMMENTS

1) We are impressed with the change in emphasis for BLM management that these Resource Management Plans indicate. In general, the plans appear to be genuine first efforts to develop something approaching a sustainable ecosystem management program. They certainly do not represent "business as usual."

2) The documents are quite well organized and obviously represent a great deal of work.

3) In our opinion, the practice of defining a program or concept at the beginning of the documents and subsequently using an acronym or only the initials of that program or concept is confusing, needlessly obscure, and extremely annoying. It would be much better to avoid these kinds of shortcuts altogether. Use of the fully spelled-out words would make the documents much more readable.

4) The documents need editing. In particular, the spelling of scientific names should be checked thoroughly. For example Phellinus, the genus of the most important forest pathogen in western Oregon, is spelled "Phillinus" several times in the Roseburg District Plan. Also, references need to be checked. Some that appear in the texts are not listed in the respective References Cited sections.

B. SPECIFIC COMMENTS RELATIVE TO VEGETATION/INSECT AND DISEASE MANAGEMENT

1) When referring to competing vegetation management, all Resource Management Plans are tiered to the BLM's 1989 EIS, Western Oregon-Management of Competing Vegetation. Noxious weed references are tiered to the 1987 Supplement, and Record of Decision, to the 1986 EIS, Northwest Noxious Weed Control. This appears to be a reasonable approach, and we believe that the documents to which they are being tiered are of good quality.

2) In our opinion, none of the Resource Management Plans adequately addresses insect and disease concerns. Coverage is superficial and vague, and the plans, as written, strongly imply that insects and diseases are not important. We are particularly concerned about the following points:

a) Insects and diseases are not mentioned in any issues or concerns. Forest health is mentioned peripherally, but the insect and disease components are, for the most part, ignored. Existing conditions of insects and diseases in management areas are not addressed or are superficially addressed (with the exception of the Klamath Falls Resource Area Plan), and quantitative data (which are available) are not included. Monitoring of insect and disease effects will be impossible since there is no base line for comparison. Little or no effort is made to project effects of new management practices on future

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insect and disease impacts. Some of the proposed management changes will affect insect and pathogen populations profoundly.

We believe that significant insects and pathogens should receive treatment as important concerns or planning considerations under at least the "timber production practices" issue raised in all the plans. Specifically, laminated root rot and Douglas-fir beetle should receive coverage in westside District plans (where they presently receive only brief mention). Pine bark beetles, dwarf mistletoes, Armillaria root disease, and annosus root disease should be addressed in the Klamath Falls Resource Area plan. They are discussed in the draft but should be addressed in much greater detail.

b) Many of the plans refer to insects and diseases as "natural components of the ecosystem" and seem to imply that, under that reasoning, there is little need to consider their management. While it is true that insects and pathogens are natural ecosystem components, so are fires, vegetation that competes with trees, animals that consume trees, heavily stocked stands, etc. We suggest that insects and pathogens are "agents of change" that should concern the forest manager just as much as those other forces that managers traditionally attempt to influence. There certainly will be cases where active management of insects and diseases will not be desirable but, in such cases, a competent manager should know the consequences of the no-action alternative. As the plans now stand, this will not be the case.

c) The plans repeatedly indicate that control methods will be applied to insects and pathogens if large outbreaks develop. We believe this is a poor way to manage insects and diseases. The preferred method of managing populations of insects and pathogens is to use a prevention approach with the goal of never allowing epidemics to develop. Integrated pest management techniques, including silvicultural manipulation of stands to prevent the development of conditions favorable for damaging population increases, is our preferred method.

d) The plans address the need to practice very intensive forestry on areas being managed primarily for the timber production objective. Thinning, use of genetically superior planting stock, competing vegetation management, etc., are advocated as methods to increase production. Use of proper management techniques for insects and diseases should be included as important methods for reducing timber growth loss and mortality.

e) Effects of insects and diseases on management objectives other than timber production are hardly mentioned at all. At the very least, the potential impacts of insects and diseases on these objectives should be outlined and estimated.

f) These documents do not contain an accepted definition of "forest health." We consider a desired state of forest health is a condition where biotic and abiotic influences (i.e., insects, diseases, atmospheric deposition, fire, silvicultural treatments, harvesting practices) do not threaten ecosystem sustainability and attainment of management objectives for a given forest unit now or in the future. Other definitions exist. All the BLM plans refer to improving and promoting forest health. However, most of the plans do not indicate how the term is defined. Several of the plans suggest that various activities (such as retaining a certain number of trees following a harvest, for example) will ensure forest health. As most of the plans are now written, there is no way to judge whether such statements have any meaning. We suggest a single, coherent definition be adopted and used in all the plans.

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5. Rural Interface

United States Department of Agriculture — Forest Service — RO

Reply to: BLM Draft Plans — Date: 12/14/92

Subject: Rural Interface

To: Director, Land Management Planning

The purpose of these comments is to aid in the response by the Forest Service to the Bureau of Land Managmement Draft Resource Management Plans for the State of Oregon.

The Bureau of Land Management Draft Plans for each of the districts in Oregon are tiered to the Medford District Draft Management Plan on the issue of Rural Interface. Rural Interface is an issue that has been identified as affecting decisions of federal and state agencies in formulating land management goals. Theory from the draft management plans on Rural Interface states that if a change in the social values for an area occur, "traditional activities" will be curtailed or have a greater cost. Nationwide, there are changing social values. The overall increase in population is a primary factor. This increase is coupled with a shift in the rural portions of states from those families that earned a living directly from the land to the families that choose to reside in the rural setting without a tie economically to the land base. Taken together, the social value system for rural areas has shifted.

The differences between the Forest Service and the Bureau of Land Management on the issue are reflective of the mission for each agency. Central to the Forest Service mission is the focus on the people element and the role they play in land management. Programs for the Forest Service range through the continuum of human interaction within ecosystems that begin in the urban environment and grade outward to the low level of interaction found in the wilderness. Because of these program elements, the Forest Service disagrees with the analysis on Rural Interface and the decisions in land allocations that are based on that analysis.

Analysis Methods

The analysis is based on the premise that conflict between the agency and the public is directly related to distance of management activities from residences. Potential lot size along with the distance from the property boundaries is then used to develop the degree of potential conflict to land management activities.

This is too simple to reflect the complicated interactions within the Rural Interface. As stated in the document (Ch 3-123), counties' efforts at zoning large lot size have been unsuccessful in facilitating public land management activities. Conflict still occurs regardless of distance. Public involvement, type of activities, history of relationships, and timing of activities also play a role in estimating the degree of conflict.

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Landowner surveys within the Non-Industrial Private Forest (NIPF) ownership group, recently completed by Washington and Oregon, indicated the land ethic of these individuals is high. Forest Service programs focused at enhancing good land stewardship by the landowner has had good acceptance. Data regarding timber supply and rates of conversion indicate that this landowner group has a willingness to manage their lands for commodities. These results are not consistent with the distance/conflict theory of the Bureau of Land Management.

Conflict Avoidance through Buffering

The conclusion from the analysis is that if Federal lands are buffered with minimum management prescriptions, conflicts with local landowners will minimized. Given the heated debate on the multitude of issues facing land management agencies, this is not a likely result. It would be more appropriate to consider a direction in dealing with conflicts which states that conflicts will occur and that a project success will be based on project selection, building a public involvement process that gains consensus on the objective, and clearly defining the decision space for the manager.

Direction to Counties on Secondary Lands

The State of Oregon has given new direction to the counties mandating that they designate the Secondary Forest Land Zone by January 8, 1993. This will reduce the number of potential residences. Any allocations by the Bureau of Land Management should be reflective of this change.

Forest Service Objectives

Forest Service objectives in regards to the Rural Interface are to implement the policy given by Congress to work through and in cooperation with State Foresters in implementing Federal programs affecting non-Federal forest lands. It is important to the Forest Service role to operate its programs affecting non-Federal lands within the regulatory framework of State and local government. The Forest Service will provide assistance to develop multiple-resource forest management plans that meet landowner objectives and provide sound stewardship of all natural resources. Programs such as rural development will help look at framing our future land management decisions. On the National Forest, decisions for Special Use Permits will consider local government direction to avoid unnecessary encumberances.

6. Comments from the Siskiyou and Rogue River National Forests (Medford District Plan)

United States Department of Agriculture	Forest Service	Siskiyou National Forest	Rogue River National Forest

Reply to: 1950/1920 Date: November 19, 1992

Subject: Medford BLM Plan

To: Regional Forester, R-6

Here is the combined Siskiyou and Rogue River National Forest response to the proposed Medford BLM District plan.

The Medford District has done a fine job of planning. Specific items which warrant comments are:

1) The water quality, stream ecosystem, and riparian ecosystem objectives are consistent with those of the National Forest lands. The watersheds deferred from timber harvest due to potential cumulative effects are also consistent with Forest Service objectives.

2) Coordination between the Siskiyou National Forest, Rogue River National Forest, and Medford BLM District will continue to be essential for achieving planning objectives associated with old growth and mature forest habitat, connectivity areas, Research Natural Areas, and Threatened and Endangered Species habitat. Activity within the old growth emphasis areas will need coordination with the Fish and Wildlife Service and their Final Recovery Plan for the northern spotted owl, and the National Forest regional FEIS for the northern spotted owl to ensure informed decisions. Both Forests will continue to contact the BLM staff to ensure coordination in these areas is ongoing before the BLM FEIS is finalized.

The emphasis items for ecological management and forest health in the areas programmed for timber harvest are to be commended. The type of regeneration harvests on the Southern General Forest Management Area, the leave trees on the Northern General Forest Management Area, snag management, and large woody material management will provide a healthier ecosystem for the entire area.

We think that the ecosystem connection between the Siskiyou and Cascade mountains is essential to consider. It appears that the management schemes on BLM lands in that area are appropriate to protect this connection/genetic pathway although they do not identify this connection specifically as being important.

3) We have noted only one significant inconsistency between National Forest land allocations and adjacent BLM management. The Rogue River N.F. has identified winter range along the western portion of Butte Falls Ranger District and the southwestern portion of Prospect Ranger District. BLM has identified significant amounts of big game winter range on their District but omitted this obvious area adjacent to Butte Falls and Prospect Districts.

4) In reaction to the Rogue River National Forest LRMP, the local chapter of the Motorcycle Rider's Association appealed. The RRNF has been working with

this group since that time as well as some representatives of Medford BLM and Siskiyou N.F. Through a lot of effort from the Motorcycle Rider's Association, we see an increasing coordination between a coalition of trail users and agencies to plan on a valley wide basis. The Medford BLM plan notes that ORV use demand will not be met with the preferred alternative. Perhaps their plan could better reflect the need to respond to this use. In any case, we look forward to coordinating Access and Travel Management with BLM, other land owners, and users across the Rogue Valley.

We applaud the significant efforts BLM has made to address ecosystem management and believe the state-wide coordination they have done is noteworthy as we proceed with our planning efforts. The Medford BLM PLan reflects significant thinking and energy toward ecosystem management and we should glean what we can from that fine job. Some of the data displays also were well done and worth taking note.

We look forward to coordinate any future decisions as our dynamic forest planning process and the BLM process continue.

/s/Abel M. Camarena for
J. MICHAEL LUNN
Forest Supervisor
Siskiyou National Forest

/s/ James T. Gladen
JAMES T. GLADEN
Forest Supervisor
Rogue River National Forest

7. Comments from the Siskiyou National Forest (Coos Bay District Plan)

United States Department of Agriculture	Forest Service	Siskiyou National Forest	Rogue River National Forest

Reply to: 1950/1920 Date: November 23, 1992

Subject: Coos Bay District BLM Resource Management Plan

To: Regional Forester, R-6

Enclosed is our response to the proposed Coos Bay District Resource Management Plan.

The Coos Bay District has done a fine job of planning. The following comments are provided:

1) The water quality, stream ecosystem, and riparian ecosystem objectives are consistent with those of the National Forest lands, although implementation of these objectives varies between agencies.

2) Coordination between the Siskiyou National Forest and Coos Bay BLM District will continue to be essential for achieving planning objectives associated with old growth and mature forest habitat, connectivity areas, Research Natural Areas, and Threatened and Endangered Species habitat. Activity within the old growth emphasis areas will need coordination with the Fish and Wildlife Service and their Final Recovery Plan for the northern spotted owl, and the National Forest regional FEIS for the northern spotted owl to ensure informed decisions. We will continue to contact the BLM staff to ensure that coordination in these areas is ongoing before the BLM FEIS is finalized.

The emphasis items for ecological management and forest health in the areas programmed for timber harvest are to be commended. The leave trees on the General Forest Management Area, snag management, and large woody material management will provide a healthier ecosystem for the entire area.

We think that the ecosystem connections are important and will also require continuing coordination and cooperation.

We applaud the significant efforts BLM has made to address ecosystem management and believe the state-wide coordination they have done is noteworthy as we proceed with our planning efforts. The Coos Bay BLM PLan reflects significant thinking and energy toward ecosystem management. Some of the data displays were also well done and worth taking note.

We look forward to coordinating any future decisions as our forest planning processes continue.

/s/ Abel M. Camarena (for)
J. MICHAEL LUNN
Forest Supervisor

8. Comments from the Winema National Forest (Klamath Falls plan)

A. The Road Management direction specified in the Klamath Falls Resource Area Plan/EIS is consistent with Road Management and Road Access direction for the Winema National Forest.

B. Page 2-18 and 19 (Rights-of-Way Corridors): There are a couple of conflicts regarding corridor designations:

The BLM recognizes a 2,000 foot corridor, where County roads cross BLM lands, for future facility placement. The Winema Forest Plan did not designate County roads as Corridors. Where the Winema Plan designates corridors, corridors correspond to the existing right-of-way/easement widths. There is no continuity of corridors between the two plans.

2) Definitions of "Exclusion" and "Avoidance" are different than what were used in the Winema Plan. In the Winema Plan Research Natural Areas and Scenic Areas are Avoidance areas, not Exclusion Areas; underground utilities may be appropriate in Scenic Areas but would not be permitted if the area was an Exclusion Area.

DEC 01 1992

United States Department of Agriculture | Forest Service | Siuslaw National Forest | 4077 S. W. Research Way, P.O. Box 1148, Corvallis, OR 97339-1148

Reply to: 1920/1950 Date: November 25, 1992

Subject: Review of BLM Resource Management Plans by Siuslaw National Forest

To: Regional Forester

We have reviewed three of the BLM Resource Management Plans and Environmental Impact Statements--Salem, Eugene and Coos Bay Districts. This review has been coordinated among the appropriate Ranger Districts whose comments are attached.

The overall impression is there has been excellent work on developing planning procedures and describing the work in very readable NEPA documents. We are glad to see the BLM has adopted an ecosystem management objective for the Preferred Alternative and has done an admirable job of publicizing that intent.

The BLM and Forest Service are presently faced with very similar land management concerns, e.g., maintaining healthy ecosystems in the Coast Range (64% of Salem District is in the Coast Range), managing for recovery of threatened and endangered species associated with mature/old growth conifer forests, evaluating streams for Wild & Scenic River status, and improving protection of watersheds and fish resources. However, the two agencies conduct separate planning processes with different methods for classifying lands and addressing management requirements. The intermingled land ownership patterns in the Coast Range will require more coordination if we want to reach some common goals for ecosystem management.

Some of our concerns related to inconsistent approaches to management include the following:

1. There are apparent differences in how the Siuslaw NF and BLM will manage habitat for northern spotted owl. The Preferred Alternative in the Salem District RMP indicates lands within Designated Conservation Areas are included in old-growth emphasis areas (OGEAs). Management of OGEAs includes long-rotation timber management (150-300 years) and thinnings for density management. The '50-11-40' guideline from the Interagency Scientific Committee report, "A Conservation Strategy for the Northern Spotted Owl", appears not to be adopted. These differences could affect our ability to meet recovery goals for the spotted owl and could conflict with expectations for access across adjacent FS land.

2. The Salem District lands in General Forest Management Areas (GFMA) would be managed primarily for timber production with traditional methods of 70-100 year rotations, 40-acre harvest units, reforestation with genetically improved seedlings when available, fertilization of all suitable stands, prescribed fire for site preparation, and, when needed, herbicide to provide planting spaces and reduce competing vegetation.

The Siuslaw NF is currently exploring new ways of managing timber lands to be more responsive to ecosystem management objectives. We strongly support the BLM proposal to manage the GFMA for landscape level diversity and to plan to leave some large, live trees in harvest areas. We would encourage BLM to explore additional ways to manage the forest lands for diversity and to address ways to reduce fragmentation of mature/old-growth ecosystems.

3. The BLM appears to be using different assumptions than the Siuslaw NF used for estimating effects of alternatives on fish habitat quality and resulting fish numbers. Information provided in Chapter 4 of the Salem District EIS shows there are no expected differences in habitat quality between alternatives (excluding Alternatives NA and A), although the alternatives are designed with varying widths of Riparian Management Areas (RMA) along streams. This gives the impression that the BLM assumes larger RMA widths, with the potential to provide greater quantities of large woody debris for stream structure, are not expected to provide greater benefits to stream condition. This approach differs from our current understanding of fish habitat management.

More specific comments related to the Coos Bay and Eugene Districts are included in the attached letter from the Mapleton Ranger District. Some specific comments about the Salem District RMP are:

1. Designation of an ACEC on Marys Peak is consistent with our established Marys Peak Special Interest Area. We would encourage some coordination on potential trail developments and any recreation developments planned for Parker Creek.

2. The Corvallis-to-the-Sea trail planning effort is well underway at the Alsea Ranger District, but the Salem District EIS indicates that trail is not included in the preferred alternative (Table 2-5). We encourage BLM to reconsider that proposal.

If you have any questions about these comments, please contact Harriet Plumley (750-7079) or myself.

JAMES R. FURNISH
Acting Forest Supervisor

cc: R.Lewis, RO-PE&A

Enclosures (2)

FS-6200-28(7-82)

FS-6200-28(7-82)

UNITED STATES DEPARTMENT OF AGRICULTURE | Forest Service | Siuslaw National Forest | Waldport Ranger District, P. O. Box 400, Waldport, OR 97394

Reply to: 1900 Date: November 17, 1992

Subject: Salem District Resource Management Plan

To: Forest Supervisor

We have reviewed the Salem District Resource Management Plan and Environmental Impact Statement for major conflicts with our Forest Plan. In general it appears their plan would be consistent with the current Forest Plan. We recognize the Salem District is attempting to take an ecosystem approach for managing their lands. It appears the Salem District is utilizing different biological parameters, models and assumptions than our agency and the Fish and Wildlife service when it comes to analyzing the effects of their alternative on listed species. By not recognizing the differences in approach between agencies two concerns are raised for us.

The first concern relates to access across NFS lands. Upon implementation, BLM will have expectations to utilize or develop access across lands we manage. Since they would be following different parameters, it is possible their proposals for access may be inconsistent with the Final Environmental Impact Statement on Management for the Northern Spotted Owl in the National Forests.

We are also concerned that by following different conservation efforts on listed species our ability to plan and implement conservation/recovery efforts will continue to be delayed. The best example is the effects of the "God Squad" findings have had on both planned sales and acceptance of the EIS for management of the northern spotted owl.

I believe their final EIS should recognize that adjacent land managment agencies are following different strategies for managing listed species.

Conny J. Frisch

CONNY J. FRISCH
District Ranger

Caring for the Land and Serving People

United States Department of Agriculture | Forest Service | Siuslaw National Forest | Mapleton Ranger District, P.O. Box 67, Mapleton, Oregon 97453

Reply to: 1920 November 13, 1992

Subject: Review of BLM Resource Mgmt Plans

To: Forest Supervisor

In accordance with your letter dated September 30, we have reviewed the BLM Resource Management Plan for both the Eugene and Coos Bay Districts. Beginning with the Eugene District Plan, we have the following comments.

EUGENE DISTRICT:

General Recreation

1) We support the basic recreation and landscape management strategies along the Siuslaw river corridor.

2) We encourage the inclusion of the Whitaker Creek road into the BLM Back Country Byways program. This route is the principal access to our popular Kentucky Falls trail and also serves as a scenic backcountry route from highway 126 to highway 101 near Reedsport. Forest Service road 23, which is in the middle of this extended route, provides access to the Kentucky Falls area and ties into the Whitaker Creek system. It is also a key part of our Discovery Route for the public. The numerous scenic overlooks, several hiker trails, and bike route provide good opportunities for interpretation. Coordination of signing and interpretation among the Forest Service, Eugene District BLM, and Coos Bay BLM would maximize the effectiveness of service delivery to our publics.

3) We encourage your development of the trail to Whitaker Falls which is along our joint Back Country Byway/Discovery Route system.

4) We encourage development of the proposed Windy Peak trail in cooperation with the Deadwood Creek CRMP. The Siuslaw National Forest and Eugene District BLM are both participants in this CRMP.

5) Coordination of Watchable Wildlife observation points along the Byway/ Discovery Route corridor discussed above and along similar routes is desirable.

Western Lane Area

1) Map RIA-1 on page 3-122 continues to show two Cannery Hill areas. It is our understanding that one of them was transferred to the City of Florence.

2) We concur with the land tenure zones shown on Map 2-L-1 on page 2-16 which shows all the isolated tracts west of the Petersen tunnel in Zone III. All or most of the isolated tracts which are inefficient for BLM management are adjacent to or near blocks of National Forest. We would be interested in having most of these either transferred or traded to the Siuslaw National Forest.

3) The Heceta Sand Oune area, in particular, is an important area in an emerging urban/rural interface that would be more effectively managed by a single agency. At present, the areas on both sides of the National Forest/BLM landline are very similar and the landline on the ground is not readily apparent. While many management goals are similar, specific implementation policies and methods vary and sometimes are diametrically opposed. At the same time, access to National Forest is through a small portion of BLM. The public tends to be confused and law enforcement is greatly complicated under this scenario. Consolidation of management under one agency would alleviate these problems. At the least, implementation policies and methods need to be closely coordinated to reduce these problems.

4) It is unclear if day use facilities are being proposed at the Heceta Sand Dunes area as suggested on pages 3-88 and 3-97. The Siuslaw Forest Plan also found need for modest day use facilities. Parking and sanitation facilities near the end of the county road may well be the best location. BLM and the Forest Service should closely coordinate management planning.

5) We concur that sand mining in the Heceta Sand Dunes area is not acceptable.

6) We believe active management measures will be required to maintain the unusual and attractive environmental conditions in the Heceta Sand Dunes. In the thousands of similar acres managed by the Siuslaw National Forest, we have found noxious weeds such as gorse, Scotch broom, and even European beach grass have a profound negative impact. One of the more obvious changes is the reduction in the open dunes area.

Silviculture

1) Traditional girdling of trees to create wildlife snags has not been found to be as effective as anticipated. The fatal wound tends to be the entry point for decay organisms, resulting in premature breakage at the girdle.

2) Habitat for species preferring mature and older stands is much more dependent on structure than age. Early intervention to develop the more complex stands is necessary. Based on ten years of commercial thinning experience in 25-35 year old managed stands, we believe the more complex stand structure typical of older forests can be developed beginning at an early age. This is particularly true where some residual component of the original stand is left in adjacent leave areas or scattered in unit. It is quite possible that a landscape of these more complex stands may be more effective for timber, wildlife, and other uses and values than a "balkanized" landscape with patches of 70 year rotations and 300 year rotations.

Fish and Wildlife

1) "These declines are not related to management activities by the Oistrict but are due to other factors that have caused declines coastwide." (page 4-58). This may be largely true but, based on documentation, timber harvest and road building have had some effect.

2) In 1992, the Mapleton Oistrict and the Eugene District had a successful joint venture on a fish restoration project in Lake Creek. We hope to continue these partnerships.

Fish and Wildlife

1) Map 3-5 on page 3-44 indicates that the middle portion of the North Fork Smith is not anadromous fish habitat. Most of this section is on National Forest and is anadromous habitat. At the same time, it is doubtful that anadromous fish would be located above the 90+ foot falls on the North Fork Smith.

2) Table 4-B0-3 on page 4-33 indicates only 30,000 acres of old growth on the Siuslaw National Forest over the long term. The Forest Plan protects 23,300 acres of existing old growth stands and projects that another 92,100 acres of protected mature stands will grow into old growth within the next century. Given more recent developments (e.g., Habitat Conservation Areas), these estimates appear to be quite conservative.

3) We support sharing of fish and wildlife survey information to better coordinate management of the resources.

Silviculture

1) Habitat for species preferring mature and older stands is much more dependent on structure than age. Early intervention to develop the more complex stands is necessary. Based on ten years of commercial thinning experience in 25-35 year old managed stands, we believe the more complex stand structure typical of older forests can be developed beginning at an early age. This is particularly true where some residual component of the original stand is left in adjacent leave areas or scattered in unit. It is quite possible that a landscape of such more complex stands may be more effective for timber, wildlife, and other uses and values than a "balkanized" landscape of patches with 70 year rotations and 300 year rotations.

/s/ Oave Braley
for
W.M. Helphinstine
Oistrict Ranger

3) We support sharing of fish and wildlife survey information to better coordinate management of the resources.

COOS BAY DISTRICT:

Recreation

1) We concur with the designation of the Smith River road into your Back Country Byways system.

2) We encourage the inclusion of the North Fork Smith road into the BLM Back Country Byways program. This route is the principal access from the south to our popular Kentucky Falls trail and also serves as a scenic backcountry route from highway 101 near Reedsport to highway 126. Forest Service road 23, which is in the middle of this extended route, provides access to the Kentucky Falls area and ties into Eugene BLM's Whitaker Creek system. It is also a key part of our Oiscovery Route for the public. The numerous scenic overlooks, several hiker trails, and bike route provide good opportunities for interpretation. Coordination of signing and interpretation among the Forest Service, Eugene District BLM, and Coos Bay BLM would maximize the effectiveness of service delivery to our publics.

3) We encourage development of the trail from Roman Nose to our Kentucky Falls trail system. We have plans to extend our existing trail downstream 6 miles to a new trailhead on our 23 road in the NW quarter of section 31 (T19S; R9W).

4) Coordination of Watchable Wildlife observation points along the North Fork Smith corridor and along similar routes is desirable.

5) We encourage development of the proposed Wassen Creek trail beginning at Wassen Lake. This trail system would connect with a proposed trail system on National Forest. International Paper has also agreed to cooperate in this Smith River CRMP-coordinated project. There appears to be significant interest in developing this trail system and some potential partners.

6) The Siuslaw Forest Plan found the portion of Wassen Creek on National Forest to be eligible for Wild status but the suitability study has not been started. Although National Forest and BLM creek segments adjoin, there are some differences with generally more remote and undeveloped conditions on National Forest.

Lands

1) Several of the small and isolated blocks of land in the North Fork Smith and Fiddle drainages are adjacent to National Forest. We expect to begin another land exchange with International Paper in the next couple years. Participation in a three-party exchange may provide additional flexibility and be helpful in establishing more manageable boundaries for all parties.

2 94B

Coos County Board of Commissioners
Jack L. Beebe Sr. Gordon Ross Doc Stevenson
Coos County Courthouse/Coquille, Oregon 97423/(503) 396-3121 Ext. 224, 225

October 12, 1992

Mr. Mel Chase
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

Oear Mel:

The following is the testimony we wish to present concerning your new land management plan:

Alternative "A: which maximizes harvest and receipts, incorporates all the stream side set-backs and best management practices present in our Oregon forest practices act. Because it maximizes productivity it provides the most revenue for forest protection from fire and disease. It also keeps employed two and a half times as many loggers and water wagons, and cats to be used in times of fire disaster. It maximizes growth, converting that much more CO_2 to wood fiber.

This alternative reflects the additional growth in the forests brought about by the expenditure of tha plow back fund and will reimburse the counties for this investment.

Alternative "B" protects all the anadromous streams that "A" doas, plus it sets aside 300 acres around each spotted owl nesting site. This is a major investment on the part of the counties for the "supposed well being" of the owls.

Your preferred alternatives address this administration's goal of limiting clear cutting and achieving biodiversity. It also attempts, through buzz words like "Total Forest Management" or "Ecosystem Management" to ward off attacks of the future, one species at a time. It is a masterpiece of diplomacy and we may have to buy in to it as such as the only game in town that will give us any harvest at all.

However, we would like to express very strongly that we prefer Alternative "B: and that the line is drawn in the sand and any further reduction in harvest levels would compel us to resist very strongly.

We would also like to bring to your attention that there seems to be little or no mention of the O&C Act and its requirement to harvest timber in an amount great enough to ansure economic stability in the local area.

Another point not made in your plan, that we feel would need to be addressed, is the fact that the roads you propose to close are roads that were built with O&C Counties' plow-back funds which gives us a vested interest, and we must demand a say in whether they are closed or not before we could sign off on our plan.

BOARD OF COMMISSIONERS

Jack L. Beebe
Commissioner

We continue to firmly believe, with all the evidence provided to us by our constituents, experts in their own right, that there is nothing magical about an "old-growth ecosystem", that there is no habitat indigenous to such a system that is not present in a well managed, sustained yield forest, and that your preferred alternative departs widely from sound scientifically developed, silvicultural practices. Even so, it is head and shoulders above the disaster that would be brought about by ISC, the gang of four and the recovery plan alternative.

We would also like to bring to your attention that there seems to be little or no mention of the O&C Act and its requirement to harvest timber in an amount great enough to ensure economic stability in the local area.

Another point not made in your plan, that we feel would need to be addressed, is the fact that the roads you propose to close are roads that were built with O&C Counties' plow-back funds which gives us a vested interest, and we must demand a say in whether they are closed or not before we could sign off on your plan.

May we again commend you for your ingenuity and add our qualified endorsement to your preferred alternative until time gives us more wisdom and we can again review our management of the O&C forests.

BOARD OF COMMISSIONERS

Doc Stevenson
Chairman

Cordon Ross
Commissioner

Jack L. Beebe
Commissioner

cc: Steve Cornacchia, Lane County
Rocky McVay, Curry County
Doug Robertson, Douglas County
Ray Doerner, O&C Counties

6948

Coos County Board of Commissioners
Jack L. Beebe Sr. Cordon Ross Doc Stevenson
Coos County Courthouse/Coquille, Oregon 97423/(503) 396-3121 Ext. 224, 225

August 31, 1992

Mr. Dean Bibles, Director
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

Dear Dean:

Thank you for meeting with us last Wednesday to present your "preferred alternatives" for the next decade.

We appreciate your efforts to squeeze some allowable cut out of our present political climate and come up with a plan that our master foresters in Federal courts might endorse which would allow them to lift their injunctions.

If it were not for the present political dilemma we would oppose vigorously your preferred alternative on both silvicultural and environmental basis. We would also endorse either "A" or "B" as the best choices for both long run productivity and the health of our forests and streams.

"A", which maximizes harvest and receipts, incorporates all the stream side set-backs and best management practices present in our Oregon forest practices act. Because it maximizes productivity it provides the most revenue for forest protection from fire and disease. It also keeps employed two and a half times as many loggers and water wagons, and cats to be used in times of fire disaster. It maximizes growth, converting that much more CO_2 to wood fiber.

This alternative reflects the additional growth in the forests brought about by the expenditure of the plow back fund and will reimburse the counties for this investment.

Alternative "B" protects all the anadromous streams that "A" does, plus it sets aside 300 acres around 110 spotted owl nesting sites. This is a major investment on the part of the counties for the "supposed well being" of 110 pairs of owls.

Your preferred alternatives address this administration's goal of limiting clear cutting and achieving biodiversity. It also attempts, through buzz words like "Total Forest Management" or "Ecosystem Management" to ward off attacks of the future, one species at a time. It is a masterpiece of diplomacy and we may have to buy in to it as such and as the only game in town that will give us any harvest at all.

RESOLUTION NO. R-9293-03

A RESOLUTION IN SUPPORT OF CONTINUED MANAGEMENT OF O & C TIMBERLANDS

Whereas, the Bureau of Land Management has requested public input on its ten-year land and resource management plan, and

Whereas, the health, peace and safety of the people of Douglas County are affected by the alternative selected by the BLM for the management of O & C timberlands, and

Whereas, the natural resources provided through aggressive management of federal lands under the O & C Sustained Yield Act of 1937 has contributed to social and economic stability in 18 Western Oregon counties, including Douglas County, and

Whereas, the counties have invested more than one billion dollars to fund intensive forest management on these lands with the explicit expectation of an ongoing return on this investment, and

Whereas, O & C lands continue to provide a reliable employment base for many Oregon communities, and

Whereas O & C lands also provide diverse and sustainable habitat for fish and wildlife, clean air and water, and outdoor recreation opportunities, and

Whereas, these lands should continue to provide economic stability, healthy and productive forests and reliable employment base,

Therefore, be it resolved that the City of Drain supports the continued management of these lands in accordance with the O & C Sustained Yield Act of 1937 to provide a stable and predictable level of timber harvest for Oregon communities while considering other resource values, and

Be it resolved that we support the principles of multiple use for these O & C lands which include management for timber, water, recreation and wildlife, and

Be it further resolved that we encourage legislation that would enact a balance management plan into law by the Congress of the United States of America and remove management decision from the federal court system.

Passed by the City Council, of the City of Drain, Douglas County, Oregon this 14th day of December, 1992.

Wes Anderson, Council Pres.

ATTEST: Bill Ewing
Bill Ewing, City Admin.

Appendix HH

X-027

EUGENE (GENE) D. TIMMS
HARNEY, LAKE, MALHEUR,
KLAMATH COUNTIES
DISTRICT 30

REPLY TO ADDRESS INDICATED:
☐ Senate Chamber
Salem, OR 97310-1347
☐ 1049 N Court
Burns, Oregon 97720

OREGON STATE SENATE
SALEM, OREGON
97310-1347

December 22, 1992

D. Dean Bibles, State Director
Bureau of Land Management
PO Box 2965
Portland, Oregon 97208

Dear Mr. Bibles,

I feel compelled to register my concerns with the Preferred Alternatives outlined in the Resource Management Plan and Environmental Impact Statement which will result in a ten-year plan for the BLM lands.

As is noted by BLM staff, the Preferred Alternatives will have a negative impact on key Oregon industries such as timber and agriculture.

I do not understand how we have come to this predicament. BLM lands have been used for decades as multiple use lands that provide a base for economic activity. It now appears there is another agenda that would take productive lands and set them off for recreation, etc. Where was the public input that led to the Preferred Alternatives. Can they be altered at this time? Have you considered the key industries, the County governments and the regional public in your decisions?

It would constitute a serious set back of our economy if these plans were to go from draft to final with little change. I request that this train be stopped dead and the public be called in as a partner to assure realistic uses of the public BLM lands. Please change the timetable for consideration of public comment, and work much closer with the public in reaching conclusions such as Preferred Alternatives.

Sincerely,

Gene

Gene Timms
Senate Republican Leader

BARBARA ROBERTS
GOVERNOR

OFFICE OF THE GOVERNOR
STATE CAPITOL
SALEM, OREGON 97310-0370
TELEPHONE: (503) 378-3111

December 18, 1992

Dean Bibles, State Director
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

Dear Dean:

The State of Oregon has completed its review of the Eugene, Salem, Coos Bay, Roseburg, Medford and Klamath Falls draft Resource Management Plans and Environmental Impact Statements. Enclosed you will find a copy of the State of Oregon's Final Coordinated Response, including state agencies' comments, six position papers, and Oregon State University's analysis of the Bureau of Land Management's six draft plans.

We have sent individual copies of the State's Final Coordinated Response to each of the six District managers for consideration when developing their final plans.

This response represents concerns and recommendations from twelve state agencies. Comments we received from the public, interest groups and Oregon State University over the last several months were all considered when developing this Final Coordinated Response.

The State commends BLM for taking a progressive step forward in addressing concerns on managing their natural resources. This new approach is not without risk and will require additional research, evaluation, intensive monitoring and an atmosphere of cooperation among all forest land managers.

Oregon views this set of comments as just one phase in our involvement in the BLM planning process. The six position papers that the State presented to BLM earlier this year form the framework for our recommendations to address many of the concerns that have been identified by the public and state agencies.

My Governor's Forest Planning Team and the individual state agencies stand ready to work closely with BLM wherever necessary to fully understand the concerns and recommendations we have presented in the State's Final Coordinated Response. I trust that BLM will call on them as you work toward your final plans.

I appreciate BLM's State Office assistance to my Governor's Forest Planning Team and state agencies over the last year. I believe that this cooperation is in the spirit of our Memorandum of Understanding and will benefit not only the State of Oregon but also BLM. If you, your staff, or the Districts have questions concerning the State's final response, don't hesitate to call Bob Warren or Anne Squier.

Sincerely,

Barbara Roberts

Barbara Roberts
Governor

X-[illegible]

DELNA JONES
WASHINGTON COUNTY
DISTRICT 6

REPLY TO ADDRESS INDICATED:
☑ House of Representatives
Salem, OR 97310-1347
378-6657
☐ P.O. Box 5556
Aloha, OR 97006
642-3102

HOUSE OF REPRESENTATIVES
SALEM, OREGON
97310-1347

COMMITTEES
Chair
Revenue & Schoo
Member
Education
Agency Reorganiz
PRIOR COMMITT
Vice-Chairperson
State & Federal Af
Member
Intergovernmental
Trade & Economic
Legislative Rules
Business & Consu
Education
Environment & Ene

December 21, 1992

D. Dean Bibles
State Director
Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

RE: Draft Resource Management Plan & Environmental Impact Statement

Dear Mr. Bibles:

I appreciate the opportunity to comment on your draft plan; however, I am skeptical of the impact public input will have on this draft.

As I look at the Preferred Alternative in the various BLM areas I see a continuation of the loss of the public lands use that will deter the economic welfare of Oregon and the nation. Certainly, it should be clear today that the government cannot afford to spend deficit tax dollars to maintain set asides while removing productive lands for recreational purposes. However, it is clear from the draft plan that the BLM is doing just that. How were the Preferred Alternatives arrived at? Was the public involved? In Oregon, the Preferred Alternatives will eliminate thousands of timber related jobs, limit mining activities, restrict grazing and off road vehicle access and lock away rivers.

I would like to see a great deal more public involvement in this planning process. I would like to see these decisions driven by public opinion in the part of Oregon that will be harmed by the decisions. The current approach appears to meet an agenda from out of the region or out of state. These public lands have been depended upon for a major portion of the Oregon economic base. THis ten year plan will have a major impact on our state's economy and deserves a thorough public study, inspection of data, and consideration of the opinion of those closest to the resource.

Sincerely,

Delna

Delna Jones
State Representative
District 6

CLACKAMAS COUNTY
Board of Commissioners

JUDIE HAMMERSTAD
CHAIR
DARLENE HOOLEY
COMMISSIONER
ED LINDQUIST
COMMISSIONER
MICHAEL F. SWANSON
CHIEF EXECUTIVE OFFICER

January 8, 1993

Mr. Dean Bibles, Director
U.S. Dept. of the Interior
Bureau of Land Management
Oregon State Office
P.O. Box 2965 (1300 NE 44th Ave.)
Portland, OR 97208

Dear Mr. Bibles:

I am writing to comment on BLM's Draft Resource Management Plan. Overall, Clackamas County believes that BLM is working hard at developing responsible plans that address the changing expectations with regard to how we manage our natural resources and for what purposes.

I do have some general concerns however. Other resource agencies are emphasizing improvements in fish and wildlife stocks and the habitats and riparian areas needed to support them. It appears that BLM is also attempting to incorporate such an emphasis. Consequently, it seems a paradox for any responsible planning effort to include actions that could result "in a minor or significant degree of degradation", in the cases of water quality or fish and wildlife habitat, or declines, as in the case of fish, wildlife, or vegetation species.

We support the objectives contained in BLM's Fish and Wildlife 2000 document to improve water quality, riparian areas, and habitat and to increase fish, wildlife, and native vegetation. This requires a minimum goal of no further disruption, degradation, or declines. We agree with the State's comments that consistent standards and measurements are necessary to monitor progress toward improvements in these areas. BLM needs to stay ahead of the tide, by not contibuting to the listing of sensitive species as well as refusing to engage in or support activities which will contribute to additional degradation or declines or lead to further damage in marginal lands, forage cover, etc. It is disturbing to read plans which talk of maintaining species at minimum viable populations when we need to be planning for and discussing improvements to these populations to prevent them from becoming threatened or endangered. Future listings can only contribute to further shrinking of the timber supply.

Interagency, intergovernmental cooperative efforts are necessary to the successful achievement of many of BLMs goals. Watershed protection, recreational development and tourism, other agencies' objectives with regard to improvement of fish and wildlife populations could be enhanced by BLM planning efforts taking their goals into consideration. In turn, the other agencies

906 Main Street • Oregon City, OR 97045-1882 • 655-8581

involved in these areas can enhance BLM's efforts as well. The State's call for BLM to enter into special partnerships is timely and can contribute to a more comprehensive approach to resource management. Partnerships need to include counties as well. One particular area of concern which requires strong partnerships is the area of rural interface.

For Clackamas County, the issue of rural interface is most glaring along Highway 26 in the Hoodland Corridor. Rural interface raises the issue of BLM's management plans being developed strictly within the context of BLM lands. Comprehensive planning requires consideration of all lands in a given area regardless of ownership.

The scenic quality along the Corridor has been negatively impacted by the lack of a comprehensive partnership with regard to managing lands along the highway. The patchwork ownership of these lands has led to differing degrees of harvesting and maintenance of tree stands for the protection of visual quality. As a result, the Corridor is designated as a VRM II rather than a VRM I. My concern is that the lesser designation lends itself to more intensive harvesting, which in turn, may lead to a further degradation of the scenic values which attract tourists and recreationists from around the country. It occurs to me that in some areas affected by old style harvesting techniques and management, the appropriate goal should be to improve these areas to the point where a higher classification could be assigned to them eventually.

One last issue arises with regard to BLM's plan. Due to the increasing competition among resource uses and the uncertain future of timber in light of the Environmental Protection and Endangered Species Acts, we agree with the State that BLM's estimates regarding timber supply should be conservative estimates. A conservative estimate of supply should increase stumpage prices, another factor with which we agree with the State. The end result may well be an increase in revenue despite a decrease in harvest yields. Any accurate estimate of socioeconomic impact needs to take the supply/demand/price relationship into consideration.

We appreciate the opportunity to offer our thoughts as you move forward with a final version of your plan. We also appreciate the difficult balance which BLM faces as it is one we also share as Clackamas County continues the transition away from being a heavily timber dependent area. We look forward to seeing the results of your planning effort.

Sincerely yours,

Donna M Peterson

Donna M. Peterson
Staff Assistant

Appendix II. Summary of Comments on the Draft Resource Management Plan and BLM's Responses

Introduction

The public comment period on the draft Coos Bay District Resource Management Plan and Environmental Impact Statement began on August 28, 1992, and closed on December 21, 1992. The district received 954 comment letters, with an additional 54 letters sent directly to the Oregon State Office. Each letter was read and coded according to subjects discussed. Substantive comments have been paraphrased below as provided for in NEPA, and are grouped by 22 resources/topics along with the response. A list of the resources/topics and their reference page numbers are provided preceding the comments/responses.

Many of the comments on the adequacy of the Draft RMP/EIS addressed specific elements of the preferred alternative that are no longer components of the proposed plan. Comments that had a corollary element in the proposed plan were treated as if they applied to the corollary allocation. The most common example is comments on Old Growth Emphasis Areas. Our responses to those comments treat them as applying to Late Successional Reserves in the proposed plan (PRMP).

The acronym "SEIS" used in comment responses refers to the 1993 *Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl.* The term "FEMAT report" refers to the 1993 Report of the Forest Ecosystem Management Assessment Team, titled *Forest Ecosystem Management: An Ecological, Economic and Social Assessment.*

Scoping

Comment: The BLM and State of Oregon should convene an independent commission to study the specific ecological and administrative problems arising from the current ownership pattern.

Response: Funding for such an initiative would have to be authorized by the Congress and the State legislature. Such a proposal is beyond the scope of the RMP.

State Director Guidance

Comment: The State Director Guidance for the planning process should be amended to permit changes in the preferred alternative.

Response: The State Director Guidance, which was issued through a series of instruction memos during the years 1988 through 1992, did not directly address the formulation of the preferred alternative nor did it preclude changes in that alternative. The State Director never intended it to formally guide that aspect of the process. The guidance did not direct any discretionary allocations or constraints in the preferred alternative nor did it guide development of the PRMP.

Purpose and Need

Comment: The RMP/EIS should acknowledge the purpose of the O&C Lands (which is to be managed for the stability of local communities and industries through the production of timber, under the principles of sustained yield) and should also reference important related judicial decisions.

Response: Chapter 1 has been expanded, but citation of specific judicial decisions seems unnecessary to the function of the RMP.

Comment: The documents never spell out clearly what decisions will be made as a result of this analysis.

Response: The Chapter 1 discussion, Purpose and Need for the Action, has been expanded to refer to the planning questions in Appendix B and to Table 2-1 where these decisions are summarized.

Budget Assumptions

Comment: The Draft RMP does not include a cost analysis of the alternatives. It should include costs of all aspects of timber sales—including such items as road building, sale preparation, monitoring, site cleanup, mitigation of environmental impacts, and restoration. Higher management costs would undoubtedly occur if the Preferred Alternative were adopted.

Response: Ecosystem-based management focuses on the many activities required to manage a specific geographic area. This type of management is different from traditional program-based management which focuses on costs and units of accomplishments in each individual program. For this reason, cost comparison is limited to comparison of the total costs of the No Action Alternative and the PRMP (See Chapter 2, Management Direction Common to All Alternatives, Costs of Management).

Comment: Consider the unstable nature of federal funding of forest management activities and the difficulties of securing this funding.

Response: The Introduction to Chapter 4 has been modified to acknowledge the funding issue.

Comment: How does BLM expect to obtain funding to implement ecosystem management with reduced harvest levels and higher predicted costs?

Response: We expect the Congress will be able to look beyond the traditional measure of timber sales, understand the importance of ecosystem management, and appropriate adequate funding for its successful implementation.

Comment: Evaluate the impact of lower funding levels on programs and outputs, including mitigation and monitoring. How will accountability for funding mitigation and monitoring support be verified?

Response: Since the essence of ecosystem management is balance, reduced funding levels would affect all programs and outputs proportionally. Mitigation and monitoring are considered to be part and parcel of timber sale and other implementation costs. In the priority setting process, managers will ensure the integrity of program balance (including mitigation and monitoring) in the budget.

Comment: Review historical silvicultural plans, required budgets, approved budgets, activities conducted, and reasons for the differences.

Response: Much of this information demands an analysis of political decisions made at high levels of past administrations and/or during legislative deliberations in Congress. Although the analysis would make an interesting if lengthy article, we believe it would suggest little about the probable outcome of deliberations and decisions in the 1990s.

Organization of Document, Editing, and Maps

Comment: It was difficult to distinguish the draft RMP from the draft EIS. For example, implementation standards were scattered throughout the document.

Response: Chapter 2 has been reformatted to clearly display proposed objectives and link them to management direction for each resource.

Comment: Avoidance of acronyms would make the document more readable.

Response: The use of acronyms has been reduced.

Comment: Moving the list of acronyms and abbreviations to the front of the document would help the reader.

Response: This change has been made.

Comment: A table of contents should be located at the beginning of the document for easy reference. Also, the page headers should be labeled as to what each chapter is covering.

Response: These changes have been made.

Comment: Maps should display and name more geographic places and towns, name more streams, and indicate secondary roads.

Response: The level of detail in geographic naming was limited to avoid cluttering the maps.

Comment: The scales used on maps showing land allocations are too small, and the maps have few reference points.

Response: A reference grid has been added to the new PRMP maps. The scale is considered adequate for an environmental impact statement. For more detail, see maps available for review in the district office.

Comment: My biggest disappointment is the maps. The State and Forest Service lands should be indicated on the maps. Only a few of the major streams, highways, and cities are located which makes it quite difficult to find many of the places described in the text.

Response: The maps included in the RMP have been produced using the BLM's GIS. The purpose of the maps is to give the reader a general overview of management proposed for each of the alternatives. Larger scale maps are available at the district office and will be utilized for plan implementation.

The SEIS contained maps that displayed the location of USFS lands within the range of the northern spotted owl. These maps were also produced from a GIS by combining elements of both BLM and Forest Service data. Neither system contains the data for state land ownership.

Comment: There is difficulty distinguishing the legend on Map 2-1 because all shades of gray are the same.

Response The shading pattern used for the PRMP maps have been changed to make them more distinctive.

Planning Schedule

Comment: The final RMP/EIS and Record of Decision should not be completed before completion of Endangered Species Act consultation.

Response: We consider consultation on our RMP already accomplished by the consultation and resultant biological opinion from the Fish and Wildlife Service on the SEIS. Additional consultation will occur as project planning follows the RMP.

Comment: The deficiencies of the draft plan warrant BLM developing a revised or supplemental draft before proceeding to the final stage.

Response: BLM, with the Forest Service, prepared a Supplemental EIS on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (SEIS).

Coordination With Other Parties

Comment: If other federal lands are the key to success of an alternative, identify the related coordination and cooperation planned.

Response: Such coordination is addressed in the SEIS Record of Decision.

Comment: All lands within the aboriginal territory of the Confederated Tribe of Coos, Lower Umpqua, and Siuslaw Indians can still be considered "Indian Country," as the President never signed into law the only document ceding rights of ownership of the aboriginal territory (Treaty of 1855).

Response: "Indian Country" is legally defined as (a) land within a reservation, (b) land held in trust by the federal government, or (c) dependent Indian communities. See 18 U.S.C. § 1151. Although this definition is found in the criminal statutes of the United States, it has been utilized by the courts in civil proceedings as well. Under this definition, there is no "Indian Country" on the lands managed by the BLM in western Oregon.

The Coos, Lower Umpqua, and Siuslaw Indian Tribes unsuccessfully litigated their rights as "aboriginal owners" of lands in western Oregon before the Court of Claims in 1938. See *Coos Bay, Lower Umpqua, and Siuslaw Indian Tribes v. United States*, 87 Ct.Cl. 143 (1938), cert. denied, 306 U.S. 653 (1939). By the Coos Restoration Act in 1984, Congress restored a trust relationship with these tribes which had been terminated in the Act of August 13, 1954, 68 Stat. 724. See 98 Stat. 2250 (codified in 25 U.S.C. § 714). However, the only lands included in the restored reservation were three small parcels of land located near Coos Bay. See 25 U.S.C. § 714e.

Comment: The Confederated Tribes should be contacted for review of any activity permanently altering the land, minerals, and vegetation on or access to, their aboriginal lands. The tribal office should receive copies of environmental assessments, FONSIs, EISs, and other notifications of actions.

Response: A Memorandum of Understanding with the tribal government will identify the types of activities for which the Confederated Tribes will be contacted and sent official BLM documents.

Comment: The final RMP/EIS should clearly outline what types of coordination and cooperation will be a part of plan implementation.

Response: A Coordination and Consultation section has been added to Chapter 2 of the PRMP. This topic has also been discussed in the ROD for the SEIS.

Goals and Objectives

Comment: It was difficult to identify plan policies in the RMPs. The RMPs should identify the expected future condition.

Response: Explicit PRMP objectives have been added for each topic in Chapter 2 to address these concerns.

Comment: There should be a stronger link between the plan's broad goals and the specific actions that will be undertaken. In general, standards and guidelines need to be established.

Response: The objectives that have been added for the PRMP provide that link and—along with management actions/direction—equate to standards and guidelines.

The Preferred Alternative

Comment: A table showing the acreage in each land classification would help the reader determine the significance of restricted areas.

Response: Allocations overlap so any table oversimplifies. Tables S-1 and S-2 in both the draft RMP and Proposed Resource Management Plan Summary display the major land use allocations for both the total district lands and the net commercial forest lands.

Comment: The RMP should use a watershed approach to land resource management.

Response: The SEIS decision that has been incorporated into our PRMP details a four tier approach to land resource management: regional, physiographic or river basin, watershed, and site specific or project level. Under this approach, analysis starts at the watershed level. The planning units will be physiographic province or river basin, consisting of a number of watersheds. Watershed-based planning will be implemented and, over time, the federal agencies including the BLM will either switch from existing planning units to the provinces or modify the boundaries of current planning units to be more compatible with the watershed-based approach.

Comment: BLM's long-term projections are unreliable due to the vagaries of time and changing political and economic agendas. Adoption of any alternative should be a short-term action only.

Response: We recognize that the plan adopted will be replaced by another plan within 10 years or so. However, much of the plan's focus remains long term because only then can we attain many of the plan's key objectives,

Legal Consistency of Preferred Alternative

Comment: The draft plans have not explained how ecosystem management in the preferred alternatives is consistent with BLM's legal mandate for O&C/CBWR lands, including its community stability requirement.

Response: The SEIS Record of Decision addresses this comment, and discussion has been added to Chapter 2, Purpose and Need, of this PRMP/FEIS.

Comment: The preferred alternative makes timber production the residual rather than the dominant use, because lands are first set aside for riparian and other uses, and the residual land is further managed for old-growth restoration. This subservient position for timber violates the O&C Act.

Response: Management of these lands under the O&C Act mandate to provide a sustainable level of timber production must also be reconciled with other laws such as the Endangered Species Act and the Clean Water Act. The need of the local communities and industry for a stable timber supply is certainly of foremost concern in the management decisions for the O&C lands. The selection of the preferred alternative or PRMP is our attempt to manage the O&C lands in a responsible manner. Such management is intended to allow as high a level of sustainable timber supply as possible without risking further drastic curtailments in the timber supply in the future due to the requirements of a myriad of other laws through which the BLM must chart its course. The mechanical PSQ calculation hierarchy may make it appear that timber production was the last concern in the decision-making process. This does not mean, however, that it was subsidiary to other uses of the timber lands.

Comment: Since the Alternative A level of riparian protection meets legal requirements, selection of that level of riparian protection would be most consistent with the O&C Act.

Response: The level of riparian protection included in the PRMP was selected not only to meet current legal requirements, but also to promote the goals of watershed protection contained in the O&C Act and to provide sufficient protection to reduce the potential for listing of aquatic species as threatened or endangered. Taking into consideration the anticipated benefits to the quality of watersheds in the O&C Act does not necessarily mean that the alternative with the least riparian protection allowed by law is the "most consistent with the O&C Act."

Comment: Lowering the minimum harvest age by releasing arbitrary constraints on it would seem to be most consistent with the O&C Act—particularly considering the difficult timber supply situation.

Response: While the O&C Act does not set "arbitrary constraints" one way or the other about the rotation age or minimum harvest age of the timber, the purposes of the O&C Act in providing a long-term sustainable timber supply may be adversely affected by lowering the minimum harvest age. The level of sustainable harvest over the long term could be reduced if the minimum harvest age is significantly lowered below the age of the culmination of mean annual increment. Intensifying harvest activities of the lands included in the GFMA by lowering the minimum harvest age could also have adverse effects on the quality of watersheds on the O&C lands. Such results cannot be considered as most consistent with the O&C Act.

The environmental impacts of harvesting much younger trees must also be considered. For example, lowering the minimum harvest age in the GFMA could have significant adverse impacts on the ability of protected species—such as the northern spotted owl—to disperse throughout their range and possibly cause the BLM to violate the Endangered Species Act.

Comment: The exclusion of O&C forest land from exchange for lands to be managed for single use management purposes relative to listed species appears to conflict with Section 7(a)(1) of the Endangered Species Act.

Response: Congress—in Section 7(a)(1)—did not direct the Secretary to ignore the limitations in statutory authorities for other Interior programs when it directed the Secretary to use these authorities to further the purposes of the Endangered Species Act. The O&C Act requires those lands to be primarily managed for timber. The BLM would violate its statutory authority under the O&C Act for the management of these lands if O&C timberlands were exchanged for property intended for use primarily as wildlife habitat. See *Headwaters v. BLM*, 914 F.2d 1174 (9th Cir., 1990). Accordingly, the proposal to exclude the O&C lands from exchanges for lands intended for

purposes other than multiple use does not conflict with the promotion of conservation of listed species under §7(a)(1), since that section does not require agencies to violate their existing statutory authorities to accomplish its purposes.

The No Action Alternative

Comment: The No Action Alternative should be no activities.

Response: It is well established that in land-use plan EISs by federal land management agencies, the No Action Alternative is continuation of the existing plan. According to the Council on Environmental Quality, in an action updating a land management plan where an ongoing program under existing legislation is taking place, the "no action" alternative is the alternative of "no change" from current management direction or level of management intensity. "To construct an alternative that is based on no management at all would be a useless academic exercise." (Answer to Question 3 of CEQ's "NEPA's Forty Most Asked Questions," 46 Fed. Reg. 18026 (Mar. 23, 1981), as amended.)

Comment: The plan should note the current level of survey, monitoring, and inventory that is done regularly.

Response: Monitoring under the current plan is described in the Oregon State Office 162-page Manual Handbook H-1734-1. Survey and inventory procedures are equally detailed by resource. Copies of these procedures are available for review in the Coos Bay District office.

New Alternative Proposals

Comment: Assess alternative harvest priorities that maintain more options for the "old growth" in the GFMA. Include alternatives that rely more on partial cuttings.

Response: PRMP harvest priorities in the GFMA have been prorated so most old growth there would be intact after the first decade. Partial cuttings (including thinning and density management) have been incorporated into the PRMP to the extent consistent with both ecosystem management and timber management objectives.

Comment: It is recommended that BLM add a fisheries emphasis alternative. It would be based on the alternatives for Management of Late Successional Forests in the Pacific Northwest.

Response: Fisheries emphasis is an integral component of the (new) PRMP.

Comment: Evaluate the effects of longer rotations and higher minimum harvest ages on all lands administered by BLM.

Response: Sensitivity analysis of Alternative B in the Draft RMP/EIS looked at 150-year rotations. Sensitivity analysis of the draft PA looked at no harvest below culmination of mean annual increment.

Comment: Develop and analyze other alternatives that retain biologically significant old-growth stands while still producing economic opportunities.

Response: Alternatives C, D, E, and the PRMP—as well as all other alternatives analyzed in the recent SEIS—do this to varying degrees. We do not believe adding more such alternatives would be particularly useful.

Comment: An alternative should be developed—or at least one of the existing alternatives modified—to make long cycle, uneven age management the silviculture method for the GFMA of the PA or its equivalent in the other alternatives.

Response: Option (alternative) 1 of the SEIS analyzed management of the matrix on a 180-year rotation and utilized the 50-11-40 rule. Development of another alternative with similar prescriptions is not deemed necessary.

Impact Analysis Generally

Comment: A 10-year, short-term impact time frame is not equally appropriate for all resource categories. You should consider varying times according to the life spans of affected biota.

Response: The 10-year period was selected as the end of the period before the RMP is most likely to be revised. Keying to the life-spans of affected biota is more relevant to a project EIS, such as for a dam or oil and gas leasing. The text acknowledges where available information suggests that intermediate term impact conclusions would be substantially different than the trend implied by short-term and long-term conclusions.

Comment: Assess spatial feasibility of the harvest plan in future decades.

Response: A major constraint on spatial feasibility in BLM's checkerboard ownership pattern is harvest activity on other ownerships, particularly private land. Future harvests on private lands are often not the subject of long-term plans; often proprietary even if plans exist; and subject to rapid change due to market conditions, changes in ownership and other business considerations. Given these considerations, even spatial feasibility of the 10-year scenario is speculative and must be revisited during annual timber sale planning. The elaborate exercise entailed in extending the 10-year scenario out several decades would prove little.

Comment: In some parts of the document, private lands are excluded from consideration while in others BLM appears to be using private lands for mitigation.

Response: In no case does BLM suggest it can control activities on private lands, except for the indirect control that may occur where specific access across BLM-administered land may be denied due to overriding environmental constraints such as the Endangered Species Act. However, expected management on private land is sometimes cited as providing certain consequences—for example, adequate elk forage.

Comment: Identify where private land management is hindering the achievement of ecological objectives.

Response: Our assumption is that all private forest management— whatever it is today—may become short-rotation intensive forest management. That is the basis for all cumulative effects analysis, and BLM's ecological objectives reflect that assumption.

Comment: Soil erosion, watershed degradation, stream sedimentation, and forest habitat destruction must all be analyzed with adjacent lands factored in.

Response: Soil erosion (soil loss as distinguished from stream sedimentation) is a site-specific concern; cumulative effects of soil loss with other ownerships are not relevant to BLM's management decision. The balance of these concerns are addressed broadly in the EIS and will be more specifically addressed in watershed analyses.

Comment: Consideration for catastrophic loss should be factored into the plans.

Response: Projections of catastrophic loss have been explicitly factored into the proposed PSQ and into analysis of effects on old growth. Adaptive management will address the locally unpredictable dimensions of catastrophic losses.

Comment: BLM has not done a risk analysis nor developed contingency plans for OGEAs and CAs that potentially could be destroyed by a catastrophic event.

Response: As is discussed in Appendix O of *A Conservation Strategy for the Northern Spotted Owl* (1990), the original habitat conservation areas suggested in that document were distributed as a hedge against catastrophes that could cause regional but not total extinction of the spotted owl. The late-successional reserve system is similar. The Draft Recovery Plan and the EIS both specifically address catastrophic loss of habitat. The dispersal of connectivity diversity blocks will also function as a hedge against major ecosystem impacts from catastrophic events. Risk analysis was incorporated into the SEIS. Contingency planning would have to be based on a multiplicity of "what if's." We consider it more relevant to adapt our management as appropriate after a specific catastrophic event occurs.

Comment: The environmental costs of relying on foreign, non-sustainable resources for forest products have been overlooked. The plan also ignores the other environmental costs such as higher energy consumption, increased CO_2 emissions, accelerated depletion of nonrenewable resources, and increased reliance on substitute building materials.

Response: Assessment of the environmental costs of substitute sources of timber or substitute building materials would entail much conjecture about international markets and is beyond the scope of a single RMP EIS. We are aware of some region-wide analyses of this topic, however, and a discussion of them has been added to Chapter 4 Socioeconomic Conditions.

Comment: If harvest levels are reduced in the United States, harvest levels will increase in other parts of the world. Because these countries do not have environmental regulations, there will be destruction to their forest environments.

Response: The SEIS acknowledges that reductions in federal timber supplies will result in some increase in supply from private lands and that the remaining needs will be met either by product substitution or by imports from other countries and other sections of the United States. The details of possible consequences of increased harvesting in other countries is beyond the scope of the SEIS or this EIS.

Comment: Identify the economic, recreational, commercial, and aesthetic values of key wildlife groups or species.

Response: Recreation and aesthetic values are not distinguishable and are incorporated in the EIS sections on recreation. Stratification of values by key wildlife group or species is not practical due to lack of consistent, comparable sets of data. Some economic and commercial values of game

animals and fisheries have been indirectly captured through the analysis of recreation-dependent and fisheries-dependent personal income and employment. We recognize that these analyses do not capture all of the values associated with key wildlife groups or species.

Comment: Wildlife tree retention causes increased operational costs and safety risks, which have not been adequately analyzed.

Response: In the PRMP, a series of stand structural classes have been designed to meet a variety of resource management objectives and to produce stands with desired characteristics over time. An integral part of the structural class is retention of snags and green trees. Worker safety would not be compromised to achieve resource management objectives. Retention of snags and green trees for wildlife or other objectives does increase operational costs as compared to the complete harvest of stands. However, average costs for snag and green tree retention under the PRMP would not be expected to be much different than costs required to complete shelterwoods and perform overstory removals and partial cut harvests while retaining wildlife trees under the plan for the 1980s.

Comment: Identify the cultural and subsistence needs of Indian tribes or nations and how well the preferred alternative meets these needs.

Response: The identification of the "cultural and subsistence needs of Indian tribes or nations" at any point in time is a difficult undertaking. Each tribe or nation may define these needs quite differently. In addition, these needs change over time as does the situation in which Indian tribes or nations find themselves.

We intend to take the needs of Indian tribes or nations into consideration. However, the identification of these needs is of necessity a shared responsibility. Accordingly, we—and the tribes—must jointly develop a process whereby information concerning the interests and needs of each tribe or nation is shared. The existing Memorandum of Understanding with the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, Inc., and the Memorandums of Understanding presently in development with the Coquille Indian Tribe and the Siletz Tribe constitute an important step in this information sharing process.

Comment: If helicopter use is an option for accessing and harvesting timber sales, include a discussion of noise impacts.

Response: Such discussion has been added in Chapter 4, Rural Interface Areas.

Comment: For existing or proposed livestock grazing permits, analyze effects on water quality, condition, and management strategies for riparian zones and watersheds, impacts on biological diversity, special status species in grazing allotments, cumulative effects of grazing and other management activities, and proposed livestock improvements.

Response: This will be done on a case-by-case basis.

Comment: Effects of insects and diseases—other than on timber production—are hardly mentioned.

Response: Discussions of forest health have been added to both Chapters 3 and 4, Biological Diversity and Ecological Health.

Air Resources

Comment: Ten years is not an appropriate time frame for assessing effects to air quality. At a minimum, short-term air quality impacts should be analyzed under the shortest practicable period of time related to the implementation of specific activities.

Response: The short-term air quality impacts identified are actually average annual impacts throughout the 10-year forecast period.

Comment: Statements that air quality management will be in compliance with applicable laws and regulations do not inform the decision maker or the public of how the district will be in compliance and the projected impacts of prescribed fire emissions.

Response: Chapter 2 has been revised.

Comment: Various terms—such as nonattainment and designated areas—are used in the text without definition. These terms must be understandable by the public and must be used consistently between districts.

Response: These terms are included in the glossary.

Comment: Smoke sensitive areas on the maps need to be labeled, and each district plan should identify which areas are most likely to be affected by that district's prescribed fire activities. This discussion should also explain why each area has been designated.

Response: The air quality discussions have been revised.

Comment: The final RMP should discuss all the applicable regulatory and/or permit requirements, including National Ambient Air Quality Standards, Prevention of Significant Deterioration, and visibility impairment in Class I areas. The Oregon Smoke Management Plan also needs to be fully described, as well as its relationship to the State Implementation Plan.

Response: Chapter 3 has been revised.

Comment: The Draft RMPs include reference to the BLM's smoke surveillance for intrusions. What is this, what does it measure, and how are intrusions reported? What are the district's contributions to reported intrusions? What further monitoring standards and methods will the BLM use to measure compliance with the Clean Air Act and State Implementation Plan standards?

Response: The air quality discussions have been revised.

Comment: The Draft RMP assumes uniform burning conditions across the district. These differences need to be fully disclosed in the Final RMP.

Response: The air quality discussions have been revised. Additional consideration of these differences are more appropriately addressed at the watershed or province planning levels, as identified in the SEIS. Fire management plans completed at those levels will include methods most appropriate for their specific geographic areas.

Comment: A more complete comparison is needed between regulated pollutants and expected emissions, especially PM10.

Response: The air quality section of Chapter 3 has been revised.

Comment: The types of use of prescribed fire in the RMP need to be identified and fully discussed. Particularly, the dispersion conditions of low-intensity fire need to be discussed along with potential impacts to air quality.

Response: The air quality discussions have been revised.

Comment: The Final RMP should include more thorough analysis of emission reduction techniques and alternatives to the use of prescribed fire.

Response: The air quality discussions have been revised.

Comment: The Final RMP needs to disclose potential impacts to persons in the Rural Interface Areas.

Response: The air quality section (Chapter 4) has been revised.

Comment: The analysis needs to include consideration of more complete utilization of slash materials as an alternative to broadcast burning.

Response The air quality discussions have been revised.

Comment: The Final RMP needs a discussion on the decision process of using prescribed fire.

Response: Chapter 2 has been revised. Additional rationale can be found in the SEIS.

Comment: The impact of the district's firewood program on the air quality of neighboring communities needs to be considered.

Response: The air quality section of Chapter 4 has been revised. The amount of available firewood is expected to decline sharply due to decreased timber harvest levels and increased retention of coarse woody materials for ecosystem management objectives, including wildfire requirements.

Soils/Site Productivity

Comment: Address ways to reduce soil compaction.

Response: Soil compaction is an unavoidable adverse impact when heavy equipment is permitted on the land. However, the PRMP has adopted a series of Best Management Practices (BMPs) (Appendix H) that are designed to prevent or mitigate the effects of compaction. Additional mitigating measures are employed on a site-by-site basis to reduce compaction and the subsequent productivity losses, soil erosion, siltation, and increased peak flows. Productivity losses due to soil compaction will be limited to one percent or less where ground-based equipment is employed. Under any alternative, less than ten acres per year are proposed for tractor yarding.

Comment: We question the necessity of tilling all skid trails from previous logging in addition to current and future harvesting activities. What research literature supports this management technique?

Response: Management Direction in Chapter 2 has been revised to reflect only selected skid trails would be tilled.

Research by Andrus and Froehlic, and S. Davis has shown that tilling of compacted soils can recover lost productivity.

Comment: The BLM should reduce or eliminate broadcast burning because burning reduces site productivity, increases erosion, kills small trees, reduces mycorrhizae, and damages adjacent timber lands.

Response: Broadcast burning is used for several purposes, including: to provide planting sites for seedlings, to control competing vegetation, and to reduce the risk of wildfire. Logging slash—when left untreated—can burn very intensely under wildfire conditions. Best Management Practices (BMPs) have been used since the 1980s to reduce the impacts on site productivity due to broadcast burning. Refer to the appendices for current BMPs on broadcast burning. Alternatives to broadcast burning such as hand piling and burning, lopping and scattering of limbs, and cutting of planting holes in slash are also used where feasible. Broadcast burning is one of several tools used for site preparation and will continue in the future. However, broadcast burning levels will decrease due to changes in harvest practices and other resource management objectives and constraints.

Comment: Protective standards for potential landslide areas have not been described. Provide information regarding slope stability which is needed for—among other things— the location of waste disposal sites.

Response: BLM's intensive Timber Production Capability Classification (TPCC) inventory classifies areas based on soil and site susceptibility to degradation from timber management activities. Fragile soil areas were identified at two degrees of susceptibility to management activities. One was the identification of areas where management activities would result in detrimental impacts to soil/ site productivity and/or potential off-site impacts. An example of this is the TPCC category, FGNW, which identified the areas with high potential for landsliding. These sites were designated as "nonsuitable woodlands" and will be managed to protect and enhance their non-timber values. The second grouping of fragile sites is the "fragile suitable commercial forest land." These areas have been identified to be fully capable of timber management without site deterioration or off-site impacts when Best Management Practices (See Appendix H) are used to protect and mitigate impacts from management activities. In addition, during site-specific planning, onsite investigations are conducted on these lands to avoid areas subject to landslides or provide adequate protection to limit their number and size.

Comment: Clearcutting causes soil destruction and productivity losses.

Response: Most sites that are prone to landsliding or surface erosion have been identified by the Timber Production Capability Classification (TPCC) inventory. Others will be identified during site-specific planning. Some of these sites—for example "fragile nonsuitable woodland"—are not planned for harvest. The remainder of these sites have been identified as fragile and require special restrictions or mitigation measures to avoid unacceptable soil impacts and productivity loss. Using management direction for the PRMP and Best Management Practices (BMPs) will minimize soil destruction and productivity losses. In addition, under PRMP management regimes, areas scheduled for harvest will have an average of at least 6-10 green trees per acre retained after harvesting activities have been completed.

Retention of snags and green trees on the completion of harvest operations will provide future large woody debris to assist in maintaining soil productivity.

Comment: FORCYTE-II and other ecological models should be applied to a broad range of potential management prescriptions to reduce risk of long-term site degradation. These models and those of physical properties—such as erosion—should be employed in a realistic test of timberland suitability.

Response: Using FORCYTE 11, a full range of prescriptions was analyzed on seven different site conditions. The impacts of these prescriptions were carried through as if the same prescription was used for 600-900 years. The trend of both mean annual production and site quality were then reviewed to help resource managers determine the preferred prescription to use. Timberland suitability has been determined through the Timber Production Capability Classification (TPCC) inventory which will be updated over time to keep up with research data and improve mapping.

Comment: Remove from the suitable timber base all lands identified as fragile due to slope steepness, soil instability, and potential for soil erosion. Allow no new logging or road building on fragile lands. Reduce sedimentation from existing roads and clearcuts through revegetation and stabilization of unstable slopes.

Response: An intensive inventory (TPCC) has been completed for all BLM-administered lands to classify the lands based on soil and site susceptibility to erosion, landsliding, or nutrient depletion from timber management activities. Two categories of fragile soils were identified.

1) Fragile Nonsuitable Woodlands are those sites which are not considered to be commercial forest lands. These sites are typically found on extremely steep slopes with shallow, rocky soils. Conducting operations on these sites would result in the loss of soil productivity. They will be managed to protect or enhance their nontimber values.

2) Fragile Suitable, Restricted are those sites which are less fragile and are deemed capable of being managed for timber production without site deterioration or off-site impacts when best management practices (BMPs) are employed. Onsite investigations are conducted to determine appropriate BMPs and mitigating measures such as utilizing aerial or skyline yarding systems, maintaining vegetation on the site, reducing the intensity of prescribed burns, endhauling excavated material when constructing roads or landings, or installing drainage structures. Unstable areas are avoided and/or excluded from timber harvest.

Comment: The draft plan acreage in TPCC areas is excessive. These lands could be managed using new harvesting techniques and placed in the commercial land base rather than set-asides.

Response: See response above.

Water Resources

Comment: The RMP should establish a desired future condition for each stream or subwatershed which adequately protects the beneficial uses.

Response: Objectives for management of RMAs have been added in Chapter 2. Identification of beneficial uses is a component of the watershed analysis process that will be implemented under the PRMP. Watershed analysis may help identify strategies to help protect the beneficial uses.

Comment: Establish riparian management areas (RMAs) of sufficient width to achieve restoration on streams in poor condition. Place a high priority on restoration in these watersheds and include the State and other interest groups in restoration plans.

Response: Riparian Reserves widths of Alternative 9 of the SEIS have been applied to BLM-administered lands by the SEIS ROD and have been incorporated into the PRMP. The Riparian Reserve widths may be modified after watershed analysis which will consider factors that include stream condition. Review and guidance for possible modifications of Riparian Reserves would be coordinated through the Regional Ecosystem Office. Restoration will be based on watershed analysis and planning. Watershed analysis will also be used to identify and prioritize potential cooperative projects involving various landowners. Additional information on restoration can be found in SEIS Appendix A: FEMAT (Appendix V-J) and in SEIS Appendix B6 (Aquatic Conservation Strategy).

Comment: The Scientific Panel has determined that "no-cut" buffers of at least 50 feet are needed to protect intermittent streams with unstable soils.

Response: The PRMP incorporates such buffers in Riparian Reserves to include unstable and potentially unstable areas if they are not protected by TPCC exclusion.

Comment: The relegation of first and second order streams to a lower level of protection than higher stream orders is inconsistent with the Oregon Water Quality Standards and with EPA's Regional Riparian Management Policy.

Response: The PRMP reflects the characteristic that larger stream orders generally have wider riparian zones and provide greater aquatic and terrestrial wildlife habitat than smaller stream orders.

Comment: Intermittent streams should be managed according to specific standards. Intermittent and ephemeral streams are treated no differently than any other forest acre in the plans, yet they are major sources of landslides and debris flows and serve as critical habitats for amphibians.

Response: Management direction for intermittent and ephemeral streams has been derived from the SEIS and incorporated into the PRMP. In addition, a vast majority of the unstable lands that contain these streams of concern have been excluded from timber management as nonsuitable woodlands in the Timber Production Capability Classification (TPCC).

Comment: We suggest additional information be utilized in developing a Holistic Natural Watershed Management Plan (HNWMP). This would include riparian corridor widths and other provisions prescribed in the watershed/fish emphasis option described by the Scientific Panel on Late-Successional Forest Ecosystems of the Pacific Northwest.

Response: The PRMP has been developed to be consistent with the President's Forest Plan. It encompasses many of the provisions of the Northern Spotted Owl Recovery Plan and the Report of the Scientific Panel.

Comment: BLM should set watershed impact standards to help guide forest management activities. Standards should address maximum soil compaction, erosion rates, equivalent clearcut area, and relative percentages of seral stages.

Response: This level of detail is normally included in watershed analysis and activity level plans. Watershed characteristics, conditions, and sensitivities vary widely. Accordingly, when impact standards are used, they must be drainage specific and address the important processes and risks involved.

Comment: BMPs listed in the plan contain few measurable standards. BMP language should include conditions for which BMPs are applicable.

Response: BMPs will be prescribed and implemented based upon site-specific conditions and requirements. BMPs will be monitored, evaluated, and modified as necessary through an iterative process to meet water quality criteria and other resource management objectives.

Comment: The 1988 Oregon Statewide Assessment of Nonpoint Sources of Water Pollution (NPS Assessment Report) should be used in conjunction with Oregon's 1992 Water Quality Status Assessment (305[b]) Report, and other data, to establish:

- Desired future condition on a stream-by-stream basis.
- Criteria and priorities for cumulative effects analysis.
- Priorities for water quality monitoring programs.
- Criteria and priorities for watershed level activity plans.
- Priorities for watershed rehabilitation programs.
- BMPs and watershed harvest deferrals.

Response: These items will be established during plan implementation.

Comment: The EIS should not rely solely on the application of BMPs to satisfy the Clean Water Act. Discuss the effectiveness of BMPS.

Response: BMPs are recognized as the primary mechanism to enable the achievement of water quality standards. The iterative process that will be followed includes:

1. Design of BMPs based on site-specific conditions, technical, economic, and institutional feasibility and the water quality standards of those waters potentially impacted.

2. Monitoring to ensure that practices are correctly designed and applied.

3. Monitoring to determine: the effectiveness of practices in meeting water quality standards, and the appropriateness of water quality criteria in reasonably assuring protection of beneficial uses.

4. Adjustment of BMPs when it is found that water quality standards are not being protected to a desired level and/or possible adjustment of water quality standards based on considerations in 40 CFR 131.

Comment: The final RMP/EIS should discuss the effectiveness of BMPs with illustrations of specific project examples and/or monitoring results.

Response: BMPs as listed in Appendix H are not intended to replace site-specific planning and individual project BMP design. BMPs are selected for a site activity based on BMP success elsewhere for a similar set of forestry or other practices, and if unsure selection is made by professional judgement of resource specialists. An integral part of the BMP design and feedback process is implementation monitoring (including water monitoring) for BMPs—especially where

effectiveness has not been proven. To maintain water quality goals, adjustments will be made for future projects where a BMP or set of BMPs has been found to be ineffective.

Comment: Include a BMP outlining specific parameters applicable to project-specific cumulative watershed effects analysis.

Response: A cumulative watershed effects BMP has been incorporated into the PRMP and considers applicable beneficial uses, NPS Assessment and 305(b) reported conditions, and monitoring and inventory data. New methods of analysis will be incorporated as they are developed and validated.

Comment: Include a BMP with a commitment to activity deferrals when the cumulative effects analysis identifies probable beneficial use impairment. Include a BMP outlining a more conservative site-specific project planning approach when cumulative watershed effects analysis tools are not available, are under development, or have not been validated.

Response: A BMP has been incorporated into the PRMP to address activity deferral or mitigation of cumulative watershed effects where impacts to beneficial uses are probable.

Comment: BLM should not allow discretionary mining, grazing, and other discretionary activities that would increase temperatures over the long term in streams not meeting state standards for temperature.

Response: Authorized management actions will be designed or regulated to comply with applicable water quality criteria for the protection of identified beneficial uses and the SEIS Aquatic Conservation Strategy.

Comment: Mining activities in or adjacent to streams should be managed in a way not to adversely impact riparian area vegetation and water quality.

Response: Various state and federal permits are normally required, with conditions applied to limit disturbance and impact to water and riparian resources. In addition, BLM can require conditions to offset facilities or infrastructure development in stream or floodplain areas.

Also see response above.

Comment: Acknowledge the limits on the availability of surface water and address surface water quality problems.

Response: Current Departmental policy requires that BLM follow state requirements for the acquisition of all necessary water rights. Where surface water is limited in availability, we will pursue acquisition of water rights based upon the most current Departmental policy. Surface water quality problems as identified in the Oregon Nonpoint Assessment Report and the 1992 Water Quality Assessment (305 [b]) Report and/or district inventories are described in Chapter 3 of the RMP/ EIS.

Comment: Describe watershed improvement and stream restoration activities that increase low season flow.

Response: Low season flow will be enhanced by improvement of flood plain and upland hydrologic functions through the implementation of riparian enhancement projects that enhance the

potential for bank storage and slow release through establishment of proper functioning riparian systems and by mitigating existing compaction through obliteration of roads or other compacted land surfaces to restore slope hydrologic functions.

Comment: More emphasis should be placed on first restoring the watersheds to permanent stability and then maintaining them through management and harvest of all resources at a level that will not degrade the long-term productivity of the system.

Response: Stabilizing watersheds utilizing restoration techniques is a primary component of the Aquatic Conservation Strategy, as described in Chapter 2 of the PRMP and the SEIS.

Comment: Set watershed impact standards, including maximum soil compaction, erosion rates, equivalent clearcut acres and relative percentage of seral stages.

Response: Maximum soil compaction is addressed in Chapter 2. Common watershed prescriptions are inappropriate. Prescriptions for individual watersheds will be based on watershed analysis, application of BMPs, and assessment of cumulative watershed effects, considering watershed specific soils, geology, inherent channel stability, beneficial uses to be protected, and other relevant site-specific characteristics.

Comment: Watersheds should be classified and prioritized according to current functional or ecological conditions and importance for maintaining viable wildlife populations.

Response: Although BLM's forest inventory data provides some information on overall ecological or functional condition, this information cannot be disaggregated by watershed and remain statistically valid. Data on intermingled private lands is even less useful. We are currently implementing a riparian inventory to assess functional condition of stream reaches and riparian zones.

Comment: Watershed-specific standards should be developed in cooperation with adjacent lands.

Response: Cooperation with other parties may often be an appropriate way to implement RMP decisions most effectively, and their involvement will be encouraged. It is not appropriate, however, to make RMP implementation dependent on the cooperation of other landowners.

Comment: BLM should initiate collaborative planning for watershed management, bringing together all property owners and management authorities in said watershed.

Response: BLM will perform comprehensive watershed planning in watersheds primarily administered by the agency. Due to the scattered ownership pattern, however, many district lands are only a small percentage of a watershed. In these instances, watershed management programs such as the Strategic Water Management Group (SWMG) coordinated by 12 Oregon State Natural Resource Departments, may better serve multiple property owners. SWMG goals include formation of local watershed councils, watershed assessment, and watershed action plans for priority watersheds.

Comment: Watershed concerns suggest that road culvert design standards should be based on a 50-year peakflow, not 25-years.

Response: Road culvert standards have been revised to require that culverts be designed to accommodate at least the 100-year flood. This conforms the PRMP to the standards and guidelines attached to the SEIS ROD.

Comment: The goal for watershed management in watersheds providing surface water to public systems serving municipalities should be restated as being to assure the needs of the users are addressed and to protect comprehensive water quality.

Response: Watersheds providing surface water for domestic uses will be managed to meet or exceed applicable water quality requirements established through Oregon Department of Environmental Quality.

Comment: Display severely impaired streams identified by DEQ's 1988 Oregon Statewide Assessment of Nonpoint Sources of Water Pollution within analytical watersheds.

Response: Those streams with an A1 impairment rating were listed in Appendix III-D, Table III-D-1, in the draft RMP.

Comment: DEQ's 1988 non-point source report identified many stream segments in the district that have serious non-point source pollution problems caused by forest practices. The DEIS should have updated that report with more recent information. What is BLM doing about the problems?

Response: The 319 Assessment Report of 1988 was a collaborative effort undertaken by many agencies and groups within the state. BLM district personnel played an integral role in providing the information contained in the report. In cooperation with Oregon DEQ, we are currently in the process of systematically updating the Assessment Report. As a Designated Management Agency under the Clean Water Act, we have worked—and will continue to work—closely with Oregon DEQ in improving and updating the assessment of stream segments on BLM-administered lands. Opportunities to mitigate existing NPS pollution sources will be an integral component of plan implementation.

Comment: Contact Oregon DEQ for their results of recent monitoring programs on streams.

Response: As a Designated Management Agency, we work closely with Oregon DEQ on all aspects of the Nonpoint Source Pollution Management Plan—including the sharing of data relevant to BLM-administered lands.

Comment: All recommendations made by Coos Bay District staff with the slightest use of this report (1988 Oregon Statewide Assessment of Non-point sources of Water pollution) should be reviewed for accuracy.

Response: The DEQ 1988 Nonpoint Source Assessment report was used along with other available information to describe existing water quality conditions in the planning area. It is not used to describe existing stream channel and riparian conditions. BLM District personnel were involved in providing information contained in the report. Appendix III-D in the draft RMP lists streams identified by DEQ as having serious nonpoint source pollution problems. Pollution types are divided into two categories (data and observation) with a footnote explaining the source of information. The assessment maps in DEQ's report also note that they should only be used for planning purposes, which is how they were used in BLM's draft RMP/EIS planning process. It is appropriate for BLM to use all available information to describe the existing condition. Since water quality may be a reflection of upland conditions, it is not necessary to limit water quality information to site-specific assessments on BLM-administered lands.

Comment: All conclusions and recommended management actions derived by the BLM from the DEQ report are invalid since they are not based on a scientifically objective assessment of stream conditions.

Response: See response above.

Comment: There is a need for on-the-ground mapping of streams and stream orders—with clear identification of addressed intermittent and perennial streams. The maps should also present 100-year flood plains and potentially hyporheic zones.

Response: Such mapping would be a massive undertaking and would need to cover not only BLM-administered lands, but also some of the intermingled lands in other ownerships. We currently have plans for revising and upgrading the current hydrography data themes for our GIS system to be completed concurrent with implementation of the plan. Currently, we do not have plans for mapping of perennial and intermittent streams, 100-year flood plains, or potential hyporheic zones.

Comment: Ten years is not an appropriate time frame for assessing effects to water quality. At a minimum, short-term time frames should be analyzed under the shortest practicable period of time related to the implementation of specific activities.

Response: The RMP does not fix dates for the implementation of specific activities that might affect water quality. Most site-specific activities contemplated will occur two or more decades in the future, not during the life of the plan. Most that will occur during the life of the plan are not site-specifically established but their approximate location is projected through the 10-year timber management scenario. Shorter time frames can only be assessed as annual or sequential multi-year plans for site-specific treatments are developed.

Comment: Roads cause most of the sedimentation in our rivers through surface erosion and landslides.

Response: The BLM will continue nonpoint source pollution management in accordance with the guidelines established by the Environmental Protection Agency (EPA) and the Oregon Department of Environmental Quality (ODEQ). Appendix H contains a section on Best Management Practices (BMPs) that will be used to help ensure compliance with these guidelines. Some of these practices include revegetating exposed soils, restricting access to natural surface roads, and paving or rocking permanent roads. Temporary roads will be put to bed or erosion control practices will be used to keep erosion to an insignificant level. In addition, management activities and new road construction will be designed, located, and constructed to avoid mass soil movement. As stated in the SEIS ROD (Aquatic Conservation Strategy), watershed restoration will include control and prevention of road-related runoff and sediment production. The Timber Production Capability Classification (TPCC) inventory has located areas with surface erosion and landslide limitations. This inventory data will be supplemented by an onsite investigation for each proposed management activity. In Key Watersheds identified in the SEIS ROD, there will be no net increase in roads.

Comment: The plans for road building violate the Clean Water Act because new roads will contribute sediment to already impacted streams.

Response: BMPs will be implemented to minimize potential impacts from both new and existing roads. In addition, opportunities will be identified through project planning to mitigate existing nonpoint sources of sediment.

Comment: We have objections to any timber harvest and road construction in the Middle Fork Coquille River until channel stability improvement has been documented through monitoring and cumulative effects can be evaluated.

Response: Watershed analysis and activity plans will include analysis of cumulative effects in 3-5th order drainages within the Middle Fork Coquille River, as well as other AWSs. Harvest scheduling or deferral of activities may be required where a cumulative effect has a high risk of occurring. BMPs and monitoring will be incorporated into all activity plans to carefully manage—while maintaining or improving—the Middle Fork Coquille to the extent it is influenced by BLM activities.

Comment: Why can't a couple of ravines somewhere close to the Bay area be developed to provide lakes for water to support businesses, industrial needs, and job expansion.

Response: Water supply for present and future needs has recently been studied by a consultant for Coos County (*Coos County Water Supply Plan*, CH2M HILL 1993).

Comment: It is not clear how the Watershed Condition Index (WCI) was generated; how it was used in planning; how it was used in standards, guidelines and monitoring; nor how it will be validated.

Response: The WCI has been dropped as an analytical tool for the following reasons. First, the information upon which the draft RMP/EIS WCI analysis was calculated is outdated due to significant logging activities on private and industrial lands. Second, it will be difficult to update and forecast land-disturbing activities on private lands due to soft projections of potential sale quantities in the 10-year timber management scenario for the PRMP. Finally, it was felt that the requirements for watershed analysis in the SEIS ROD would ultimately provide a more revealing assessment of the current watershed condition and provide the foundation for appropriate resource management decisions.

Comment: Explore the possibility that mining activities on BLM-administered lands cause significant increases in the concentrations of metals in streams that supply public water systems.

Response: To protect beneficial uses such as public water supplies, mining activities on BLM-administered lands must comply with surface management regulations, state water quality criteria, and Best Management Practices.

Comment: People would be at risk from BLM allowing pesticides, inerts, and fertilizers into drinking water supplies.

Response: The buffering of streams when such products are used is part of the commitment to provide treatable water at the point of intake. Impacts of the use of herbicides and inert carriers have been fully addressed in BLM's *Western Oregon-Management of Competing Vegetation EIS* and the *Northwest Area Noxious Weed Control EIS.*

Comment: Expand the discussion concerning the availability of groundwater and groundwater quality.

Response: Available information—mostly from other agencies—has been incorporated into the RMP/EIS. The extent of ground water supply effects is a site-specific issue that will be evaluated at the watershed or project level. Management prescriptions will be developed in all instances where groundwater quality might be potentially impacted.

Comment: The need for acquiring private landowners water rights and establishing instream rights should be emphasized.

Response: Both of these proposals are beyond the scope of the RMP/EIS as they are beyond BLM's authority.

Comment: Has a complete inventory been conducted to assess the district's wetland resources? How are significant impacts assessed? How will wetland inventories be conducted prior to timber harvests and other activities?

Response: We do not have inventories of all wetlands. Wetland inventories will be part of site-specific interdisciplinary inventories conducted prior to activities. Activity plans and project plans will identify appropriate protection for these lands consistent with our goal for the protection of water quality and existing federal direction for their classification and preservation. See riparian objectives in Chapter 2. Environmental analysis of these plans will lead to a determination if impacts are expected to be significant.

Comment: Specifically name wetlands as features for which riparian management areas will be established and specifically identify wetlands that will be restored or enhanced.

Response: The PRMP/FEIS acknowledges wetlands and provides management direction for their protection. Opportunities to restore or enhance wetlands will be identified during implementation of the plan. Identification in the PRMP of specific wetlands to be restored or enhanced is beyond our current capability due to an incomplete inventory of these resources.

Comment: Acknowledge the need to coordinate and cooperate with public and private landowners to inventory wetlands, set criteria for significance for protection and restoration, and coordinate priorities to protect and restore public wetlands.

Response: Coordination and cooperation with other landowners may be an appropriate way to implement RMP decisions most effectively, and their involvement will be encouraged. It is not appropriate, however, to make RMP implementation dependent on the cooperation of other landowners.

Comment: Acknowledge that the preservation of wetlands on BLM-administered lands makes a major contribution to the attainment of the Oregon Benchmark goals on wetlands (i.e., 100 percent of 1990 Oregon wetlands still preserved in the year 2000).

Response: BLM's goal for wetland management is consistent with Oregon's Benchmark goals. Any activity affecting wetlands and that cannot reasonably be avoided will be mitigated by creating wetlands of equal value.

Comment: Provide a more thorough discussion of the potential effects on water yields and streamflow.

Response: The Chapter 4 discussion on this topic reflects the circumstance that potential effects on water yield and streamflow are highly dependent upon physio-climatic watershed conditions and the nature of management action. Reduction of evapotranspiration immediately following regeneration timber harvest will generally make more water available for streamflow, though the duration and timing of increased yield will be highly variable. Analysis of water yield and timing will be a component of watershed analysis.

Biological Diversity

Comment: BLM districts need to express in greater detail what the expected future conditions will be from implementing the Preferred Alternatives.

Response: A vision statement, as well as a strategy description for the management of BLM-administered lands, are included in Chapter 2 of the PRMP. Additionally, objectives and management actions/direction for each of the land use allocations and resource programs for the PRMP have been added. Also, see the Ecological Principles for the management of Late-Successional Forests (Appendix F) derived from the SEIS ROD.

Comment RMPs should include specific, measurable prescriptions or standards that—when implemented—would work toward meeting the expected future condition.

Response: See above.

Comment: Emphasis remains on single species recovery programs rather than on habitat protection and other measures that focus on maintaining biodiversity.

Response: The emphasis of the PRMP is dual, focusing on both. Emphasis on existing recovery programs must continue until a decision is made on the recovery status of species such as the peregrine falcon, Columbian white-tailed deer, and bald eagle. The USFWS currently focuses on single species recovery and until an official shift to habitat recovery is made, BLM land management must satisfy single species management requirements.

Comment: Old Growth Emphasis Areas do not protect old-growth ecosystems from logging roads, soil compaction, and other threats to biodiversity.

Response: The PRMP substitutes Late-Successional Reserves. Thinning or silvicultural treatments within them must be beneficial to the creation of late-successional forest conditions.

Comment: Identify and examine expected future condition for biodiversity. Relate to the compositional, structural, and functional attributes of ecosystems and include a regional perspective.

Response: Data to do this is not available.

Comment: The plan does not state what the natural pattern of age classes might have been for the Coos Bay District.

Response: This information is not readily available for the district.

Comment: Provide information on the current condition of ecosystems and their compositional, structural, and functional attributes.

Response: Information gleaned from existing inventories was used to develop the information displayed in the Biological Diversity section of Chapter 3 of the draft RMP. In the PRMP/FEIS, we used data from a Forest Service synthesis of available information about the pre-settlement characteristics of Pacific Northwest forests to compare current forest condition and function with the range of pre-settlement conditions. Ecosystem functions are statements about the ways in which

ecosystem processes operate. These can sometimes be the subject of inventories; for instance, inventories describing the nesting success of spotted owls provide an indicator of one aspect of ecosystem function. Where possible, such statements of ecological function are shown in Chapter 3, Biological Diversity and Ecological Health, or other sections describing specific resources.

More generally, ecosystem processes are implied from the presence of species, structures, and disturbance intervals known to be required for functions to occur. For instance, the retention of nitrogen-fixing plants in young stands, the nitrogen fixation associated with lichens in large old trees, and microbial fixation of nitrogen in down wood result in processes that maintain site productivity. If forest conditions are maintained within the range of natural variation that occurred before settlement began, and if species mixtures and structural complexity are retained, it is thought that ecological functions will be maintained.

Comment: Express the amount of large woody debris (LWD) to be retained by size class, i.e., logs at least 20 feet long and 25 inches in diameter at the large end.

Response: We have adopted the SEIS ROD standards. Pending development of models specific to plant associations and stand types, the interim guidelines consider only logs 16 feet or longer and at least 16 inches in diameter as relevant in this district.

Comment: Permit the retention of LWD from the merchantable component if the unmerchantable component is absent.

Response: Both merchantable and nonmerchantable down wood will be candidates for retention in meeting structural targets within the analytic landscape. However, nonmerchantable wood will be utilized first in satisfying targets.

Comment: Within 100 years of management under the draft plans, almost all large woody material will disappear in General Forest Management Areas.

Response: Because of root diseases, storm events, and other disturbances, there are differences in the decay rate for down wood in different environments and the contribution of down wood is usually periodic. This results in variation in the amount and size of down wood that will exist in the forest for different structural (age) classes. For the PRMP, structural targets have been set as described in Chapter 2. The shorter harvest rotations set for the General Forest Management Areas would likely reduce the large woody debris component. However, retention of some green trees, snags, and available large woody debris in harvest areas will prevent disappearance of all large woody material in the GFMA.

Comment: Include retention of target levels of dead-and-downed wood in timber sale contract stipulations.

Response: Retention levels set forth in the plan objectives will be translated into contract stipulations.

Comment: It is not possible to determine the proportion of mature stands that will be logged in the first decade.

Response: As modeled in the TRIM-PLUS model, approximately six percent of mature stands are expected to have regeneration harvest in the first decade. The effect of these harvests on seral diversity is shown in Table 4-9.

Comment: The substitution of geographically diverse plantation stock for narrow, locally-adapted families may increase diversity at the site level, but homogenizes the landscape and thus reduces overall diversity. Address the influence of BLM's tree improvement program at the species, ecosystem, and landscape levels.

Response: We expect to re-examine our tree improvement program and the extent to which we use genetically-improved stock to assure that the genetic diversity of the forest is maintained at both the stand level and at the regional level. The tree improvement program appears to increase our ability to fit naturally-evolved and adapted genotypes to forest sites, to maintain the genetic quality of forest stands, and to be useful in increasing resistance of stands to global climate change.

Management of the forest with or without tree improvement has the potential to change genetic diversity. Tree improvement assures genetic conservation of desired genotypes for use in meeting resource management objectives.

Comment: The BLM correctly asserts that biological diversity must be defined according to the model provided by nature. Yet, the draft plans present no evidence of an attempt to represent that model across the landscape and thus cannot achieve the objective of maintaining biological diversity.

Response: The SEIS ROD's Ecological Principles for Management of Late-Successional Forests, as displayed in Appendix F, address this.

Old Growth Forest

Comment: The DEIS violates NEPA by failing to adequately describe the complexity of old-growth forests.

Response: Books have been written describing that complexity, which the EIS recognizes. It is not appropriate for an EIS to repeat at length general information previously published.

Comment: Preservation of old-growth forests is impossible as trees have finite life spans.

Response: Although individual tree death is a natural part of old-growth ecosystems, Morrison and Swanson (1990) and Agee (1991) showed that old-growth Douglas-fir ecosystems persisted on sites over many centuries. These ecosystems are renewed and regenerated by under-canopy and patchwork fire, and gap mortality. Our EIS examines the ability of the different alternatives to provide old-growth habitat within the general BLM-managed landscape. The loss of some older stands from wildfire and other causes and the death of trees is assumed and is included in seral diversity analyses. It is also assumed that prescribed fire and other practices would sometimes be used to control seral changes within older stands and that such use might cause the older stands to deteriorate from desired old-growth conditions (for instance, shifting away from conifer dominance and toward tanoak dominance).

Comment: The old-growth inventory should be corrected or augmented to identify old-growth stands meeting the PNW-447 and GTR-285 definitions.

Response: We do not have a specific old-growth (late successional stage) inventory. We have an operational inventory of timber stands within which late successional forests are located and their timber inventory attributes identified. These attributes include overstory and understory timber size, volume, and age classes. An inventory of these forests to determine the character

of old growth is under consideration while the broad range of features needed to be inventoried are determined.

Late successional age classes are fairly evenly distributed over the general landscape. Approximately two-thirds of these stands currently occur in proposed reserves or special management areas. About one-third occur in the matrix. Additional inventory of these lands is expected and a determination of their late-successional values will occur in the plan implementation process.

Comment: The BLM's assumption that old-growth forest conditions can be re-created through timber management is a fundamental flaw that seriously undermines the validity of the draft plans.

Response: We acknowledge that the development of old-growth conditions through timber management is untested. The SEIS recognizes that thinning in unnatural, managed stands can accelerate the development of certain late-successional forest characteristics. The Final Draft Spotted Owl Recovery Plan (USDI unpub.) states that the risks of inaction outweigh the risks associated with these restoration actions. Under the PRMP, plans for limited thinnings must be beneficial to the development and maintenance of the late-successional forest ecosystem and are subject to review by the Regional Ecosystem Office. Standards and guidelines in the SEIS and management actions/direction in the PRMP reflect the habitat needs of species, as well as those necessary for the maintenance of a late-successional forest ecosystem.

Comment: The agency should abandon its scientifically unfounded assumption that old-growth forest conditions can be re-created through timber management.

Response: See response above.

Comment: We are opposed to experimentation in old-growth forests to test theories under the auspices of adaptive management.

Response: See response above.

Comment: Given the limited understanding of, and experience with, forest management for old-growth characteristics, there is a higher risk of failure of these techniques. Therefore, density management should not be applied to late-successional forest in deferred OGEAs.

Response: See response above.

Comment: While the draft plans acknowledge that this scheme is "attended by a lower level of confidence," the BLM presents no proposals to hedge against the increased risk.

Response: See response above.

Comment: Old growth could be heavily impacted by density management and lose its habitat value.

Response: Stands meeting minimum old-growth definitions are not proposed for density management. Density management is normally proposed only for stands under 80 years of age and must be expected to be beneficial to the creation of late-successional forest conditions. Density management of young mono-species/canopy plantations in Late Successional Reserves is to focus on increasing diversity within stands through development of multiple canopies with a mix of species.

Comment: The amount of rare, old forest that will be lost if the preferred alternative is adopted is understated. In the long run, only one-third of OGEAs will qualify as old-growth. No uncut, natural forest existing in OGEAs today will survive full implementation of the plans. Explain how clearcuts with minimal retention in OGEAs— even with a 300-year rotation—maintain and enhance old-growth characteristics.

Response: This approach is no longer part of the PRMP.

Comment: Instead of 200- to 300-year rotations, Old Growth Emphasis Areas should be withdrawn from the suitable timber base and protected from all logging.

Response: Old Growth Emphasis Areas are no longer part of the PRMP. In the PRMP, timber harvest within the Late-Successional Reserves will generally be in stands less than 80 years of age. LSRs are not included in the calculations of the PSQ.

Comment: Explain how the management objectives of silvicultural prescriptions for Old Growth Emphasis Areas meets the intent of maintaining old-growth dependent species.

Response: Old Growth Emphasis Areas are no longer part of the PRMP. See Chapter 2 PRMP for the management actions/directions for the proposed management of the Late-Successional Reserves.

Comment: Explain why old-growth characteristics can be developed in 120 years under the connectivity area prescriptions, but not until 150 years in the Old Growth Emphasis Areas.

Response: Although not a part of the PRMP, Old Growth Emphasis Areas would not have been managed as intensively as the connectivity areas, which would account for some differences. However, we can only estimate how stands can be manipulated to reach some old-growth characteristics at an earlier age. We will depend on research and monitoring, as well as knowledge gained from techniques used in the adaptive management areas to refine the process.

Management of Connectivity Areas would have resulted in the retention of a larger number of green trees (12-14 versus 6-8) within the Old Growth Emphasis Areas. As a result, the Connectivity Areas have a head start over the Old Growth Emphasis Areas in the development of stands with multi-storied canopies; this would tend to meet the old-growth characteristics more rapidly.

Comment: Explain the rationale for providing permanent openings in the Old Growth Emphasis Areas given their intent.

Response: Table 2-5 of the draft RMP indicated that areas less than 10 acres in size would be created within the Old Growth Emphasis Areas. These openings would primarily be roads and landings that would be utilized to mimic natural openings for the benefit of big game and other edge species that naturally occur in old-growth areas.

Comment: Small old-growth patches may provide necessary ecosystem functions, depending on the relative proximity of other old stands and the general structure of the landscape. Small patches may become quite valuable if they exist in the context of a natural stand that seals edges and provides connectivity. There is no evidence that BLM considered these factors in making land allocations.

Response: We agree that the matrix within which older forest patches exist is a significant component of wildlife habitat, as is the total landscape arrangement of habitat grains of various sizes, shapes, and seral stages. We did, however, consider this when designating our Connectivity/Diversity Blocks, many of which contain older stands. As specified in the SEIS ROD, project-level NEPA analysis will address effects on the remaining late-successional forests.

Comment: The plans are ambiguous as to the value the agency places on small, scattered patches of ancient forest.

Response: See response above.

Comment: Solutions to the shortfall of older-aged components in the Coast Range (Eugene, Salem, and Coos Bay) should be analyzed.

Response: The SEIS analyzed a range of alternatives to protect or enhance late-successional and old-growth ecosystems including the Coast Range.

Comment: Further evaluate the impacts on biological diversity in the Coast Range from harvesting old growth in the general forest allocation.

Response: In the Coos Bay District, the acreage of old growth on BLM-administered land in the Coast Range is expected to increase under the PRMP in the first decade. The discussion in Chapter 4 has been expanded.

Comment: Old-growth acreage should be reported by forest cover type.

Response: While reporting such information would be desirable, that information is currently unavailable. This information will become available as the forest plan is implemented and further old-growth inventories are initiated. Although the approximate associations can be estimated by province and sustained yield unit, data on the series, habitat type, or plant association do not currently exist. Dominant and understory forest tree information is available and is included in the final plan inventory of forest conditions (see Appendix S).

Comment: The GIS technology should be used to identify patches of ancient forest embedded in mature forests that could develop interior conditions in the near future and also should target other areas for restoration of interior forest habitat.

Response: Our Operations Inventory is not detailed enough to identify the features relevant to such projections. Also, our current GIS system lacks image processing capabilities to identify and classify these areas. The GIS technology was used, however, to help select lands for late-successional reserves expected to provide much of the long-term interior old-growth forest on BLM-administered lands. Watershed analysis will further consider potential future landscape arrangements.

Comment: Table 4-BD-3 on page 4-33 in the draft indicates only 30,000 acres of old growth on the Siuslaw National Forest over the long term. These estimates appear to be quite conservative.

Response: This data has been corrected.

Comment: By disregarding important shift in the character of the old-growth forest, the BLM has obscured the impact of its draft plans on old growth.

Response: The SEIS adequately discussed this issue.

Ecosystem Management

Comment: The checkerboard ownership pattern makes it unlikely to achieve the ecosystem management objectives.

Response: The PRMP approaches ecosystem management utilizing a variety of temporal and spatial landscape allocations. It is true that BLM manages land that is mostly in a checkerboard pattern. The ecosystem management vision cannot be achieved by BLM alone, but through cooperation with other public agencies over a broad landscape. Such cooperation is a strong component of the SEIS decision strategy.

Comment: It is inaccurate to make an assumption suggesting all private lands will be harvested equally at 50- to 60-year regeneration harvests.

Response: While private landowners may manage their lands in several different ways in the future—and while the regulatory structure governing management of these lands may change over time—the extent of such changes is uncertain. The fluctuating economic realities of the marketplace will probably continue to strongly influence private land management. By assuming that future management on private lands will continue to rely on shorter rotations and will employ objectives weighted toward timber production, BLM may be conservative. If private land management on parcels intermingled with BLM section changes significantly over time, future BLM plans would be adjusted for changed habitat conditions within the entire landscape.

Comment: The plans contain no evidence that a real landscape perspective was taken, nor do they address the important role of the federal government in providing values that are lacking on non-federal lands in the area. This is especially true in relation to ancient forests—a resource that is in short supply but still viable on many portions of BLM's holdings.

Response: The SEIS fully discussed the relationship between the management of federal lands and the importance/values derived from the nonfederal lands.

Comment: By not discussing the younger age classes found on BLM ownership, the Coos Bay District is selling its management short of measured diversity.

Response: Younger age classes are addressed in the Wildlife section in Chapter 4.

Comment: The BLM ignores the capability of private intermingled ownerships to provide a variety of elements important to biodiversity.

Response: We have addressed the private intermingled lands as generally providing the younger-aged stands in the forest landscape.

Comment: To maintain this system, the full range of forest ages must be maintained across the landscape.

Response: See response above.

Comment: BLM has failed to propose a program of true ecosystem management for its western Oregon forest lands.

Response: See response above.

Comment: Degraded habitats on adjacent land should be mitigated by increased protective measures on BLM-administered land.

Response: See response above.

Comment: The BLM should outline a strategy for land acquisition and consolidation to secure a landscape that is more amenable to ecosystem management.

Response: Development of such a strategy may be appropriate after the RMP is completed, but would be quite complex since it would depend on the participation of many landowners.

Comment: Identify how silvicultural practices will lead to the goals of ecosystem management.

Response: Silvicultural systems define the sequence of management practices that take place over the life of stands in a managed forest to meet land management objectives. See Appendix K for structural retention and development of late successional stage systems. Structure in an ecosystem or community is the relationship of physical size, height, and vertical stratification of vegetation. Managing younger stands with low levels of structural diversity toward more complex conditions is important in several land use allocations to meet non-timber objectives.

Comment: Specify methods for coordinating biodiversity and ecosystem management goals with other landowners, specifically the Forest Service and the State.

Response: The SEIS ROD addresses this topic primarily in the Interagency Coordination discussion in section E of its Attachment A.

Comment: The BLM should consider substantially increasing the number of acres to conduct trial harvest programs in old-growth emphasis areas and connectivity areas.

Response: Ten Adaptive Management Areas (AMAs) have been identified in the SEIS across the range of the northern spotted owl. The overall objective for AMAs is to develop and test new management approaches to integrate and achieve ecological and economic health, and other social objectives. Although none of the AMAs are located within the district, the knowledge gained from this new management could be applied to portions of the district.

Comment: The silvicultural systems proposed bear no resemblance to natural processes that should be emulated in a program of genuine ecosystem management. The overall effect of the intensive management regime proposed will be a highly fragmented landscape with some stands of old-growth trees but few, if any, other characteristics of an ancient forest ecosystem. Even the pattern of residual trees bears no resemblance to natural mortality. Natural catastrophic fire would leave many well-distributed snags and clumps of green survivors. The scattering of residual trees proposed would not likely survive the first major winter storm.

Response: The rationale for partial tree retention is not so much to precisely parallel natural processes as it is to provide a biological legacy and maintain long-term site productivity. See the FEMAT report, page IV-34. A legacy is something passed on from one generation to future generations. Like trees that survived catastrophic fires or windstorms, retained legacy trees can be both well distributed and clumped, and would provide a source of seed as well as important habitat components such as large green trees, snags, and eventually, large down logs. While blowdown and breakage is a problem in some locations, experience indicates that most retained trees would remain standing for many years.

Comment: Connectivity Areas should be used to link old-growth "reserves."

Response: One criteria used in delineating connectivity areas was its placement in relation to other older forest reserves and its ability to function as a habitat stepping stone between these reserves.

Comment: Ecosystem management should actively strive to protect unique habitats and communities as they contribute a disproportionate amount to the protection of biodiversity in the region.

Response: Unique habitats received special consideration in the development of the PRMP.

Comment: There should be provisions to adjust the level of regeneration harvest commensurate with available funding for development and retention of old-growth components in young and subsequent seral stage stands.

Response: Development and retention of old-growth components is not a function of budget, since it is management direction for regeneration harvest in timber sales. Accordingly, it is self adjusting.

Vegetation (includes Special Forest Products)

Comment: Contrast the differences between early successional stages resulting from natural processes and those resulting from silvicultural prescriptions.

Response: The structural differences between seral stages resulting from various levels of natural stand replacement and conventional, even-aged management are shown in Figure 3-2. Silvicultural systems can produce early seral stages with a wide variety of structures and compositions depending on the approach taken, including structures and compositions that resemble those originating from natural processes. The primary difference between the compositions of young stands is that there are lower levels of standing dead and down wood arising from harvests than from natural disturbance.

Comment: The plans should include a detailed summary of forest age class distribution through time, with a separation of two-stage and multi-stage stands.

Response: Such projection would be complex and time consuming and would be unreliable until most watershed analysis are done. We believe it would have little utility without information on spatial distribution, which cannot be projected.

Comment: The importance of conserving relatively rare hardwood forests is virtually ignored. Conversion of hardwoods to conifers should be approached with caution, as there are ecological reasons why many sites are dominated by hardwoods.

Response: Conversion is proposed only in the General Forest Management Areas on sites considered natural conifer sites where past human action led to conversion of the site from conifers to hardwoods. The PRMP provides for the retention of existing natural hardwood stands and their management for the sustained yield of hardwood resources. Species diversity requirements for reforestation actions, prescribed fire treatments, and subsequent stand management will assure the retention of native hardwood species within stands considered for active management.

Comment: Display current acreage of major hardwood groups in conifer-dominated stands, mixed conifer-hardwood stands, and hardwood-dominated stands. A further breakdown into seral hardwoods and hardwoods commonly present throughout the life of a stand would be helpful. Display projected changes in these hardwood acres by alternatives.

Response: Current data is incomplete and we have little basis for projecting future conditions in a quantified way.

Comment: Goals and objectives in the Preferred Alternatives should have as their theme the maintenance of hardwoods and hardwood stand types through space and time.

Response: True natural hardwood stands occurring on the district will be maintained. The PRMP proposes to convert only hardwood stands that have developed as a result of human actions.

Comment: Address threats (including those on private lands) to oak and other deciduous woodlands. Identify specific management plans for all hardwood stands.

Response: Naturally-occurring woodlands on BLM-administered land are threatened only by naturally-occurring losses (such as fire). Where BLM management maintains such stands, an analysis of threats to stands in other ownerships is beyond the scope of the RMP/EIS. Specific management plans for such stands would be a component of implementation plans.

Comment: Develop and display goals, objectives, and prescriptions for maintaining hardwoods, minor conifer species, and shrubs.

Response: Objectives have been added regarding native plant communities and species. Prescriptions are implicit in the management actions/direction, but would be site-specifically developed in implementation plans.

Comment: Develop and display goals, objectives, and prescriptions for maintaining hardwoods in conifer-dominated stands, mixed conifer hardwood stands, and hardwood-dominated stands. This is especially critical for stands in which hardwoods are long-lived components and/or an integral part of the plant community during all stages of succession.

Response: The natural forest tree species mixture (prior to management) in the planning area indicates Douglas-fir was the predominant tree species, with lower numbers of other conifers such as western hemlock, western redcedar, and Port-Orford-cedar. Hardwoods, overall, made up a relatively small component of all tree species.

A recent evaluation of our 5-point inventory plots indicates the hardwood component in managed stands is comparable to the original natural stands. During the application of intensive management practices in coniferous stands within the General Forest Management Area, hardwoods will be retained where they do not compete with existing conifers.

Comment: Identify minor conifer species present in conifer- dominated stands.

Response: Appendix S shows the relative abundance of species occurring on the district.

Comment: Display the amounts of early successional stages in each alternative during the first decade.

Response: This data was displayed in Figure 4-BD-1 in the Biological Diversity section of Chapter 4 in the draft RMP. It is included as Figure 4-2 in the PRMP.

Comment: The BLM failed to analyze the impacts of its proposed actions on Port-Orford-cedar and suggested no method to conserve the tree. The agency also overlooked important conservation opportunities by declining to include and protect significant stands of uninfected Port-Orford-cedar in potential Areas of Critical Environmental Concern.

Response: The discussion on Port-Orford-cedar has been expanded. Additionally, a management plan for Port-Orford-cedar will be prepared, and management will be in accord with that plan.

Comment: Protect Port-Orford-cedar. There is an urgent need to identify uninfected watersheds. No roads or logging should be allowed in uninfected watersheds.

Response: This level of detail is normally accomplished in activity level plans. When fully implemented, the watershed analysis process may identify uninfected stands of Port-Orford-cedar and may help to identify alternative management strategies.

Comment: Address how current and proposed management complies with the Pacific Yew Act. Do this in addition to the separate EIS being prepared by the Forest Service with BLM cooperating.

Response: Such duplication is neither efficient or appropriate.

Comment: We encourage BLM to carefully follow the interim guidelines for Pacific yew management in order to collect the maximum amount of yew bark feasible from current forest management projects.

Response: Management of Pacific yew was the subject of a separate EIS.

Comment: The Pacific Yew Act effectively bans even-aged management and slash burning in yew habitat. The draft RMP fails to adequately protect yew trees. The Pacific Yew Act may also require replanting of yew to the same stocking levels as before harvest.

Response: As long as the Act remains in effect, RMP implementation actions in yew habitat will conform to its terms.

Comment: The Draft EIS violates NEPA by failing to disclose how long the proposed yew bark harvest rates can be sustained.

Response: The RMP/EIS does not propose any specific rate of yew harvest. A permissible rate of harvest from National Forest system and BLM-administered lands was identified in the Record of Decision on the joint BLM-Forest Service *Pacific Yew Management EIS*, and its sustainability was analyzed in that EIS.

Comment: Disclose where suitable mushroom habitat exists and the environmental impacts of logging on mushroom populations.

Response: Data on suitable mushroom habitat is currently limited. The distribution and abundance of these species has not been determined on most BLM-administered lands. Chapter 4, Special Status and SEIS Special Attention Species, has been expanded to address such impact concerns. In general, mushrooms that are shade tolerant would be favored under Alternatives C, D and E. Harvest of mushrooms would be done in compliance with appropriate NEPA regulations and be consistent with ecosystem management principles. The final BLM Task Force Report, *Managing Special Forest Products in Oregon/Washington*, was approved by the BLM State Director on March 31, 1993. It recommended that the BLM identify the inventory, monitoring, and research needs reflecting the biological sensitivity, public demand, and interest in any given species of special forest products.

The BLM *Forest Ecosystem Inventory Handbook*, published in October 1993, allows for the collection of data on mushroom species, quantity, and quality. This inventory has begun. Several research studies have been proposed to investigate the productivity and ecological habitat of noxious mushroom species. They would involve the BLM, the USFS Pacific Northwest Research Station, and the National Biological Survey.

Comment: Harvest of minor forest products (such as salal, beargrass, ferns, moss and fungi) should be more carefully managed. Collection of such products should be by permit only and should be monitored and enforced.

Response: Discussions of management for such products has been added to Chapter 2, and a related element has been added to the monitoring plan. Although authorized harvest would be by permit only, monitoring and enforcement will not be totally effective due to the scattered locations of the resources.

Riparian Zones

Comment: Define expected future condition for RMAs.

Response: Objectives that do this for Riparian Reserves have been added for the PRMP, derived from the Aquatic Conservation Strategy objectives in SEIS Appendix B6.

Comment: Establish standards for all stream orders, reflecting functional and ecological differences between orders. These factors should ensure shading, water quality, microclimate, floodplain protection, and critical habitat for wildlife and sensitive species.

Response: The Aquatic Conservation Strategy described in Appendix B6 of the SEIS requires that watershed analysis be a principal analytical foundation for management actions. Watershed analysis is required in Key Watersheds prior to land management and will eventually be accomplished for all watersheds. The information from watershed analysis will guide management prescriptions by refining boundaries of riparian reserves and developing restoration strategies and priorities.

Comment: Address riparian area management at the watershed or landscape level, reflecting the current condition of watersheds.

Response: Riparian Reserves are described in Appendix B6 of the SEIS. Standards and Guidelines prohibit activities in Riparian Reserves that retard or prevent attainment of the Aquatic Conservation Strategy Objectives. Widths of Riparian Reserves are based on ecological and geomorphic factors. Those widths apply until watershed analysis is completed, a site-specific analysis is conducted and described, and the rationale for final Riparian Reserve boundaries is presented and approved.

Comment: Clarify how average widths shown for RMAs are utilized in on-the-ground analysis. Include both the documentation and the mechanisms to fully protect all beneficial uses for riparian areas including wetlands.

Response: See previous response. Watershed analysis will identify the riparian reserve widths needed to meet RMP objectives on specific stream reaches, wetlands, or other water bodies. Aquatic Conservation Strategy objectives would be met by completing watershed analysis (including appropriate geotechnical analyses) prior to construction of new roads or landings in Riparian Reserves.

Comment: Riparian area buffers identified on-the-ground for protection of specific riparian area resources should have no scheduled harvest planned.

Response: No scheduled harvest will be planned in riparian area buffers.

Comment: It is inappropriate to allow roads in riparian management areas to access timber harvest in other areas.

Response: Construction of roads upslope and near ridges is normally preferred, but occasionally construction within (but toward the outer edge of) a Riparian Reserve may reduce the total road length needed for harvest access by so much that it is considered environmentally preferable to build the shorter road. Any road construction in Riparian Reserves would occur only after watershed analysis.

Comment: BLM's proposed riparian management on perennial streams is only about the width recommended by the Scientific Panel on Late-Successional Forest Ecosystems, which said, "Establishing wider riparian corridors on federal lands <u>across the landscape</u> will provide additional protection from disturbance and help initiate recovery of degraded areas."

Response: In the PRMP, Riparian Reserve widths on perennial streams have been expanded to the widths recommended by the Scientific Panel.

Comment: Intermittent streams should be managed according to specific standards established for large woody debris recruitment, snags, shading, water quality (temperature and turbidity), microclimate, and critical habitat for wildlife and sensitive species.

Response: Management of intermittent streams will be consistent with the Aquatic Conservation Strategy objectives and the Riparian Reserve management actions/direction as described in Chapter 2. Watershed analysis will address intermittent stream features and functions, including woody debris recruitment and water quality, as well as restoration needed to ensure the protection of aquatic systems and wildlife habitat. Such analysis will develop specific objectives with documented logic paths that retain the amount, distribution, diversity, and function of important riparian ecosystem needs.

Comment: If riparian buffers are not at least three times the height of the tallest trees, windthrow over time will negate the design of the buffer.

Response: Since windfirmness varies among sites, we do not believe such a generality is true.

Comment: Restoration of riparian areas in poor or deteriorating condition should be a high priority.

Response: Priority will be given to restoration of degraded Riparian Reserves. Watershed analysis will help identify priority areas, with Key Watersheds having particular emphasis.

Comment: The proposed riparian management program overlooks the interactions between coarse woody debris and channel morphology.

Response: Management of Riparian Reserves will consider these interactions. Watershed analysis will discuss important stream channel and near-channel linkages and function.

Comment: RMA width should be appropriate to meet water quality standards, supply potential large woody debris and down wood, and manage for sensitive riparian-dependent species within a landscape context.

Response: The PRMP Riparian Reserve widths aim at all these objectives. Along some stream reaches, however, the opportunity to meet all objectives (e.g., large woody debris) will not occur for many decades.

Comment: Conifers should be planted within hardwood-dominated riparian areas.

Response: This will be incorporated in watershed restoration efforts where appropriate.

Comment: Since tree diameter was selected as a measure of riparian zone health, indicate how diameter thresholds were selected.

Response The diameter thresholds were those available from our current extensive forest inventory (the operations inventory), which divides forest stands into four diameter classes. The largest class, above 21 inches, was defined as best (good/optimal). The second largest (11 to 21 inches) was defined as next best (fair). The others were defined as poorest (minimal).

Comment: Since the RMP/EIS determines riparian zone forest age and size based on the timber operations inventory for adjoining upslope trees, address the inventory's accuracy in riparian zones.

Response: Analysis of the information obtained indicates a general relationship between the age and composition of the riparian community and the instream woody structure that creates fish habitat. The relationship is far from absolute, as we are aware, but the vegetation is a good general indicator of the overall health of a system. In the absence of detailed data on all streams, we elected to use vegetation information as the best method for approximating stream health.

The upslope inventory was used as a guide to the age and composition of the riparian vegetation. This does tend to over-state the age and size of the riparian vegetation. This overstatement may result in some degraded streams being listed in better condition than they are. However, this data was used mainly as the basis of comparison among the alternatives.

Comment: The riparian analysis should provide tree species and density data and describe factors that may limit future riparian zone maintenance and production (such as water table alteration).

Response: Neither our forest inventory data or other data are consistently specific enough to be considered valid for this purpose in riparian zones. Watershed analysis is expected to begin to address such concerns.

Comment: As diameter class increases with size, the BLM has assumed the riparian condition will increase as well. This assumption alone has little bearing to existing scientific knowledge which focuses on actual benefits found in riparian area due to elements other than diameter class.

Response: BLM realizes the use of diameter class to infer condition is only an approximation for planning purposes, as extensive riparian inventories have not been fully completed. Diameter class does indicate disturbance history and provides general information on degree of stream opening and availability of large wood for maintenance of stream integrity and function.

Wildlife

Comment: In the analysis of wildlife populations, spatially explicit models were not used (excepting for spotted owls) and hence projections may be overly optimistic.

Response: Spatially explicit models do not exist for most wildlife species, but another one used was the elk model. The best available models that could be applied using BLM's data base were used in the analysis of effects.

Comment: There is an over-reliance on riparian zones for meeting the needs of wildlife communities. Many of the upland species habitats are not considered.

Response: We disagree that there is an over-reliance on riparian zones. Upland habitats will be maintained or enhanced in significant amounts in Late-Successional Reserves, Connectivity/Diversity Blocks, and special management areas.

Comment: The wildlife species have been aggregated into groups that are inappropriate for assessing viability.

Response: Aggregating wildlife species into groups with similarities in habitat requirements complements the concept of ecosystem management. We acknowledge that there are some differences between species' needs in a particular group (e.g., amphibians), but there are also broad similarities which can be addressed more suitably in the development of forest plans often affecting hundreds of thousands of acres. One of the intended advantages of ecosystem management is to avoid the problems inherent on a species-by-species approach— primarily those of conflicting habitat requirements of individual species. A goal of ecosystem management is to provide a balance of all potential natural vegetation communities suitably distributed across the landscape. Viability assessment is primarily provided by the SEIS and the FEMAT report.

Comment: Identify goals, objectives, demands, and opportunities for these key species or groups in one logical section of the plan. This section should identify how well demands will be met by alternatives.

Response: This has been done in Chapter 2.

Comment: Animal species that occur within the planning area but with no known occurrence on Bureau lands should be suspected as occurring on Bureau lands unless adequate inventory work shows otherwise.

Response: We agree except where strong field evidence dictates otherwise.

Comment: The effectiveness of Connectivity Areas as corridors for wildlife movement has not been adequately addressed. Consider their width, current habitat fragmentation within the corridors, the effect of timber harvest on habitat mosaics including anticipated patch size, land ownership pattern, and the different dispersal needs of wildlife.

Response: In the PRMP, the concept has been revised. Connectivity/Diversity Blocks will not be confined to specific corridors but will be dispersed across the landscape. The idea is to enhance biodiversity and to help provide for dispersal of mobile wildlife species. Their effectiveness for the latter purpose is unknown, however, as dispersal needs of most species have not been researched.

Comment: Describe the design features that assure the retention of desired levels of habitat connectivity for old-growth dependent species within the general landscape. No information was presented on the reason for the placement and width.

Response: See response above. Additionally, parcels (generally a section at a time) were designated based on the amount of older forest habitat available and its value to special status species, anadromous stocks listed at risk, and general wildlife and biological diversity. An attempt was made to designate such areas distributed through the matrix and not immediately adjacent to any of the Late-Successional or other reserves.

Comment: Identify the species expected to benefit from connectivity areas and their expected function for each species. Evaluate the ability of the areas to provide these functions, relating to their locations, width, and proposed management. Address their lowest condition expected relative to old-growth characteristics and its relation to desired future condition.

Response: Not enough is known about the mobility patterns of species to permit a species-by-species discussion of the value of these areas. The lowest condition expected relative to old-growth characteristics would be the existing situation. Desired future conditions would have 25 to 30 percent of each Connectivity/Diversity Block in a late-successional forest at any one point in time. These late-successional forests would exhibit some old-growth characteristics.

Comment: The document should identify the species for which the connectivity areas might forestall listing and how connectivity would assist the conservation of these species.

Response: In general, those species that prefer mature, late, and old-growth seral stages, as shown on Appendix T, would benefit from the Connectivity/Diversity Blocks. The Connectivity/Diversity Blocks along with other reserves and special areas dispersed throughout the GFMA will provide habitat for variety of species. In the selection of Connectivity/Diversity Blocks, we attempted to include, wherever possible, habitat of special status species (in particular less mobile amphibians) and drainages that had salmon stocks at risk.

Comment: Identify the role and value of shrubfields as wildlife habitat. Assess whether any species are dependent on these shrubfields.

Response: Discussion has been added in the Wildlife section of Chapter 3.

Comment: A 100- or 150-foot RMA for lakes, ponds, and other water bodies may not adequately maintain or protect the inherent value and habitat use of the water body and adjacent zone, especially for fish-eating raptors.

Response: The PRMP expands this width for lakes and natural ponds. All such buffer widths may be adjusted after watershed analysis, based on site-specific characteristics.

Comment: Conduct a district-wide inventory of sensitive wildlife areas and areas with currently high densities of Off-Highway Vehicle use.

Response: A partial district-wide inventory of sensitive wildlife areas has been accomplished (e.g., nest sites of ospreys, great blue herons, marbled murrelets, bald eagles, and spotted owls). Gathering updated information, as well as additional species data, will be part of monitoring and continuing inventory.

There are no known high intensity OHV use areas in the district. Conflicts between OHV use and sensitive species have been identified on the North Spit of Coos Bay, and these conflicts are being addressed in the Coos Bay Shorelands Plan which is being prepared.

Comment: Provide management consideration for all species contained on the district that are described the ODFW's 1992 "Sensitive Vertebrates of Oregon."

Response: Most of the species listed in ODFW's 1992 list of "*Sensitive Vertebrates of Oregon*" are addressed as Special Status Species in the PRMP/FEIS.

Comment: A more formalized risk assessment regarding old-growth sensitive species is needed. Alternative E could serve as a benchmark.

Response: Risk assessment regarding such species was accomplished in the SEIS.

Comment: Address how BLM proposes to improve marginal elk forage conditions and to meet habitat effectiveness and herd number objectives.

Response: We propose to conduct some forage seeding to improve elk habitat. The cover quality and spacing indices would likely be improved by establishment of reserves and Connectivity/ Diversity Blocks. We also propose a variety of road closure or access limitation measures to reduce road density levels.

Comment: Where feasible, expand forage seeding programs to benefit big game.

Response: We propose to do some forage seeding. However, this program will necessarily be limited by the reduced level of clearcutting and burning under the PRMP. For example, past observations indicate that forage germination is best after burning has produced black ash seedbeds. This condition is expected to be limited in the future. We are also considering the use of native forage species in future forage enhancement projects. Unfortunately, lack of a reliable source of seeds for native species may also limit our forage enhancement program.

Comment: The method used to analyze effects on elk populations is flawed. The importance of "optimal thermal cover" to elk is grossly exaggerated. The fastest increase in elk populations ever recorded occurred in the Mt. St. Helen's blast zone, where optimal thermal cover does not exist. There is no evidence suggesting that "winter kill" of elk—which thermal cover attempts to ameliorate"is a problem in western Oregon.

Response: The Wisdom Model is considered the most widely-accepted professional model to analyze elk habitat condition at this time. It was developed by professional biologists and represented the best information at the time of its development. Validation of the model is the subject of a research study currently being conducted by Oregon State University in conjunction with BLM. The Wisdom Model was developed for forest ecosystems, not blast zones.

Comment: Re-evaluate elk habitat conditions using all four habitat variables in the Wisdom Model. Identify the current habitat effectiveness for the four variables by sub-watershed. Include private lands in the assessment.

Response: Application of the Wisdom Model to BLM-administered lands was modified to reflect shortcomings in BLM's existing database. For example, we currently do not have sufficient vegetation data on private lands to permit an automated analysis of existing elk habitat condition over all ownerships. This limitation was shared with ODFW at an early phase of our analysis. We have, however, developed an automated analysis to evaluate elk habitat condition on BLM-administered lands using the forest inventory database. Three of the four indices are readily calculated using this method. The fourth index—the spacing index—can be calculated using automated methods but it is fairly cumbersome and time-consuming. With scattered private lands in many of the analysis areas, the spacing index for BLM-administered lands only may be less meaningful than the indices produced for the other three variables. ODFW has developed criteria to approximate the spacing index by using proportions of cover and forage.

Our automated procedure produces area tables to calculate habitat effectiveness indices and graphical outputs to display habitat condition. The procedure also produces acres of private lands within the analysis area (e.g., watershed or some other polygon). Accordingly, estimates of elk habitat condition on private land can be made and proportionally related to total acres of private land. Due to the very limited amount of thermal and optimal thermal cover on private lands, plus the lack of forage seeding on much of this land, index levels are anticipated to be even lower than calculated values for BLM-administered lands only. This was the case in one sample district where this analysis was done using our gross vegetation theme as the database from which estimates on private land were made.

Evaluation of elk habitat condition was not extended to the subwatershed scale because we believed this to be most properly evaluated during landscape analysis as part of implementation planning than at the RMP/EIS level. This was also discussed with ODFW in the initial phases of our analytical work. At least one district used watersheds for the RMP/EIS analysis, but these areas were much larger than the 1,000 to 6,000-acre level suggested by the Wisdom Model. However, these large watersheds can be subdivided into smaller subwatersheds which could serve as permanent compartments to keep records on elk habitat condition.

Comment: Set measurable goals for elk habitat effectiveness on a sub-watershed basis. Develop these goals in concert with ODFW.

Response: Goals have been developed by ODFW and are delineated in an ODFW document entitled *Plan Review Criteria to Conserve Fish and Wildlife Resources on Bureau of Land Management Forest Lands in Western Oregon.*

Comment: Establish habitat goals to reduce bull elk vulnerability to harvest and relate to Oregon's elk plan.

Response: The goals established by ODFW for our elk habitat effectiveness indices are related to Oregon's elk plan. District goals for road management will clearly help reach the objectives set by ODFW.

Comment: The portrayal of elk conditions by the Coos Bay District is inconsistent with known empirical response and must be corrected.

Response: We used the best information available to portray elk habitat conditions in the Coos Bay District.

Comment: The real issue is elk "security" which can be substantially mitigated by road closure programs.

Response: Elk security is just one of the habitat components we have addressed. We have proposed significant road management changes to improve elk security.

Comment: Another item to consider is the closing of roads on BLM-administered lands primarily because of worries about the effects on big game.

Response: See response above.

Comment: Road closure programs and limited recreation access during periods critical to elk can effectively mitigate the security needs of the species. The alternatives that are most likely to negatively affect elk are Alternatives C, D, E, and to a slightly lesser extent the BLM's Preferred Alternative.

Response: The PRMP has objectives for road access management that are not found in Alternatives NA, A, or B. This access management is one of the features incorporated into the PRMP specifically to reduce adverse impacts to elk. Habitat analysis was accomplished using the Wisdom Model—the most widely-accepted model for this purpose. This analysis showed the PRMP to be one of the best alternatives for elk management.

Comment: Display the amounts of early successional stages in each alternative during the first decade. Identify the consequences to wildlife species heavily dependent on these stages.

Response: The total acreage of each seral stage at 10 years and 100 years is diagramed in Figures 4-2 and 4-3. The basic assumption underlying the analysis of effects in Chapter 4 is that timber harvest on the intermingled private lands within and surrounding the BLM operating area will provide adequate amounts of suitable early successional habitat for species dependent only upon the early seral stage—regardless of the alternative chosen by BLM. Our planning alternatives would add varying amounts to this base. Many species that use the early seral stage for one or more life needs are also dependent upon the presence of other habitat components within the early seral stage, such as snags, fallen trees (logs), and residual green trees. Consequences to these species are described in Chapter 4; see, for example, purple martin & western bluebird under Effects on Special Status Species and secondary cavity users under Effects on Wildlife.

Comment: Identify concrete proposals to create snags, including estimated budgets. Adjust ASQ to account for snags created over time.

Response: Among the objectives of the PRMP is management of forest lands to retain: 1) specific amounts of potential snag habitat following timber harvest, and 2) all existing snags to the extent possible given essential considerations for worker safety. Amounts of timber volume to be foregone for this purpose have been estimated and the PSQ adjusted accordingly. The PRMP commits to

provide the specified amounts of habitat through a combination of methods including retention of existing snags and creation of snags from green trees through timber sale contract requirements and by separate projects, whichever is the most efficient use of public money. Concrete proposals to create snags can be developed only on a site-specific basis. Such proposals will be identified in implementation plans following completion of the RMP.

Comment: Clarify assumptions and goals in modeling green tree retention and snag creation.

Response: The goal of snag modeling is to describe the process of snag management and quantify impacts on both the timber and wildlife resource. There are three basic assumptions:

1. Green trees retained following timber harvest will be converted to snags at future points in time so that adequate amounts of snag habitat will be available through the life of the new stand.

2. Concerns about worker safety will prevent retention of all existing snags, and in some situations snags will have to be created from green trees after timber harvest. (See response above).

3. Green trees and snags left after harvest will become large woody debris when they fall.

Comment: There should be an assessment of wildlife usage before any snags are removed.

Response: All timber sale planning will include field inspections by biologists for the purpose of assessing current and future use of the planned sale area by priority species of wildlife, including cavity-users.

Comment: The Neitro et al. Model used to address the effects of wildlife tree retention on wildlife is plagued by a myriad of problems. These problems cause the model to grossly overestimate the number of wildlife trees required to maintain healthy populations of dependent wildlife species. There is no documentation or justification for the even higher levels of wildlife tree retention proposed in the preferred alternative.

Response: Evidence presented by scientists at Oregon State University indicates the opposite—that is, if anything, the Neitro et al. Model underestimates the amounts of habitat needed by woodpeckers since it is based only on woodpecker nest tree requirements and does not consider woodpecker forage substrate needs. Furthermore, the model does not consider the nest tree needs of several species of secondary cavity users that require tree cavities in early- and mid-seral stages. For example, snags are needed in new timber harvest areas to provide nest sites for secondary cavity users such as bluebirds, purple martins, and other swallows even where surrounding forested areas have enough snags to serve as nest trees for woodpecker populations.

Comment: Identify, by alternative, how many acres of suitable pileated nesting habitat will be available and their distribution. Do the same for suitable goshawk nesting habitat.

Response: Available data does not make such information readily projectable. We believe the key question is species viability or persistence which has been addressed in the SEIS.

Comment: Use the Neitro et al. Model to estimate current populations of woodpeckers for all seral stages and allocations. Weight these estimated populations by acres of each seral stage to obtain an overall population level. Display those data.

Response: The analysis was accomplished in this way. Detailed data are available on request.

Comment: Develop comprehensive prescriptions for managing snags to achieve and maintain the population goal for woodpeckers.

Response: The focus of the RMP is its objectives. Prescriptions must be site specific, varying with existing forest stand conditions, broad ecosystem management objectives, and (where appropriate) timber management objectives. They will be developed in site-specific plans.

Comment: Eliminate the wide disparity in snag and green tree retention goals between districts for similar allocations (such as the differences in green tree retention for OGEAs across districts), or explain the biological rationale for such differences in the final plans.

Response: See response above.

Comment: Assign population goals for woodpeckers for all land allocations.

Response: The PRMP allocations compartmentalize much of the landscape outside Late-Successional Reserves into typically small patches of GFMA and Connectivity/Diversity Blocks separated by linear Riparian Reserves. Having separable population goals by allocation in such a landscape is meaningless. Over the long term, sizes of snags retained would be suitable for all species although other habitat conditions may influence which species are most abundant. Pileated woodpeckers, for example, are expected to be more abundant in the reserves while northern flickers may be the most abundant woodpecker in the General Forest Management Areas.

Comment: Use the snag recruitment model by Neitro et al. to estimate how quickly green trees retained as future snags will actually become snags. Analyze whether potential snag densities will occur in the next 20 years if natural snag recruitment is insufficient. If it is insufficient, prescribe an active program of snag creation.

Response: Tree spacings that will result from density management and thinning under the PRMP are expected to forestall natural suppression mortality. There will not be natural recruitment of snags in amounts necessary to sustain viable population levels of woodpeckers on lands intensively managed. Snag creation through an active program is, therefore, vital to the success of the PRMP. Snag creation prescriptions will be developed on a site-specific basis.

Comment: Specifically target snag creation, if needed, in younger seral stages to improve the poor distribution of snags in younger versus older stands.

Response: Chapter 2 has been revised to include snag retention and development.

Comment: Commit to reserving all snags from salvage sales and firewood cutting in the final plan.

Response: See response above.

Comment: There should be a provision for retention of so-called soft snags—those snags available for cavity nesting species during the early seral stages of a regenerated stand in General Forest Management Areas, Connectivity Corridors, and Rural Interface Zones.

Response: See response above.

Comment: There is also no mention of snag retention in the 0.5- to 5-acre harvest areas in the Non-deferred OGEAs.

Response: See response above.

Comment: Evaluate the resource trade-offs of managing at the 80 percent population level for woodpeckers, recognizing that the Neitro et al. Model likely underestimates woodpecker requirements for snags.

Response: The actual overall long-term effects of the PRMP approximates this level.

Comment: The lands should not be managed so intensely that artificial snag creation is required to provide viable populations of snag dependent species.

Response: Snag creation is planned primarily for future timber harvest areas in second growth stands that may essentially become devoid of snags.

Comment: Reduce the number of green trees per acre to a lower level, such as 2 or 3 per acre. This should still allow for sufficient numbers of large trees to meet the minimum requirement of woodpeckers and attain the goal of one pair of pileated woodpeckers every two miles.

Response: See response above.

Comment: BLM does not adequately address the importance of its proposed management activities on neotropical migrants. Consider the July 1992 study on neotropical migrants in Pacific Northwest national forests.

Response: The habitat requirements of the 165 species of neotropical migrants as a group are so diverse as to preclude analysis of the group as a unit. The BLM is in the process of developing a monitoring strategy to begin to acquire the data necessary to analyze the impacts on each species of neotropical migrants. Currently, impacts of the various alternatives are identified for only a few priority species—some of which are neotropical migrants (for example, osprey, sharp-shinned hawk, Cooper's hawk and purple martin).

Comment: Address how logging practices are affecting the pond turtle.

Response: A discussion has been added.

Fish

Comment: Specify goals and objectives for fish habitat.

Response: Objectives have been added for the PRMP.

Comment: What is termed fish habitat enhancement is actually restoration or rehabilitation.

Response: It is enhancement of the current condition, but often is also restoration or rehabilitation.

Comment: BLM proposes a substantial amount of costly stream habitat restoration. Past restoration work in the Northwest has been poorly designed and has done little to reverse declines of many stocks. Future work should be planned on a 3rd to 5th order watershed basis, be based on a thorough pre-treatment inventory, have clearly-defined goals and objectives, and have a short and long-term monitoring plan. It should not be a substitute for protecting fish/fish habitat from the effects of land management activities and should not be conducted in watersheds where watershed processes are not functioning naturally, or where the effects of public and private land management activities combined will render restoration ineffective. It should be prioritized based on the needs of threatened stocks of anadromous fish.

Response: Watershed analysis will precede expensive restoration work. An interdisciplinary team will determine actual management prescriptions to achieve watershed standards based on site-specific requirements. It has been determined, however, that simple protection of existing aquatic habitat is not enough. Much of the aquatic habitat in the Pacific Northwest is in a degraded condition, which necessitates aggressive restoration efforts if depressed fish stocks are to be rebuilt.

The BLM has been in the forefront in developing, monitoring, and evaluating habitat restoration projects. These projects have been evaluated not just by the BLM, but in cooperation with Oregon State University, Coastal Oregon Productivity Enhancement Program, and the Oregon Department of Fish and Wildlife. Evaluation has clearly shown that restoration projects can increase the survival of salmonids from eggs to smolts. However, recovery of the stocks depends on overall management of the stream and estuary habitat and the harvest in the ocean and rivers. The BLM has no control over management of habitat on non-BLM lands nor over fish harvest management.

Comment: The types of fish habitat enhancement projects over the next decade are generally not enumerated nor described in the draft plans.

Response: Descriptions of specific projects will be included in activity level plans to be developed on completion of the RMP.

Comment: The final RMP/EIS should include a comprehensive stream biological survey; identify watersheds supporting productive or valuable remnant populations or communities of native fishes, amphibians and other aquatic biota; and delineate a well-distributed network of least disturbed watersheds.

Response: While we recognize the need for this information, it is not available at this time nor can it reasonably be acquired in a timely manner for inclusion in the PRMP. Acquiring this data will be part of the RMP implementation. The BLM recently released a strategy for the management of anadromous stocks in the Columbia and Snake River Basins which has watershed-level planning as a central focus. A similar plan developed for the coastal areas of the Pacific Northwest also includes watershed-level planning as a central focus. The latter plan, soon to be published, is a road map describing how the BLM intends to manage the fisheries of the region to meet the goals and objectives set forth in the RMP.

Comment: Sensitive and priority aquatic habitat should be identified. Recovery and restoration plans should be developed based on a watershed analysis. In addition, fish habitat and sediment yield should be utilized to establish/predict habitat quality. Summarize subwatersheds where timber harvest emphasis would occur.

Response: Priority and sensitive habitats are identified in the FEMAT report and have been taken into account when developing the PRMP. Also see previous response. Sediment yield is not reliably predictable. Watershed analysis will be accomplished eventually on all watersheds and prior to

implementing management actions in key watersheds. Until that level of analysis is complete, it is not feasible to identify subwatersheds where timber harvest emphasis will occur.

Comment: BLM should describe more completely how their Preferred Alternatives will impact sensitive fish stocks, and what steps would be taken to mitigate adverse impacts.

Response: The discussion on sensitive fish stocks has been expanded in the PRMP. Sensitive fish stocks were also discussed in the SEIS, to which the PRMP is tiered.

Comment: The information presented in this section is very incomplete. Data on stocks occurring on the district is substantially lacking, and accurate data on critical stocks is lacking.

Response: We have expanded the discussion on fish, but inventory data on critical stocks is generally unavailable. While BLM can detect the presence or absence of fish species, determinations on stocks is more difficult. Management of fish stocks is the responsibility of the Oregon Department of Fish and Wildlife.

Comment: Although critical stocks exist on the district, the RMP does not identify critical habitat for these declining salmonid stocks nor does it develop a coherent restoration plan.

Response: Restoration plans will be developed on a site-by-site basis during the life of the Plan.

Comment: Consider the information on aquatic resources in the Draft Recovery Plan for the Northern Spotted Owl, the Forest Service's strategy entitled PACFISH, and BLM Washington Office Information Bulletin 92-642.

Response: We have considered this information.

Comment: Identify and discuss the status of various wild anadromous fish stocks and habitat conditions within whole watersheds, not just BLM-administered portions. What is the relationship between habitat conditions and the severely depressed status of many stocks?

Response: We actively seek to cooperate with other landowners in developing and implementing plans for management of aquatic habitat. We are cooperating fully with ODFW efforts to identify and protect genetically unique fish stocks and with management proposals to protect and enhance salmon and trout communities. However, BLM does not have any control over management of habitat on private lands, which is a State responsibility. While we acknowledge that activities on private and State lands may affect habitat on BLM-administered lands, we recognize that private and State lands are managed under State regulations. We have taken these differences into account during impact analysis.

Habitat condition undeniably plays a role in the depressed status of many stocks; however, many factors other than habitat condition (i.e., harvest and ocean conditions) affect fish production. These factors are not under the control of the BLM. Another factor is that many watersheds are currently underseeded.

Comment: Analysis of impacts on fish is flawed because it fails to consider management activities on private lands, assumes that past damage will improve independently, and ignores effects from continued timber harvest in upland areas.

Response: See previous response.

A component of the methodology used to establish condition ratings was the related factor analysis. This analysis then adjusted the condition using the vegetation information to account for such related factors as the amount of new and existing roads, soil stability, and adjacent land management practices, to name a few.

Comment: The methodology for stream (fish) habitat quality rating is very simplistic and has not been peer reviewed. The conclusions about existing habitat quality are very optimistic.

Response: We have conducted 5 to 6 years of extensive stream habitat inventories on the district. Analysis of the information obtained indicates a general relationship between the age and composition of the riparian community and the instream woody structure that creates fish habitat. The relationship is far from absolute, as we are aware, but the vegetation is a good general indicator of the overall health of a system. In the absence of detailed data on all streams, we elected to use vegetation information as the best method for approximating stream health. However, this information was not the only information used to establish condition ratings. An equally important component of the methodology was the related factor analysis. See previous response.

We are aware of the work done on stream ecology on Mt. St. Helens, as well as in other geographic areas. This work was taken into consideration in developing the procedures we used. Analysis in any situation needs to be developed on the basis of conditions in that location, with information on other locations providing only general guidance. The upslope inventory was used as a guide to the age and composition of the riparian vegetation. This does tend to overstate the age and size of the riparian vegetation, which would result in the classification of some streams as in poorer condition than they actually are.

This analysis method has been peer reviewed internally, but has not received peer review outside the agency. The Oregon Department of Fish and Wildlife has reviewed this methodology and provided helpful comments. We recognize that up-to-date stream inventories are needed, but funding has been lacking. The data so far collected was used in developing this methodology.

Comment: The Fisheries Productivity Rating System needs further explanation.

Response: Refer to Appendix IV-H in the Draft RMP/EIS for a description of the methodology used to calculate fish production capability. Data relating fish production capability to habitat condition was provided by ODFW. This data was considered to be the best available information and appeared reasonable when compared to BLM's habitat production capability data.

Our fish production estimates represent the potential capability only. Because many factors other than habitat condition (i.e. harvest and ocean conditions) affect fish production, actual production will vary as a result of these other factors. Since these factors are not controlled by BLM, the actual fish production under a particular alternative will likely vary from its prediction. By illustrating the relative difference among alternatives, however, the production estimate method used provides a basis for management decisions.

Comment: Effects on fish should be measured against a desired future condition, not against current conditions.

Response: An environmental impact statement normally addresses the changes that alternative courses of action would cause from the present condition. Desired future condition or resource condition objectives identified in the planning process are developed for a specific alternative and would differ for each alternative. The objectives provide the standards for monitoring the effects of the implementation of the plan, while the current conditions establish the baseline against which the

effects on fish by the various alternatives can be measured. Although the FEMAT team made regional comparisons of some of their alternatives against independently derived possible target conditions, those subjective ratings could not be replicated by BLM personnel on a single district basis.

Comment: The tables showing potential fish production capability are unproved, most likely inaccurate, and are misleading.

Response: Data used in developing fish production estimates was provided by the Oregon Department of Fish and Wildlife. This data was considered to be the best available information and appeared reasonable when compared to habitat production capability data we have collected. However, estimates of future condition for all resources are unproven; the state of the art in resource management make such estimates unprovable. Many factors other than habitat condition (i.e., harvest and ocean conditions) affect fish production. These factors are not under the control of the BLM. Accordingly, our fish production estimates represent only the potential capability; actual production will vary as a result of these other factors.

Comment: It is not clear that proposed riparian corridor widths on perennial streams will produce the stated results. The adopted RMP should, over the long-term, result in optimal riparian corridor conditions on all streams on BLM-administered land.

Response: Monitoring should help determine if optimal conditions are developing.

Comment: The final document should state to what degree a 58 percent increase would be of the maximum potential of a fully restored fishery.

Response: The percentage of increase, or decrease, in fish numbers is used for relative comparison of alternatives. The numbers were not intended to be used as actual population estimates.

Comment: It is not clear exactly what "optimum" levels are.

Response: As indicated in the footnote on Table 4-F-1 of the draft RMP, optimal riparian conditions are assumed to exist if riparian trees are 21 inches or larger in diameter.

Comment: The table (4-F-1) needs to show how close these figures are to "optimum" (maximum potential) levels. Further, the table and previous discussion should be expanded to illustrate the status of individual fish stocks, some of which may be near extinction.

Response: Because of disturbances that will persist over time, some streams may never achieve fully optimal conditions. For example, an existing road within the riparian zone may not allow full recovery of the riparian vegetation to optimal condition, but would permit the area to achieve its "maximum potential."

Fish stocks of concern have been addressed in the Special Status and SEIS Special Attention Species section, and also in the SEIS.

Comment: The estimates of long-term increases of salmon and steelhead are entirely unsubstantiated and over-optimistic.

Response: The information shown is not for expected population estimates, but rather potential population projections used to compare alternatives.

Comment: The mechanisms by which the 200-year increase in fish populations would occur are not provided. Acute and chronic stressors such as upstream sediment inputs from unstable slopes, landslides, roads, and mining may continue to degrade fish habitat. In addition, migratory species may be limited by habitat utilized at a single-life history stage.

Response: The recovery of the riparian zones to healthy, properly functioning condition in respect to large woody debris recruitment, streambank stability, shading, organic input, etc. is considered to be the method by which these increases in fish populations will occur. The 200-year time frame is a reflection of this logic and reflects the length of time that can be expected to be required for full recovery of these riparian zones. It is expected that a healthy, properly-functioning riparian area provides all habitat components necessary for all life stages. The related factor analysis utilized in combination with riparian quality to determine habitat condition takes into account such factors as sediment production from roads and upland areas, impacts originating from other ownerships, and other activities on and off BLM-administered lands.

Comment: Use of the average diameter of trees to predict fish habitat trends is too simplified. There is a need for much more detailed information on stream variables related to fish survival, such as substrate imbeddedness, stream temperature, presence of deep pools, dissolved oxygen, and sedimentation.

Response: These factors were considered when performing the related factor analysis used in combination with the riparian condition method.

Comment: There is no discussion of the very real possibility of loss of viability of some aquatic species—particularly anadromous fish stocks of concern. Consider the recent finding by the Oregon Department of Fish and Wildlife that their index of coastal abundance greatly overestimated escapement, and the status of wild coho stocks may be bleaker than once thought.

Response: We are aware of these findings. The SEIS addressed viability of aquatic species. Although we do not manage species, we are cooperating fully with ODFW efforts to identify and protect genetically unique fish stocks, and with management proposals to protect and enhance salmon and trout communities. The riparian and stream management in the PRMP will be adequate to protect existing habitat and to promote long-term recovery of diminished habitat on BLM-administered lands. However, the fate of many fish stocks will be influenced more by activities on other land ownerships and by regulation of fishing. Funding priority for rehabilitation and restoration efforts will reflect stock status.

Comment: The state recommends that BLM conduct a survey to identify declining fish populations and develop recovery plans for high risk populations.

Response: While the BLM does conduct surveys of streams occurring on lands it administers, the responsibility for similar surveys on private lands rests with ODFW. BLM manages the habitat for species, not populations. The responsibility for development of recovery plans rests with the U.S. Fish and Wildlife Service and National Marine Fisheries Service.

Comment: The status of salmon, trout and steelhead must be determined in each watershed.

Response: Watershed Analysis will address the status of anadromous fish.

Comment: The draft RMP/EIS lists several fish species of concern. However, information and documentation (e.g., genetic integrity and diversity) regarding these species are absent.

Response: This level of detail is beyond the scope of the RMP. Information is available from other sources such as the American Fish Society, the "Gang of Four Report", Oregon Department of Fish and Wildlife, and the FEMAT report.

Comment: Identify how closely the expected condition of the fishery resource will approach maximum potential.

Response: It is not possible to determine the maximum potential of the fishery resource. Further, the BLM does not control all factors affecting fish production.

Comment: The lands in the suitable timber base classified as fragile likely represent only the BLM's most erosive and landslide-prone areas. Additional fragile lands occur throughout the Coast Range, making most logging and road building potentially hazardous for fish habitat.

Response: The most erosive and landslide-prone areas fall into Timber Production Capability Classification (TPCC) categories excluded from planned timber harvest. The potential hazards of TPCC categories available for harvest are taken into account during the design of timber sales and associated roads, and appropriate measures are incorporated to minimize impacts. For further discussion, see previous comment responses on Soils/Site Productivity.

Comment: Map 3-5 on page 3-44 of the draft RMP is anadromous habitat.

Response: Map 3-5 displays the fish-bearing streams occurring within the planning area—to the extent that data is available and is within the digital data base.

Comment: Provide an explanation of the statement, "BLM ownership in watersheds would be blocked up to improve watershed management for federal candidate fish and amphibian species."

Response: This statement is intended to provide the flexibility of entering into exchanges within watersheds, as and if the opportunity arises, without requiring a plan amendment.

Comment: The BLM should reference its activities to the State of Oregon Wild Fish Policy.

Response: The PRMP is determined to be consistent with Oregon's Wild Fish Policy.

Special Status and SEIS Special Attention Species

Comment: Note the current status of species-specific management plans. Clarify whether site-specific management plans will be developed for the bald eagle and peregrine falcon, and if so, when they will be developed.

Response: Site-specific management plans—termed Conservation Agreements—are being developed for Special Status Plants. These are interagency plans developed among BLM, USFS, and the USFWS, which identify and schedule specific management actions to prevent listing and to conserve these species. Currently, no Conservation Agreements have been completed for the district. One Conservation Strategy for salt-marsh bird's-beak (*Cordylanthus maritimus* ssp.

palustris) is being proposed. We have also been provided input on the U.S. Forest Service Species Management Guides for sensitive species. Several others are scheduled for 1994. For animal species such as the bald eagle and peregrine falcon, the objectives of recovery plans will be the basis of BLM management. Plans will be developed and maintained using information from applicable watershed analyses.

Comment: Indicate what measures (inventories, buffers, site-specific management plans, consultation with the Fish & Wildlife Service, etc.) will be implemented to assure that actions such as timber harvest, road construction, grazing, and recreational use and development do not adversely affect listed species.

Response: Federally listed species and/or their habitat will be managed in compliance with the Endangered Species Act and BLM national and State Office policy which will include conferencing and consultation with the U.S. Fish and Wildlife Service. For species with completed recovery plans, management activities will be consistent with the plans' objectives. Inventories and identification of buffers, seasonal restriction, and other project modifications are part of the process to ensure that actions are in compliance.

Comment: Identify the species expected to benefit from the OGEAs and how the OGEAs will contribute to habitat, forestall listing, or assist in delisting of each species.

Response: Reserves were not specifically intended to benefit special status plants. All special status plants, except for Assessment Species, will be managed in a way that will not contribute to the need to list, regardless of land allocation.

In general, animal species that will benefit from the Late-Successional Reserves are those whose daily and annual life cycle needs require habitat components provided in late-successional conifer forests. Those species are identified in Appendix T. Some of these species are currently federal listed, some are candidates for listing, and others are not now—nor will they probably ever be—in need of listing protection, but all benefit from the habitat conditions inherent in the Reserves. For example, the Reserves follow the intent of the Designated Conservation Areas of the Final Draft Northern Spotted Owl Recovery Plan. This plan and its components are designed not only to recover the spotted owl populations, but also provide habitat for a host of other species having common occurrence.

The Late-Successional Reserves are large tracts that will eventually have significant acreages of older forest. Species such as the marbled murrelet, goshawk, bald eagle (where the Reserves are near water bodies), salmonid fishes—as well as numerous species of small mammals, birds, and amphibians—will be able to sustain populations in these areas. A given Reserve may contain several populations of a given salamander species, while far-ranging species (such as the goshawk and spotted owl) may require multiple Reserves to serve the needs of a population.

Key items in the Fish and Wildlife Service's review to determine if a species should be listed or delisted are: whether the habitat of the species is being lost, and whether there are regulatory mechanisms in place to protect the species. Because Reserves serve as cornerstones for meeting both of these items of concern, they should weigh heavily in the listing/delisting considerations. The viability ratings in the SEIS also provide an indirect identification of species expected to benefit.

Comment: The Preferred Alternatives in the Final Plans should contain a standard set of land allocations and management standards for each of these special status species. These standards should be developed using the expertise of species' specialists. Standards should specify where vegetative manipulation is an option.

Response: We have taken the approach of ecosystem management, rather than single species management. Habitats will be managed to produce a variety of seral stages and habitat components that meet the needs of all species. Accordingly, specific objectives for individual species are not identified. However, the PRMP has identified land use allocations and/or management direction for some species or species groups when scientific knowledge permits identification of appropriate standards to supplement ecosystem management. Many of those standards were developed for the SEIS and included in its ROD.

Comment: The federal status of several species is incorrectly noted.

Response: The special status species list has been corrected and updated.

Comment: Consultation under the Endangered Species Act regarding effects of activities on mining claims on federally listed threatened and endangered species is the responsibility of BLM.

Response: Consultation with the U.S. Fish and Wildlife Service for mining is the responsibility of the claimant if there is a notice of intent in place. It is the BLM's responsibility if there is a plan of operation filed. However, we would certainly be in contact with the USFWS in both cases, regardless of responsibility for consultation.

Comment: A minimum viable population of a species is on the brink of catastrophe. Managing special status species for populations above the minimum is recommended.

Response: Our goal is to manage for healthy populations of all fauna and flora—including special status species—by employing policies, land use allocations, and management direction that will ensure stable populations.

Comment: Inventory sensitive wildlife species.

Response: Inventories are an ongoing process but are not a standard decision element of an RMP. Because wildlife inventories are very expensive, they are subject to budget constraints.

Comment: Standards or guidelines should be provided to ensure actions will be limited to appropriate situations.

Response: Land use allocations and management direction for the PRMP have been added.

Comment: The RMP should include an evaluation of the potential impact of salvage on future habitat condition.

Response: This has been done.

Comment: The discussion of rare species other than spotted owls is so brief that it appears BLM is only doing clearance related inventories in project areas.

Response: Inventories are conducted for all federally listed, proposed, candidate, and Bureau sensitive species and their habitat prior to conducting land-disturbing activities.

Comment: Table S-3 should be rechecked and updated.

Response: Table S-3 has been revised.

Comment: The DEIS violated NEPA by failing to adequately analyze the effects of the RMP on marbled murrelets, songbirds, declining populations of amphibians, western pond turtles, many important species of plants sensitive to disturbance, and candidates for the endangered species list.

Response: In the RMP/EIS, those effects are analyzed at a level of detail consistent with what is known about the habitat needs of the many species at issue. They are also analyzed in the SEIS. Monitoring is a critical component of the RMP and will increase our knowledge of habitat needs. This information will be used to adjust management strategies whenever necessary to ensure that management objectives are achieved.

Comment: Provide clear direction for site-specific protection of other Oregon sensitive (wildlife) species. The preferred alternative should contain allocations and management standards for bald eagles, peregrine falcons, wild turkeys, Townsend's big-eared bats, great blue herons, and band-tailed pigeon mineral springs. It should also commit to develop site-specific habitat management plans for each known site and other sites as they are found.

Response: The PRMP contains management direction for various wildlife species. In many cases, allocations such as reserves and special management areas will provide habitat for wildlife species. The concept of ecosystem management is to provide habitat sufficient to meet the needs of all wildlife species rather than to provide species-by-species allocations. Chapter 4 provides species-by-species discussions of how the allocations will serve the species. Where the RMP allocations and prescriptions are not sufficiently detailed to guide management of these species, habitat management plans will be prepared.

Comment: The treatment of marbled murrelets is inadequate.

Response: The discussion of marbled murrelets was expanded in the PRMP/FEIS.

Comment: Clearly define the scope and criteria used for site-specific protection of species that may be threatened or jeopardized by timber harvesting activities within all the land use allocation categories.

Response: Management direction for the PRMP has been expanded to address this.

Comment: Commit to a process for identifying all marbled murrelet nesting habitat and flight corridors in consultation with the U.S. Fish and Wildlife Service. Help fund and accelerate research on murrelet use of BLM-administered habitat.

Response: There are provisions in the PRMP for general inventories of BLM-administered lands for murrelets. Additionally, all proposed project areas will be surveyed according to protocol for murrelets (which requires two years of site visits) prior to implementing any projects. All lands where murrelet occupancy is confirmed will be unavailable for planned timber harvest. Research on marbled murrelets is a priority.

Comment: Clearly state the impacts on marbled murrelet habitat on BLM-administered lands, not merely the overall future conditions on all lands.

Response: Impacts to the identified marbled murrelet habitat on BLM-administered lands are specifically addressed in Chapter 4.

Comment: Analysis of murrelet habitat loss should consider areas of mature forests with some old-growth trees as possible murrelet habitat.

Response: The definition of potential marbled murrelet habitat includes mature stands with scattered old-growth trees, thus that acreage was included in the analysis of effects.

Comment: The changes of murrelet habitat in the future may not be accurate and are likely to under-estimate habitat losses.

Response: The discussion on murrelets has been expanded. Additionally, the SEIS discussed the habitat needs of the marbled murrelet.

Comment: We request the BLM to model or estimate the number of suitable murrelet nest trees expected to exist under each alternative through time. Such an analysis is crucial information that should have been divulged in the DEIS, and we specifically request its inclusion in the FEIS.

Response: The information is not available nor is there sufficient information to make a reasonable estimate.

Comment: All potential habitat of the marbled murrelet should be protected from logging until a recovery plan is formulated.

Response: The PRMP protects all occupied habitat with a 0.5-mile buffer.

Comment: Protection for the marbled murrelet should be greatly expanded beyond the 100-acre preserves around known nest sites. All potential habitat should be protected.

Response: See response above.

Comment: Since increases in recreation, road construction activities, and activities related to timber harvest may contribute to harassment and disturbance of bald eagles, measures that will be implemented to avoid and minimize impact should be addressed in the Final EIS and in the Bureau's biological assessment.

Response: This level of detail is normally covered in activity plans.

Comment: The numbers of bald eagles seem questionable.

Response: We have confirmed the numbers to be correct.

Comment: There are two overriding factors responsible for the continued decline in the snowy plover population: 1) the decline of its habitat due primarily to the encroachment of stabilization efforts within the species' nesting and rearing areas, and 2) the adverse impact of human use in plover nesting and rearing areas, primarily stemming from recreational activities.

Response: This has been acknowledged in the text.

Comment: The western snowy plover was proposed for listing as threatened on January 14, 1992. The Fish and Wildlife Service recommends that the northern goshawk, fisher, western pond turtle, Del Norte and Siskiyou Mountain salamanders, long-billed curlew, Gold Beach and Pistol River pocket gophers, and several invertebrates should be given consideration—due to their federal candidate status—as special status animal species occurring in the planning area.

Response: This has been done.

Comment: Special emphasis should be placed on the recovery requirements of the spotted owl and provisions for anadromous fish.

Response: The PRMP has placed emphasis on these species.

Comment: All potentially threatened stock of wild anadromous fish on BLM-managed lands should be included on the list of special status species.

Response: The native fish stocks that we have determined merit special management consideration are described on page 3-58 of this RMP.

Comment: Take a more active role in improving habitat for sensitive fish species and stocks. Describe more completely how the preferred alternative will affect sensitive fish stocks and how adverse impacts would be mitigated.

Response: The BLM does not manage species or communities; we do manage the habitat on which these species depend. We are cooperating with ODFW efforts to identify and protect genetically unique fish stocks, and with management proposals to protect and enhance salmon and trout communities. Habitat restoration is an important component of the PRMP. We also have an extensive monitoring program for salmon and steelhead.

Comment: Identify all existing sites for listed and candidate plant species. Work with other state and federal agencies to prioritize their study and monitoring.

Response: All existing known sites for listed and candidate species are mapped on our GIS. As new sites are discovered through inventory, they will be added to the GIS. Inventory will continue throughout the life of the plan. Extensive coordination already occurs with state and federal agencies and private organizations. Memoranda of Understanding and/or Cooperative Agreements have been developed with the Oregon Department of Agriculture, the Oregon Natural Heritage Program, The Nature Conservancy, and the Center for Plant Conservation.

In addition to memorandums of understanding and cooperative agreements, interagency management plans called conservation agreements are being developed among all federal landowners throughout a species range. Cost-share agreements are in place for studying and monitoring many listed and federal candidate plant species.

Comment: Discuss the effects of management alternatives on special status plant species similarly to the discussion of effects on special status animal species. Bureau sensitive plant species get too little attention. Use the ONHP list for identifying habitats of plant species that could become threatened or endangered.

Response: Special status plants are not discussed individually because of their large populations and the limited amount of information available on their biology. Additional research is needed before more can be said. The ONHP list provides only species' names and status and cannot be used

to identify habitats. Location information for the district—which is stored in the ONHP Element Occurrence Database—was provided for the most part by BLM personnel. Location information is exchanged between the ONHP and the BLM on an annual basis under a Memorandum of Understanding and Cooperative Agreement.

Comment: All plant species on the Oregon Natural Heritage Program sensitive list should be considered in the RMP/EIS. Standards addressing the protection of ONHP sensitive species and their habitats should be included in all land use allocations. The orientation of management for sensitive species should shift from individual species and habitats to ecosystems.

Response: Plant species occurring on BLM-administered land that are identified as threatened or endangered on the ONHP's sensitive lists are addressed in the PRMP. Species on the ONHP's four sensitive lists have widely varying needs for management. The BLM Oregon State Office special status species policy includes all plant species in the ONHP lists, according different levels of attention based on the species' sensitivity. Plant species on BLM-administered land that are threatened or endangered throughout their range (ONHP List 1) are federal candidate or Bureau sensitive species; those threatened or endangered in Oregon but more stable or abundant elsewhere (List 2) are BLM Oregon/Washington assessment species and are addressed in the RMP. Plant species on List 3 (review list) and on List 4 (watch list) are BLM Oregon/Washington tracking species. They are identified by ONHP as species needing more information (List 3) and as being of concern but not presently threatened or endangered (List 4). When funding permits, we would collect information on tracking species but special management is not planned.

The PRMP provides management direction for those species considered in jeopardy of extinction and in need of special management attention. This includes federal listed, federal proposed, federal candidate, state listed, and Bureau sensitive species. These species were identified from U.S. Fish & Wildlife Service lists of federal listed, proposed, and candidate species, State of Oregon lists of state listed and candidate species, and ONHP lists. Management strategies for special status plants do not vary with land use allocation in the PRMP. The PRMP will provide for ecosystem management to protect special status species.

Comment: To follow state and federal guidelines, rare plant habitats should be "protected" rather than "managed."

Response: Proposed management prescriptions are in full compliance with all state and federal guidelines. "Protection" alone will not be sufficient for maintaining many plant species. Active management, such as prescribed fire, may be necessary to maintain or restore the structure and function of certain plant habitats.

Comment: Recommend that the BLM promote active management of Bureau sensitive species, focusing on those that are USFWS Category 2 species or those threatened by activities.

Response: All federal candidate and Bureau sensitive species are afforded the same protection as listed species so as to not contribute to their potential listing.

Comment: *Lillium occidentale* was proposed for listing as endangered on October 26, 1992.

Response: The change has been noted in Table 3-31.

Comment: We can find no scientific reason why the plant *Arctostaphylos hispidula* should be awarded special status.

Response: The Oregon Natural Heritage Program includes this species on List 2-Threatened or Endangered in Oregon but more common elsewhere. Under the BLM system, this category is treated as a special status species.

Comment: An inventory of sensitive plant species occurring in the Coos Bay BLM District should be systematically conducted.

Response: Surveys are conducted prior to management activities when potential sensitive plant habitat is likely to be involved.

Comment: In Table 2-5, the habitat protection for special status animal species is presented for each alternative. We would like to see similar information presented for special status plant species that also require habitat protection.

Response: All special status plant species will be protected from land-disturbing activities on a case-by-case basis. Management plans for these species will be prepared during the life of the plan. Most of the special status plant species are found in special areas (ACECs and RNAs) or in areas not proposed for land-disturbing activities (TPCC fragile nonsuitable sites or noncommercial forest land).

Comment: The final RMP/EIS should explain the rationale for providing different levels of protection for special status plants and animals on Oregon and California railroad lands (O&C) and Coos Bay Wagon Road (CBWR) versus Public Domain lands.

Response: In the PRMP, special status species are treated the same under all lands administered by the BLM.

Comment: The scope of the final RMP/EIS alternatives and analysis should not be limited to the existence of recovery plans.

Response: See response above.

Comment: Your management regime for spotted owls and marbled murrelets should be designed to meet at least minimum provisions of the U.S. Fish and Wildlife Service recovery plans.

Response: The PRMP is designed as a BLM implementation of the Final Draft Recovery Plan for the northern spotted owl. It varies from an exact interpretation of the Final Draft Recovery Plan due to the consideration of other resources. There is currently no recovery plan for the marbled murrelet.

Spotted Owl

Comment: Standards or guidelines should be provided within the RMP to allow evaluation of the risk and impacts to the recovery of the spotted owl.

Response: Management Actions/Direction have been developed for the PRMP (see Chapter 2).

Comment: Standards or guidelines should be provided to ensure actions will be limited to appropriate situations.

Response: See above.

Comment: There is no scientific evidence that the forest structure needed as spotted owl habitat can be grown over time using long rotation forestry.

Response: Although the evidence may not be complete, there is promise that long rotation forestry may produce suitable spotted owl habitat. For that reason, the BLM has initiated research to aid future forest managers who will deal with the issue in the next century. The BLM will maintain all suitable habitat in Late-Successional Reserves and foster old-growth forest conditions in the current young forests in the Late-Successional Reserves as they mature.

Comment: The assumption that natural habitat is "better" than man-made habitat is unfounded and purely emotional based. The BLM should re-analyze this position by carefully reviewing existing data on the subject of natural versus man-made suitable habitat.

Response: Stands that occur naturally, such as after a fire or major windstorm event, often have residual trees remaining. These residual trees provide seed sources and are a recruitment pool for snags for the subsequent stand. Until recently, only a limited number of residual trees and relatively little coarse woody debris were left after timber harvest. Large quantities of coarse woody debris, such as snags or down logs, are typically left following natural disturbance. Because natural regeneration of the new stand may take place over a period of time, individual trees may vary considerably in age.

Also, natural regeneration often includes more tree species than are typically planted in a commercial forest. Tree plantations have traditionally focused on fiber production rather than species diversity. Accordingly, naturally-regenerated stands are generally more likely to retain the biological diversity of the previous stand. By retaining coarse woody debris, snags, and green trees in harvested stands as proposed in the PRMP, some of the characteristics of natural stand development process can be replicated. Additionally, inventories of the young managed stands have shown the tree species composition to be similar to natural stands as a result of natural seeding from minor species.

Comment: Spotted owls do not require old-growth forests, so large reserves are unnecessary. Habitat depends on structure, which can be managed to attain.

Response: The most credible plan for managing spotted owls in the long term involves the concept of large areas to support clusters of nesting spotted owls. If research indicates other options are preferable in the future, the current approach can be modified.

Comment: Though it has been said that owls nest only in old growth, they are now finding owls nesting in young trees as well.

Response: Spotted owls have been found to nest in younger forests with significant older forest structural characteristics. Recent regeneration harvests— especially clear cuts—have not retained these structures, including large retention trees, numerous snags, and large amounts of down wood debris.

Comment: Address management direction for timber sale areas exempted by the Endangered Species Committee in 1992.

Response: The BLM will not pursue the harvest of any of the previously planned timber sales exempted by the Endangered Species Committee. Harvest may occur at a future time on the same land acres, but the prescriptions will not jeopardize the continued existence of the spotted owl or any other federal-listed species.

Comment: Identify the standards under which known spotted owl nest sites will be protected.

Response: At a minimum, at least one center of activity at all known sites of resident single and territorial pairs of northern spotted owls known as of January 1, 1994, will have up to 100 acres of the best available surrounding habitat excluded from timber harvest. Obviously, sites that fall within Reserves or Special Management Areas would have more acres protected surrounding the site.

Comment: Indicate how the Residual Habitat Areas will be placed on the landscape and explain why they are only provided for eight decades.

Response: Although no longer called Residual Habitat Areas, they are allocated as 100 acres of the best suitable habitat around site centers that were known as of January 1, 1994 that fall within the Matrix. The eight-decade deferral is no longer proposed; they are now reserves.

Comment: Clarify whether surface occupancy for mining activities will be allowed in northern spotted owl sites.

Response: As a general rule, disturbances such as surface occupancy would not be authorized within 0.25 miles of a northern spotted owl site. This will, however, vary by site and by season of the year so it is not an absolute exclusion. In instances where the mining activities can occur in harmony with the owl occupancy of the site, efforts will be made to accommodate the mineral resource use.

Comment: BLM proposed inappropriately to provide connectivity for spotted owls by managing connectivity areas.

Response: The purpose of Connectivity/Diversity Blocks is to serve a variety of wildlife species, not only spotted owls. Connectivity/Diversity Blocks—along with other allocations such as Riparian Reserves and Special Management Areas—are expected to mix with the General Forest Management Areas to provide for dispersal of many species including spotted owls.

Comment: Explain how the connectivity areas compare to the 50-11-40 rule outlined in the ISC report.

Response: Management of BLM-administered lands within a quarter township in a Connectivity/Diversity Block will meet or exceed 50-11-40. In the short term, there will be quarter townships where this is not true but in these areas conditions will not decline and recovery will occur in future decades.

Comment: BLM should adhere to the 50-11-40 rule developed by the Interagency Spotted Owl Committee.

Response: In the long-term, BLM-administered lands will provide dispersal habitat that meets the 50-11-40 criteria. To attempt to meet that criteria in the short-term would reduce the PSQ and have too severe an impact on the economies of local communities.

Comment: This RMP does not appear to meet the assumption of the Forest Service EIS that the BLM would adopt a long range plan similar to the ISC Strategy.

Response: The PRMP has been developed to be consistent with the President's Forest Plan. It encompasses many of the provisions of the Northern Spotted Owl Recovery Plan and the Report of the Scientific Analysis Team.

Comment: We recommend (1) BLM adopt a strategy for managing the northern spotted owl that is consistent with the ISC Strategy and/or the Recovery Plan, and (2) the strategy be incorporated into the Resource Management Plans.

Response: See response above.

Comment: The adequacy of connectivity areas for spotted owl dispersal should be demonstrated.

Response: That can only be demonstrated through monitoring. Given other requirements of the plan, it may be impossible to isolate the effects of Connectivity/Diversity Blocks.

Comment: Provisions to provide additional habitat and protection for spotted owl pairs outside of the large blocks of habitat should be incorporated into the plan.

Response: In addition to the Late-Successional Reserves, habitat for a wide variety of species is provided in the Riparian Reserves, Connectivity/Diversity Blocks, and other lands not available for timber harvest. These lands are dispersed through the Matrix.

Comment: Provide the rationale or basis—in terms of spotted owl biology—for the statement that "these [connectivity] areas could provide adequate dispersal habitat between OGEAs proposed in the planning area and on adjacent Federal lands."

Response: The Connectivity/Diversity Blocks—in conjunction with Riparian Reserves, residual habitat areas, reserved pair areas, and the general forest Matrix—combine to meet the dispersal needs for the owl.

Comment: The location and width of the connectivity areas in the Coos Bay District appear inadequate to provide connectivity within the network of the OGEAs. The connectivity areas should be expanded in size and new areas added to interconnect the OGEAs in a network.

Response: Although not designed to meet connectivity objectives, other allocations (such as Riparian Reserves, administrative reserves, and TPCC withdrawals) supplement the Connectivity/ Diversity Blocks, thereby aiding the dispersal of species between the large Late-Successional Reserves.

Comment: Several activities are proposed in deferred OGEAs that appear inconsistent with the draft spotted owl recovery plan. These include density management in older second growth and large scale salvage.

Response: OGEAs have been dropped from the PRMP. Activities in Late-Successional Reserves must be beneficial to the spotted owl and pass the review of the Regional Ecosystem Office.

Comment: The potential synergistic effects of low habitat, low population, and reduced dispersal on the survival of the spotted owl should be addressed.

Response: A discussion of this subject has been added to Chapter 4.

Comment: Assess the viability of the spotted owl under the preferred alternative in the short term, at the lowest point in habitat development, and in the long term.

Response: An assessment of the viability of the spotted owl included in the SEIS is discussed in Chapter 4 of the PRMP/FEIS.

Comment: Evaluate the effects of the plan on designated critical habitat.

Response: An assessment of the effects of the plan on designated Critical Habitat has been added to the analysis of effects. No actions will be implemented that will result in the destruction or adverse modification of Critical Habitat.

Comment: The discussion of the discrepancy between the spotted owl population model's projection of current population and the observed population should include problems with the model.

Response: Since SEIS Appendix J superseded our analysis, we have not rerun the McKelvey Model for analysis of the PRMP except to acknowledge and reference the SEIS analysis.

Comment: Assess the risk that density management would negatively affect suitable spotted owl habitat.

Response: There is no density management proposed in suitable owl habitat in the Reserves nor in occupied residual habitat areas in the Matrix. Otherwise, owl habitat in the Matrix is available for management, and loss of habitat over time in the Matrix is acknowledged.

Comment: Evaluate the level of risk to the stability of spotted owl populations under the Preferred Alternative.

Response: The Chapter 4 discussion has been expanded to describe risk in general terms. The SEIS evaluates risk from the (new) PRMP as it integrates with other Federal plans.

Comment: Provide information on the quality and distribution of suitable spotted owl habitat after 100 years. Identify the extent to which the development of future habitat is dependent on the ability to create or speed its development through silvicultural practices.

Response: Information on the acreage of suitable habitat expected on BLM-administered lands after 100 years is provided in Table 4-19 in Chapter 4. The development of quality habitat is dependent on time. The younger stands of today that hold the key to habitat recovery will be 100 to 140 years of age in 100 years. In this age range, stands are beginning to move from primarily foraging substrate to furnishing high quality foraging and nesting habitat. The role of density management is to diversify the stands structurally so that they might attain the higher quality status at approximately 120 years of age.

The silvicultural practices serve as an enhancement technique that, if successful, will bring habitat on line faster. If it is not successful, however, stand development could be retarded and the time until habitat conditions were reached could be lengthened. Many of the answers to

questions on this topic are unknown at this time, but the objective is to apply the management prescriptions over time within an adaptive management framework.

Comment: Provide information on the quality and distribution of suitable habitat beyond simply stating that there will be more suitable spotted owl habitat under the Preferred Alternative after 100 years than is currently available.

Response: Chapter 4 has been expanded to include a more through discussion of the impacts to the Northern Spotted Owl.

Comment: Provide information on the extent to which development of habitat is dependent on the ability to create or speed the development of suitable habitat through silvicultural practices, which is yet an unproven assumption.

Response: Under the proposed resource management plan, most of the spotted owl habitat consists of reserved existing habitat. Development of additional habitat is dependent on regrowth (aging) of younger stands. The pace at which these stands develop relevant characteristics can be influenced by silvicultural practices, but "with and without" comparisons would only be relative and as noted, unproven. Only stands less than 80 years old would be entered with density management harvests to help speed the development of suitable habitat. Additionally, the BLM has initiated research to assist managers in addressing this issue in the future.

Comment: Discuss the capability of OGEAs, and the management proposed within them, to maintain population levels sufficient to provide their internal stability.

Response: This capability, in relation to Late-Successional Reserves, has been fully addressed in the SEIS.

Comment: The prediction that as much as 40 percent of the OGEAs may be subject to density management increases the risk of catastrophic failure of the network concept. This failure is due to the lack of experience in developing and maintaining old-growth characteristics capable of supporting viable populations of spotted owls and also the lack of detailed knowledge on the components of structurally diverse forest important to spotted owls. Evaluate the risk of failure of the techniques and the potential impact on the species of such a failure.

Response: The Chapter 4 discussion has been expanded to address this concern as it now relates to late-Successional Reserves. This issue is also addressed in the SEIS. Under the PRMP, thinning would only occur in Late-Successional Reserve stands less than 80-years old. Given this limited thinning, we feel that the risk of failure and potential negative impacts on the northern spotted owl is minimal. The potential for habitat enhancement far outweighs the perceived risk.

Comment: Specifically assess the effects of the Preferred Alternative on spotted owls in the Coast Range province.

Response: This is fully addressed, province-wide, in the SEIS.

Comment: Indicate how spotted owl dispersal will be maintained.

Response: Dispersal habitat for owls will be provided by the vegetation pattern and condition inherent in the management allocations and prescriptions of the Late-Successional Reserves, Riparian Reserves, Special Management Areas, Connectivity/Diversity Blocks, and the General Forest Management Areas.

Comment: The BLM has misrepresented the capability of private lands to contribute to spotted owl recovery.

Response: The SEIS fully discussed the relationship between the management of federal lands and the importance/values derived from the non-federal lands.

Comment: Provide rationale or documentation for the statement that isolation is not thought to be a factor under the preferred alternative.

Response: The issue of isolation of segments of the population was addressed in the Final Draft Recovery Plan for the Northern Spotted Owl. It was accounted for by the size and arrangement of Designated Conservation Areas (DCAs) and the management of the matrix between them. The PRMP adopted the reserve system identified in Alternative 9 of the SEIS and will manage the intervening Special Management Areas, Connectivity/Diversity Blocks, and General Forest Management Area lands to ensure adequate survival and movement of young owls.

Comment: Discuss the impact of the Preferred Alternative on all quarter townships, not just those in connectivity areas. Evaluate how the deficient quarter townships (re: the 50-11-40 rule) are distributed and how their location affects inter- and intra-provincial dispersal.

Response: The discussion of dispersal habitat under the PRMP addresses dispersal on lands outside the (Late-Successional) reserve system.

Comment: As time goes by, the numbers of known spotted owls or pairs of owls keep rising and as of now the number of owls known to exist far exceeds the numbers that were estimated in the past.

Response: It is true that the number of spotted owls has increased in recent years. This is primarily due to the much increased intensity of survey efforts during the breeding season. The apparent increase in population size does not contradict the projected decline of the species range-wide. Neither does the number of known individuals exceed the estimates from Thomas ,et al. (1990) or the Final Draft Recovery Plan.

Comment: Due to the controversy surrounding the type of science being employed, the BLM's documentation must disclose not only the assumptions used in estimating land management impacts on species, but the associated level of confidence as well.

Response: Some of the documentation is listed in Appendix IV-I of the draft RMP/EIS. Additional documentation has been provided in the SEIS.

Special Areas

Comment: Protection of ACECs instead, or additionally, as Outstanding Natural Areas (ONAs) is needed to assure truly meaningful agency protection.

Response: Outstanding Natural Area is a recreational designation (CFR 8352.0-2) and may not be appropriate for all ACECs. The Federal Land Policy and Management Act requires protection of all the relevant and important natural features for which an ACEC is designated. ACEC designation provides adequate protection under existing law and policy. Secondary designations such as RNA or ONA have been provided for some ACECs only to clarify management objectives.

Comment: All ACECs should be posted to prevent unintentional use and should be closed to off-road vehicle use.

Response: Posting and other protective measures will be undertaken for each ACEC, commensurate with values at risk, threats from inappropriate uses, and physical and biological factors. Actions taken to prevent unintentional uses will depend on the primary values for which an ACEC was designated and will be developed during watershed planning and/or activity planning after completion of the RMP.

Comment: A stronger policy is needed to prevent the harvesting of "minor forest products" from special areas.

Response: A stronger policy has been developed for minor forest products, which are now referred to as special forest products. The discussion of them has been expanded. See Chapter 2, Special Forest Products.

Comment: Designate the four RNA proposals as ACEC/RNAs and not just as ACECs.

Response: Five areas within the district were proposed for designation as RNAs/ACECs. In the RMP, each of the five (Wassen Creek, Upper Rock Creek, North Fork Hunter Creek, Hunter Creek Bog, and North Fork Chetco River) has been proposed for designation as an ACEC. Such a designation would protect the natural features present at the sites, as required by FLPMA, while also providing an opportunity for consideration of multiple uses to occur. Designation as an RNA would preclude future management opportunities such as the development of a foot trail within an area. Upon final designation, a site-specific management plan will be prepared, which will describe permitted and prohibited uses within each of the areas.

Comment: We are concerned that the district wants to consider recreation development in areas that have long been proposed for RNA status.

Response: See above.

Comment: If we encourage recreation use in RNAs, their utility for baseline information will quickly become compromised. Once set, recreation use patterns are nearly impossible to change or curb.

Response: The PRMP does not encourage recreation use in any RNA. Also see response above.

Comment: The Fish and Wildlife Service supports the Oregon Natural Heritage's recommendations for Resource Natural Area designations for Hunter Creek Bog and North Fork Hunter Creek for their botanical and ecological uniqueness.

Response: See response above.

Comment: The Coos Bay plan fails to designate the Upper Rock Creek area with its significant stand of old-growth redcedar as an ACEC.

Response: Upper Rock Creek was proposed for designation as an ACEC in the draft RMP (see Table 2-6 in the draft RMP), and is also proposed for designation as an ACEC in the PRMP.

Cultural Resources

Comment: The cultural resources discussion does not accurately address governmental bodies of federally recognized Indian tribes.

Response: The text has been revised to identify such bodies by the appropriate names or collectively refer to them as "federally recognized Indian tribes" or as "Indian nations."

Comment: The cultural resources section of the document should include interaction and consultation with appropriate tribal governments regarding cultural/archeological issues.

Response: The Chapter 2 discussion of Cultural Resources has been expanded to address these interactions. The provision of the draft RMP to the tribal governments is regarded as the first step in the consultation process. Further interaction and consultation regarding site-specific actions of tribal interest can be initiated either by the tribe or by the BLM as tribal concerns are identified. BLM has suggested—and is in the process of consulting with each of the tribal governments about—development of Memorandums of Understanding to encourage more interaction and consultation between the tribal governments and the BLM.

Visual Resources

Comment: Describe existing visual conditions along major highways, identify those segments appropriate for visual management, and direct management plans to achieve expected future conditions.

Response: BLM-administered lands have been inventoried, evaluated, and assigned inventory classes based on their relative worth from a VRM point of view. Chapter 3 describes the results of the inventory process. The alternatives recommend various classes of visual resource management (VRM) for BLM-administered lands including lands along major highways. Each VRM class has objectives that are used to identify management prescriptions (See Chapter 2) for the maintenance, enhancement, or preservation of scenic values.

Comment: Long-term visual management objectives should consider the use of silvicultural practices to accomplish the VRM objectives.

Response: Such practices will be used in VRM Class II and III areas where consistent with land use allocations protective of other resources. See PRMP Management Actions/Direction.

Comment: Work with adjacent landowners and others to maintain visual continuity.

Response: BLM has authority or responsibility for visual resource management only on BLM-administered lands. We will work with adjacent interested landowners to coordinate visual resource management primarily during watershed analysis.

Wild and Scenic Rivers

Comment: Say whether BLM land management actions that could impact designated State scenic waterways will be coordinated with the State.

Response: This coordination will occur in accordance with the Memorandum of Understanding for River Management among the BLM, the Forest Service, and the Oregon Parks and Recreation Department.

Comment: Clarify how technical procedures were used by BLM to determine wild and scenic river suitability.

Response: Although a number of explicit technical criteria were used to determine which rivers would be found suitable under Alternatives A, B, C, D, and E, the suitability findings in the PRMP were based on a more subjective weighing of these criteria plus public comment on the various rivers.

Comment: Consider the following additional criteria in suitability determinations.

- Aggregated values of a given stream.
- Importance of aggregated values on both a statewide and SCORP regional level.
- Importance of smaller "less stellar" streams to the program.
- Non-local, as well as local, support for a given stream.

Response: These factors were considered in the PRMP.

Comment: How is it possible to recommend a given eligible river segment for national wild and scenic river status in one alternative and not in another?

Response: To show a range of alternatives, the variation is based on the relative importance attached to economic tradeoffs, quality of the river segments, and manageability of outstandingly remarkable values by BLM. The purpose of alternatives is to consider the consequences of varying management direction and resource allocations.

Comment: Wild and scenic river suitability is not based on a "Top Four" recognition.

Response: The "top four" assessment was used to structure Alternatives B, C, and D but was not directly used in the suitability finding process for the (draft RMP/EIS) preferred alternative or the PRMP.

Comment: The cursory suitability studies in the RMPs do not fulfill the BLM policy requirement. It is especially important to evaluate degradation to ORVs should a river not be given wild and scenic status.

Response: The wild and scenic river assessment reports in Appendix II-N of the draft RMP/EIS were prepared in accordance with BLM policy. Probable degradation of ORVs—should a river not be given wild and scenic status—is addressed in the section of each report titled Effects on Outstandingly Remarkable Values.

Comment: Another management option does not preclude wild and scenic status. RMPs are not permanent and will no doubt change. BLM should protect those rivers deserving of such status.

Response: The suitability findings proposed considered all those aspects of the question.

Comment: The alternative management options for "not suitable" rivers may not give them protection comparable to wild and scenic status.

Response: The "not suitable" rivers were all found to be eligible for recreational classification only. Proposed Riparian Reserve widths on these segments range from approximately 400 to 600 feet on each side of the stream, subject to some modification after watershed analysis. These Riparian Reserve widths and other management direction outside the Riparian Reserves would provide comparable or better protection than that envisioned for "recreational river designation" by the Wild and Scenic Rivers Act for the portions of these river segments crossing BLM-administered lands.

Comment: All values on eligible rivers should be maintained at their current level until Congress acts.

Response: Neither the Wild and Scenic Rivers Act or any related policy suggests that an agency's negative suitability determinations on eligible rivers will be referred to Congress for action. The standard protocol is that the agency's negative determination resolves the issue.

Comment: How long will interim management occur on eligible rivers not studied in the RMP?

Response: Since BLM nor any other agency has a plan to study these rivers, interim management may last a long time.

Comment: Interim guidelines for eligible wild and scenic rivers result in de facto designation and management of those rivers in violation of the Wild and Scenic Rivers Act and FLPMA. Further, the interim guidelines exceed the Department of Interior's own regulations by excluding timber management activities along these rivers.

Response: The de facto designation is only for the period until suitability is determined or, if found suitable, a river's status is settled by legislation. This is consistent with FLPMA and in accordance with the Wild and Scenic Rivers Act. Timber management activities are excluded within the full 0.5-mile wide corridor for protection of such rivers only if they are eligible for wild classification.

Comment: The simple fact that a river has anadromous fish or scenic or recreational qualities does not qualify it as eligible for further study under the Wild and Scenic Rivers Act.

Response: True. The values must be found to be "outstandingly remarkable" under the terms of the Act.

Comment: BLM should establish a new study process to be used for determining suitability that conforms to the Wild and Scenic Act and BLM policies. All rivers (even those previously studied) should be evaluated for suitability using the new process.

Response: The study process that was used by the district in preparing the PRMP conforms with requirements of the Wild and Scenic Rivers Act and Bureau policies.

Recreation

Comment: Coordinate with State and local government on actions that may influence the Regional Strategies and Community Initiatives programs. Develop a multiple agency recreation planning program to promote recreational development and tourism.

Response: The plan provides for such coordination, which is discussed where relevant, specific, multiple-agency planning is an implementation planning process function, not a part of the RMP.

Comment: Develop trail plans.

Response: Trail plan development is a part of activity planning that follows completion of the RMP.

Comment: Include provisions for designating areas to meet off-road vehicle demand.

Response: It is BLM policy that off-highway vehicle use is acceptable wherever it is compatible with established resource management objectives. BLM-administered lands remain open to such use unless specifically closed or limited. After completion of the RMP, the district will develop an OHV implementation plan with more specific management provisions.

Comment: Strengthen standards and guidelines for ORV use.

Response: Those guidelines are contained in the Bureau's regulations (43 CFR 8340). Revision of those regulations is beyond the scope of the RMP.

Comment: Use of the term "off-road vehicle" rather than "off-highway vehicle" implies that vehicles leaving roads or trails is okay, which is not so.

Response: The term has been revised to off-highway vehicle.

Comment: Associated impacts of ORV use on wildlife—including special status species—are not identified anywhere in the RMP/EIS.

Response: Chapter 4 has been revised to address these impacts.

Comment: Incorporate the ROS rating system into the final plan.

Response: Due to the fragmented land ownership pattern and the density of the existing road system on BLM-administered lands in the planning area, the current ROS classification system is not an effective tool for management planning. However, the district is developing a modified ROS classification system that could effectively differentiate among the variety of recreational experiences and settings that are available on the district's landscape.

Comment: We urge that current recreational economic methodologies be reconsidered so the full value of recreation can be described in the final RMPs.

Response: Chapter 4 has been revised to include a general description of economic impacts resulting from out-of-state visitation, as well as from development of recreation projects such as Bal'diyaka at Gregory Point. It should be noted, however, that due to a lack of reliable out-of-state visitor data, the planning area data base used to quantify economic impacts did not include out-of-state visitation.

Comment: There is concern that the projected increase in usage of recreational resources has been significantly underestimated. The plan uses Oregon State Parks' estimates of future usage based on Oregon residents only.

Response: This has been acknowledged in Chapter 3. The data used is the best that is available at this time.

Comment: The plan should address mountain biking as a recreational activity.

Response: Chapter 3 has been revised to acknowledge this activity.

Comment: We strongly urge you to eliminate the two proposed boat ramps in the designated recreation area between mile five and six on the Sixes River.

Response: The two boat ramps proposed in the draft RMP have been dropped as a result of further site analysis which showed the two sites were not suitable for development as boat launch sites.

Timber - Management Direction/Practices

Comment: Timber supply does not appear to be an important part of alternative formulation.

Response: Timber supply was a consideration, both in the RMP/EIS and the SEIS. Since timber supply concerns paralleled concerns regarding socioeconomic conditions, which had higher visibility, its role in the formulation of alternatives was less visible.

Comment: Discuss the Bureau's willingness to accept "departure" from nondeclining yield. If management in OGEAs is modified in the future, then harvest in future decades will change.

Response: It is implicit in any decadal or other cyclical planning process that management guidelines will change when the plans are revised. New information from research and monitoring, as well as new legislation and policies, may drive such changes. In subsequent planning cycles, the identified sustainable harvest may decline or increase, but it is unlikely to stay the same. That perception does not make the currently estimated sustainable timber harvest a "departure." A departure is a deviation from currently estimated sustainable levels.

Comment: Explain the rationale for minimum harvest ages.

Response: The minimum harvest age is the youngest aged forest stand to be scheduled for regeneration harvest. Minimum harvest ages were selected to move the managed forest toward a long-term balance in age class distribution and forest condition. Relatively low minimum harvest ages provide flexibility in scheduling regeneration harvest ages for stands. When older age classes on lands available for harvest are limited or their harvest is restricted during the early decades of the plan and younger merchantable age classes are abundant, some of the younger age classes may be subject to regeneration harvest until adequate rotation aged timber is again available. In the long term, most regeneration harvest would take place at or above the target rotation age.

Comment: The RMP calls for harvest of one-quarter of the stands 100 to 200 years old during the next decade, a rate not sustainable.

Response: The requirement that harvest be sustainable is applicable to harvest from all age classes combined, not to separate age class groups. The PRMP will harvest six percent of such stands on BLM-administered land in the first decade.

Comment: Maintain within each third-order watershed examples(s) of ecologically significant older forest stands. These stands should represent PNW 447 criteria, or if no stands having these characteristics are present, include natural stands without significant salvage or thinning histories.

Response: Option 1 of the FSEIS was designed to protect all existing old-growth forest stands. The SEIS fully analyzed this option (alternative).

Comment: The BLM's Preferred Alternative preserves more than 32,000 additional acres for visual resource management. These acres should be part of the productive land base to be managed for timber.

Response: BLM-administered lands are managed for a variety of resource uses and benefits, including timber harvest. To prepare a balanced resource management plan for the planning area, some resource trade-offs are necessary for the benefit of other resource programs.

Comment: There are no provisions for phasing down timber harvest levels. BLM should consider a one-decade departure from the non-declining harvest level.

Response: BLM's sustained yield mandate makes no provision for such a phase down of planned harvest (PSQ). BLM lacks such authority—other than for a departure which would cause a negligible subsequent drop below sustained yield levels. The stand conditions on lands available for timber harvest in the PRMP and the overall plan objectives would cause any significant departure to result in substantial drop in sustained yield levels in future decades.

Comment: The practicality is questionable of logging patches of five acres or less and of leaving a few green trees per acre (which might be genetically inferior but would likely overstock planted regeneration areas if not blown over first).

Response: This approach has been de-emphasized in the PRMP.

Comment: It is inappropriate to include "deferred" old-growth areas and watersheds in the timber harvest assumptions.

Response: The O&C Act requires BLM to identify the sustainable harvest level.

Comment: Lack of trained silviculturists may be a barrier to implementing the proposed silvicultural activities.

Response: We recognize a need to modify our skill mix and provide or obtain additional training.

Comment: More detailed silvicultural prescriptions are needed.

Response: Due to the somewhat experimental nature of many prescriptions, they must be adaptive and variable from site-to-site, as we learn from our own experience and that of others attempting active ecosystem management.

Comment: It is difficult to determine how proposed silviculture will actually influence stand growth, yield, and structure.

Response: These are some reasons for our emphasis on adaptive management.

Comment: Use of formaldehyde as a binder in fertilizers is illegal.

Response: The use of formaldehyde in fertilizers is not illegal. When selecting products for use, federal agencies screen for the presence of formaldehyde and select products without it if they are similar in effectiveness. For aerial fertilization, only pelletized fertilizers are considered highly effective because their weight carries them through the canopy to the forest floor. The only binder commonly used for pelletizing is formaldehyde, which forms urea into hardened crystals that not only prevent dusting but protect against caking and provide slow release of the fertilizer.

Comment: The court injunction on BLM's use of herbicides has not been lifted.

Response: As long as the injunction remains in place, herbicides will not be used. The probable sale quantity (PSQ) is not dependent on the use of herbicides, but in the absence of their use on a long-term basis, costs of management would increase.

Comment: The plan makes no allowance for failure to meet timber production goals that hinge on the success of intensive management practices. Past efforts to increase yields through intensive management have fallen short of expectations.

Response: During the period of 1984-1992, the Bureau's intensive management investment in western Oregon supported 117 percent of the offered volume and 90 percent of the planned volume. The PRMP provides for reduction of timber sale offerings below the PSQ if investments in timber management do not support offering the PSQ.

Intensive management practices on all available lands will provide opportunities to increase harvestable materials at some time in the future. These will be especially important as future harvest becomes more dependent on density management and commercial thinning in the 4^{th} through 6^{th} decades.

Comment: All BLM plans rely to a significant degree on intensive management and make no allowances for failure to meet goals that hinge on the success of such practices. Past efforts to increase yields through intensive management have fallen far short of expectations.

Response: We disagree with the conclusion that intensive management practices have fallen short of expectations. Research indicates that the gains resulting from such practices are well within our projections for the future.

Also see response above.

Comment: The ASQ should be reduced to reflect realistic assumptions for funding intensive management practices.

Response: Annual timber sale levels will be adjusted to reflect any sustained shortfall in funding for the intensive management practices on which the PSQ is partly contingent. The PSQ itself properly estimates the level of harvest that is biologically sustainable given the agency's management direction.

Comment: The sustained units as defined in the plan should be for all of the district, not a portion of the district.

Response: This is the case for the Coos Bay District.

Comment: BLM should act consistently with Oregon laws, policies, and programs adopted to protect the State's forest land base for timber production and other forest uses.

Response: See the discussion on consistency in Chapter 4 and Appendix FF.

Comment: Coordinate with adjacent landowners regarding timber management practices, particularly harvest activities.

Response: Coordination with major industrial owners and adjacent USFS Ranger Districts has been occurring for many years through annual coordination meetings. Additionally, communication with adjacent landowners occurs on case-by-case basis on individual timber sales, and in particular where prescribed burning or the use of herbicides is proposed. Initiation of the watershed analysis process will increase this coordination with other landowners.

Comment: The cumulative effects of timber harvest decisions by other land management agencies need to be considered by the BLM in their final plan.

Response: See response above.

Comment: To truly practice ecosystem management, the BLM needs to look at the accumulated impacts of its actions in concert with the intermingled private lands.

Response: This is the basis for Chapter 4, analysis of affects or environmental consequences. Also see response above.

Comment: Habitat for species preferring mature and older stands is much more dependent on structure than age. We believe the more complex stand structure typical of older forests can be developed beginning at an early age.

Response: We agree. The rationale for proposed stand management within the Late Successional Reserves and Connectivity/Diversity Blocks is to develop old-growth characteristics more rapidly.

Comment: The final RMP/EIS should identify silvicultural management priorities that could guide activities should they not be sufficiently funded during plan implementation.

Response: This will be included in the ROD.

Comment: Use thinning and multi-species replanting techniques to convert even-aged plantations to naturally diverse forests.

Response: The PRMP uses density management and understory planting with a variety of species as a means of increasing diversity.

Comment: Throughout the document, I can find no discussion of the possible negative environmental effects of fertilization.

Response: We are not aware of any negative effects resulting from the proper use of fertilizer. The Aquatic Conservation Strategy and the Best Management Practices Appendix both address the application of fertilizer.

Comment: Small sales to local loggers and sawmills should be a vital part of the RMP.

Response: The Small Business Administration has established a set-aside program for small businesses. This program has rarely satisfied operators with fewer than 15 employees. Establishment of additional programs require regulatory changes and are outside the scope of the RMP.

Comment: Request that Port-Orford-cedar be removed from designation as a surplus species.

Response: Such a change requires regulatory action and therefore is beyond the scope of the RMP.

Comment: We would suggest that the BLM needs to intensively manage cutover lands to the greatest extent possible. As such, all acres needing protection should be treated.

Response: This is done to the extent funding is available.

Comment: It appears that the amount of timber being set aside for the spotted owl is excessive. Possibly, some beneficial cutting could be permitted in these areas .

Response: The PRMP proposes some harvesting in both the Connectivity/Diversity Blocks and Late Successional Reserves, primarily in the form of density management thinning. In the Connectivity/Diversity Blocks, regeneration harvest is proposed over time, albeit on a long rotation.

Comment: BLM should set a limit of two years after harvesting to have their lands replanted. After all, the Oregon Forest Practices Act currently requires private landowners to commence reforestation efforts within one year of harvesting.

Response: In most cases, we meet or exceed OFPA requirements. The State of Oregon recognizes that our reforestation program meets the intent of the OFPA. In a few isolated cases, we may not be able to guarantee "free to grow" seedlings in five years because of brush encroachment. In those cases, planting is deferred until adequate site preparation is completed.

Comment: All lands suitable for timber production should be intensively managed by using forestry techniques such as thinning, fertilization, site preparation, and tree planting.

Response: Intensive management practices will be employed on those stands occurring in the General Forest Management Area.

Comment: There should be provisions to adjust the level of harvest commensurate with the available funding for genetic improvement, fertilizer use, thinning, use of herbicides, or other intensive management practices designed to increase tree growth.

Response: See the discussion on the Budget Link in Chapter 2.

Comment: Stop shipping so many logs out of the country and there will be plenty for our mills.

Response: Exporting of unprocessed logs from federal lands, with the exception of Port-Orford-cedar, has been banned by federal law since the late 1960s. The BLM has no authority to regulate export of logs originating from private lands.

Timber - Productivity/Sustainability/Forest Health

Comment: Set specific goals and objectives for forest health, detailing how proposed management strategies will address it and what measures will be implemented to improve unhealthy forest conditions.

Response: Ecosystem (forest) health was defined by FEMAT as the state of an ecosystem in which processes and functions are adequate to maintain diversity of biotic communities commensurate with those initially found there. As such, the concept includes the condition and characteristics of stands and landscapes we considered under the topic of Biological Diversity and Ecological Health. Goals for general forest health and ecosystem diversity and function were set as part of the PRMP. Chapter 4 describes the result of applying these goals at the planning level and the extent to which the plan alternatives will result in forests within the range of natural conditions. Further analysis will occur in watershed analysis.

Comment: Assess forest health issues, particularly the role of salvage operations.

Response: Salvage operations will harvest the result of accelerated mortality of trees caused by poor forest conditions in periods of drought or other environmental stress. Attainment of higher levels of forest health will result in mortality declining to levels that are normal for relevant seral stages. Salvage does not by itself have a positive ecological effect and may have a negative effect if carried to excess.

Comment: The BLM plans timber harvest rotations of 60 years, close to the rotation period the FORCYTE-II model suggests is unsustainable.

Response: The FORCYTE-11 model suggests that harvest rotations (repeated harvest cycles) of less than 50 years would be unsustainable. Analysis for the district indicates that stands less than 60 years of age will not be harvested.

Comment: Failure to retain the large old insect resistant trees has been attributed to much of the forest health problems presently being experienced in the Northwest.

Response: Resistance to insects is a function of tree/forest vigor more often than size or age of individual trees. Vigorous low density widely spaced trees rarely succumb to insect problems. In stands where density is greater than long term site potential to support vegetation during drought periods the vigor of trees is lower. Insects, disease or fire thin out the most susceptible trees.

Size of trees is a factor in resistance to natural disturbance regimes such as frequent fires that reduces forest density by killing trees with thin bark and/or foliage that provides fire-ladders. Older trees are insulated from such thermal intrusion and normally have elevated tree crown bases. Selective harvesting of older-larger sized trees or removing older stand components has contributed to homogenous stands in fire prone areas, lowering overall stand fire resistance and thus patch survival following catastrophic events.

Not permitting fire to play its traditional (natural) function has had a significant impact on both eastern and western Oregon. In fire-prone areas removal of the large fire resistant trees has also contributed to problems in implementing underburning to reduce density of brush/ hardwoods/understories of confers. In moderately-to-very dense stands the recent drought cycle has placed some of the largest trees within these stands at risk since they have not been able to compete successfully for limited soil moisture. Once weakened or killed by drought, they are readily attacked by insects.

Comment: Existing conditions of insects and diseases are not addressed or are superficially addressed and quantitative data are not included. Little or no effort is made to project effects of new management practices on future insect and disease impacts.

Response: This is an emerging issue that was not identified during scoping of the plan. Consequently, previous inventories did not address such existing conditions. These concerns are part of the focus of ecosystem management, but too little is known for us to forecast comparative outcomes. As we learn more, our management will adapt.

Comment: The plan indicates that control methods will be applied to insects and pathogens if large outbreaks develop. A prevention approach, never allowing outbreaks to develop, is preferable.

Response: A preventive approach is preferred for insect and pathogens as well as dealing with competing vegetation and animal damage. Identifying ecosystem potentials, using density management and underburning appear to be the preferred prevention/control method.

Comment: Forest health is not defined.

Response: Discussion has been added to Chapter 3, which includes a definition.

Comment: Significant insects and pathogens should receive treatment as important concerns or planning considerations under at least the "timber production practices" issue raised in all the plans.

Response: The discussion on Forest Health has been expanded to include insects and pathogens.

Comment: The preferred method of managing populations of insects and pathogens is to use a prevention approach with the goal of never allowing epidemics to develop. Integrated pest management techniques, including silvicultural manipulation of stands to prevent the development of conditions favorable for damaging population increases, is our preferred method.

Response: We agree. The integrated pest management approach is our preferred method.

Comment: What new problems and/or pests will surface if logs are imported from foreign forests?

Response: The RMP does not propose to import logs from foreign forests.

The SEIS acknowledges that reductions in federal timber supplies will result in some increase in supply from private lands and that the remaining needs will be met by product substitution or by imports from other countries and other sections of the United States. The details of preventing the importation of insects or diseases via imported wood products is beyond the scope of this EIS.

Timber - ASQ/PSQ

Comment: Include a discussion of the ASQ philosophy and identify whether the ASQ is a goal or a mandated level of timber production.

Response: Discussion has been added to the Introduction to Chapter 4.

Comment: Clarify growth and yield assumptions.

Response: A general description of growth and yield assumptions and the modelling procedure used for each SYU is contained in Appendix U to the PRMP/FEIS. The actual yield tables used are available for review at the district office.

Comment: The approach used for incorporating genetic improvement into the growth and yield models is inappropriate.

Response: Predicted genetic gains are based on individual tree growth differences in young progeny evaluation plantations. We recognize that it has not yet been demonstrated that these gains are achievable as per-unit-area yield gains at rotation. Field tests comparing performance of improved and unimproved stock continue to be established to verify estimates. The Northwest Tree Improvement Cooperative, of which BLM is a member, has initiated a series of genetic gain trials to evaluate genetic gain on a yield-per-unit-area basis. In the meantime the results from progeny evaluation plantations are the best data we have. The effect on the calculated PSQ is negligible for this decade.

Comment: Adjustments to the yield models for genetics and fertilization are speculative.

Response: Considerable detail under the various treatment conditions and a high level of confidence from demonstrable responses is indeed lacking. There is prediction involved and this prediction is based on current evidence available.

The expected gains from the genetic selection program in western Oregon are currently estimated from conifer species studies and the results of early progeny tests from the Northwest Tree Improvement Cooperative. From other forest tree studies it has been found that the major changes in growth attributes can be estimated through changes in growth height-age curves. Young stand growth studies are in place throughout western Oregon to provide data on benefits of growth of selected progeny trees. The current young growth of these trees has then been modelled through growth simulators to estimate gain in volume. Tests comparing performance of improved and unimproved stock continue to be established to verify the BLM estimates.

Part of the predictive process is indicating what to do now in order to increase the likelihood of a desired future condition. In the instances of genetic selection and fertilizer, gain is both an increase in volume and the quality/return from the resultant products. We have used average responses for acreage predicted to be treated and will monitor as well as continue research.

Genetic effects will become important in approximately four decades when currently treated stands will be a major part of PSQ when those areas planted with genetically improved stocked undergo thinning and limited regeneration harvest. Thus, the evidence should be available when the gains are being realized. Most simulators demonstrate low impact on current PSQ calculations and are appropriately conservative.

Fertilization and commercial thinning results are more immediate in their effects, as treatment and harvest in commercial thinning can occur within the same decade. Plots exist in western

Oregon which indicate the expectation of average gains for treated stands is reasonable. Gains related to fertilization at time of precommercial thinning are more speculative. But again, as in the case of genetic selection, the effects will occur in the future.

Comment: Compare modeled, first-decade growth to historic, empiric growth.

Response: The inventory design utilized to estimate current standing volume does not permit the derivation of actual decadal volume growth in the forest. Growth of stands is projected in the TRIM-PLUS model using empirical yield tables, approach to normality functions, and managed stand yield tables developed from SPS. Long-term studies of the effects of intensive management on stand yield do not exist in southwestern Oregon; however, extrapolated yields are consistent with existing empirical data for the region.

Comment: Compare the stands scheduled for treatment in decade 1 from the TRIM analysis and those stands scheduled in the operational plan for the first decade.

Response: The 10-year scenario is not an operational plan but a modeling tool that selects the quantity of stands with similar age and previous management attributes as those modeled in the TRIM-PLUS harvest simulator.

Comment: It appears that ASQ is based on a linear model similar to FORPLAN.

Response: TRIM-PLUS is a timber yield model similar in many ways to FORPLAN timber yields. Major advantages were that TRIM-PLUS could be run on enhanced IBM/AT compatible microcomputers and many runs could be made inexpensively and directly available for district personnel access, thus making runs adapted to local conditions and age classes. TRIM-PLUS is a binary search model with the capability of structuring the forest in unlimited units based upon site, species, stocking levels and management prescription. Different minimum harvest ages can be used on component units.

FORPLAN, in comparison, is a linear program optimization model requiring production coefficients for various resource values. It includes many more 'inputs' and addresses many 'outputs' in addition to timber yield.

Comment: Display a plot incorporating expected yield per acre at various rotation lengths multiplied by pond value per cubic foot. Include rotations up to 300 years.

Response: There is not enough data to form a realistic basis for such estimates. Speculation on long-term future pond values would be more misleading than useful.

Comment: Short-term harvest limitations due to emerging concerns over threatened and endangered species, watershed protection and the cumulative effects may limit ASQ more than sustained yield constraints do.

Response: The interaction between PSQ calculation and our 10-year timber management scenario has permitted us to address cumulative watershed effects as well as is practical in a checkerboard ownership pattern where private actions are speculative. Ecosystem management is intended to minimize the need to add unforeseen restrictions on timber harvest due to listing of additional threatened and endangered species.

Comment: Use a model such as FORPLAN or SARA, or expansion of your 50-11-40 rule analysis model, to determine the potential harvest acreage by subarea and type in the first few decades of the plan.

Response: The 10-year scenario identifies potential harvest acreage, which can be determined by subarea, for the first decade. Extending the scenario into the future would lose reliability due to the adaptive nature of the plan.

Comment: Appendix II-D should include a description of the procedures used to compute the allowable sale quantity for the Preferred Alternative (and/or Proposed Action).

Response: Complete documentation on the ASQ computation process is available for review at the district office. Inclusion of this detail would probably not be of interest to the average reader.

Comment: The statement that brands the Allowable Sale Quantity (ASQ) calculations as "speculative" seems to be a disclaimer for the accuracy of the ASQ calculations for the Preferred Alternative and Alternative C, bringing question to the procedure used.

Response: The draft RMP stated (page 2-46), "The Preferred Alternative, like Alternative C, contains many timber management practices recognized to be substantially untested, thus, modeling its sustained yield is more difficult than it is for alternatives that rely on traditional forest management techniques. The level of confidence in the resulting ASQ is, therefore, lower than for Alternatives A, B, D, and E." We believe that statement is accurate.

Comment: For Alternative D only: We recommend that you expand this model to include other "cumulative effect" factors that may limit your harvest level in the coming decade. This model could calculate the allowable harvest acreage for each relevant sub-area of the district for the coming decades and be used in conjunction with the TRIM-PLUS model.

Response: This is beyond the scope of analysis at this time. Had this been proposed at the time when alternatives were being developed, it might have been possible to include in the model.

Comment: It is important to identify the ASQ contributed by each individual intensive management practice.

Response: Table IV-A-1 in Appendix IV-A of the draft RMP displayed the contribution of many of the intensive management practices and the expected changes to the ASQ for the Preferred Alternative.

Comment: Include a sensitivity analysis in Appendix IV-A to determine for the Preferred Alternative (and/or Proposed Action) the ASQ for a departure of ten percent above the non-declining harvest level, provided that the resulting increase in ASQ does not exceed the long-term sustained yield capacity.

Response: Such a sensitivity analysis—if it addressed effects on all resources—would show adverse effects on the quality of watersheds and other sensitive resources, as well as a drop in PSQ in subsequent decades.

Comment: The model reduced yield for green tree retention but made no reduction for competition from the overstory. This appears to be wrong and will give a significant error in future yield volumes in the long term.

Response: Revisions in the computation of PSQ have been made to reflect green tree retention and the loss of growth due to overstory competition.

Comment: A model must be used that accounts for lower yields under the area where the 6 or 12 trees are retained.

Response: Although there is no such model for the Coast Range, yield reductions resulting from green tree retention have been made in computing the PSQ for the PRMP.

Comment: The draft plans apparently do not make any adjustment in calculating allowable timber sale quantities to allow for less than full timber yields from fragile lands.

Response: The TPCC has identified and classified the fragility of sites occurring on the district, with the most fragile being removed from the available land base. Less fragile sites are included in the base; however, operational restrictions may result in less intensive management prescriptions that affect the PSQ and can result in less than full timber yields.

Comment: The allowable sale quantity assumed in the plan is not adequately documented and must be more fully discussed.

Response: Because of the technical nature and volume of documentation on how the ASQ was calculated, it was not included in the draft RMP. Full documentation is available for review at the district office.

Comment: In reviewing the computer modeling capabilities of the BLM relative to uneven age management, we find that the current system is unable to track uneven age stands. With this technological weakness it will be difficult for the BLM to properly track and monitor the uneven age stands that will be the focus of the ecosystem management strategy.

Response: Computer modeling is used mainly to estimate the PSQ, primarily in the GFMA. As the primary harvest method used in the GFMA is an even-aged system, TRIM-PLUS capabilities are not exceeded. Management of the Connectivity/Diversity Blocks is based on an area control strategy, with the PSQ not estimated by TRIM-PLUS.

Tracking—or monitoring the development of stands over time—is not necessarily dependent on existing models. We fully anticipate that when we review the PSQ computations for the next planning cycle, a revised model that can handle uneven-aged stands will have been developed and tested for this area.

Timber - Inventories

Comment: Update the starting timber inventory for ASQ calculation to October 1, 1993.

Response: For the PRMP/FEIS, the inventory was updated to October 1, 1992. Only a slight change (increase) has occurred the year since then.

Comment: Use data from the Forestry Intensified Research project, Oregon Department of Forestry, and other studies to continue to validate the accuracy of forest inventory data and further evaluate lands currently determined to be unsuitable. If it can be determined that these lands can be managed for timber production, return them to the suitable base. Likewise, lands in the suitable base that are determined to be unsuitable through monitoring should be taken out of the base.

Response: Adaptive management as discussed in the Use of the Completed Plan section of Chapter 2 provides for such adjustments.

Comment: Revisions in inventory procedures to monitor growth and yield are likely to be necessary.

Response: Revisions in inventory procedures are expected and are currently underway. As part of the adaptive management philosophy, monitoring is a critical function in the forest management plan and this includes growth and yield. The inventory systems will be delineated as the objectives of management by land-use allocation become more clear, expected outcomes are projected, and the multiple resource data needs are determined. Peer review is anticipated.

Comment: How does the starting inventory in the TRIM-PLUS model compare to the Bureau's most recent inventory?

Response: The two inventories are linked, through the base data that they share, but they are quite different in purpose. The most recent BLM decadal Continuous Forest Inventory (CFI) was designed to estimate total timber volume for all forest lands within each Sustained Yield Unit (SYU). The forest base was stratified prior to sampling to enhance the efficiency and accuracy of the inventory. This stratification allocated each stand an Operations Inventory (OI) unit by its SYU, site productivity, age group, and predominant cover type. The composite volume estimates for the SYUs and for the district were computed using strata expansion factors generated from the stratification procedure.

The base CFI data was used to derive empiric yield curves for existing unmanaged stands. It was also used, in conjunction with the Growth and Yield Model (SPS), to develop yield curves for existing and future managed stands. These empiric yield curves link the base CFI data with the TRIM-PLUS model. The starting inventory in TRIM-PLUS reflect the uniting of Land-Use Allocations and the empiric yield estimates. This starting inventory only represents those lands available for harvest under an alternative.

Comment: Volume equations and site index equations may be giving rise to biased estimates in the standing inventory.

Response: A bias in estimation in small diameter trees is recognized. BLM volume equations had high volume levels in small diameter trees. The net effect on PSQ calculations dependent on older age classes was not considered worth correcting in the DEIS stage. Since the PRMP PSQ is less dependent on older age classes, adjustments have been made. These newer equations compare favorably with other estimates.

Timber - Demand, Supply and Market Effects

Comment: Analysis of the timber supply situation is more optimistic than warranted. Portray additional scenarios reflecting lower potential harvests by other parties, as well as uncertainty of implementing proposed BLM sale levels.

Response: The Timber Supply Analysis has been revised for the PRMP. The analysis now reflects implementation of the President's Forest Plan on the National Forests, and includes updated private land timber harvest information consistent with the analysis in the final SEIS. Each BLM alternative is analyzed in this updated regional timber supply setting. The result is a lower regional timber supply for all alternatives than shown in the draft RMP.

Comment: BLM should explain how the timber supply analysis was used in formulating its draft alternatives and how it will be used in formulating the record of decision.

Response: A timber supply analysis was conducted as part of the Analysis of the Management Situation (AMS). This document was prepared before the alternatives were defined. This document provided contextual information for alternative formulation as well as the basis for starting impact assessment of the alternatives. The record of decision has not yet been prepared.

Comment: With the current harvest pressure on private lands, we question the inventory and growth projects utilized in the timber supply analysis.

Response: The timber supply analysis included in the draft RMP has been updated to represent the changes that would result from implementation of the President's Forest Plan on federal forest lands. That assessment reflects full implementation by both the USDA Forest Service and BLM. It does not assume a continuation of the court imposed injunctions that existed at the time of the President's Forest Conference on April 2, 1993.

Energy and Mineral Resources

Comment: Identify State-owned mineral rights and acknowledge non-impact of the plan on those and other existing valid rights.

Response: BLM has no record of the owners of non-federal mineral rights. The acknowledgement has been added.

Comment: The state believes that the management of severed estates with state-owned mineral rights should be specifically addressed and that the management direction offer the greatest possible latitude to the state.

Response: See response above.

Comment: A mineral inventory should be conducted before withdrawals are recommended.

Response: The withdrawal proposals in the PRMP are based on the sensitivity of other resources to significant damage from mineral exploration and/or development activities as they would be anticipated to occur under present laws and regulations. The formal recommendation to the Secretary of the Interior for withdrawal will be accompanied by a mineral potential report to support a fully informed decision.

Comment: BLM districts should recognize energy and minerals as an important resource when making land management allocations. Decisions to withdraw lands should be based on an open analysis with proper accommodation of current environmental protection and reclamation requirements.

Response: Whenever a withdrawal is considered, all resource values are recognized and analyzed—including the potential for mineral reclamation requirements.

Comment: The appendix showing locatable mineral management requirements shows only standard requirements under 43 CFR 3809. Additional restrictions in management areas such as ACECs, wild and scenic rivers, VRM class II areas, and special status species habitat should also be shown.

Response: Such restrictions are broadly identified on the mineral management restriction maps for the proposed PRMP. The effects of such restrictions are site specific and mining-plan specific and cannot be known without a specific proposal to analyze.

Comment: It is inappropriate to categorize as low potential all areas where there is insufficient information to determine mineral potential.

Response: The relevant column header in the Chapter 3 tables have been revised to reflect that the identified acres are a combination of low and unknown potential.

Comment: Additional work is needed to refine maps, data, and procedures used to generate Tables 2-8, 2-9, 2-10, 3-M-1, 3-M-2, 3-M-4, 4-M-1, 4-M-2, and 4-M-3. These tables do not appear to accurately reflect the overall mineral resource situation due to incomplete and inconsistent information.

Response: Changes to the maps and tables have been made.

Livestock Grazing

Comment: Limit livestock use in riparian areas to periods when forage and soils are most resilient and to uses determined by site-specific conditions.

Response: Problems associated with livestock grazing in riparian areas are usually the result of timing and duration of use. Where conflicts with riparian areas have been identified, the livestock grazing authorization may be modified, fencing may be constructed, or grazing eliminated.

Comment: Exclude livestock until the recovery of riparian area vegetation (to a good condition) is enough to allow managed grazing.

Response: See response above.

Comment: We support livestock exclusions (via grazing allotments) in all riparian areas. Priority areas for restoration are riparian areas in poor condition due to overgrazing.

Response: See response above.

Comment: Attract livestock away from riparian areas by developing other water sources, placing salt blocks away from riparian areas, and planting other palatable vegetation.

Response: See response above.

Land Tenure

Comment: Coordinate with adjoining districts regarding land tenure decisions.

Response: This coordination has been accomplished.

Comment: Address BLM's responsibility to accommodate the State's 5,202.29 acres of in-lieu land entitlement with public domain land.

Response: This has been added to Chapter 3, Land Tenure.

Comment: The geographic information system (GIS) used by BLM should also be used to identify areas of non-federal land that—if acquired by the federal government—will facilitate ecosystem management.

Response: BLM's GIS for western Oregon includes only limited resource data (hydrography) on the intermingled lands. Acquiring the data necessary to explore such a question comprehensively would cost millions of dollars and take several years.

Comment: If land should be considered for disposal, the Confederated Tribes should have the opportunity to acquire it—either by transfer to the BIA or other means.

Response: Current legislative authority makes no provision for such a preference for Indian tribes. Most lands considered for disposal, however, would only be exchanged for other lands.

Comment: Acknowledge existing or potential State ownership claims on navigable waterways.

Response: This has been added to Chapter 3.

Comment: There seems to be no uniformity on how districts have categorized their lands.

Response: Categorization of land is based on the on-the-ground values of individual parcels. As such, uniformity in categorization will vary from district-to-district. Management of lands, however, has been coordinated between the districts.

Comment: With the projected decrease in receipts, the county can ill afford any additional reductions in its land base. Accordingly, as a general policy, the Board (of Commissioners) opposes any additional land acquisitions. Furthermore, the Board opposes any trade of O&C lands, unless the acquired lands assume the O&C status.

Response: If O&C lands are exchanged for private lands, the status of the acquired private land would become O&C.

Comment: With reference to Authorities PSCO1, PSC127, and WPD17, we urge BLM not recommend to revoke at this time. Is there substantiated justification for this recommendation, and has it been made available to the public for comment?

Response: The Plan does not recommend revocation of the water power withdrawals. The Plan recommends these withdrawals be reviewed, and upon review, a determination would be made as to which withdrawals are found to be valuable for future hydropower development and which are not. Those which are not valuable would then be recommended for revocation.

Comment: Regarding the land tenure adjustment proposal, we urge BLM to provide more updated and current information.

Response: This has been done.

Access

Comment: Identify how much access BLM provides to intermingled landowners through agreements and easements.

Response: Approximately 90 percent of intermingled forest land has rights of access for forest management purposes under the terms of agreements and easements with BLM.

Roads

Comment: Develop a comprehensive road management plan.

Response: Such plans will follow completion of the RMP. Transportation management objectives will be developed for all roads.

Comment: Coordinate with adjacent landowners and others in the development and implementation of a comprehensive road management program.

Response: We recognize the importance of coordination with intermingled landowners and other road users. Reciprocal right-of-way agreements require coordination with the intermingled landowners and road users who are parties to them.

Comment: Outline how BLM will cooperate with other landowners to build the permanent road system and accomplish road management objectives.

Response: Most of the permanent road system already exists. Cooperation with other landowners is an integral part of road development planning and the development of transportation management objectives.

Comment: The final RMP/EIS should estimate the miles of road that might be constructed by private parties.

Response: This information is not readily available, is not shared by private landowners, and is rarely reliable for more than one year at a time.

Comment: The final RMP/EIS should outline how the BLM will coordinate and cooperate with adjacent and intermingled landowners to plan, build, and maintain the permanent road system and accomplish road management objectives.

Response: This level of detail is beyond the scope of the RMP. It is normally accomplished at the activity planning stage, discussed at annual meetings with adjacent landowners, or included in either the annual work plan or the annual maintenance operation plans. Watershed analysis and the proposed Road Management Plan would also address portions of these concerns.

Comment: The final RMP/EIS should clarify which method of closure is appropriate related to specific issues and objectives.

Response: See response above.

Comment: Clarify how administrative road closure and obliteration relate to specific issues and objectives. Address maintenance of roads administratively closed. Also address road maintenance priorities if funding is not adequate.

Response: Road closures are driven by issues and objectives for protection of other resources, such as wildlife. If roads are to be retained for future management, but closed to public use, most road closures would be accomplished by gates which allow access for maintenance. Transportation management objectives in transportation management plans will address maintenance priorities.

Comment: Explain how the proposed road density objective will be achieved in light of the contention that partial cut systems often require greater road densities than clear-cut systems.

Response: Some additional roads will be temporary and will be revegetated. Some existing local and collector roads will also be closed to help meet this objective, and use of aerial logging systems will increase.

Comment: The state recommends that a maximum 1.5 mile/square mile road density objective (i.e., roads open to vehicular traffic) be instituted.

Response: Watershed analysis and the proposed Road Management Plan will address road density.

Comment: The state recommends that BLM attempt to achieve a reasonable reduction (10 percent) in open road density over the next decade.

Response: See response above.

Comment: Develop a methodology for prioritizing those roads BLM is planning to build, as well as for prioritizing road closure and restoration.

Response: Transportation management objectives will address such prioritization.

Comment: Allow no logging of old-growth forest and build no new roads in watersheds where wild salmon and trout exist.

Response: These requirements were included within the options initially considered by the FEMAT team.

Comment: The state recommends that BLM continue to aggressively pursue funding for its road management program.

Response: This level of detail is beyond the scope of the RMP. These concerns are addressed in the preparation of the annual work plan.

Comment: The document should address road maintenance priorities that can guide decision making when funding is not adequate for complete road system maintenance.

Response: See response above.

Comment: Address the fact that the roads you propose to close are roads that were built with O&C Counties' plow-back funds which gives us (the County) a vested interest, and we must demand input about their proposed closures.

Response: Major access roads were constructed with appropriated funds including some of the O&C "plow-back" funds. These roads are an integral part of the district road system (arterial roads) and would remain open. Roads proposed for closure are secondary roads (collector and local) that were constructed under the terms of timber sales.

Prior to the closure of any roads, public meetings would be held providing the county and other members of the public an opportunity to comment on specific roads proposed for closure.

Fire

Comment: Consider letting naturally-caused fires burn, while protecting life and property.

Response: Most naturally-caused fires in the district occur during times when the fire risk (and danger to life and property) is high. Among the "property" at stake are timber and residences on intermingled private land. Accordingly, it would rarely be appropriate to let a fire burn—except where prescribed fire and vegetation management objectives would be met.

Comment: The draft RMP/EIS indicates that not all timber harvest units require treatment by prescribed burning.

The final RMP/EIS should present a brief discussion about how the decision to burn or not to burn is made.

Response: Decisions on the timing of prescribed burning and the specific prescription to be employed are made at the activity plan level (timber sale). These prescriptions evaluate factors such as: physical site characteristics, location of the unit, site preparation needs of the particular unit, type and arrangement of fuel, availability of planting spots, number of planting spots needed, existing vegetation and regeneration strategy of that vegetation, and finally the anticipated weather conditions.

Comment: The final RMP/EIS should provide some discussion of the economic and technological feasibility of improved slash utilization and the effect on fuel hazard.

Response: See response above.

Comment: The term and definition of "conditional" is not in concurrence with Chapter C.5.6 of the ODF-BLM contract addressing "Special Fire Management Measures."

Response: The term "Special Fire Management Measures" as used in the protection contract was developed several years ago. It addresses special suppression actions that would be taken in sensitive areas such as ACECs or RNAs. The RMP terminology of "Conditional Fire Suppression" addresses similar situations. If the contract were written today, the term "Conditional Fire Suppression" would be used.

Comment: All lands should be protected by an intensive response— both for the protection of the natural resource on public lands as well as adjacent private lands.

Response: "Intensive Fire Suppression" actions will be the standard operating procedure under most fire situations occurring on the district. "Conditional Fire Suppression" techniques will, however, be exercised on BLM-administered lands having a resource that is likely to be irrevocably damaged without special restrictions imposed.

Protection of private lands would be under the terms of the state protective contract, and would probably be treated with "Intensive Fire Suppression" actions.

Socioeconomic Conditions

Comment: Assess the forest-wide economic efficiency of the new plans.

Response: Assessing such efficiency would require placing dollar values on a variety of ecosystem management benefits which we do not believe can be effectively quantified on an equal economic standard with commercial product (e.g., timber) benefits. Ecosystem considerations are more appropriately assessed on their qualitative merits.

Comment: Assess the economic efficiency of stand management prescriptions, including a comprehensive look at wood quality and value.

Response: Since stand management prescriptions are driven substantially by ecosystem-based management concerns, we do not consider economic efficiency analysis very relevant.

Comment: Update economic data to reflect more current information.

Response: Additional and more recent employment, personal income, and county revenue information has been added to the final EIS. Although the official baseline (1984-1988) remains unchanged, the added information allows absolute and relative comparison of the alternatives and their impacts.

Comment: The BLM should include an analysis of statewide impacts of the alternatives and proposed action in the final RMP/EIS.

Response: An additional layer of analysis has been added to analyze the western Oregon impacts of BLM alternatives and the PRMP.

Comment: BLM has not considered the impacts of Ballot Measure 5 in its planning process.

Response: A discussion of Ballot Measure 5 and the constraints it places on local government revenues has been added. This discussion recognizes that Measure 5 is part of the economic environment in which BLM decisions are made.

Comment: BLM has failed to identify viable mitigation measures for the "very real and severe" social and economic impacts associated with the alternatives. To mitigate social and economic impacts, consider compensating adversely impacted citizens, maintaining/increasing county revenues, and providing social and economic development programs that tap the spirit of rural people.

Response: The BLM has neither the authority or ability to provide compensation, social services, or other economic assistance to impacted counties, businesses, or individuals. Such proposals are beyond the scope of the RMP, but they are addressed in Chapter 7 of the FEMAT report and in the Economic and Community Assistance Program discussion in Chapter 4 of the SEIS.

Comment: There are no provisions in the plan to make up for county revenues reduced due to reductions in timber harvest levels.

Response: BLM has no authority to make up for any reduction in O&C revenues to the counties. However, in recent legislation Congress has defined a formula to set minimum O&C payments to be made to the counties.

Comment: Since 1953, the O&C counties have relinquished one- third of their statutory entitlement. These foregone county monies were "invested" by the counties with the expectation they would receive a "return" on their investment through increased harvest levels in future decades. Nearly one billion of otherwise county revenue has been so appropriated since 1953.

Response: The 25 percent plowback by the O&C counties between 1953 and 1981 was used to increase management intensity of the O&C lands. Although many expenditures, such as road building and reforestation, were made with additional future use and harvest in mind, these activities also enabled immediate access to, and harvest of, otherwise inaccessible timber. This resulted in increasing levels of sustainable harvest being identified throughout this period, as well as increasing timber receipt collections.

Comment: School programs will be cut as revenue declines from diminished O&C receipts.

Response: Unlike county payments from the National Forests which must be used to fund schools (25 percent) and roads (75 percent), O&C payments enter directly into the county general fund. Distribution of these general fund monies is discretionary. All counties in western Oregon have at some time transferred monies from the general fund to the local school districts or Educational Service District (ESD). Most counties continue to make these transfers annually. It is through these transfers that changing O&C payments to the counties could impact school funding. An analysis conducted in 1988 concluded that O&C funds appear to contribute between zero and 2.75 percent of school funds (Hackworth, Kevin. 1988. *Importance of Timber-Related Revenues to Local Governments in Oregon and the Effects of Forests in Oregon on Property Tax Rates.* Masters Thesis Submitted to Oregon State University.)

Distribution of county general fund monies to the schools could change dramatically from past distribution patterns due to reductions in national forest payments to counties and the implementation of Ballot Measure 5.

In Coos and Douglas counties—where Coos Bay Wagon Road lands are located—payments are made by the BLM to local taxing districts, including school districts. These payments are compensation for tax revenues lost because these lands are federally owned. The formula has two components (a fixed payment and a payment similar to severance taxes) that are paid when timber is harvested from the lands. School district revenues would be negatively impacted by harvest reductions on these lands.

Comment: BLM should "support/endorse" federal and state loans and grants to encourage local businesses to invest in the equipment for milling smaller logs.

Response: Discussion of potential legislative agendas is beyond the scope of the RMP/EIS.

Comment: Re-evaluate the impacts to total employment of harvest reductions.

Response: Different models representing different employment and income multipliers were used to assess BLM and cumulative impacts. Although this appears inconsistent, we felt the different type of analysis conducted required the use of different models, thus multipliers. The analysis of BLM actions was conducted as a marginal analysis, examining only the actions of BLM. For these analyses, BLMPACT was used. The western Oregon cumulative effects analysis examined BLM actions together with assumed management actions of the USFS, State and private forests. This analysis used the subregion multipliers in the SEIS. Unlike the multipliers used in the DRMP/EIS, these multipliers only examine impacts within the timber industry, including self-employment.

Comment: An alternative emphasizing recreation opportunities could have served as a benchmark from which to compare jobs gained from the various alternatives presented in the plans.

Response: Using information available in Hospodarsky (1989), the BLM projected future recreation demands (year 2000) expected on BLM-administered lands. This identified demand was assumed to represent the maximum recreation potential of these lands. No alternative was developed specifically to address meeting the maximum recreation potential of BLM-administered lands. However—based on the expected provision of recreation opportunities under each alternative—we determined what level of potential demand could be met. See Table 4-26, Anticipated Short-Term Capability of BLM Administered Facilities and Resources to Meet Projected Recreational Demand for 10 Major Use Categories by Alternative. Designing and analyzing specific plan alternatives merely to provide benchmarks for comparative analysis would make the RMP/EIS unwieldy.

Comment: Provide the analytical ground work for an effective policy response to the fundamental social and economic changes that would follow implementation of the preferred alternative.

Response: This is outside the reach of BLM's statutory mission and beyond the scope of the RMP/EIS. Chapter 4 of the SEIS has addressed this, however, in its Economic and Community Assistance Program discussion.

Comment: Promote restorative work for ex-loggers.

Response: Labor intensive management activities, including restorative work, that have been incorporated into the PRMP will provide additional employment opportunities in the local economy. The level of employment identified cannot fully replace employment losses caused by reduced harvest levels. In addition, BLM has no authority to assure that those employed in such work are ex-loggers or former workers of a specific industry.

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Response: A discussion of Ballot Measure 5 and the constraints it places on local government revenues has been added. This discussion recognizes that Measure 5 is part of the economic environment in which BLM decisions are made.

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Response: Labor intensive management activities, including restorative work, that have been incorporated into the PRMP will provide additional employment opportunities in the local economy. The level of employment identified cannot fully replace employment losses caused by reduced harvest levels. In addition, BLM has no authority to assure that those employed in such work are ex-loggers or former workers of a specific industry.

Comment: BLM has not examined the national and international impacts of reduced lumber and wood products production in the Pacific Northwest. Identified areas of impact include:

- Economic & environmental impacts of using substitute building materials.
- Housing cost impacts.
- Changing import/export flows (especially from developing countries).
- Economic and environmental impacts of harvesting timber elsewhere in the world.

Response: A generalized discussion of the national and international impacts of using substitute building materials and fiber sources has been added using information from recent publications. These studies examine the range of resource substitution impacts individually. The extent and rate at which these effects will combine in response to reduce Pacific Northwest timber harvests is unknown.

Comment: Add export base analysis.

Response: Attempting to do an export base analysis for western Oregon communities would entail making substantial assumptions about the "export" content of incomes in many sectors of the economy of each community. The results would not contribute substantial new knowledge about which communities are sensitive to "export" markets. Sensitivity of communities to changes in "exports" has been identified through numerous sources including: Oregon Legislature, Joint Legislative Committee on Land Use, *Dependent Communities Desktop Analysis* (1990); and Oregon Economic Development Department, *Oregon's Coordinated Timber Response Program* (Updated 1993).

Comment: BLM failed to identify the importance of changes in the natural environment and amenity values (scenic beauty, clean water and air, and recreation resources) in attracting businesses and retirees to western Oregon.

Response: Those changes would be long term and not within the 10-year time frame of our socioeconomic analysis. Additional discussion has been added, however, to Chapter 4, Socioeconomic Conditions. Quantitative analysis and comparisons were not made for these amenity values.

Comment: An economic analysis of the benefits and costs of a "Holistic Natural Watershed Management Plan" alternative, compared to the alternatives, should be made. Include greatly increased commercial and sport fishery benefits.

Response: The SEIS addressed such an alternative in its Alternative 1. The comparative economic benefits of such an alternative would occur many decades in the future. Full recovery of fish habitat, for example, is not expected for 200 years under any alternative. The cost of heavily protective alternatives, however, in lost revenues, employment, and local income would be immediate. Economic analysis—with traditional discount rates for future benefits—would attach little current value to any such long-term benefits.

Comment: Identify other forest industries that are becoming significant contributors to the local economy, such as special forest products. Identify industry potential.

Response: The types and value of special forest products sold from BLM-administered lands have been identified. See Chapter 3. The economic impacts of the these sales have not been examined due to lack of information on which to base estimates or projections of employment and personal income.

Comment: Recommend that the final RMP/EIS analysis be expanded to include more information on other sectors of the economy.

Response: The presentation of economic impacts has been changed to display employment and income impacts by general economic sector. This change better aligns the presentation and analysis of economic impacts with the integrated nature of the proposed action and moves away from the individual commodity based analysis traditionally conducted.

Comment: The analysis would be substantially more useful if BLM entered as inputs to its input-output model current forecasts of how other sectors of the Oregon economy are expected to change over the next decade.

Response: Input-output models by nature and design are static and linear. This type of model was selected to examine impacts of BLM actions assuming all other economic variables remain the same. Including forecasts of how other sectors of the Oregon economy are expected to change over the next decade implies including variable and non-linear considerations, something input-output models cannot readily incorporate. While there are models available that use variable and non-linear types of analysis, these types were not selected because we felt they would imply a greater confidence regarding the future of all economic/industrial sectors than appropriate.

Comment: A quantitative analysis of each "revenue and cost" stream would allow the audience of the RMP/EIS to understand the magnitude of the subsidies involved and to determine whether continuing these subsidies would be good public policy.

Response: Assessing such efficiency would require placing dollar values on a variety of ecosystem management benefits which we believe cannot be effectively quantified on an equal economic standard with commercial product (e.g., timber) benefits.

Comment: Projected high stumpage prices (are unlikely to persist) (will increase substantially more).

Response: As shown in Tables 4-39 and EE-1 (Appendix EE), projected future prices are lower than current prices. Upon implementation of the PRMP and the assumed resumption of timber sales on the national forests, prices are expected to decline from the high levels associated with the current federal timber supply crisis. Less federal timber will be available in the future compared to the 1984-1988 baseline period, thus higher prices can reasonably be expected.

Comment: Use appropriate models to measure social impacts and systematically analyze them.

Response: No models were used to measure or analyze social impacts in the PRMP/FEIS. However, several recent publications—which were not available at the time of the Draft—were used to enhance the discussion to social impacts. These publications generally relied on surveys, focus groups, and interviews to assess impacts.

Comment: Important findings were that the incidence of spouse or child abuse, alcohol or drug abuse, and other manifestations of social stress increases in response to rising unemployment at the same time that local providers of services in these areas find themselves with diminished capacity to respond to those in need.

Response: The report cited has been reviewed by many managers and staff throughout western Oregon. The RMP also cites and summarizes information from this report. However, we believe reprinting the report as part of the RMP/EIS would not add new or additional information to the discussion.

Comment: Regarding the impacts on local economies due to reductions in the public timber supply, the estimates focused on: 1) reductions in federal payments to the counties, 2) likely cuts in services associated with the reduced revenues, 3) social impacts due to the reduced services, and 4) the need for additional services due to the severe dislocation of timber workers sure to follow such a reduction.

Response: See above.

Comment: Add demographic and occupational profiles of communities.

Response: This type of data is not readily available for all communities potentially impacted by BLM management alternatives. A profile of "at risk" communities was developed by the FEMAT and is discussed. This profile contains demographic, occupational, and other characteristics.

Comment: Add an occupational profile of displaced workers.

Response: This information was provided by the Oregon Employment Division. Because of the wealth of information and length of the report, only a few points could be highlighted in our PRMP/FEIS. A full reference was provided for those wishing to request the information from the Oregon Employment Division.

Comment: The costs of retraining are substantial. In addition, for those who make it into retraining, then complete retraining and are placed, there is almost always a substantial reduction in wages.

Response: The State of Oregon's Employment Division provided information regarding the cost of retraining, as well as results of a study conducted regarding re-employment of displaced timber workers. A brief summary of this information has been included in the document with a full citation for those persons wishing more information.

Comment: Table 4-SE-6 does not adequately represent the projected costs for retraining by failing to include the positive (or no-cost) effects of Alternatives A, B, or No Action.

Response: The Oregon Employment Division model used to project retraining costs is designed to examine program needs based on projected job losses. Positive or no-cost effects of Alternatives A, B, and No Action could not be examined using this analytical tool.

Comment: Describe the linkage and dependency (social, economic, and spiritual) of local and regional communities, groups, and industries on ecosystems within each land allocation.

Response: Social and economic analyses were conducted for each alternative, representing a complete set of allocations. Individual allocations were not examined. Spiritual dependency and linkages to BLM-administered lands are individual in nature, with the exception of traditional tribal use areas. The RMP/EIS was unable to comprehensively address these linkages to ecosystems due to the lack of information.

Comment: Disclose the economic impacts of ground-disturbing activities on the mushroom harvesting industry.

Response: Although qualitative information regarding the ecological impacts of ground-disturbing activities exists for most plant species (see revised Chapter 4, Vegetation), quantitative information for

many is not available. The economic impacts of ground-disturbing activities for any given mushroom species could only be defined on a site and time-specific basis. Therefore, it is not possible to identify any general economic impacts at this time.

Comment: The use of PNV as a timber management tool should not be used in our public forests. It puts too much emphasis on short rotation tree farming at the expense of maintaining a true forest.

Response: We believe that treating time as though it were costless would be improper. The effect of forgoing opportunities for society now—in order to obtain increased opportunities for society in the future—is the reason why there is much controversy over natural resource management. Public officials cannot ignore these costs.

Comment: Who will pay for all the social services needed with the increased unemployment caused by this proposed reduction in timber sale levels?

Response: Payment of costs associated with social services is beyond the scope of the RMP.

Comment: The BLM planning team did not include any significant study of the non-recreational social cost/benefit to the affected communities.

Response: The discussion of alternative impacts includes some non-recreational social values. Scenic quality, traditional uses, bequest, and existence values are recognized as important human values associated with forested lands. Because of the personal nature of many of these values, they are impossible to capture fully or quantify. It would be inappropriate to present these values in terms of monetary benefits and costs.

Comment: Three specific areas need to be included in the planning process. One is the existing social services delivery network and the effect an immediate timber harvest reduction will have on such services. Second is the impact on communities in Douglas and Coos counties' ability to continue economic development in light of the anticipated reduction in social services resulting from a decrease in timber harvest. Third, the BLM's obligation as the federal government's long-term experts in the field of timber management to utilize its management and technical expertise to plan for mitigation of the "human cost" of the Preferred Plan.

Response: The PRMP/FEIS has been revised to include a summary of impacts to social service funding and demand as well as community economic development and growth. This summary has been derived from the Final SEIS.

An outgrowth of the President's Forest Plan has been a commitment by the BLM and Forest Service to participate in Regional and Community Economic Revitalization Teams (CERTs). The activities of the CERTs are not traditional social services. Instead, federal agencies will work cooperatively to target existing programs and funds to impacted communities throughout the Spotted Owl region. This focus on existing programs and activities best utilizes the unique knowledge and experience of each participating federal agency to its fullest extent.

Comment: An objective economic assessment should compare the impact of alternative timber cut levels with an historical baseline encompassing an entire business cycle.

Response: The discussion of timber harvest levels and associated employment and personal income has been presented in absolute terms. This allows readers to make comparisons to any time periods they wish to consider. The 1984-1988 baseline period used in the PRMP/FEIS for

relative comparisons is unchanged from the draft. This baseline is consistent with the baseline period used throughout the RMP/EIS.

Comment: In translating future timber supplies into numbers of jobs, the BLM ignores economic trends unrelated to timber supply that are causing the timber industry to reduce the size of its work force.

Response: Projected trends unrelated to timber supply were not incorporated into the economic model used to project personal income and employment. However, these factors were not ignored. A list of ongoing structural changes in the lumber and wood products sector was included in Chapter 3 Socioeconomics as an important part of the existing socioeconomic environment.

Comment: We recommend that the BLM prepare a cost-benefits analysis relative to any departure from the Oregon Forest Practices Act.

Response: Assessing such efficiency would require placing dollar values on a variety of ecosystem management benefits which we do not believe can be effectively quantified on an equal economic standard with commercial product (e.g., timber) benefits.

Comment: Recommend that community stability be made a formal issue in the analysis with consideration given to developing an alternative that fully addresses it.

Response: Multiple definitions of community stability exist within the professional literature, but no conclusive methodology has been developed to measure it. Accordingly, community stability is not used as an evaluative factor in the analysis of the alternatives. The PRMP/FEIS addresses several economic and social factors commonly thought to influence community stability—employment; income; county revenues; access; rural interface; traditional, subsistence, and ceremonial uses; and scenic quality.

Rural Interface Areas

Comment: BLM's strategy of buffering rural interface areas adjacent to federal lands will do little to alleviate new inappropriate developments in rural interface areas.

Response: The PRMP strategy is intended only to address the relationship to existing and planned development. Development of private lands will be guided by local comprehensive plans in conformity with statewide planning goal 4. The BLM has no direct authority to limit or constrain development on private lands.

Comment: The analysis is based on the premise that conflict between the agency and the public is directly related to distance of management activities from residences. This is too simple to reflect the complicated interactions within the Rural Interface.

Response: See response above.

Comment: Increase BLM's participation in Oregon's statewide land use planning program.

Response: When the RMP is approved for implementation, we expect to participate in statewide and local planning whenever proposed adjacent land uses are perceived to be inconsistent with RMP goals and objectives.

Comment: The State of Oregon has given new direction to the counties mandating that they designate the Secondary Forest Land Zone by January 8, 1993. This will reduce the number of potential residences. Any BLM allocations should reflect this change.

Response: See response above.

Comment: The BLM should have clear policy guidance for addressing rural interface issues.

Response: The RMP will define the objectives against which we will measure the significance of future rural interface land use issues.

Comment: In cooperation with the State, establish and apply a revised definition of rural interface areas that takes into account existing uses; current federal, state, and local plans; and other land use factors.

Response: After the RMPs are complete, such a comprehensive effort can be considered. Such an effort would be dependent on the availability of local, State, and BLM staffing to participate consistent with management prioritization of workloads.

Comment: The final RMP/EIS needs to discuss human health standards and the effect of prescribed burning on people living in RIAs and other downwind communities.

Response: This discussion is included in the *Final Environmental Impact Statement Western Oregon Program-Management of Competing Vegetation.*

Comment: It would be necessary to consider fire prevention, fire control, and the impact on the residents of smoke from slash disposal.

Response: This level of detail is normally included in activity planning.

Comment: The BLM should enter into a covenant with persons building homes in the rural interface areas near BLM lands that permit the BLM to carry out normal forest activities.

Response: The counties have the responsibility for permitting the construction of homes on private property. Restrictions/covenants imposed are a result of county zoning ordinances. Any restriction imposed by BLM could be considered a "taking of rights," requiring compensation. BLM does not propose any such taking.

Consistency With Other Agency Plans & Programs

Comment: Document how the selected alternative complies with the statutory authorities and regulations of the Oregon Coastal Management Program.

Response: This documentation is provided in Appendix FF, Relationship of PRMP to Statewide Planning Goals.

Comment: Acknowledge that preservation of BLM wetlands contributes to attainment of the Oregon Benchmark goals on wetlands.

Response: A statement has been added.

Comment: The RMP/EIS should better outline how the alternatives compare to the following: Recovery Plan for the Northern Spotted Owl, the Forest Service EIS on Management for the Northern Spotted Owl, the Endangered Species Committee Record of Decision, Alternatives for Management of Late-Successional Forests of the Pacific Northwest, and A Conservation Strategy for the Northern Spotted Owl.

Response: The first of these is only a final draft agency document, but discussion has been added to the Consistency with Other Agency Plans and Programs section of Chapter 4. The second has been rendered moot by court ruling and superseded by the SEIS and its Record of Decision. The third merely required that BLM consult with the Fish and Wildlife Service before proceeding with certain timber sales, and such consultation is embedded in the process for completing and implementing this RMP. The last two are considered ad-hoc reports. The first of these two makes no single set of recommendations. The last makes a single set of recommendations which are specifically followed in Alternative D only.

Comment: The Draft RMP fails to comply with the USFWS Spotted Owl Recovery Plan.

Response: The Fish and Wildlife Services's Biological Opinion on the SEIS says that the SEIS plan—which is incorporated into the PRMP—provides protection for more known spotted owl sites and currently suitable habitat than does the Final Draft Recovery Plan (FDRP), and that the number of acres subject to matrix management is less than under the FDRP. Thus, we believe it meets the objectives of the FDRP.

Comment: There is lack of substantiation to support claims of consistency with the plans and policies of other agencies affected by the RMPs.

Response: We believe the discussion on consistency in Chapter 4, along with Appendix FF, adequately covers the subject.

Comment: The BLM RMPs must be consistent with the local comprehensive plans. Either the BLM must conduct a consistency review or make a formal request to the county for such review.

Response: Consistency with the local comprehensive plans is described in Chapter 4. Consistency determinations will also be completed for specific projects as an element of implementing the PRMP.

Comment: Any departure from the OFPA should be identified as an inconsistency.

Response: Consistency with the OFPA is described in Chapter 4 and Appendix FF.

Requirement for Further Environmental Analysis

Comment: The RMP/EIS should identify criteria for determining what sort of NEPA documentation will be required for future projects. In addition, it should provide guidance for the scope of analyses expected in these tiered documents, to clarify what analyses and issues are considered fully addressed in the RMP/EIS and what analyses and issues should be further considered based on site-specific resources and conditions.

Response: The BLM National Environmental Policy Act Handbook provides some guidance on this topic. Supplementation of that guidance—with specific reference to the western Oregon RMPs—seems premature until we gain experience relating to the ecosystem management concept and its many new management approaches.

Comment: The "Further Analysis" section should clearly disclose the cumulative watershed effects analysis procedure to be used for site-specific projects during RMP implementation. At present, it appears undirected, fails to consider fish and fish habitat, and is simplistic. To be credible, the process must be peer reviewed and deemed acceptable.

Response: The discussion has been strengthened to address the relationship to the watershed analysis process and how that process will enhance cumulative impact analysis. The watershed analysis process is still evolving as the BLM and the Forest Service conduct pilot analyses.

Comment: Describe how cumulative watershed effects analysis will be coordinated among adjacent landowners.

Response: Information available from private landowners will be gathered and considered. Most private management plans, however, are subject to change due to changing economic conditions, so we will make some assumptions about probable private management.

Use of the Completed Plan

Comment: Detail how BLM intends to integrate management, monitoring, and research to continually apply adaptive management and improve the scientific basis for ecosystem management.

Response: The discussion in Chapter 2 has been expanded. Further elaboration is contained in the SEIS ROD and its Monitoring and Evaluation Plan.

Comment: Clarify how timber sale volumes and associated programs will be reduced if annual funding is not sufficient to support monitoring.

Response: The discussion in Chapter 2 has been expanded.

Comment: Do not plan any timber sales until there is an approved RMP and all court injunctions are lifted.

Response: Since planning of individual timber sales usually takes a year or more, it would be irresponsible for BLM to defer all such planning until final RMP approval. Tentative site-specific plans based on unapproved versions of the RMP can be adjusted as needed to conform to the RMP as approved.

Comment: Individual forest project plans should evaluate protection needs for intermittent order 1 and 2 streams and, as needed, apply measures to protect channel integrity and identified beneficial uses. Project planning should also evaluate potential cumulative effects on beneficial uses outside the project area sub-basin.

Response: The Aquatic Conservation Strategy, which is part of the record of decision for the SEIS, addresses this concern and is incorporated in our PRMP. Watershed analysis will address it at the sub-basin level.

Comment: The final plan for the BLM Coos Bay District should incorporate narrative which allows and permits the BLM to revise and/or change its allowable cut upwards if new scientific information and technology indicates such increases can be made.

Response: This possibility is implicit in the plan evaluation discussion in the Use of the Completed Plan section of Chapter 2.

Monitoring

Comment: Detailed monitoring plans should be developed within one year after final plan completion. They should contain procedures that have undergone appropriate peer review. They should also identify thresholds which trigger changes in practices or procedures or result in plan changes.

Response: Further detail in the monitoring plan awaits refinement of the Monitoring and Evaluation Plan for the SEIS.

Comment: The monitoring plan should include written standards for sampling design, monitoring parameters, analytical techniques, statistical methods, reporting units, location of sampling, indicator species, budget, and procedures for using data or results in plan implementation; and availability of results to interested and affected groups. It should also have a clear feedback mechanism that enables the use of monitoring results to adjust standards and guidelines, BMPs, standard operating procedures, monitoring intensity, and project implementation.

Response: We believe some of these details belong in technical handbooks. Others will be developed after the SEIS Monitoring and Evaluation Plan is refined or within the SEIS Monitoring and Evaluation Plan.

Comment: Why aren't monitoring standards presented for each land allocation (old-growth emphasis areas, connectivity areas, and general forest management areas)?

Response: This kind of stratification is included in the SEIS Monitoring and Evaluation Plan for the allocations made in the SEIS ROD. The proposed RMP Monitoring Plan parallels the SEIS Monitoring and Evaluation Plan.

Comment: Why haven't monitoring questions been tied to measurable standards?

Response: For most topics, this tie awaits completion of the SEIS Monitoring and Evaluation Plan.

Comment: Is there a tie between implementation and effectiveness that is necessary for meeting the expected future condition (ecosystem management)? Does BLM have a long-range monitoring framework that will direct the agency over the next 100 years to meet these expected future conditions?

Response: The Monitoring and Evaluation Plan for the SEIS is expected to provide both the tie and the framework.

Comment: The extent of cumulative watershed effects analysis validation should be described.

Response: This description awaits refinement of the SEIS Monitoring and Evaluation Plan.

Comment: Consider onsite inspection to monitor BMP implementation.

Response: This will be part of contract administration.

Comment: Consider RMA monitoring to assess long-term organic debris contribution to stream systems.

Response: The SEIS Monitoring and Evaluation Plan calls for this in Key Watersheds. It is also incorporated in our Monitoring Plan.

Comment: Consider a research/monitoring program to determine the effects of spatial/temporal segregation of timber harvests on sediment and hydrology.

Response: Consideration of this awaits refinement of the SEIS Monitoring and Evaluation Plan.

Comment: To obtain more specific data from evaluation and monitoring, subdivide analytical watersheds greater than 10,000 acres into smaller units.

Response: Much of the aquatic system monitoring will focus on watersheds smaller than 10,000 acres.

Comment: Monitor activities in each watershed to determine cumulative effects on water, soil, fish, and other resources.

Response: The SEIS Monitoring and Evaluation Plan will be based on a determination of the level of such monitoring that would be cost effective.

Comment: Mining activities in or adjacent to streams should be monitored to determine if they are adversely affecting riparian area vegetation.

Response: Such effectiveness monitoring may be included in the SEIS Monitoring and Evaluation Plan. Activities in approved plans of operations would be monitored for conformity to RMP direction (implementation monitoring).

Comment: Monitor to assess impacts on Oregon sensitive species.

Response: The SEIS Monitoring and Evaluation Plan will define the extent of special status species monitoring for those species that occur in special habitats. Species in the FEMAT matrix or

those not in special habitats will be monitored if monitoring is prescribed in an Environmental Assessment for a proposed action.

Comment: Monitor to ensure target levels of dead-and-downed wood are attained.

Response: The SEIS Monitoring and Evaluation Plan addresses this.

Comment: Give more attention to monitoring the population and geographic distribution of special status plant species.

Response: Conservation of the special status plant species will include preparation of management plans considering the geographic distribution of these species and the role of BLM populations in the survival of the species. As needed to conserve the species, these plans will direct: determination of species requirements where BLM can act to enhance survival or recovery, implementation of BLM actions in recovering or enhancing the species and assessment of the effectiveness of those actions. Sampling of population trends will be a means of assessing what needs to be done, as well as effectiveness and appropriateness of these actions in recovery of the species.

Comment: Use recent advances in technology to monitor special status plants, especially listed plants. Address monitoring of special status plant species in more detail.

Response: Monitoring guidelines in the RMP must be general in nature. There is too much variation between populations and site-specific management objectives to provide more detail. More detail will be developed during activity planning following the completion of the RMP and refinement of the SEIS Monitoring and Evaluation Plan. The most cost-effective technology will be used.

Comment: RMA monitoring should focus partly on amphibians or other key dependent species.

Response: The extent of such validation monitoring in Riparian Reserves will be defined by the SEIS Monitoring and Evaluation Plan.

Comment: Monitoring fish and fish habitat in one stream per resource area seems insufficient.

Response: All key watersheds will be monitored.

Comment: Previously-logged areas should be selected for study and monitoring of experimental efforts to restore old-growth conditions.

Response: Such studies are ongoing in existing monitoring and research programs by other agencies. Some areas have been identified where past logging on lands BLM administers appears to be leading to early development of old-growth conditions, and these are being monitored.

Comment: A monitoring program should be established to identify noxious weeds before they become a problem.

Response: As part of the cooperative agreement between the BLM and the Oregon Department of Agriculture (ODA), ODA conducts noxious weed field surveys; collects and redistributes biological control agents; and monitors results and efficiency of bio-control sites. Noxious weed

infestations have already been identified by townships and sections. We continue to locate problem areas during proposed project planning when sites are surveyed.

Comment: Incorporate the rural interface issue into BLM's agreement for monitoring implementation of BLM plans.

Response: Rural Interface area monitoring is included in the PRMP Monitoring Plan.

Comment: The monitoring section of this document should be expanded and increased to include specific proposals with thresholds, trigger points, and courses of action.

Response: The Monitoring Plan has been revised and should provide this.

Comment: The BLM should provide its own monitoring program for spotted owls in the event that a recovery plan is not adopted immediately. If monitoring is not funded, actions affecting the listed species should not proceed.

Response: Owl monitoring is ongoing, but is likely to be modified when the SEIS Monitoring and Evaluation Plan is refined.

Comment: Monitoring should be an especially important part of the final BLM plans. While the draft plans include provisions for monitoring of natural resources, it should also include provisions for monitoring of socioeconomic conditions and for modification of the plan based on changes in these conditions.

Response: Implementation, effectiveness, and validation monitoring are planned for socioeconomic conditions and trends. The BLM Monitoring Plan identifies monitoring questions and defers to the SEIS Monitoring and Evaluation Plan for monitoring requirements.

All monitoring has the potential to trigger changes in management if indicators warrant a change, or if expected outcomes are not achieved (validation monitoring).

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