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Bureau of Land Management

Eugene District Office
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Eugene District Proposed Resource Management Plan/ Environmental Impact Statement

Volume III



QH
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E944
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v.3

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

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Appendix KK Response to Public Comments

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Introduction

This Appendix documents the efforts made by the Eugene District to solicit and analyze public comments during the review of its Draft RMP/EIS. It contains 5 major parts. The 1st section is an introduction to the public participation process. Section 2 is a summary of public participation information, including a brief subject summary (listed by resource) of the comments received. The 3rd section lists the full extracted and paraphrased substantive comments along with the BLM responses. The 4th section contains a list of all the individuals, groups, organizations, and agencies that commented on the Draft RMP/EIS. Section 5 consists of reproductions of the letters sent by Federal, State, and local government agencies; elected officials and bodies; and Native American groups.

Public Participation Process

As part of its planning process, the Eugene District Bureau of Land Management (BLM) solicited public comments on its Draft RMP/EIS. Based on comments received, the BLM made changes to its Draft RMP/EIS and issued this Proposed Resource Management Plan/Final Environmental Impact Statement (PRMP/FEIS).

The analysis of public comments is not a vote counting exercise. The comments received from letters and public meetings were analyzed so that meaningful changes could be made. Specific substantive comments were generally the most useful to the BLM in the modification of the draft preferred alternative, and in developing the Proposed Plan, although all comments were considered.

Management decisions as published in the PRMP/FEIS are based on 4 factors: laws, technical information, resource limitations, and public opinion. The BLM consulted with the public continuously throughout the planning process to obtain some of this information. All of the information was considered by the BLM in developing its Preferred Alternative and in changing the Preferred Alternative to the Proposed Plan. The PRMP/FEIS is an ecosystem management plan that must meet the BLM's multiple use mandate, the Federal Land Policy and Management Act, the O&C Act, other laws and

regulations, and public needs. Considering some of these conflicting directions, goals, and needs, the District has advanced the PRMP/FEIS as the best combination of management actions for the land and resources for the present and future needs of the American people.

The National Environmental Policy Act requires the BLM to respond to public comments received during the comment period. That response could take one of the following forms:

- Modifying alternatives (including the Proposed Plan) developing and evaluating new alternatives that address new issues, concerns, and opportunities
- Supplementing, improving or modifying analysis
- Making factual corrections
- Explaining why the comments do not warrant further agency response (taking no action and explaining why the BLM used rationale, authorities, and sources in the draft plan, and why the agency's position is maintained in the final plan)

Comment letters received by Eugene District staff were numbered, read, and coded according to the subject(s) discussed. Copies of all letters were routed to management and to resource program specialists. Substantive comments and preferences/opinions were selected and responses developed to the substantive comments.

A substantive comment relates to inadequacies or inaccuracies in the analysis or methodologies used; recommends new alternatives or management actions; or involves substantive disagreements on interpretations of significance. Responses to substantive comments are reproduced in this Appendix.

A preference or opinion generally states a position on an issue without supporting that position with proof, data, or references.

Some of the comment letters contained up to 40 or 50 substantive comments, although the average letter contained 5 to 15. Most letters contained preferences and opinions. As stated earlier, analysis of public comments is not a vote counting exercise, therefore, preferences and opinions were considered.

Every attempt was made to accurately capture all the substantive comments extracted from the letters

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received and display them. These comments are grouped by resource along with a response and are reproduced in this Appendix.

Some comments suggested actions that are beyond BLM jurisdiction, legal authorities, or the scope of an RMP. In such cases, the response would have been to take no action except to explain why the suggestion is beyond the BLM's authority or scope. Some specific suggestions asked for detailed discussions in the plan; however, many of these details are beyond the scope of this plan. These comments have been retained for consideration in the preparation of future site specific plans or projects.

Summary of Public Participation

The Eugene District Draft RMP/EIS was released for public review on August 28, 1992 with the Federal Register Notice printed on August 27, 1992 (Vol. 57, No. 167, pg. 38853). During the 4-month comment period, the Eugene District received 1,272 comment letters. The District continued to accept comment letters well past the official closing date and tried to consider these comments as much as possible. All of the original letters are on file at the Eugene District office and are available for public review.

Approximately 800 copies of the Eugene District Draft RMP/EIS were distributed by mailings to individuals, groups, and agencies on the District's mailing list, and to visitors to the office and those attending the public meetings.

Statewide Public Involvement

There were a number of formal briefings of non-BLM groups and individuals, as well as informal meetings that covered all 6 western Oregon Draft RMPs. These meetings and briefings usually were coordinated by the Oregon State Office of BLM, although the formal briefings were led by past Eugene District Manager, Ron Kaufman. The following is a list of all Western Oregon briefings held by State Office personnel for all six western Oregon District RMPs.

7/20/92 U.S. Fish and Wildlife Service, Portland
8/6-13/92 U.S. Forest Service, Washington D.C.
Senator Bob Packwood
Senator Mark Hatfield (staff)
Senator Slade Gordon (staff)
Congressman Les AuCoin (staff)
Congressman Norm Dix
Congressman Peter DeFazio (staff)
Congressman Peter Kopetski
Congressman Bob Smith
Congressman Ron Wyden

BLM Washington Office Staff
Assistant Secretary of the Interior & Staff
Professional/Conservation Groups,
Washington D.C.

House Interior Appropriations Staff
Senate Interior Appropriations Staff
O&C Counties Executive Board
Environmental Groups (Oregon)
Industry Associations (Oregon)
8/19/92 District Advisory Council
8/20/92 Governor's Forest Planning Team
9/16/92 Scientific Review Panel
9/17/92 Willamette Timbermen
9/22/92 Lane County Tax Equalization Group
10/06/92 U.S. Forest Service, Willamette National Forest
10/08/92 Oregon State University Faculty
10/09/92 Willamette Forestry Council
10/21/92 Society of American Foresters, Portland
10/26/92 Society of American Foresters, Eugene
10/27/92 University of Oregon Faculty
11/02/92 University of Washington Faculty
11/10/92 Society of American Foresters, Roseburg

District Public Involvement

The Eugene District Draft RMP/EIS was released for public review on August 28, 1992. The Federal Register Notice was printed on August 27, 1992 (Vol. 57 No. 167 pg. 38853).

As part of the planning process, the Eugene District solicited public comments on its Draft RMP/EIS. Based on comments received, the BLM made changes to its Draft RMP/EIS and issued the Proposed Resource Management Plan/Final Environmental Impact Statement (PRMP/FEIS).

During the 120-day comment period extending from August 21 to December 21, 1992, the District received 1,272 comment letters. The District continued to accept comment letters past the official closing date of the comment period and tried to consider these comments as much as possible. All of the original letters are on file at the Eugene District Office and are available for public review.

The District comments were received through individual letters, personal contacts, petitions, and public meetings. They were analyzed so that meaningful changes could be made to the Preferred Alternative (PA) and in the development of the PRMP/FEIS. Substantive comments were the most useful to the BLM in development of the Proposed RMP, although all were considered. Substantive comments were those indicating

- errors in analysis;
- new information that would have a bearing on the analysis;
- misinformation that may have been utilized and could have affected the outcome of the analysis,
- requests for clarification; and
- support of an existing alternative or definition of a substantive new alternative within the range of alternatives considered.

Each comment was considered valuable whether "substantive" or otherwise; opinions, feelings, suggestions, and observations were also considered. Each comment was weighed on its own merit against legal, technical information, resource capability, and public opinion.

The National Environmental Policy Act of 1976 (NEPA) requires BLM to respond to substantive comments received during a comment period. Responses to the substantive comments can be found in this Appendix.

Public Meetings (District)

The Eugene District had four open houses to dispense information, answer questions, and solicit input regarding the Draft RMP/EIS. They were attended by 117 people who were asked to submit written comments. In addition, several other meetings were held with the Eugene District Advisory Council. Table A is a list of the dates, meetings, and open houses where BLM staffers met to discuss the Draft RMP/EIS.

Table A Public Meetings

Date	Number Attending	Meeting
08/28/92	8	Eugene Advisory Council
09/30/92	35	Open House, Eugene District Office
10/02/92	7	Eugene Advisory Council
10/07/92	11	Open House, Florence, Oregon
10/22/92	2	Open House, Cottage Grove, Oregon
10/28/92	47	Open House, Leaburg, Oregon
11/13/92	7	Eugene Advisory Council
Total	117	

Demographics

The District received 1,272 letters: 1,169 were individual letters, 3 were petitions, 4 were resolutions, and 946 were form letters with a total of 2,718 signatures. Most letters had more than one comment; there were 2,157 separate comments. Of the 2,157 comments, approximately 248 were substantive comments and 1,909 were preference/opinion comments.

The District received letters from 4 States: California, 49; Indiana, 1; Oregon, 1,216; and Washington, 6. All 1,272 letters received were recorded into a dBase computer program.

Form letters made up 46 percent of the total letters received. The District received 4 different form letters. They included 113 from Environmental Groups and 896 from the Timber Industry.

Table B tabulates the response type, the number of comments received on Eugene's Draft RMP/EIS, and the number of signatures on the respective correspondence.

Table B - Summary by Type of Response

Response Type	Responses Number	Signatures Number
Comment Sheets	2	2
Form Letter	946	947
Letter	316	434
Petition	3	1,294
Resolution	4	40
Other	1	1
Total	1,272	2,718

Tables C and D tabulate and summarize some of the demographic information about the comment letters received by the Eugene District on its Draft RMP/EIS.

Table C - Summary by Type of Respondent

Respondent Type	Responses Number	Signatures Number
Affiliated with Organization	84	1,478
Federal government	6	6
Individual	1,169	1,219
Local government	8	10
State government	5	5
Total	1,272	2,718

Table D - Geographical Location of Responders

State	Responders
California	49
Indiana	1
Oregon	1,216
Washington	6

Summary of Comments with BLM Responses

The following section contains substantive comments and BLM responses by resource topic. Eugene specific comments are located at the end of each Resource Topic section following common Statewide comments.

The following list tabulates the number of comments according to major topics or resource elements addressed in the comment letters. Preferred Alternative comments addressed resource topics and, therefore, were coded in the dBase to the resource programs contained in the following list.

Topic	Number of Comments
Access	1
Air Resources	15
Biological Diversity	34
Cultural Resources	3
Energy & Minerals	51
Fire	4
Fish	15
Hazardous Mat/Noxious Weeds	1
Lands, Rights-of-Way, Withdraw	18
Livestock Grazing	1
Recreation	28
Riparian Resources	35
Roads	14
Rural Interface Areas	19
Socioeconomic Conditions	115
Soil Resources	4
Special Areas	63
Special Status Species	98
Timber Resources	340
Vegetation	14
Visual Resources	16
Water Resources	44
Wild and Scenic Rivers	23
Wildlife	63
RMP/EIS (General)	59
Ecosystem Management	31
Withdrawals	1
Consistency w/ Agency Plans	8
Require Further EA	2
Use of Completed Plan	5
Mgt. New Acquired Lands	1
Monitoring	15
Research	1
Environmental Form Comments	113
Industry Form Comment—Yellow	285
Timber Industry Form Letter	43
Willamette Forest Council— Form Letter	568
Other	6
Total	2,157

Draft RMP/EIS Common Comment/Responses

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Common Comment Synthesis/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. Where the Proposed Plan had a corollary element, our responses to such comments treated them 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*.

To assist the reader, substantive comments/responses specific to the Eugene District are located near the end of each Resource Topic section.

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, and did not preclude changes in that alternative. The State Director never intended it to formally guide that aspect of the process and it did not direct any discretionary allocations or constraints in the Preferred Alternative. It has also not guided development of the Proposed RMP.

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, 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 Management focuses on the many activities required to manage a specific geographic area. This type of management is different from traditional program based management that 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, 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 this.

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 historic silvicultural plans, required budgets, approved budgets, activities conducted, and reasons for the differences.

Response: Much of what is requested 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 how such deliberations and decisions will come out 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: On the maps more geographic places and towns should be shown and named, more streams named, and secondary roads indicated.

Response: The level of detail of geographic naming was limited so as not to clutter the maps.

Comment: Maps showing land allocations are too small a scale with 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.

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.

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 that had been terminated in 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.

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Comment: The Confederated Tribes should be contacted for review of any activity permanently altering the land, minerals, vegetation on, or access to their aboriginal lands. The tribal office should receive copies of Environmental Assessments, FONSI's, EIS's, and other notifications of actions.

Response: A Memorandum of Understanding, currently under development with the tribal government, will identify those activities that the Confederated Tribes will be contacted on and receive official BLM 30 documents about.

Goals and Objectives

Comment: It was difficult to identify plan policies in the RMP's. The RMP's 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: Table 4-50 identifies land allocation acreages. Also see Tables S-1 and S-2.

Comment: The RMP should use a watershed approach to land resource management.

Response: The SEIS decision, which 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 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. Yet, only in the long-term can we attain many of the plan's key objectives, so much of the plan's focus remains long-term.

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, 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 Proposed Plan 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, it does not necessarily follow 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. 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 we were to exchange O&C timberlands for property intended for use primarily as wildlife habitat. See *Headwaters v. BLM*, 914 F.2d 1174 (9th Cir., 1990). Thus, 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: Note the current level of survey, monitoring and inventory, which is done regularly.

Response: Monitoring under the current plan is described in Oregon State Office Manual handbook H-1734-1, 162 pages. Survey and inventory procedures are equally detailed by resource. Copies of these procedures are available for review in the 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 Based 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: An integral component of the (new) PRMP is fisheries emphasis.

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 Preferred Alternative 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 and 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.

Impact Analysis Generally

- Comment:** A 10-year short-term impact time frame is not equally appropriate for all resource categories. Consider varying according to the life spans of affected biota.
- Response:** The 10-year period was selected as the end of the period before the PRMP 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. Where available information suggest that intermediate term impact conclusions would be substantially different than the trend implied by short-term and long-term conclusions, that has been acknowledged.
- 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. Even spatial feasibility of the 10-year scenario is speculative, given these considerations, 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 that 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. Expected management on private land, however, 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. 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 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 and 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 so as to 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 SEIS 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 regional SEIS. Contingency planning would have to be based on a multiplicity of "what ifs." 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, unsustainable resources for forest products has been overlooked. The plan also ignores the other environmental costs — higher energy consumption, increased CO₂ emissions, accelerated depletion of nonrenewable resources — of relying more 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 Resource Management Plan EIS. We are aware, however, of some regionwide analyses of this topic, and discussion of them has been added to Chapter 4, Socioeconomic Conditions.

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, 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 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. Therefore, we and the tribes must jointly develop a process whereby information concerning the interests and needs of each tribe or nation is shared. The Memorandum(s) of Understanding presently in development constitutes an important step in this process of information sharing.

Comment: If helicopter use is an option for accessing and harvesting timber sales, include a discussion of noise impacts.

Response: Discussion has been added in Chapter 4, Recreation and 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: The Eugene District does not currently manage a livestock grazing program. If livestock grazing is proposed in the future, an impact assessment would be conducted covering these concerns and many others. The Aquatic Conservation Strategy Objectives from the ROD would be followed.

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 Quality

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 labelled, 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 include 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.

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- 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 area.
- 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:** More thorough analysis of emission reduction techniques and alternatives to the use of prescribed fire is necessary in the Final RMP.
- 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 neighboring communities' air quality 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.
- Comment:** There will be about the same amount of smoke produced under the Preferred Alternative with less logging.
- Response:** A clerical error was produced in the Draft RMP Table 4-a-1. This table as well as Tables 2-10, 2-11, and 2-12 have been corrected to accurately reflect the tons of consumption and emissions.

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 (BMP) (Appendix G) 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 1 percent or less where ground based equipment is employed.

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 providing planting sites for seedlings, controlling competing vegetation, and to reduce the risk of wildfire. Logging slash, when left untreated, can burn very intensely under wildfire conditions. Best Management Practices (BMP) 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 scatter 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 that 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 of site impacts. An example of this is the TPCC category, FGNW, which identified the areas of potential landsliding that could enter waterways. These sites were designated as "nonsuitable woodlands" and will be managed to protect and enhance their nontimber 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 G) are used to protect and mitigate impacts from management activities. During site-specific planning, in addition, on-site investigations are conducted on these lands so we can avoid areas subject to landslides or provide adequate protection to limit their number and size.

Comment: Clear cutting 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, "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 in Chapter 2 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 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 models of physical properties, such as erosion, should be employed in a realistic test of timberland suitability.

Response: Using FORCYTE a full range of prescriptions were analyzed on seven different site conditions. The impacts of these prescriptions were carried through as if the same prescription were 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 that will be updated over time to keep up with research data and improve mapping.

Water Resources

Comment: Establish Riparian Management Areas (RMA) 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 Reserve 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 that will consider factors, which include stream condition. Review and guidance for possible modifications of Riparian Reserves would be coordinated through the Regional Ecosystem Office (REO). 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 Chapter V Appendix J, and 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 that will include unstable and potentially unstable areas if they are not protected by TPCC exclusion.

Comment: The relegation of 1st and 2nd 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, which contain these streams of concern, have been excluded from timber management as unsuitable woodlands in the Timber Production Capability Classification (TPCC).

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 and 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:

1. Desired future condition on a stream-by-stream basis

2. Criteria and priorities for cumulative effects analysis
3. Priorities for water quality monitoring programs
4. Criteria and priorities for watershed level activity plans
5. Priorities for watershed rehabilitation programs
6. BMPs and watershed harvest deferrals

Response: We agree. 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: It is recognized that BMPs are the primary mechanism to enable the achievement of water quality standards. BMPs are selected to achieve 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:
 - a. The effectiveness of practices in meeting water quality standards.
 - b. 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: 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 that considers applicable beneficial uses, NPS Assessment and 305(b) reported conditions, and monitoring and inventory data. When new methods of analysis are developed and validated, they will be incorporated.

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: Acknowledge the limits on the availability of surface water and address surface water quality problems.

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Response: Current Departmental policy requires that we 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: Implementation of riparian enhancement projects that enhance the potential for bank storage and slow release through establishment of proper function riparian systems, and mitigation of existing compaction through obliteration of roads or other compacted land surfaces to restore slope hydrologic functions, will improve flood plain and upland hydrologic functions to maintain or enhance low season flow.

Comment: Set watershed impact standards, including maximum soil compaction, erosion rates, equivalent clear cut acres and relative percentage of seral stages.

Response: Maximum soil compaction is addressed in Chapter 2. Across the board watershed prescriptions are inappropriate. Prescriptions for individual watersheds will be based upon 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 desegregated 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: Watershed concerns suggest that road culvert design standards should be based on 50-year peak flow, not 25-year.

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 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: See Tables 3-46 in the PRMP/FEIS.

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 1988 319 Assessment Report 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. We, in cooperation with Oregon DEQ, 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: On-the-ground mapping of streams and stream orders, with clear identification of addressed intermittent and perennial streams is needed. The maps should also present 100-year flood plains and potentially hyporheic zones.

Response: Such mapping would be a massive undertaking and would have 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 stream 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 PRMP 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 G 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 on-site 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.

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- 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: It is unclear how the Watershed Condition Index (WCI) was generated; how it was used in planning; how it will be used in standards, guidelines and monitoring; and 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 out-of-date due to significant logging activities on private and industrial lands. Second, it will be difficult to update and forecast land disturbing activities on BLM administered lands due to soft projections of Potential Sale Quantities in the 10-year timber management scenario for the PRMP. Finally, it was felt that 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 lands cause significant increases in the concentrations of metals in streams that supply public water systems.
- Response: Mining activities on BLM administered lands must comply with surface management regulations, State water quality criteria, and Best Management Practices, to protect beneficial uses such as public water supplies.
- Comment: The people that BLM would be closing by allowing pesticides, inerts, fertilizers and the like to get into drinking water supplies would be at risk.
- 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 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 PRMP/FEIS. The extent of ground water supply effects is a site-specific issue and 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 stressed.
- 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 determination if impacts would 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, lacking a complete 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: 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: 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 attribute of ecosystems and include a regional perspective.

Response: Data to do this is not available.

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 Biodiversity Diversity section of Chapter 3 in the Draft RMP. In the PRMP/FEIS we used data from a Forest Service synthesis of available information about the presettlement characteristics of Pacific Northwest forests to compare current forest condition and function with the range of presettlement 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, which 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 20 (16) feet or longer and at least 20 (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 GFMA's.

Response: Because there are differences in the decay rate for down wood in different environments and because the contribution of down wood is usually periodic, related to root diseases, storm events and other disturbances, there will be variation in the amount and size of down wood, which 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 GFMA 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, some 3 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 Figure 4-1, Eugene District RMP/EIS.

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 reexamine 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.

Old Growth Forest

Comment: The Draft EIS violates NEPA by failing to adequately describe the complexity of old-growth forests.

Response: Entire 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. The BLM 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 that might cause them to deteriorate away from desired old growth conditions (for instance shifting away from conifer dominance and toward tan oak 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: 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 clear cuts 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: 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. As specified in the SEIS/ROD, project level NEPA analysis will address effects on the remaining late-successional forests.

Comment: Solutions to the shortfall of older-aged components in the Coast Range (Eugene, Salem, 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 Eugene District, only a small portion of remaining old growth in the GFMA is expected to be harvested under the PRMP in the first decade.

Comment: Old growth acreage should be reported by forest cover type.

Response: Reporting such information would be desirable but at this time that information is not available. As the forest plan is implemented and further old growth inventories are initiated, this information will become available. Unfortunately, data on the series, habitat type or plant association do not currently exist, although the approximate associations can be estimated by province and Sustained Yield Unit. Dominant and understorey forest tree information is available and is included in the final plan inventory of forest conditions.

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 to 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. And 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 which will provide much of the long-term interior old growth forest on BLM administered lands. Watershed analysis will further consider potential future landscape arrangements.

Ecosystem Management

Comment: The checkerboard ownership pattern makes it unlikely that the ecosystem management objectives will be achieved.

Response: The PRMP approaches Ecosystem Management utilizing a variety of temporal and spatial landscape allocations. BLM manages land that is mostly in a checkerboard pattern. The Ecosystem Management vision can not 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: 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 BB 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 nontimber objectives.

Comment: Specify methods for coordinating biodiversity and ecosystem management goals with other land-

owners, 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 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, P. 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.

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 3-1 in the Eugene District DRMP. 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 arising from natural disturbance and young stands arising from harvests are lower levels of standing dead and down wood.

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 analyses 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 GFMA on sites considered natural conifer sites where past management 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

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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: 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: 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 nor appropriate.

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 Pacific Yew Act remains in effect, RMP implementation actions in yew habitat will conform to its terms.

Comment: The Draft EIS violates NEPA because it fails to disclose how long the proposed yew bark harvest rates can be sustained.

Response: The PRMP/FEIS 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, Vegetation, 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 National Environmental Policy Act (NEPA) regulations and principles consistent with Ecosystem Management. 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 inventory, monitoring, and research needs that reflect 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 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 mush-

room 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, including 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 on specific stream reaches, wetlands, or other water bodies, to meet PRMP objectives. 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: 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.

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Comment: BLM's proposed riparian management on perennial streams is only about half as wide as recommended by the Scientific Panel on Late-Successional Forest Ecosystems, which said, "Establishing wider riparian corridors on Federal lands *across the landscape* 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: 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: Wind firmness 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 areas. Watershed analysis will help identify priority areas. Key watersheds will have particular emphasis.

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. The opportunity to meet all of them (e.g., large woody debris) will not occur for many decades along some stream reaches.

Comment: Plant conifers 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 up-slope 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. While this would result in some degraded streams being listed as in better condition than they are, the converse is also true.

Comment: Provide tree species and density data and describe factors that may limit future riparian zone maintenance and production, such as water table alteration, in the riparian analysis.

Response: Neither our forest inventory data nor 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.

Wildlife Habitat

- 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. The best available models that could be applied using BLM's database 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 concepts 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 that can be dealt with 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:** Animal species, which 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 spread out across the landscape. The idea is to enhance biodiversity and to 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:** Identify the role and value of shrub fields as wildlife habitat. Assess whether any species are dependent on these shrub fields.
- Response:** Management objectives for shrubs and other early or mid-successional habitats are specifically addressed in Chapter 2 Wildlife and Special Status - SEIS Special Attention Species Habitat sections. All habitats are important to some species. An overall wildlife goal of the PRMP is to "enhance and maintain biological diversity and ecosystem health to contribute to viable wildlife populations." This will take place in the PRMP across all age classes and land-use allocations.
- Comment:** A 100 or 150-foot RMA for lakes, and 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.

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- Response: The PRMP expands this width for lakes and natural ponds. All such buffers may be adjusted after watershed analysis, based on site specific characteristics.
- Comment: Conduct a Districtwide inventory of sensitive wildlife areas and areas with currently high densities of Off-Highway Vehicle (OHV) use.
- Response: A partial Districtwide inventory of sensitive wildlife areas has been accomplished (e.g., nest sites of ospreys, great blue herons, marbled murrelets, bald eagles, spotted owls). Gathering updated information as well as additional species data will be part of monitoring and continuing inventory. The Eugene District is currently working with motorized organizations to identify areas that are receiving high off highway use. This information will be used to design OHV use designations.
- 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: 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. Chapter 4 Biodiversity identifies the acreage of old growth stands in connectivity/diversity blocks over time. For additional information, see the Biodiversity section in Chapter 4.
- 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 clear cutting 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: Reevaluate 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). Thus, 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 sub-watershed scale because we believed this to be most properly evaluated during watershed 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 1-6,000 acre level suggested by the Wisdom model. However, these large watersheds can be subdivided into smaller sub-watersheds that 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.

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 4-1 and 4-2. 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), residual green trees, etc. 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 are to manage forest lands so as 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, which follow completion of the RMP/EIS.

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.
3. Green tree replacements 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 affects 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, the 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 its 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 the populations so estimated 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 PRMP 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: 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. In such a landscape, separable population goals by allocation are 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 and northern flickers may be the most abundant woodpecker in the GFMA's.
- 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: 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 as to have to require artificial snag creation 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 become essentially devoid of snags.
- 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 migrant. 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,

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Coopers' hawk and purple martin.

Comment: Address how logging practices are affecting the pond turtle.

Response: A discussion has been added.

Comment: A category should be created entitled "Special or Unique Habitats," which should include strategies for retaining and restoring vanishing habitats.

Response: "Special Habitats" are discussed in several places in the draft RMP/EIS document. Protection for special habitats is included in Chapter 2 under Special Areas and Wildlife Habitat.

Comment: Small species are just as important as large ones from an ecological perspective. Much more attention needs to be given in the Plan to invertebrates and other small animals.

Response: Invertebrates have been addressed more fully in the SEIS.

Comment: Old Growth Emphasis Areas (OGEA) will be harvested between 200 and 300 years of age, which is well before the time maximum species diversity of mammals and plants is reached.

Response: The establishment of Late-Successional Reserves (LSR) will ensure that large areas will be managed to preserve or produce the desired conditions for maximum diversity.

Comment: Impacts to wildlife, including Special Status Species, have not been analyzed for the 37 recreational sites, 19 trails, and the 9 proposed Back Country Byways on the Eugene District.

Response: The Chapter 4 discussions on Wildlife and Special Status Species have been expanded.

Comment: The BLM needs to provide management consideration for all species contained on the Eugene District that are described in the Oregon Department of Fish and Wildlife's June 1992 "Sensitive Vertebrates of Oregon."

Response: Most of those species that occur on BLM administered lands within the District are considered as Special Status Species. Other species are not covered because of their questionable status (Sensitive-Undetermined).

Comment: Specific information is lacking. You state that the Eugene District is currently conducting an initial inventory of amphibians. How can you put forward a plan, the goals of which include restoration and preservation of habitat for these creatures, without such an initial inventory having been completed?

Response: Since the release of the draft document, much of the inventory has been accomplished. This information is summarized in Chapter 3. Although there are no requirements to have an inventory of all resources prior to completion of a RMP, we have tried to include all available information into the plan.

Comment: What is BLM's recommendation for habitat protection when active raptor nests are found within a proposed timber sale? Would a buffer be composed of reserve trees?

Response: No retention standards are adopted for protection of raptor nest trees, other than seasonal restrictions to prevent falling of the nest tree while occupied. Buffering of the nest trees using reserve trees is possible, although this approach is likely to be used infrequently since there are competing objectives for distribution of planned retention trees.

Comment: Leaving a range of sizes and ages of wildlife trees behind in harvest units better ensures that they will survive over the long-term. Leaving older trees provides short-term Large Woody Debris and habitat while younger trees that are left behind will grow into the wildlife trees available when the new forest matures.

Response: This is the approach we have used to develop criteria for selecting green retention trees, and scientific knowledge permits identification of appropriate standards to supplement Ecosystem Management. Many of those standards were developed for the SEIS Record of Decision and are included in the PRMP.

Fish Habitat

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-5th order watershed basis, be based on a thorough pretreatment 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, thus, aggressive restoration efforts are necessary 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 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: We recognize the need for this information; however, it is not available at this time nor can it reasonably be acquired in a timely manner for inclusion in the PRMP/FEIS. As a part of implementation of the RMP, we will move to acquire this data. The BLM has recently released a strategy for the management of anadromous stocks in the Columbia and Snake River Basins, which has as a central focus watershed level planning. A similar plan has been developed for the coastal areas of the Pacific Northwest and includes watershed level planning as a central focus. This plan, which will be published soon, is a road map of how the BLM intends to manage the fisheries of the region to meet the goals and objectives set forth in the PRMP.

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 sub-watersheds where timber harvest emphasis would occur.

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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 before management actions in key watersheds. Until that level of analysis is complete, it is not feasible to identify sub-watersheds where timber harvest emphasis will occur.

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 are aware of this information and have considered it.

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 affect fish production (i.e., harvest, ocean conditions, etc.). These factors are not under the control of the BLM. Currently many watersheds are underseeded. The Eugene District has conducted annual spawning ground counts to monitor run and management action impacts. Despite habitat restoration projects and a generally upward trend in aquatic habitat, runs have continued to decline, part of a coastwide phenomenon.

Comment: Analysis of impacts on fish is flawed because it fails to consider management activities on private lands, assumes that past damage will improve on its own, 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 adjusted the condition arrived at using the vegetation information to account for such related factors as the amount of new and existing roading, 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 wildly optimistic.

Response: We have conducted extensive habitat inventories. The Eugene District has inventoried 107 miles of habitat in the past decade, about 113 of available anadromous fish habitat, or 25 percent of the total fish habitat, including resident fish habitat. 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 over-state the age and size of the riparian vegetation. This would result in the classification of some streams as in better condition than they actually are.

This analysis method has been peer reviewed internally but has not received peer review outside the agency. ODFW 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 4G 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 habitat production capability data the BLM has.

Our fish production estimates represent the potential capability only. Many factors other than habitat condition affect fish production (i.e., harvest, ocean conditions, etc.) and actual production will vary as a result of these other factors. Since these factors are not under the control of the BLM the actual fish production under a particular alternative will likely vary from what was predicted. However, the method used does illustrate the relative difference among alternatives, thus providing 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, in the planning process, are developed for a specific alternative. They 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 ODFW. 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 affect fish production (i.e., harvest, ocean conditions, etc.) These factors are not under the control of the BLM. Thus, our fish production estimates represent the potential capability only and actual production will vary as a result of these other factors.

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. Much more detailed information on stream variables related to fish survival is needed, such as substrate imbeddedness, stream temperature, presence of deep pools, dissolved oxygen, sedimentation, etc.

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 ODFW 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: Identify how closely the expected condition of the fishery resource will approach maximum potential.

Response: It is not possible to determine what the maximum potential is and 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 incorporated to minimize impacts. For further discussion, see previous comment responses on Soils/Site Productivity.

Comment: Several streams were excluded from Table 2-2 because they had low potential. Shouldn't all streams be included?

Response: Table 2-2 listed streams considered to have the higher potential for recovery in the short-term as a result of management activities and restoration efforts using economically feasible methods. Other streams not listed have the potential for recovery, but may be influenced more by activities on nonfederal lands. These streams will require extensive restoration efforts over a long period of time, or would require costly restoration methods far exceeding potential benefits. All streams should show recovery over the long-term under proposed management actions.

Comment: BLM needs to develop clear objectives for riparian, stream and fish resources.

Response: Objectives have been added to Chapter 2 of the PRMP/FEIS.

Comment: Mining at Sharp's Creek is harmful to fish habitat. Won't more mining activity cause more damage?

Response: Monitoring by BLM has not shown any significant impact to fish habitat in Sharp's Creek as a result of the current level of mining activity. There is some local disturbance but it has not affected the overall fish habitat. Sharp's Creek was probably disturbed historically by mineral development in the Bohemia Mining District. Major development of mining, especially an increase in bench placer mining or the use of large-scale suction dredging, has the potential for increased disturbance that might result in damage to fish habitat if not mitigated. BLM will monitor future mining operations to prevent unnecessary and undue degradation, including potential damage to fish habitat.

Comment: The Upper Siuslaw River has declined over the years and anadromous fish are now largely absent.

Response: BLM has very limited habitat in the upper Siuslaw Basin. BLM has done extensive monitoring for anadromous fish and fish habitat during the past decade. Runs of anadromous fish are depressed. However, habitat on public lands has not changed as a result of BLM management during the past decade. The major changes in the upper river occurred in past decades and resulted more from activity on private than BLM land. Recent changes in the river are due primarily to increased human development, including the building of houses and farm structures, increased roads and Off-Highway Vehicle (OHV) use, increased discharge of nutrients from septic tanks and animal use, increased erosion from animal and human activity, and increased use of chemicals. Analysis of impacts of BLM management is based on the current situation and not on the historic conditions in the upper basin.

Special Status Species (Animals and Plants)

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 when.

Response: Site specific management plans termed Conservation Agreements are being developed for Special Status Plants. These are interagency plans developed between BLM, USFS and USFWS, which identify and schedule specific management actions to prevent listing and to conserve these species. Several plans 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 or habitat will be managed in compliance with the Endangered Species Act and BLM national and State Office policy and 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, forestalling listing, and/or 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. Some of these are currently Federal Listed species, some are Candidates for listing and others are not now nor probably will 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 to recover the spotted owl populations, but also provide habitat for a host of other species where the occurrence is in common. 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 and 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 for more far-ranging species such as the goshawk and spotted owl it may require multiple Reserves to serve the needs of a population. Key items in the Fish and Wildlife Service's review of whether 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. The Reserves serve as cornerstones for meeting both of these items of concern and thus 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 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 USFWS 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. Wildlife inventories are very expensive and thus subject to budget constraints.

Comment: The Draft EIS violated NEPA by failing to adequately analyze the effects of the RMP on marbled murrelets, songbirds, declining amphibians, western pond turtles, many important species of plants sensitive to disturbance and candidates for the endangered species list.

Response: In the PRMP/FEIS, 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. Much research is needed about the habitat needs of most such species before more can be said. 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 in order 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, a Habitat Management Plan will be prepared.

Comment: The treatment of marbled murrelets is inadequate.

Response: The discussion of marbled murrelets was expanded in the PRMP/FEIS.

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: Provisions in the PRMP call for general inventories of BLM administered lands for murrelets. Additionally, all proposed project areas will be surveyed according to protocol for murrelets (which requires 2 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 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: All potentially threatened stock of wild anadromous fish on BLM managed lands should be included on the list of special status species.

Response: A list of native fish stocks, which we have determined merit special management consideration, has been prepared and can be found in Chapter 2, Special Status Species of this PRMP/FEIS.

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 between 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 be come threatened or endangered.

Response: Special status plants are not discussed individually because of the large number of special status plants and the limited amount of information available on their biology. More research is needed before more can be said. The ONHP list provides only species names and status and can not 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, which 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 which 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 PRMP. Plant species on List 3 ("review") and on List 4 ("watch") 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: It is difficult to analyze murrelet impacts under the various alternatives, due primarily to the scarcity of information included in the Eugene District documentation.

Response: Documentation of impacts to the marbled murrelet from the Eugene District Draft RMP/EIS was presented on pages 4-75 to 4-77. Some additional documentation has been prepared for the FEIS.

Comment: In assessing habitat changes over time, a short-term decrease in murrelet habitat under the PA amounts to less than a 7 percent reduction. Long-term, however, the amount of murrelet habitat is envisioned to increase by 84 percent. The DEIS describes these changes in the following manner: Under the Preferred Alternative, a moderate loss in habitat in the short-term would be followed by a moderate gain in the long-term (Eugene District DEIS, 4-77). It is apparent that a duality exists in how habitat decreases and increases are envisioned. The FEIS must strive to be less biased in its presentation.

Response: The Impacts of various alternatives on marbled murrelets has been rewritten to include SEIS/ROD information, and this concern has been addressed in Chapter 4, Effects on Special Status and SEIS Special Attention Species.

Comment: Descriptions of the alternatives are inconsistent with impacts to Special Status Species identified in Chapter 4. This appears to violate NEPA in that the confusing situation precludes a "full and fair discussion of significant environmental impacts," (see CEQ Regs., Sec. 1502.); neither is the proposal defined (CEQ Regs. Sec. 1502.4).

Numerous statements in the Chapter 2 narratives describing the various Alternatives state that all alternatives would protect, or manage one or more categories of Special Status Species and their habitats or the ecosystems upon which they depend. Most readers would interpret the words "protect" and "manage" to mean actions will take place to ensure species recovery without additional losses (for species already listed), or to ensure BLM does not contribute to the need to list (for species not Federally listed). However, many of the statements conflict with impacts identified in Chapter 4, which are based on design features agreed upon in the District.

Response: The planning alternatives were formulated during a period of uncertainty regarding elements of the species' recovery plans, so their assumptions about management vary. Impact analysis reflects more recent knowledge and recovery objectives.

Comment: Nesting is dependent more upon a stand structure that can be developed through proper silviculture than any arbitrary stand age. Over the long-term, you cannot ensure the continuance of a species by "preserving" a forest.

Response: It is assumed in the PRMP that stand structure can be developed using silvicultural prescriptions designed to retain or create habitat characteristics favorable to older forest dependent species. However, it is also assumed that the amount and distribution of older forest on BLM administered lands at the current time is near a minimum amount needed to retain all plant and animal species in the short-term. For this reason, significant amounts of older forest are deferred from harvest until younger forests have been managed into a proper functioning condition for older forest species. It is also assumed that there are characteristics for which we may have no silvicultural fix-it, and need to let these characteristics develop over time; hence, the establishment of Late Successional Reserves.

Comment: Key to the success or failure of the BLM's Preferred Alternative and the eventual Final Plans will be if the U.S. Fish and Wildlife Service can embrace an ecosystem management/landscape level approach to protecting listed species. This adoption or rejection by the USFWS should be made part of and displayed in the Final Environmental Impact Statement.

Response: The Biological Opinion prepared by the USFWS in the SEIS reflects their current position.

Comment: It is difficult to analyze murrelet impacts under the various alternatives, due primarily to the scarcity of information included in the Eugene District documentation.

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- Response: The PRMP provides for 100-acre core areas (managed similar to Late-Successional Reserves) in the Matrix lands for known spotted owl site centers.
- Comment: On most of the high site lands managed by BLM, these (connectivity/diversity blocks and regional biological diversity) objectives could be met within 30 years after harvest if a few green conifers, hardwoods, and all down woody material are left on the site.
- Response: In order to meet the objectives for the Connectivity/Diversity Block areas, including providing habitat for species needing older forest conditions, extended rotations of 150 years are proposed. This projection is based on the best scientific information provided from extensive stand growth data presented by researchers at OSU and other research facilities.
- Comment: The assumption that natural habitat is "better" than man-made habitat is unfounded and purely emotionally based. The BLM should reanalyze this position by carefully reviewing existing data on the subject of natural versus man-made suitable habitat.
- Response: BLM does not assume that natural habitat is "better" than man-made habitat. The PRMP does assume that spotted owl habitat, and old growth forests in general, can be developed using carefully designed silvicultural practices. What limits the process is time; with even the best practices, older forests take decades to develop and old growth forests, with their structural and functional diversity, need more than a century to develop. These assumptions are based on the best existing forestry models, and qualified by the knowledge that our understanding of long-term ecological processes is limited.
- Comment: State that habitats would be protected and managed to maintain populations of candidate species.
- Response: This change has been made.
- Comment: The BLM should check with legal authority to determine the appropriate role of discretion in the determination on consultation responsibility.
- Response: This "discretionary authority" is a part of every biological evaluation, and is incorporated into the analysis of each BLM action.
- Comment: Emphasize detailed special protection plans for nonconiferous ecosystems.
- Response: All ecologically significant special habitats will be given protection. "Detailed special protection plans" are part of activity level planning. Inventory and site-specific prescriptions will be addressed at that level through an interdisciplinary team review.
- Comment: The DEIS violated NEPA by failing to adequately analyze the effects of the RMP on marbled murrelets, songbirds, declining amphibians, western pond turtles, many important species of plants sensitive to disturbance and candidates for the endangered species list.
- Response: Those effects are analyzed in this EIS and in the SEIS, at a level of detail consistent with what is known about the habitat needs of the many species at issue. Research is needed to identify the habitat needs of most species before more detailed information can be presented. Monitoring is a critical component of the RMP and will help overcome this problem. Monitoring results will be used to adjust management strategies when necessary in order to ensure that management objectives are achieved. All Special Status plant species will be protected and managed.
- Comment: 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.

Spotted Owl

- 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:** 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 deferred from timber harvest. Obviously, sites that fall within Reserves or Special Management Areas would have more acres protected surrounding the site.
- 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 mile 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:** 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:** 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.

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- Response: OGEAs have been dropped from the PRMP. Activities in Late-Successional Reserves must be beneficial to the spotted owl and pass review under the auspices 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 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 or 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 tabular form 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 it is successful, will bring habitat on line faster. If it is not successful, however, stand development could be retarded and the time till 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: Discuss the capability of OGEAs, and the management proposed within them, to maintain population levels sufficient to provide internal stability within them.
- Response: This capability in relation to Late-Successional Reserves has been fully addressed in the SEIS.

- Comment:** Given the 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. 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, and it is addressed in the SEIS.
- 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:** 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 and 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 (re the 50-11-40 rule) quarter townships 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:** Your RMP fails to protect the reserve pair areas in the Coast Range on the Eugene District as recommended by the recovery team.
- Response:** Some of the reserve pair areas in the Coast Range are protected by Late-Successional Reserves (LSR). These pair sites were selected by biologists as the most viable sites available outside of the recovery plan Designated Conservation Areas (DCA), with the highest chance of long-term success.
- Comment:** BLM's own studies show that spotted owls are prospering on this intensively harvested land.
- Response:** The overwhelming evidence from scientific research shows that spotted owls using younger forests have lower nesting success, higher mortality, and less pair stability than pairs using old growth and mature forests.
- Comment:** Your research has clearly demonstrated that the owl does not need large tracts of old growth to survive.
- Response:** BLM research has shown that spotted owl habitat use, pair stability, and reproductive success are all adversely impacted by increases in habitat fragmentation and reductions in amounts of older forest

seral stages in the landscape. Although owls have been found to use some highly fragmented landscapes, optimal use is in areas of extensive older forests.

Comment: The underestimation of the true capacity of the land to support spotted owls occurs because the size of any vegetative management activity will average less than 20 acres, the landscape is not homogeneous but is interspersed with riparian leave strips and unsuitable lands, and the overestimation of the time needed for stands to become suitable habitat.

Response: All habitats available to be maintained or regrown into spotted owl suitable habitat were included in the analysis of effects for this species. Projections of regrowth are based on the site capability as projected from the best available growth projection models. Variability among sites is expected; projections are based on averages over similar landscapes.

Comment: Pairs of nesting owls are also being found with home ranges entirely on private lands. The contribution of private lands is therefore being dramatically underestimated by the BLM in its analysis.

Response: It is true that some spotted owls are nesting on private lands (and other non-BLM lands in the planning area). Site fidelity and site occupancy are lower than on BLM lands with more older forest components. It is also assumed in the BLM analysis that private lands will continue to be cut on a short rotation with low retention of snags, green trees and large down woody debris. Therefore, BLM analysis assumed that private lands in the planning area would make an insignificant contribution to the total population of spotted owls in the long term.

Comment: Instead of agreeing with wild theories of packing, BLM should be presenting home range data for the owl pairs living on its lands.

Response: A detailed discussion of home ranges and Habitat Conservation Areas (HCA) is found in the Inter-agency Scientific Committee (ISC) Strategy for the Conservation of the northern spotted owl.

Comment: There are no long-term demographic studies of spotted owls in natural old growth; yet this has not stopped many advocates from proclaiming its superiority.

Response: Existing research indicates that habitat selection is significantly higher for old growth forests over younger forests. This information was used as a premise that productivity of sites in old growth is higher than those comprised mostly of younger forests. The Eugene District is conducting two 5-year studies of demography of spotted owls under a variety of forest age conditions that will shed light on these assumptions.

Comment: It is commonly known that a spotted owl pair's home range needs to be comprised of between 10 - 40 percent nesting, roosting and foraging habitat. (Under Alternative B) utilizing the Geographical Information System (GIS) capabilities, home range of known pairs could be managed in a way that at least 30 percent of the home range would be suitable nesting, roosting and foraging habitat at all times (based on 79,000 acres of suitable habitat remains at the end of the decade, and 314,700 acres of Eugene District ownership).

Response: Due to the checkerboard ownership pattern on the District, the actual BLM operating area (all nonfederal lands within 1 mile of significant land parcels of BLM Eugene District ownership) consists of approximately 1,100,000 acres. This 79,000 acres of suitable habitat actually represents only about 7.2 percent of the total landscape that could be utilized by spotted owls under the above scenario, significantly below the threshold of 10 - 40 percent for owls.

Comment: The statement on page 3-69 that "Lands cut within the last 40 years provide no significant habitat value for spotted owls" is in conflict with some of the BLM's own research.

Response: These lands provide less value than old growth or even stands 40-80 years of age, and are not capable of supporting viable populations unless significantly supplemented by forests with structural characteristics of nesting or foraging habitat. However, it is probably incorrect to state that these

stands have no significant value for spotted owls. This statement has been changed in the PRMP/FEIS.

- Comment:** Management of the area of concern across the southern portion of the Eugene District as nondeferred Old Growth Emphasis Area should contain specific standards and minimum conditions to ensure the improvement and maintenance of high quality dispersal conditions at all times.
- Response:** This corridor falls within lands to be managed as a Connectivity/Diversity Block in the PRMP. Unlike other Connectivity/Diversity blocks on the District to be managed on 3-5 mile spacing of individual sections, all Eugene District ownership within this area of concern will be included under this land use allocation. (Please refer to land use allocation maps.) This land use allocation requires the "best" (usually oldest) 30 percent of acres to be deferred from harvest until all acres are in a regulated age class structure. That is, no harvest of the oldest stands will occur until the younger stands grow into dispersal habitat condition. Over the long-term, each portion of this area of concern will have a mixture of older forest and younger forest to maintain dispersal habitat on a 150-year rotation. Development of stands 50-80 years of age into dispersal habitat will be facilitated through density management to speed the creation of forest structure characteristic of older forest stands. For nearly all of the quarter-townships in this corridor, recovery of dispersal conditions will occur as rapidly as under Interagency Scientific Committee (ISC) Strategy.
- Comment:** Describe the number, location, or condition of the sites for which additional habitat will be provided in the connectivity areas to "protect" selected spotted owl sites to supplement the OGEA. In addition, the document should include a description of how these sites will be selected and how they are expected to supplement the OGEA.
- Response:** In the PRMP, these additional sites (5) are incorporated into the larger Late-Successional Reserves in the Coast Range Resource Area. Selection criteria were based on the highest viability sites (based on previous years' monitoring data and overall habitat availability).
- Comment:** Assuming the purpose of maintaining additional spotted owl sites is to supplement OGEA already deficient in population, maintenance of habitat on these sites should include the maximum possible suitable habitat within the likely home range area.
- Response:** In the PRMP, all of these additional sites are now incorporated into Late-Successional Reserves and, therefore, will be managed for the maximum suitable habitat.
- Comment:** Provide an indication of how this (1,000 acres of Residual Habitat Area forest land) will be placed on the landscape, why it would provide any options for spotted owl management, and the reason it is only provided for 8 decades.
- Response:** These RHAs are allocated as 100 acres of the best suitable habitat around all site centers that fall within the Matrix. These correspond to the HCA-4s of the ISC Strategy. The 8-decade deferral has been changed to full reserve status.
- Comment:** The two sentences on Page 3-67, column 2, paragraph 3, Eugene District DEIS, have not been properly referenced and have been misrepresented as they refer to conditions of critical habitat and nesting/roosting habitat.
- Response:** Dispersal and foraging habitat were erroneously added to this definition; the error has been corrected.
- Comment:** Check the values in Table 4-SSW-2 on the Eugene District relative to the time at which managed forests are expected to attain spotted owl habitat condition (70 in CA vs. 60 in GFMA).
- Response:** This error has been corrected in the PRMP/FEIS.
- Comment:** Provide an assessment of the effects of the Preferred Alternative on spotted owls in the Oregon

Coast Range province, rather than simply highlighting the importance of BLM lands to spotted owls in this province.

Response: The discussion has been expanded in Chapter 4 of the PRMP/FEIS, and this topic is also addressed in the SEIS.

Comment: The Eugene District should provide information on the extent and location of the "uneven and widely scattered distribution of small patches of old growth and mature habitat to contribute to the first requisite of dispersal habitat in most quarter-townships," and how this will contribute to dispersal.

Response: This statement means that under all alternatives, there will be at least some patches of mature and/or old growth of various sizes scattered throughout the Eugene District. These patches may be in riparian areas or TPCC withdrawn lands, or specifically designated for dispersal purposes. Although these areas contribute to the dispersal ability of spotted owls (and other wildlife species), they are not assumed to be equivalent in effectiveness among all alternatives, nor to be adequate under all alternatives.

Comment: The percent of quarter-townships meeting 50-11-40 each decade until the conditions reach optimal in 2040 is critical to assessing the impacts of the Preferred Alternative to dispersal. The document should include a discussion on the dispersal condition on quarter-townships in the South Willamette/North Umpqua Area of Concern for inter-provincial movements.

Response: The discussion of the PRMP in Chapter 4, Effects on Special Status and SEIS Special Attention Species (and Habitat), under subtitle "Effects on Dispersal Habitat" within the Eugene District specifically addresses this concern.

Comment: Define the timing of restriction on disturbance as March 1 - September 30 of each year.

Response: This is part of the standard procedure for assessing impacts to spotted owls on individual actions, and is incorporated into all project contracts.

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 PRMP.

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: Nomination for Cottage Grove Tract (T20S R3W Sec 31) for ACEC or EEA; wants BLM also to consider White Creek Tract (T21S R4W Sec 35) and other parcels in T20S R4W Sec 25 & T21S R3W 17.

Response: This nomination was received after the Draft RMP was published and was not subject to public comment. Because of this, the area of interest will be carried forward as a potential EEA (Environmental Education Area) until a plan amendment is initiated or until a new planning effort is underway. The area will be intermittently managed to protect the important values during this time. A cooperative agreement between the BLM and the Cottage Grove School Districts on the tract located in T20S R3W Sec 31 will be pursued.

At the time of the nomination, the parcel located in T20 R4W Sec 35 was a sold and awarded timber sale and as such was under other legal authorities. An ACEC review of this area was not pursued.

Comment: Does not want Heceta Dunes to become an ACEC.

Response: Heceta Dunes ACEC/ONA designation will be carried forward in the final RMP. ACEC designation does not preclude all activities, but regulates those activities that are inconsistent with maintaining the primary values for which the area was designated. An ONA designation specifically provides for recreational activities while protecting or managing for the natural features of the area. ACEC designation was determined by the area's ability to meet relevance and importance criteria set forth in BLM policy. The area has received review by several resource specialists including those familiar with coastal ecology and the values have been determined to be a significant resource.

Comment: More RNA and ACEC should be identified.

Response: Inventory and evaluation of ACEC/RNA is an ongoing process within the Eugene District. Areas can be nominated at any time if such values are identified. The public is welcome to provide nominations for areas that they feel are worthy of ACEC nomination.

Comment: All ACEC should be designated as Special Areas and not protected under other land use allocations.

Response: One of the criteria in the establishment of ACEC is that special management is needed to protect the values of an area. If adjustments can be made such that a modification in a specific land use allocation will protect proposed special area values, designation of that area may no longer be needed.

Those areas such as the Bald Eagle Habitat Areas will receive adequate protection under the Endangered Species Act for bald eagles. Relict Forest Islands are proposed for designation as ACECs in the final PRMP.

Comment: Districts, other than Medford, need to go back and reinventory and reevaluate their RNA and ACEC Program.

Response: Inventory and evaluation of ACEC is an ongoing process within the Eugene District. Areas can be nominated at any time if such values are identified. The public is welcome to provide nominations for areas that they feel are worthy of ACEC nomination. Such areas need to meet the criteria of relevance and importance to qualify for designation. Because one District has more ACEC than another, does not mean that important values are not being managed. Some portions of Oregon have different values than other portions, which may warrant ACEC consideration.

Comment: There needs to be some clarification on the ORV use in ACEC to better fit RNA management.

Response: Off-Highway Vehicle (OHV) (formerly ORV) use within all Special Areas (ACEC/RNA/ONA) will not be permitted. These areas will be closed to OHV use by Federal Register notice.

Comment: Cougar Mountain Ancient Yew Grove's name should be changed.

Response: While the trees in this area are very old, we agreed with your connotation of the word "Ancient" and have changed the site's name to "Cougar Mountain Yew Grove." Due to the quantity of trees and age of these trees, the area was determined to be a significant resource worthy of special management.

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 "Native Americans."

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) the development of Memorandums of Understanding that will 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 Visual Resource Management (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 (See Chapter 2 for the prescriptions) and these objectives are used to identify management prescriptions that would maintain, enhance, or preserve 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 landowners who are interested, to coordinate visual resource management primarily during watershed analysis.

Comment: The BLM tract closest to my home is known as "Wildflower Ridge." In the preferred alternative it is designated as a Class II visual resource. Logging of Wildflower Ridge would ruin the view from our home. Several areas in the west Fox Hollow area (e.g., those adjacent to the Fox Hollow Research Natural Area) were given Class II status in Alternative E, but in your preferred alternative they are not given any protection as a visual resource.

Response: Class II visual resource for "Wildflower Ridge" would limit logging practices to retain the existing character of the landscape. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color and texture found in the predominant natural features of the characteristic landscape. This management objective should not ruin the view.

Regarding the areas in west Fox Hollow: The objective of Alternative E, in part, is to emphasize protection of older forests. The objective of the PRMP is to sustain a balance between the protection of natural resources and the production of economic outputs.

Wild and Scenic Rivers

Comment: State whether BLM land management actions that could impact on 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 between 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.

- a. Aggregated values of a given stream.
- b. Importance of aggregated values on both a Statewide and SCORP regional level.
- c. Importance of smaller "less stellar" streams to program.
- d. Nonlocal 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 (ORV) by BLM. The purpose of alternatives is to consider 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 findings 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 Outstandingly Remarkable Values (ORV) should a river not be given wild and scenic status.

Response: The Wild and Scenic River assessment reports in Appendix 2-H of the Eugene District Draft RMP/EIS were prepared in accordance with BLM policy. Probable degradation of ORVs, should a river

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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 are 1,320 feet (1/4 mile) on each side of the stream, subject to some modification after watershed analysis. These widths and other management direction outside the riparian reserves would provide comparable or better protection than that envisioned 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 nor any related policy suggest 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 has no plan to study these rivers and neither does any other agency, 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 FLPLMA. 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 FLPLMA and in accordance with the Wild and Scenic Rivers Act. Timber management activities are excluded within the full half-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, 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: The interim guidelines used by the Eugene District for eligible wild and scenic rivers results in de facto wild and scenic river designation and management. The proposed plans cannot impose greater restrictions upon management prior to official designation than would be imposed if the river segment was actually designated. The standards used by the District to evaluate river segment eligibility is flawed. The qualities should stand out as exceedingly superior to any other rivers in the Northwest. Boise Cascade recommends that the impacted timberlands within proposed designated river boundaries be returned to the productive land base until Congress provides a designation decision. Within all interim river boundaries, BLM should not exclude timber harvest.

Response: The Act requires we evaluate all streams for potential inclusion in the National Wild and Scenic Rivers System, NWSRS. In this RMP, we eliminated streams which did not meet the Outstanding Remarkable Values (ORV), which include fish, recreation, wildlife, historic, scenic, geologic and others. We are also required to protect the ORV of the river. In the PRMP, the exclusion of timber

harvest for recreational and scenic rivers would be within the Riparian Reserves or other reserves within the corridor and Special Management Areas.

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: Such coordination is provided for in the plan and discussed where relevant but 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, which would follow RMP completion.

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 OHV 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 OK, which is not so.

Response: The term has been revised to Off-Highway Vehicle.

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, ROS is considered largely irrelevant to BLM decisions there. ROS concepts will be used at the watershed analysis and/or activity planning stage for specific land areas where appropriate.

Comment: In Chapter 3-99 a proposed trail t-16p is shown going to the top of Eagle Rock. Again more encroachment. On page 3-91 the length of the trail is stated at 6 miles, how about reducing it a little and leave this area in peace.

Response: Before a trail is constructed, a written project plan is developed which describes the details of the route. This plan may vary from the general description found in the PRMP. The project plan would also include a written Environmental Assessment which would address wildlife and other resource concerns. The length and exact location of this trail should be determined through the activity planning process for the McKenzie River Special Recreation Management Area.

Comment: There are discrepancies in Chapter 3 regarding roads available for public use. In any case, the existing roads are not sufficient to meet the needs of visitation. Your present system creates confusion concerning legal usage of BLM roads, creates unnecessary safety hazards and fails to avoid conflict between ORV users and the public. Your draft RMP does not provide information as to what area or roads are involved or to the location or size of areas for T&E species. Also your visitation

figures are low and were not referenced as to their source. We recommend your final plan include an ORV trail system in each resource area as well as specific facilities. We have included recommended areas for each resource area for trail sites.

Response: An off-road/Off-Highway Vehicle (OHV) use plan that identifies areas and trails where OHV use will be accommodated will be developed following final RMP approval. This OHV plan will be adopted through a formal designation action which will specify where, when, how and what types of OHV may be used on the District's public lands. BLM will seek active cooperation in the development of this OHV plan from all affected publics and other agencies. Recommendations offered during public review of the draft RMP/EIS will be considered in developing the OHV plan and designations.

The OHV use estimates were based on extrapolations made from the State Comprehensive Outdoor Recreation Plan (SCORP), as stated on page 3-86 of the draft plan. BLM recognizes these estimates probably do not precisely reflect OHV use of the public lands, however there is no existing technology available which we believe would yield more precise use estimates at a reasonable cost to the taxpayer.

Comment: 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.

Response: The Eugene District would develop project trail plans before construction of any trail. These recommendations will be considered during this planning process.

Comment: 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 Highway 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.

Response: In recognition of State vehicle ordinances and other environmental and resource concerns, the Eugene District has changed management direction from former "open" status to "limited" status for motor vehicle use. A comprehensive Off-Highway Vehicle (OHV) use plan and designation for each Resource Area will be developed following RMP approval.

Comment: For the 1983 ten year BLM plan I recommended a drastic increase in recreation trails in the Shotgun Creek Recreation Area.

Response: The District has added 1.4 miles of trail in the Shotgun Creek Recreation Area since the publication of the DRMP. Development of additional trails when consistent with the PRMP is still possible.

Comment: We are concerned that the BLM is proposing to constrain harvest operations from lands that were previously managed for intensive forestry. We encourage the BLM to develop additional recreation sites, but these sites should be located in areas where timber harvest has been previously constrained for other reasons such as in a Wild and Scenic River corridor. It is unrealistic to set aside 18 areas for new recreation sites to be developed this decade. It would be far more realistic to target the five most unique areas for development, and request funding at a much more reasonable, attainable level. There is no way to identify the land classification where recreation sites and special areas are proposed by reading the Draft EIS. We request that this information be displayed in the Final EIS.

Response: Most of the proposed recreation sites have been carried forward from the 1983 Management Framework Plan and therefore would not change land classification. There are exceptions where BLM has recently acquired private lands through exchange. Not all of these recreation sites would be funded for development within the planning time frame, only the most significant sites would be developed first. The special areas would affect land use allocations on very local areas in order to protect specific resource values, generally those values which must be protected by law or policy. The small areas involved cannot be graphically portrayed on the scale of maps needed for the plan's publication; however, specific information is available at the Eugene District Office.

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 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 less than CMAI 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 2 percent of such stands on BLM administered land in the Eugene District for the first decade, and 28 percent of such stands on BLM-administered land available for long-term timber management.

Comment: There are no provisions for phasing down timber harvest levels. BLM should consider a one-decade departure from the nondeclining harvest level.

Response: BLM's sustained yield mandate makes no provision for such a phase down of planned harvest. BLM lacks such authority, other than for a departure that would cause a negligible subsequent drop below sustained yield levels. The stand conditions on lands available for timber harvest in the PRMP, and overall plan objectives, would cause any significant departure to result in substantial drop in sustained yield levels in future decades.

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Comment: The practicality is questionable of logging patches of 5 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 deemphasized 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. There are no longer any "deferred" areas.

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: We agree, thus the 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.

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 identifies the level of harvest that is biologically sustainable given the agency's management direction.
- Comment: There is no reason at all why a selection harvesting system could not be worked out for the land the BLM manages.
- Response: There are several management objectives for the land that BLM manages and these objectives are tied to specific geographic areas. Silviculture systems are developed to meet a specific objective. Selection harvest is one silviculture system that will be considered and prescribed when it will best meet a given objective.
- Comment: A point of concern is the designation of forest lands as "reforestation problem". On the Eugene District, about 87 percent of the lands are classified as reforestation problems. There is simply no justification for this classification.
- Response: Classifications have been revised. See the Timber Resources section of Chapter 3 in this document.
- Comment: The Eugene district BLM appears to not be proposing any pruning activities. We would like to suggest that the Eugene District consider selective pruning on high productivity sites.
- Response: Pruning is included as one of the possible management treatments on the Eugene District and is included in the PRMP.
- Comment: The BLM orchard near Lorane provides seeds to be used throughout the BLM region. At least some of the selected clones in the orchard become pollinated by surrounding trees. Therefore, some of the trees will have Lorane trees as one of their parents. Certainly this contradicts the notion that Douglas-fir tend to be site adapted and that all reforestation efforts should be based on local parent stock.
- Response: Tree improvement program is based on genetic principals and methods. Applied genetic improvement programs have been proven effective in a number of plant and tree species.

Plantations of genetically improved trees will likely be more not less diverse than naturally regenerated or site collected seed. Naturally regenerated trees are from on site parents and can be interrelated. Improved trees represent a broad genetic and geographic diversity.

Seed production goals are based on the expected seed need. Tree improvement is a long term program. If funds are limited the program goals will take longer to accomplish. Short cuts and less diverse planting stock is not considered appropriate cost saving measures.

There are a variety of genetic studies and research projects in the region which show evidence of genetic differences. On the Eugene District the oldest progeny test sites are 23 years old and monitoring plots have been established to compare improved and reforestation trees. Evidence from these studies show improvement over check lots.

Seed orchards are managed in a number of ways to minimize the effects of outside pollen. Seed orchards crops can be produced in years when outside pollen is not present. Pollen buffers are established in the orchards. Large amounts of pollen are produced inside the orchard which minimizes the effects of outside pollen. The timing of receptivity is different among trees so some trees will naturally be out-of-phase with the surrounding pollen. Currently pollen is being monitored to determine the amount of outside pollen.

The present forests are a mosaic of various aged trees. Cone harvest from older trees and younger trees of known origins is a possible seed resource.

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. General forest health and ecosystem diversity and function goals were set as part of the PRMP. The result of application of these goals at the planning level and the extent to which the plan alternatives will result in forests that are within the range of natural conditions is described in Chapter 4. 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-II model suggests that harvest rotations (repeated harvest cycles) of less than 50 years would be unsustainable. Although the Eugene District's proposed plan would lead to regeneration harvest of some 270 acres of currently young stands as young as 56 years of age during the first decade, the next regeneration harvest of those stands is planned 80 years later, which would establish the long-term rotation for those stands.

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 reduce 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 conifers. In moderate 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 a 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: There are many special areas within the McKenzie Resource Area that would benefit from less intensive management than that outlined for the GFMA. By requiring an area containing approximately 75,000 acres or 20% of the Districts total acreage to commit to 85% of the GFMA and subsequently the allowable cut, puts a very substantial strain on the area and in time will never meet up to the expectations set forth for timber production from the district.
- Response: The concern about apparent lack of diversity and disproportion of expected harvest planned for the McKenzie Resource Area has been addressed and corrected by the SEIS and PRMP. The addition of Connectivity/Diversity blocks, Threatened and Endangered Reserves and the much larger riparian reserves throughout the McKenzie Resource Area have added greatly to providing the needed diversity that appeared to be lacking in the draft RMP.
- Comment: We propose that all the Old Growth Emphasis Areas in the Eugene district be managed with the 200-year rotation age scheme. This management concept was tested by the Northwest Forest Resource Council for the Eugene District of the BLM and was found to increase the preferred alternative harvest by 30%.
- Response: The selection of a 300-year rotation over a 200-year rotation in the draft RMP was done for habitat considerations. We fully understand the effects of long length rotations on PSQ. Current plans under the SEIS and BLM PRMP do not include Old Growth Emphasis Areas with predetermined rotation lengths. The Late-Successional Reserves (LSR) have replaced the OGEAs of the draft RMP. These LSRs will no longer be considered for regeneration timber harvest.
- Comment: We suggest removing the artificial constraint of Sustained Yield units and analyzing the Eugene District as a whole.
- Response: The elimination of sustained yield units would require changes in existing laws and regulations and, therefore, is beyond the scope of the RMP/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.

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Response: A general description of growth and yield assumptions and the modelling procedure used for each SYU is contained in Appendix AA 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. There is no effect on the calculated PSQ for the Eugene District at this time for genetics due to management constraints on acres available for harvest in the short run. (See Chapter 4, Timber.)

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 4 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 that 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. For the Eugene District there is no effect on the PSQ for these treatments at present due to harvest constraints in place at this time (see Chapter 4, Timber).

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, partial-cut yield tables derived from Stand Projection System (SPS) and managed stand yield tables developed from SPS.

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 the BLM 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: Table 3-T-5 is confusing. BLM is planning an approximate 50 percent reduction in the ASQ, therefore it would be expected the acres for management activities in the table would be reduced proportionately.

Response: Table 3-T-5 in the draft, which is now table 3-36, shows the projected and actual acres for the current plan. See the table in chapter four entitled "Average Annual Acres Treated by Alternative and Decade" which shows projected acres for the proposed plan.

Timber - Inventories

Comment: Update the starting timber inventory for ASQ calculation to October 1, 1993.

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- Response: For the PRMP/FEIS it was updated to October 1, 1992. Only slight change (increase) has occurred in the following year.
- Comment: Use data from the Forestry Intensified Research project, Oregon Department of Forestry, and other studies to continue 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, which 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. As the objectives of management by land-use allocation become clearer, expected outcomes are projected, and multiple resource data needs are determined, the inventory systems will be delineated. Peer review is anticipated.
- Comment: How does the starting inventory in the TRIM-PLUS model compare to the Bureau's most recent inventory?
- Response: For the Eugene District, the starting TRIM-PLUS inventory was slightly conservative (14 percent below the 1988 inventory for alternative A). For the PRMP, the 1988 inventory was updated to 1992, reflecting growth, mapping corrections, and sales since 1988. The net change was minus .5 percent.
- 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.
- Comment: The Eugene District of the BLM is divided into two sustained yield units, the Siuslaw SYU and the Upper Willamette SYU. According to the draft plan, Volume 1 (Chapter 2-48) there are 142,000 acres in OGEA in the district. This apparently includes some acres that are not in the sustained yield base, because the acres in the Siuslaw SYU and Upper Willamette SYU combined (BRU files supplied to WFC) total 139,722 acres. This is about 54% of the total sustained yield base acres (258,955 acres).
- Response: The apparent acreage discrepancy you note between the approximately 142,000 acres of forest land in the OGEA (Chapter 2-48) and the 139,722 acres used in the TRIM-PLUS harvest model is due to not having hardwood conversion as a management option within the Old Growth Emphasis Areas. Consequently the affected acres were not included for harvest in the TRIM-PLUS runs.
- ## 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/FEIS. 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 lower regional timber supply for all alternatives than shown in the draft RMP.

Energy and Minerals

Comment: Identify State owned mineral rights and acknowledge nonimpact of the plan on those and other existing valid rights.

Response: BLM has no record of the owners of nonfederal mineral rights. The acknowledgement has been added.

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: 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 (will be) broadly identified on the mineral management restriction maps for the PRMP (that will be developed for the Record Of Decision). The effects of such restrictions are site specific and mining-plan specific, and cannot be known without a specific proposal to analyze.

Comment: Categorizing as low potential all areas where there is insufficient information to determine mineral potential is inappropriate.

Response: The relevant column header in the Chapter 3 tables has been revised to reflect that the identified acres are a combination of low and unknown potential.

Comment: "Vegetation Removal/Firewood: The general mining law gives us the right to use timber for many things including firewood.

Response: Public Law 167, passed on July 23, 1955, posed some restrictions regarding the use of surface resources on mining claims filed after that date. There are no mining claims on BLM-managed lands in the Eugene District that were filed and determined to be valid prior to, or on, July 23, 1955. Therefore, all existing and future mining claims on BLM lands in this District are subject to the provisions of P.L. 167. One of the restrictions imposed by this law is that timber on such mining claims can only be used if "reasonably incident to mining operations," as stated in the regulation in 43 CFR 3712.1(a). This regulation states that "except to the extent required for the mining claimant's prospecting, mining or processing operations and uses reasonably incident thereto, or for the construction of buildings or structures in connection therewith, or to provide clearance for such operations or uses, or to the extent authorized by the United States, no claimant of any mining claim hereafter located under the mining laws of the United States shall, prior to issuance of patent therefore, sever, remove, or use any vegetative or other surface resources thereof which are subject to management or disposition by the United States." Furthermore, all existing mining claims on BLM lands in the Eugene District are on O & C Revested lands. Pursuant to the regulation in 43 CFR 3821.4, the owner of an unpatented mining claim must file a written application with the BLM for permission to cut and use timber upon the claim as may be necessary in the development and

operation of the mine. There are no BLM regulations that specifically allow mining claimants the right to free firewood. This office has the policy that no merchantable conifer timber (standing or otherwise) shall be used as firewood. Firewood permits on mining claims will be limited to hardwood or salvage timber, which is not considered merchantable, and any wood authorized for use in conjunction with a mining operation must not be removed from the mining claim.

Comment: Suction Dredging: Are those people who use suction dredges on withdrawn areas going to have to file Notices of Plans of Operations?

Response: Of the lands currently withdrawn from entry under the mining laws, only one site is open for operating suction dredges. This site is the Sharps Creek Recreation Area. People using suction dredges with suction hoses having an inside diameter of 4 inches or less, can operate their dredges without filing a Notice or Plan of Operation. They must, however, obtain the General Waste Discharge Permit #0700-J, issued by the Department of Environmental Quality prior to operating their dredge. Recreational mining at this site is restricted to the creek itself and excavation of the banks is prohibited. No mining is allowed there between March 1 - May 31 in order to protect spawning fish. Larger dredges are not allowed.

With regard to areas proposed under the PRMP for withdrawal from entry under the mining laws, such withdrawals will be subject to valid existing rights, including valid mining claims. Mining claim operators proposing to: use dredges with a suction hose with an inside diameter of greater than 4 inches, use multiple dredges of any size, live on the claim longer than 14 calendar days per year, install structures of any kind, or construct trails or roads, will be required to file either a Notice or Plan of Operations. Whether or not recreational mining (not affiliated with a mining claim) would be allowed on withdrawn areas would have to be determined during the withdrawal process.

Comment: Occupancy Appendix 2-117: We have major concern over the attempt to define the concept "actively involved in the mining operation or exploration work . . . Active operations are defined as a 40-hr. work week (between 9 a.m. and 5 p.m. Monday through Friday). We see a huge difference between "actively involved/active operations to warrant occupancy and the term that someone holds an active claim. This could cause real confusion down the road. Also, which law, regulation, policy, allows the BLM to set exact working hours?

If occupancy is defined as "those activities that may result in full or part time residence on the public lands . . ." Part-time needs to be qualified. As miners we envision a real difference in the level of use between occupancy and the construction of a temporary shed to store tools. Perhaps there could be an exemption for small miners for a storage shed.

Stating that no occupancy will be allowed for exploratory operations is not reasonable. . . . Does the following statement mean that occupancy will never be allowed for suction dredge mining operations? "Structures including . . . will not be allowed for exploratory operations or for suction dredge mining operations."

Pets - Appendix 2-118: Is it required for all pets to be leashed under all other uses on BLM lands - recreation, camping, etc. ?

Suction Dredging Appendix 2-118: Stating that all suction dredge operations regardless of the size of the equipment will require a notice or Plan of Operations is unacceptable. There is a big difference between a "Notice or Plan of Operations" and a 5 year permit which DEQ requires. Plans of Operation usually involved bonding, etc. and should only be required for a large operation. Does this mean someone would need BLM approval besides the DEQ permit? This would be excessive regulation. Recreational mining and prospecting "casual use," should be identified as exempt from this statement. Also, under Recreational Mining, "A Notice would be required for any mineral collection involving motorized equipment or explosives." (Appendix 4-60). Does motorized equipment include dredge engines? Earlier in the plan under the definition of exploratory, large equipment is defined as "mechanized earth moving equipment." (Appendix 2-118) This needs to be clarified.

Response: The term "active" has been removed from this appendix section and the concept of occupancy, i.e., living on a mining claim, has been clarified. The regulation in 43 CFR 3712.1(b) gives the BLM the authority to ensure that mining claims are only used for prospecting, mining, mineral processing operations and uses reasonably incident thereto. The section on occupancy in Appendix HH has been changed to allow occupancy of claimants/operators and their immediate family members on mining claims as long as good faith diligent efforts in prospecting, exploration, mining or processing operations are being conducted. Proposed occupancy must be described in either a Notice or Plan of Operations.

There is no statement in the Draft RMP saying that no occupancy will be allowed for exploratory operations. The need for structures will be reviewed on a case-by-case basis, and the statement which reads that structures would not be allowed for suction dredge operations (p. 2-118) has been dropped.

Pets are not required to be leashed on BLM lands except in developed recreation sites.

Appendix HH has been modified to describe cases where suction dredging is allowed without the filing of a Notice or Plan of Operation. The use of a suction dredge having a suction hose with an inside diameter of 4 inches or less is considered casual use as long as no occupancy, installation of structures, trail or road construction, or multiple dredges of any size, is proposed. A Notice or Plan of Operation will be required to use larger dredges. A Notice or Plan of Operations will also be required in cases where occupancy, installation of structures, trail or road construction, or the use of more than one suction dredge of any size, is proposed. All suction dredge operators must also comply with State requirements, including any necessary DEQ permits.

There is no statement in the Draft RMP on Appendix 2-118 that states "exploratory large equipment is defined as "mechanized earth-moving equipment."

Comment: Special Areas Chp 2-10: We have a problem with this statement: "Where substantial mineral potential has been identified, Special Areas would be withdrawn from locatable mineral entry and would be closed to salable mineral development" Does this mean minerals would be withdrawn from locatable mineral entry or vis (sic) versa? The sentence structure is confusing. The BLM's own plan states, "The most favorable condition for exploration and development of mineral resources would be where there are as few restrictions as possible." (Chp. 4-101) Wherever a substantial mineral potential is identified, mineral resource management should be the favored use.

Another major question we have is how the BLM can justify expanding the Sharps Creek Recreational Site to establish a Recreational Mining Area? On Table 3-REC-6, recreational mining is not even mentioned. According to BLM's own SCORP database (ORPD 1988) interest in recreational mining fell in the less than 5% interest category. (Chp 3.3-93). It appears to us that other uses need the financial commitment more. It is interesting that there is already a U.S. Forest Service recreational mining site on Brice Creek which gets little or no use (can be documented by Forest Service statement), yet the BLM is proposing another recreational mining area. We cannot see the justification of the government spending more time and money on this effort, especially with this country's large deficit. Also, one of our own BMOA members provides a valuable service to the government and public by allowing unlimited access and panning on his Sharps Creek claim. This opportunity is being used extensively by the general public and we see no need for another mining site development. How does the BLM justify the statement, "The District receives many requests from the public each year for recreational mining in this area," (Appendix 2-69), when the statement of record (Table 3-REC-6) contradicts this?

Appendix 3-B-2 also is in conflict. "The purpose of the proposed withdrawal is to allow the establishment and development of a recreational mining area in an area with high recreational mining demand and potential." The problem lies in the difference between demand and potential. True demand has not been substantiated. The BLM would like to pursue the potential development.

Response: Under the PRMP, all Special Areas (ACEC, RNA), regardless of mineral potential, would be with-

drawn from entry under the mining laws in order to protect valuable, unique surface resources. These areas would be irreparably changed by surface mining activities. If an ACEC remains open to mining claim location, a Plan of Operations is required prior to conducting mining or exploration activities. A Plan of Operations is reviewed and approved according to the surface management regulations in 43 CFR 3809, but if degradation of the surface resources is necessary to conduct the mining operation, the BLM cannot prevent the operator from disturbing the area. In order to fully protect these few unique areas in the Eugene District from surface alterations, we believe that withdrawal from locatable mineral entry is in the public interest. Only one of the Special Areas is considered to have high potential for locatable minerals and it is the Proposed Heceta Sand Dunes ACEC. Withdrawal of these lands from entry under the mining laws would preclude silica sand mine development on that tract. The Proposed Mohawk RNA/ACEC and the Low Elevation Headwaters of McKenzie River Proposed ACEC are considered to have moderate potential for locatable minerals. There has not been interest in those areas for mineral deposits by the mining industry, and withdrawal of the Special Areas is not expected to preclude any reasonably foreseeable mineral development activity. All other Special Areas are in areas considered to have low potential for locatable minerals. No reasonably foreseeable mineral development activity on any of those tracts is expected to be foregone under the PRMP.

Special Areas would be open for leasable mineral exploration or development, subject to the No Surface Occupancy special stipulation. All Special Areas except the proposed Low Elevation Headwaters of the McKenzie River ACEC would be closed to salable mineral development.

BLM lands along Sharps Creek have not been classified as having high potential for locatable minerals. Based on the available geologic information, including information from other government agencies, we do not believe that the classification should be changed at this time. Documentation of past exploration activities on BLM lands does not indicate this area has "substantial mineral potential". Should new data become available to indicate a different classification of the mineral potential of the Sharps Creek area, then the change can be made.

The interest in recreational mining along Sharps Creek has not been quantitatively documented, which is the reason why it is not displayed on Table 3-REC-6. Requests for information on the existing BLM Sharps Creek Recreation Site, located in T. 22 S., R. 1 W., W.M., Sec. 15; Lots 3 and 4 (W_NW_) are routinely received either in writing, in person or over the telephone. We have not kept a written record of these requests.

The BLM is proposing several recreation opportunities such as the Row River Trail and a Back Country Byway in the vicinity of Sharps Creek. A recreational mining area does not conflict with these plans. Valid existing mining claims would not be open to the general public for recreational mining. Opportunities granted to the public for recreational mining on one of your member's claims is commendable, however there is no guarantee that this opportunity will continue indefinitely or be able to meet the public requests that a developed and managed recreation site could accommodate.

Demand for a recreational mining areas has not been documented, but the requests for such an area are on-going. The public which is interested in recreational mining is drawn to historic mining areas rather than sites where no mining has ever occurred. The proposed recreational mining area would be on the edge of the Bohemia Mining District, and high quality, public access is already provided to these lands. Obviously, only those lands outside valid existing mining claims would be considered for potential development as part of the recreation area. The boundary drawn on Map #2-REC-1 only shows the proposed lands considered for this potential recreation area. An exact boundary would have to be fine-tuned after valid existing rights have been determined.

Comment: Visual Resources Chp 2-12: We feel a Class II level is too restrictive for an area already considered a Mineral Resource Management Area in the 10 year Umpqua National Forest Resource and Land Use Management Plan. If the BLM wants to remain consistent with other agencies as stated in Chp 4, p. 117, mineral resource development cannot meet the qualifications of a Class II level.

Again, we see a potential for future restrictions on mining near a SRMA. Under the Preferred

Alternative - "Bench placer mining could occur within 8 acres of Sharps Creek Special Recreation Management Area, affecting the visual qualities of the area. . . ." (Chp. 4-88) Would this kick in higher water standards for the upstream mining operations?

Another statement, "Placer exploration and bench placer mining as described in Appendix 4-K could effect recreational mining within the Sharps Creek SRMA." (Chp 4-94) So which use would get priority, mining or recreation? It should read, recreational mining on Sharps Creek will seriously effect placer exploration and bench placer mining!

Response: VRM Class II classification has no effect on locatable mineral exploration and development conducted under the authority of the mining laws. This classification could restrict discretionary mineral activities, such as recreational mining on withdrawn areas or salable or leaseable mineral developments, but would not impact the mineral activities which occur under the mining laws.

The establishment of the Row River Special Recreation Management Area would not impose additional requirements on valid existing mining claims. The establishment of the SRMA would not result in higher water quality standards for upstream mining operations. Those operations would continue to be required to meet State water quality requirements, and nothing in addition to that. In the PRMP, a bench placer mining operation is forecasted to be a reasonably foreseeable development on BLM land. If a bench placer operation occurred on a valid mining claim within a recreation area, it would be off-limits to recreational miners and therefore would "get priority" over recreation.

Comment: . . . Also, what assurance is there that existing claims in the area won't be challenged with validity contest?

Response: Withdrawal of certain lands along Sharps Creek is proposed in the PRMP as part of the Row River Special Recreation Management Area. This withdrawal would be subject to valid existing rights, including mining claims. Validity examinations might be conducted on existing mining claims. Access rights to valid mining claims would continue.

Comment: Effects on Fisheries Chp 4-58: We are glad to see the plan acknowledges the fact that, "The small scale suction dredging practices during this period (past decade) has not had an impact on aquatic habitat. "We do, however, challenge the comment, "Potential development of larger scale placer mining . . . may damage riparian areas and aquatic habitat through increased siltation . . . a decrease in substrate stability. The term large scale needs to be clarified. There are numerous published works which document the mutual benefits of placer mining and fish habitat.

Response: Larger scale placer mining refers to a bench placer operation which is forecasted in a mineral development scenario. Excavation of a bench roughly estimated at about 8 acres adjacent to a creek would probably damage the riparian area. Although substantial siltation could be mitigated, it is expected that some increased amounts of silt might enter the waterway, not to exceed standards acceptable by the DEQ. Such increased siltation might decrease the quality of fish habitat in the immediate area. Mining a bench placer deposit is not anticipated to be conducted with a suction dredge, but larger, higher volume per hour equipment.

Comment: The plan states: One of the adjustment evaluation factors in evaluating opportunities for disposal or acquisition should be "Energy and mineral potential". (Appendix 2-93) The key word here is potential. The plan states "The most favorable condition for exploration and development of mineral resources would be where there are as few restrictions as possible." (Chp 4-101) And yet, the plan intends to withdraw 403.54 areas from mineral entry in an area of high potential mineral development, stop relocation of any claims that are abandoned and possibly require higher standards for existing claims that are adjacent to the area.

The Mineral Position of the United States has been, "The Department of the Interior and its constituent Bureaus are committed to active involvement in promoting mineral-related decisions by Govern-

ment that foster and encourage a sound, stable domestic minerals industry." (1988). We would like to see a similar type statement added somewhere in the 10 yr. plan. We don't feel "It is BLM policy to encourage exploration and development of minerals using environmentally sound practices", is enough of a pro-mining statement. (Chp 3-111) The Umpqua Forest Service plan states: One of the Forest goals is "Foster and encourage the prospecting, discovery, exploration, development and extraction of locatable minerals, gas, oil, and geothermal leases, and common variety minerals within the limits of applicable laws." (FP Chp. IV-74)

Another area where the BLM needs to be careful is in complying with the National Environmental Policy Act which requires the federal government to preserve the culture, heritage and custom of the affected area. In the Bohemia Area, mining could easily qualify under this. If public lands continue to be withdrawn from mineral entry, there could be a conflict.

In Appendix 2-94 under Minerals: "Focus acquisition priority on areas which: 1. Consolidate Federal mineral estate to create economic mineral development units." 2. "Reunite split surface and mineral estates." Economical for whom? Is this the beginning of a "takings" from the small miner?"

Response: Withdrawal of these lands would preclude the re-filing of an abandoned mining claim, but the withdrawal would not initiate any higher standards for existing claims that are adjacent to the area.

The BLM statement is changed to read: "It is BLM policy to encourage exploration and development of minerals using environmentally sound practices within the limits of applicable laws." Exploration includes prospecting, discovery and exploration. Development includes development and extraction of minerals. Minerals in this RMP includes: the leasable minerals of oil, gas, and geothermal resources, and all locatable and salable minerals.

NEPA calls for the preservation of important historic, cultural, and natural aspects of our national heritage. One of the objectives of the Row River Special Recreation Management Area might be to develop a "historical mining trail" in cooperation with the Umpqua National Forest on federal lands in or near the Sharps Creek area.

The Intent of the statements in Appendix 2-94 pertaining to acquisition priorities is to assure that the management of mineral resources is carefully considered in all proposed land tenure adjustments, and that any adjustments facilitating the exploration and development of mineral resources would be considered important. Where the surface and mineral estate ownership underlying a mineral deposit or geologic formation is highly fragmented, costs to the party exploring and developing the deposit are higher due to the need to obtain land use authorizations from multiple parties. Consolidation would be accomplished primarily by exchange with willing landowners and the consolidation could be into either federal or non-Federal (including private) ownership.

Split estate lands are those where the surface and mineral estates are not owned by the same party. Locating a mining claim on federal land does not create a split estate. It is expected that most transactions would involve BLM acquiring non-federal mineral estate (land not now available for locating mining claims) underlying land where BLM owns the surface estate. Federal reserved mineral interests could also be transferred to non-federal surface estate owners. Some transfers of surface ownership to the owner of mineral estate interests are also possible. No federal mineral estate would be transferred if there were any mining claims on it. Any mineral estate acquisition would be primarily by exchange, with willing parties. There would be no "takings" from small miners.

Comment: "Is there some conflict here? Table 3-WSR-1 Potential Wild and Scenic Rivers - Found Eligible - includes Sharps Creek under Recreation Class (Chp 3-102).

Appendix 2-69 "The 11-mile segment of Sharps Creek from Clark Creek to the confluence of Row River is found not suitable for designation as a recreational river under the National Wild and Scenic Rivers system."

Appendix 2-69 "This river segment did not make the Outstandingly Remarkable Values list shown in

Table 2-WSR-1 of the Introduction."

Appendix 2-71 "The Outstandingly Remarkable Value of recreation (except for recreational mining) is rather common in the region. BLM's intent in the Preferred Alternative of its Draft RMP/EIS is to protect this Outstandingly Remarkable Value on BLM administered land. Designation is not needed to protect this value." What is the authorization for this without designation?

Response: Designation of a river segment under the National Wild and Scenic Rivers System is made by Congress after a river is found eligible and suitable. The BLM found Sharps Creek eligible because it is free flowing and has at least one outstandingly remarkable value. A potential classification as Recreational under the National Wild and Scenic Rivers System was possible, however the assessment study of this river segment proposed to find it not suitable for such a classification. Therefore, the river segment would not be recommended to Congress for designation as a recreational river under the Wild and Scenic Rivers System. The introduction to the Draft RMP Appendix 2-H (Appendix 2-49) explains the process for designation under this system. Recreational uses of the public lands can be planned for and developed without classification under the National Wild and Scenic Rivers System.

Comment: "Could you please confirm our following assumptions:

1. No area of the Bohemia Mining District/Sharps Creek is considered as a Special Area Table 4-SA-1.
2. The Sharps Creek recreational site is being proposed to become a Special Recreational/Management Area.
3. No area of the Bohemia Mining District/Sharps Creek is considered an Area of Critical Environmental Concern (Chp 3-111).
4. Sharps Creek is not designated as a recreational river under the National Wild and Scenic Rivers System, but its one Outstandingly Remarkable Value is recreation, and this use would be expanded - confusing?
5. The BLM is proposing to establish a Recreational Mining Site next to the Sharps Creek Recreational Area."

- Response:**
1. No lands along Sharps Creek, which are managed by BLM, are proposed as a Special Area. A Special Recreation Management Area (SRMA) is not a "Special Area" of the type described in Table 4-SA-1.
 2. The existing Sharps Creek Recreation Site would be included within the boundary of the Row River Special Recreation Management Area.
 3. No BLM lands in the Sharps Creek drainage are proposed for designation as an Area of Critical Environmental Concern.
 4. Sharps Creek was not proposed for designation under the National Wild and Scenic Rivers System however, recreation values of this area would be managed and developed through the proposed Row River SRMA.
 5. If lands along Sharps Creek are withdrawn to establish a recreational mining area, such a withdrawal will be subject to valid existing rights. Since many of the lands within the proposed boundary are currently under mining claim, it is premature to speculate as to the location(s) of recreational mining sites. The existing Sharps Creek Recreation Site is currently open for recreational mining except between March 1 - May 31, in order to protect possible spawning fish at the site. We anticipate that this site would continue to be available for recreational mining after completion of this Resource Management Plan.

Appendix KK

Comment: Possible impacts to future mining as the result of this ecosystem philosophy towards land management need to be clearly stated.

Response: The effects of each of the alternatives on energy and mineral resources are described in Chapter 4, Environmental Consequences.

Comment: To start with, overall mineral resource potential on the map used for the base data is misleading. Although it shows the potential for oil and gas, and geothermal resources over the entire District, it only shows locatable mineral potential for what is termed the "operating area." Because of this, the map does not include the two most significant mining areas within the District: The Bohemia-Champion mining area with recorded past mineral production of approximately \$19.2 million, and the Great Northern-Lucky Boy mining area with \$4.8 million in recorded past mineral production. This approach gives the appearance that the occurrences of locatable mineral resources within the overall Eugene District are few and insignificant.

Response: The map is revised to show only the mineral potential of Federal lands in the BLM operating area. Therefore, the mineral potential of Federal lands east of the BLM operating area, which are administered by the U.S. Forest Service, is not shown.

Comment: We also suspect that some mineral potential areas within the operating area have not been identified. Enclosed is a map from a document the Bureau of Mines published. On it are areas we identify as "Known Mineral Deposit Areas" (KMDA).

The map also shows no high mineral potential areas when, in fact, there are some. For example, the Black Butte area with over \$1 million in known past production and/or identified resources of mercury is shown as moderate potential for locatable minerals.

The Sharps Creek area with 400 acres under claim for ongoing placer suction dredging, a plan to make the area a recreational mining area, and the fact that the creek drains from a major gold mining area is also shown as having only moderate potential. Considering we are discussing BLM's definition for potential as the potential for occurrence and not for economic development, why are such areas with a history of mineral activity not classified as having high potential?

Lastly, the document noted 258 acres of high potential for uncommonly pure silica sand (p. 4-108). Why is this area not shown on the map?

Response: The maps in the U.S. Bureau of Mines Special Report entitled "Availability of Federally Owned Minerals for Exploration and Development in Western States: Oregon, 1984" were referred to and utilized in developing Map 3-M-1. Areas on the Bureau of Mines map not shown on Map 3-M-1 are outside the BLM operating area.

The polygon encompassing the Black Butte area has been changed to show high potential for mercury, due to past production.

Even though there are mining claims along Sharps Creek, available geologic information such as the geologic environment, inferred geologic processes, and reported mineral occurrences from these lands does not dictate a classification of high mineral potential at this time. If and when new information (such as known mines or deposits) does become available to warrant a change in the mineral potential classification of this area, the change will be made.

The lands having high potential for uncommonly pure silica sand were identified after Map 3-M-1 was printed. The area is shown on the revised version of this map.

Comment: First of all, the document makes a distinction between nondiscretionary and discretionary withdrawals different than made in most other BLM RMP/EIS. In other documents, nondiscretionary withdrawals refer only to withdrawals beyond the control of BLM, such as congressional withdrawals (see Medford RMP/EIS). This document, for example, includes locatable mineral withdrawals for

Special Areas as nondiscretionary despite the fact that designation of these areas and their withdrawal is completely at the discretion of BLM. By listing your own initiated withdrawals as nondiscretionary gives a false appearance that adverse withdrawals on many of the high and moderate mineral potential areas are imposed actions beyond BLM's control.

Response: We have revised this in the PRMP/FEIS to show BLM initiated withdrawals as discretionary closures.

Comment: We also believe that the list of special use designations used to identify the acreage of locatable mineral potential in the open-with-additional restrictions category is incomplete. Since both leasable and locatable mineral surface use activities can similarly conflict with special use designated areas, any designated use area which restricts leasable mineral exploration and development can also create restrictions to locatable mineral activity. Therefore, many of the uses identified as restrictive in Tables 4-M-1, 4-M-2, and 4-M-4 should also be identified as restrictive in Table 4-M-3. Take areas designated VRM Class II for example. Based on its definition, allowable activities in a VRM Class II area should not attract the attention of a casual observer. Without special mitigation measures, mining operations, such as an open pit with a total of 16 acres of disturbance including roads and support facilities (ode mine scenario, p. 4-60), will be noticeable to the casual observer. If VRM Class II managed-as-inventoried areas are considered restrictive, as is apparent from this definition, the amount of moderate, and possibly high, locatable mineral potential acres in the open-with-additional-restrictions category in these tables would increase.

Response: Many, but not all, of the restrictions listed in Tables 4-M-1, 4-M-2 and 4-M-4 are also listed in Table 4-M-3 for locatable minerals. The reason why not all of the restrictions are considered, is that leasable and salable mineral activities are discretionary mineral activities where the BLM has the authority to decide whether or not to issue a lease or permit. Locatable mineral activities are initiated by the mining claimant or operator and proposed activities are reviewed by the BLM pursuant to the surface management regulations in 43 CFR 3809. Under the leasable and salable mineral programs on this district, VRM Class II areas are given protection by either a special leasing stipulation (leasable minerals) or under a permit for a proposed salable mineral development. There is no special protection of these areas with regard to locatable mineral development. The only way to protect those visual resources from impairment due to locatable mineral activities would be to withdraw those lands from entry under the mining laws. We have chosen not to do this, in order to limit withdrawn areas to parcels supporting very special surface resources. VRM Class II areas are not listed in the footnotes under Table 4-M-3 because these areas are open subject to the standard requirements. For this reason, it is an incorrect assumption that the acres under the open-with-additional-restrictions category should be increased due to the affect of VRM Class II classification on locatable minerals.

Comment: Table 4-M-5 and the associated discussion is meaningless and only serves to hide the true impacts to the District's mineral resources. The quality of land open for mineral exploration and development is far more important than the quantity of land open.

Response: Table 4-M-5 has been deleted in the PRMP/FEIS.

Comment: Appendices covering mineral related data need additional information and clarification. Only standard requirements under Locatable Minerals Surface Management 43 CFR 3809 were listed in Appendix 2-K, Proposed Restrictions and Energy Exploration and Development Activity. The additional mineral restrictions need to mitigate impacts in management areas such as ACEC, W&SR, VRM II, and special status species habitat should also be identified. Most companies know of the standard requirements. However, many wouldn't realize the additional mitigation necessary in 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.

Response: Appendix 2-K in the Draft RMP covered restrictions to mineral exploration and development for the three categories of minerals: leasable, locatable, and salable. Appendix Attachment 2-K.1 pertained to locatable mineral activities on BLM managed lands in the district. An approved plan of

operations is required for mining operations located within ACECs and the National Wild and Scenic River system (43 CFR 3809.1-4(2), (3)). This is a regulatory requirement which we do not believe needs to be reiterated in the planning document.

There is no effect on locatable mineral activity when lands are classified as VRM Class II. The surface management regulations cited above provide no special protection for these classifications, and a withdrawal of these lands is not proposed under any of the alternatives cited in this plan. An operator might choose to try to mitigate any impacts to the visual resources caused by the mining operation, but the BLM has no legal authority to require such mitigation.

A discussion has been added in Appendix HH in the PRMP to describe the effect of the Endangered Species Act (ESA) on locatable mineral operations. The existence of Federally listed or proposed threatened or endangered species, or their habitat, might affect locatable mineral activities. Under Notice-level operations, if the review of the Notice by BLM reveals that a potential conflict with a threatened or endangered species exists, the operator will be advised not to proceed. The operator will be informed that a knowing violation of the taking provision of the ESA (for wildlife or fish) will result in a notice of noncompliance and may result in criminal penalties. Although the takings provision of the Act does not extend to plants, willful acts of vandalism to endangered plants is illegal. If processing a proposed Plan of Operations indicates that a potential conflict exists with a threatened or endangered species or its habitat, the BLM will notify the operator that the plan cannot be approved until BLM has complied with Section 7 of the ESA. Special status species (Federal Candidate/Bureau Sensitive) plants and wildlife, and their habitat will be identified for the operator by the BLM, but under the current mining laws, there is no legal requirement that the locatable minerals operator must protect these species or their habitat.

Comment: In Appendix 4-K, Ten-Year Mineral Development Scenarios, an open-pit mining scenario for a hydrothermal gold deposit was presented. This scenario did not address how the ore would be processed. These days open-pit gold mines commonly use heap leaching to process the ore, and there is no reason to believe heap leaching would not be an effective method for your lode gold scenario. What interests us is the statement on page 4-57 that no chemical heap leaching operations are forecasted during the plan period.

Response: Because of the lack of active exploration for hydrothermal gold deposits on BLM lands in this District, we have dropped the open pit mining scenario. Considering the expense of permitting a heap leach mine under present state laws, we do not foresee development of this sort of mining venture during the plan period.

Comment: Our overall concern is that this management plan appears to be designed to prevent mining. This is supported by the fact that: (1) the only identified high potential area for locatable mineral resources on BLM land within the Eugene District will be withdrawn from mining (the uncommonly pure sand deposit); and (2) the only areas identified as having potential for placer gold (Sharps Creek) will be withdrawn, and private lands in this area would be acquired and immediately withdrawn. These withdrawals have the effect of virtually eliminating two of only three reasonably foreseeable mineral development scenarios identified by the document of the next 10 years - the silica sand mine development and the bench placer mine.

Response: Based on additional information acquired since publication of the Draft RMP, other areas have been classified as having high potential for locatable minerals, and most of these high potential acres are not withdrawn from entry under the mining laws under any of the alternatives.

Under the PRMP, certain lands along Sharps Creek would be withdrawn from future entry under the mining laws, but this withdrawal would be subject to valid existing rights. Lands encompassed by valid mining claims would be excluded from a proposed recreational mining area. A bench placer mine might be developed on BLM lands, and not necessarily only along Sharps Creek.

The primary reason for acquiring other lands along Sharps Creek would be to block ownership along this creek in order to fully develop the area for recreation purposes and minimize inadvertent tres-

pass onto privately owned property by the public users. Acquisition of these currently privately owned properties would be achieved only if the private landowner was willing to trade or sell their land to the BLM. In order to ensure that these newly acquired lands would be available for the recreational uses intended, we believe it is prudent to initiate an immediate withdrawal from entry under the mining laws.

Comment: 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.

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.

Response: There are no State-owned mineral rights underlying BLM administered surface estate in the Eugene District.

A detailed mineral potential report is required prior to withdrawing lands from entry under the mining laws, but is not made a part of a Resource Management Plan. These reports evaluate known or potential leasable, locatable and salable mineral deposits so that these values can be identified prior to initiating a withdrawal action.

Comment: Table S-1 omits leasing acreage for energy minerals (oil + gas, geothermal).

Response: Table S-1 shows the acres (by alternative) which are closed to leasable mineral development, and open to leasable mineral development. Leasable minerals addressed in the document include: oil and gas, and geothermal resources.

Comment: Appendix 4, p. 4-57 (Vol. II) should mention, under Locatable Mineral Resources common to all alternatives, the discussion about silica sand which is mentioned in Appendix 4, p. 4-60, under alternatives NA and A. The discussion of silica sand should appear in both sections, as it is germane to all alternatives. To say silica sand exploration is allowed in NA and A is misleading; it should be clearly stated that it would not be allowed under the PA.

Response: When the Draft RMP was published, certain lands considered to have high potential for silica sand would only be open to mineral exploration or development under Alternatives NA and A. Since then, other lands with similar mineral potential have been identified, and would be available for mineral related activities under Alternatives NA - E. Those lands would be withdrawn from mineral entry under the PRMP. If valid existing rights were established on these lands prior to withdrawal from future locatable mineral entry, mineral development could still occur. For these reasons, the Reasonably Foreseeable Development scenario for silica sand exploration and development is carried forward under all alternatives.

Comment: Cross references to state authority should be improved by mention of specific agencies throughout the document.

Response: References to current State requirements have been added in Appendix HH.

Comment: The draft RMP states that placer mining can "significantly affect stream channels" (p. 3-28). It also notes that designating Sharps Creek as a recreation mining area could increase the amount of placer mining along the creek (p. 4-14). We are concerned that the placer mining on the Calapooia River and Sharps Creek may not be compatible with the desired future condition of the riparian areas. What protections are you providing so that the water quality guidelines are being met in areas where placer mining is occurring?

Response: Currently along Sharps Creek and the Calapooia River, placer mining has been conducted with hand tools and/or portable suction dredges, and conducted for the most part on mining claims filed

pursuant to the mining laws. Operators are required to maintain water quality according to State laws, and prevent unnecessary and undue degradation according to Federal regulations found in 43 CFR 3809. Alteration of riparian areas may be necessary in order for an operator of a valid mining claim to extract mineral deposits, a right granted under the mining laws. If such a mining proposal did not conflict with any Federal or State regulations, the project could not be stopped merely to save riparian habitat.

If certain lands along Sharps Creek are withdrawn from entry under the mining laws in order to establish a recreational mining area, this withdrawal would be subject to valid existing rights. All valid mining claims would continue to exist and mining claimants or operators would have the legal right to conduct operations subject to the requirements cited in the above paragraph. Invalid or abandoned mining claims could cease to exist and the lands would be available for recreation users. Mining of this recreational nature would be controlled and monitored by BLM to conform to all resource management objectives of the area.

Comment: The Sharps Creek area has been extensively filed on by placer miners who have an intent to produce marketable mineral products, and the development of a restricted recreational mineral resource area will infringe on those already in-place mineral claims and their respective development as private enterprise.

Potentially closing this part of the BLM properties to general public access, and gaining restricted access through gating, fee based access, or other restrictive measure will prevent the public access to the hardscrabble grade and other very historical mineral areas.

Response: Under the PRMP, certain lands along Sharps Creek would be withdrawn from future entry under the mining laws, but this withdrawal would be subject to valid existing rights. Lands encompassed by valid mining claims would be excluded from a proposed recreational mining area.

Sharps Creek would not be closed to general public access if certain lands along the creek are withdrawn from future entry under the mining laws, in order to establish a recreational mining area. The withdrawal would preclude filings of new mining claims on or after the date the withdrawal became effective. There are no proposals to restrict public access to, or through, the area.

Comment: The BLM failed to make mineral resources a primary factor/issue in the land and resource management and planning process.

Response: In our scoping of the RMP several years ago, management of mineral resources did not emerge as an issue for which we would intentionally vary our alternatives. We knew, however, that the varying levels of management for other resources would result in varying levels of mineral resource management constraints by alternative. As a corollary, the Environmental Consequences chapter has addressed the impacts on mineral availability of these varying levels of constraints.

Comment: The mineral resource assessment for the Sharps Creek area appears to be deficient with respect to the geological and mineral resource data available, level of detail (minimum quality and quantity of data required), and the determination of the potential for mineral occurrence. Since minerals are a principal or major use of public lands, the Draft RMP/EIS (Chapter 3 Affected Environment) should provide a detailed explanation of the mineral assessment for the Sharps Creek area. This explanation should include a review of the geological and mineral resource data used, a description of and justification for the level of detail used, and a description of how the mineral occurrence potential was determined including level of potential and level of certainty. A copy of the required mineral assessment report should be included in the appendices along with any other appropriate supporting detail.

Response: A detailed assessment of the mineral potential of any lands proposed for withdrawal under the PRMP will be conducted, and the mineral potential reports will be available for public comment and review. A mineral potential report would be required for the Row River Special Recreation Management Area prior to withdrawing a portion of those lands from future entry under the mining laws.

Comment: The proposed double riparian zone concerns us as most placer deposits are in the riparian zone. Wouldn't this regulation keep us from having a realistic opportunity for mineral exploration and development?

Next we would like to address your proposed mining guidelines Appendix Attachment 2-K.1:

Firewood: Federal and State laws allow downed wood to be utilized for firewood on a mining claim, and green standing trees can be used for structures, timbers, and shoring as long as they are used for mining purposes. Where is the CFR that gives BLM authority over these existing laws?

Sewage: Appendix 2-117 "outhouses and un-contained pit toilets are not allowed." BLM only can regulate surface rights. An outhouse or pit toilet would be outside of the BLM jurisdiction on a mining claim. The only regulatory authority BLM has would be that it would be a certain distance from the water, or that it would not leach into waterways.

Paragraph 3: No Occupancy between November 15 and May 15. Again, we feel the BLM is without authority in redefining the mining laws as pertaining to occupancy. There is nothing in any law books or regulation or CFRs that limit year around occupancy.

Paragraph 9: Gates - "large area safety hazard" the mining law states if necessary for security of the claim. What is a large area safety hazard?

Equipment and Debris: Mining equipment, vehicles, structures must be removed from public lands during periods of non operation. We feel this needs to be better defined. Will this be construed to mean temporary weather shut down? It would be cost prohibitive to move everything out every time we have a temporary shut down. In the past we have assisted government and private land owners with our equipment during fire and snow weather.

Response: Mining claimants are entitled to explore for and extract mineral deposits from within boundaries of the claim to the extent that there is no unnecessary or undue degradation. Alteration of riparian zones as the result of mineral activities could occur as necessary and due degradation, which is authorized under FLPMA.

Federal and State laws do not specifically say that "downed wood" can be used for firewood, or that "green standing trees" can be used for structures, timbers and shoring. The regulation in 43 CFR 3712.1(a) states that timber on mining claims filed after July 23, 1955, can only be used if "reasonably incident to mining operations". These proposed uses of timber, standing or otherwise, are and will continue to be reviewed on a case-by-case basis.

Outhouses and uncontained pit toilets are considered unnecessary and undue degradation of the public lands on the Eugene District, and are in violation of the regulation in 43 CFR 3809.2-2(c).

Living on public land, as authorized under the mining laws, must be reasonably incident to and required for actual continuous mining or diligent exploration operations. The regulation in 43 CFR 3712.1(b) states that "the locator of an unpatented mining claim subject to the Act is limited in his use of the claim to those uses specified in the act, namely prospecting, mining or processing operations and uses reasonably incident thereto." The limitation on the times of year for permitted occupancy has been dropped and the necessity for occupancy will be reviewed on a case-by-case basis.

The determination as to whether a safety hazard on a mining claim is large enough to warrant a gate will be determined on a case-by-case basis. Gates or road blocks may be installed on existing or proposed roads only with BLM approval.

Appendix HH reads: BLM may require the operator to remove equipment after an extended period (defined as 24 consecutive months) of non-operation and to reclaim the site.

Comment: The draft RMP/EIS seems to be inappropriately delegating consultation responsibilities regarding

nondiscretionary activities, such as locatable mineral exploration and development. It states that such activities "... which might jeopardize federally listed threatened or endangered plants, may have to be resolved between the Fish and Wildlife Service and the claimants." (pages 2-9). Compliance with Section 7 of the Endangered Species Act is the responsibility of federal agencies, such as BLM. While important information about mineral exploration and development project proposals is gathered from project proponents, the coordination and resolution of consultation activities cannot be delegated to a private party, even though the nondiscretionary nature of some activities could make resolution of project activity impacts on listed species difficult.

In addition, discussions on pages 2-22 and 2-23 indicate that surface occupancy for mining activities will not be allowed in bald eagle and marbled murrelet sites. The final RMP/EIS should clarify whether such restrictions also apply to northern spotted owl sites.

Response: Appendix HH in the PRMP clarifies the role of the BLM in reviewing proposed mining documents with regard to compliance with Section 7 of the Endangered Species Act (ESA). Notice-level mining activities are not subject to BLM approval; therefore, are not considered a Federal action, which is why the BLM would advise the claimant or operator of a potential conflict with the ESA, rather than seek compliance with Section 7 of the Act. If the operator wishes to develop measures that will eliminate the potential conflict, then BLM will arrange for the participation of BLM resource specialists and the U.S. Fish and Wildlife Service or the National Marine Fisheries Service in reviewing the proposed revision to the Notice. Plans of Operation are subject to BLM approval, and the BLM could not approve any Plan until BLM has complied with Section 7 of the ESA.

In Alternatives NA - E, surface occupancy for leasable mineral activities would not be allowed in bald eagle and marbled murrelet sites. The PRMP has been revised to issue mineral leases subject to a new Special Status Species special leasing stipulation. This stipulation, in part, would require that all future post-lease operations that "may affect" a threatened or endangered species must be analyzed and subjected to U.S. Fish and Wildlife Service or National Marine Fisheries Service Section 7 consultation or conference to ensure that the action is not likely to jeopardize the continued existence of any Federal threatened or endangered species, any proposed Federal threatened or endangered species, or result in the destruction or adverse modification of critical habitat. This stipulation will apply to any northern spotted owl habitat or nest sites, as well as other listed (or proposed for listing) T & E species.

Comment: A related item that generated the highest level of concern for Northwest Mining Association members concerns occupancy. This very same issue surfaced in the Medford District RMP/EIS and our comments remain much the same. We strongly urge Eugene District staff to review the most current set of proposed regulations on surface occupancy under the federal mining law promulgated by your agency. Such a review would reveal that portions of the district's occupancy management proposal are inconsistent with both the letter and intent of the occupancy regulations being proposed by the BLM and the district item should be revised accordingly. NWMA very strongly supports efforts by the Department of Interior to prevent illegal surface occupancy, whether for residential use or equipment storage, under the guise of a mining operation. However, the Eugene District proposes a scheme that also threatens to prevent uses that are legal and proper.

The preceding observation is reinforced in the occupancy item which calls for imposing retail store hours on field operations. This is certainly arbitrary and borders on being capricious. No individual who has managed construction in remote areas would even consider such a proposal. Field operations often begin soon after sun-up and can continue to well after dark. It is not unusual to work through weekends, or to work 10 days on and 4 days off shifts. Often equipment and supplies must be picked up on weekdays when retail stores are normally open. The section on pets, particularly the leash requirement, is viewed as another arbitrary proposal. This item is an unnecessary distraction from legitimate mine site concerns and threatens to create a real credibility problem for the BLM. Further, we are advised that this particular restriction is not imposed on other users of the public lands, which raises some significant enforcement questions. If the District must insist on addressing the pet issue, we would suggest the following conceptual language as a guide: "If pets are present at the work site, you are required to keep them under control at all times so they do not chase

wildlife or threaten other people using the public lands."

Again, NWMA suggests that the minerals sections of the draft RMP be closely reviewed as soon as the final occupancy regulations being developed by the BLM are published in the Federal Register.

Response: The proposed 43 CFR 3710 regulations dealing with use and occupancy under the mining laws were printed in the Federal Register on September 11, 1992, after the Draft RMP was printed the previous month. Many changes have been made in Appendix HH to correlate with these proposed regulations. Appendix HH in the PRMP is the revised version of Appendix 2-K of the Draft RMP.

The PRMP has been revised to allow occupancy by claimants and/or operators and their immediate family members (defined as spouse, minor children/stepchildren) as long as the claimant and/or operator is engaged in a good faith diligent effort in prospecting, exploration, mining, or processing operations. Such proposed occupancy must be described in either a Notice or a Plan of Operations.

We have adopted the proposed wording pertaining to pets on mining claims.

Comment: Regarding the proposal for withdrawal from mineral entry of the Sharps Creek area and acquisition of private lands, it must be clarified in the RMP that all existing claims will not be subject to such a withdrawal or validity challenges (absent an application for surface patent), that access rights will not be abridged, and that all land purchases will be from willing sellers.

Response: Withdrawal of some lands along Sharps Creek is proposed in the PRMP to create a recreation area. This withdrawal would be subject to valid existing rights, including mining claims. Validity examinations might be conducted on existing mining claims. Access rights to valid mining claims would continue. All land purchases would be from willing sellers.

Comment: Finally, NWMA recommends that the Eugene District utilize the considerable expertise available from its sister Interior agency, the U.S. Bureau of Mines, as well as the information that the Oregon Department of Geology and Mineral Industries has offered to provide.

Response: Available data pertaining to BLM lands in the planning area (published by both agencies) has been used in generating the RMP.

Land Tenure Adjustments

Comment: Coordinate with adjoining Districts regarding land tenure decisions.

Response: This coordination has been accomplished.

Comment: State 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 nonfederal 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.

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Response: Current legislative authority makes no provision for such a preference for Indian tribes. Most lands considered for disposal would only be exchanged for other lands, however.

Comment: Acknowledge existing or potential State ownership claims on navigable waterways.

Response: This has been added to Chapter 3 in the PRMP/FEIS.

Comment: The provision of the Preferred Alternative that only public domain lands are to be exchanged to support the recovery of T&E species conflicts with Bureau policy to take actions necessary to delist listed species.

Response: The PRMP provides no restrictions on exchanging lands in Land Tenure Zones 2 and 3 to support the recovery of T&E species other than stating that, as a matter of practice, O&C lands allocated to timber management would only be exchanged for lands to be managed for multiple-use purposes, which is consistent with the O & C Act.

Comment: The constraint that O&C lands available for timber production would not be candidates for exchange would stop many exchanges. This could prevent the acquisition of lands identified in the plan to further recreation plans, since most BLM lands which could be offered in exchange would be those suitable for timber production.

Response: The PRMP provides no restrictions on the exchange of O&C lands in Land Tenure Zones 2 and 3 other than stating that, as a matter of practice, O&C lands allocated to timber management would only be exchanged for lands to be managed for multiple-use purposes. Such lands could thus be exchanged for lands with recreation value provided that they would not be managed solely for recreation purposes.

Comment: BLM has failed to identify and evaluate many opportunities for enhancing region-wide biodiversity through adjustments in land tenure and the use of conservation easements.

Response: Identification of specific opportunities is activity planning and may flow from watershed analysis.

Comment: The Acquisition Criteria included in Appendix C (Land Tenure Adjustment Criteria) should include "facilitate the recovery of threatened and endangered species."

Response: The suggested criterion has been added to Appendix C.

Access

Comment: Identify how much access BLM provides to intermingled landowners through agreements and easements.

Response: On the Eugene District some 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:** Clarify how administrative road closure and obliterating them 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 closures would be accomplished by gates, allowing 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:** 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.

Fire/Fuels Management

- 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 (thus, danger to life and property) is high. Among the "property" at stake are timber and residences on intermingled private land. Therefore, it would rarely be appropriate to let a fire burn, except where prescribed fire and vegetation management objectives would be met.
- Comment:** The comments concerning "conditional fire suppression" on page 2-25 should not apply in the areas where fires on BLM property could spread to private land.
- Response:** This section has been revised and now more clearly addresses this concern.

Socioeconomic Conditions

- Comment:** Assess the forestwide economic efficiency of the new plans.
- Response:** Assessing such efficiency would require placing dollar values on a variety of Ecosystem Management benefits that 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.

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- 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 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 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 Ballot 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. Consider compensating adversely impacted citizens, maintaining/increasing County revenues, and provision of social and economic development programs that tap the spirit of rural people to mitigate social and economic impacts.
- Response: The BLM has neither the authority nor 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 the Economic and Community Assistance Program discussion in Chapter 4 of the SEIS.
- 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 plow back 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 timber otherwise inaccessible. 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 revenues 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 0 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.

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: Reevaluate 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. For this analysis the subregion multipliers cited in the SEIS were used. Unlike the multipliers used in the DRMP/EIS these multipliers only examine impacts within the timber industry, including self-employment.

Comment: An alternative that emphasized 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 4-31, Anticipated Short-Term Capability of BLM Administered Facilities and Resources to Meet Projected Recreational Demand for 11 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 groundwork for an effective policy response to the fundamental social and economic changes that would follow the 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.

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 and 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

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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: (1) 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, recreation resources) in attracting businesses and retirees to western Oregon.

Response: Those changes would be long-term, 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 these sales have not been examined due to lack of information on which to base estimates or projections of employment and personal income.

Comment: Projected high stumpage prices (are unlikely to persist) (will increase substantially more).

Response: As shown in Table 1 (Appendix E) 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, not available at the time of the Draft RMP, were used to enhance the discussion to social impacts. These publications generally relied on surveys, focus groups, and interviews to assess impacts. No models were developed or used.

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: Describe the linkage and dependency (social, economic, spiritual) of local and regional communities, groups, industries, etc. 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 lands are, with the exception of traditional tribal use areas, individual in nature. 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 any 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: There are no provisions in the plan to make up revenues lost to Lane County because of dramatic reductions in timber harvest levels. . . . no provision for phasing down timber harvest levels.

Response: BLM has no authority to make up any reduction in O & C revenues to the counties; however, Congress in recent legislation has defined a formula to set minimum O & C payments made to the counties.

Comment: The plan does not appear to meet the legal requirement of the O & C Act or adequately meet the economic needs of the County, State, and country.

Response: Discussion of conformity to the legal requirements of the O&C Act has been added to the Purpose and Need section of Chapter 1. Under the Proposed RMP, flow of timber resources will be reduced from historic levels because previous levels of harvest have been determined to be incompatible with sustained flows of other forest resources.

Comment: Timber receipts to the County government and to local schools would be cut almost in half under the proposed plan.

Response: Unlike USFS payments, which must be used to fund schools and roads, BLM payments are made directly to the county general fund and are spent at the discretion of the County. No direct payments are made by BLM to the schools. However, schools may be impacted by changing redistribution of funds to the schools. These impacts are dependent upon County decision making and beyond the scope of BLM decision making.

Comment: 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 best interest to displace these workers, then society has an obligation to assist these workers make the transition.

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- Response: With the assistance of the State of Oregon, we have identified the level of displaced workers who would be assisted by State and Federal programs. As is apparent, many workers would not receive assistance. The PRMP/FEIS has clearly identified this unmet need, providing information to social service providers and decision makers.
- Comment: Congress originally intended for these valuable timberlands to be private property.
- Response: The lands managed by BLM in western Oregon have a long legal and legislative history. This important history has not been forgotten; it has shaped the current body of laws that direct management of O & C and other BLM managed lands in western Oregon.
- Comment: Higher prices will result in the northwest forest products industry becoming less competitive, and thus a decline in production capacity is sure to follow.
- Response: The estimated employment and income levels depend on BLM's provision of commodities and amenities, including stumpage prices. Lumber and wood products employment and personal income under Alternatives C, D, E and the PRMP would be lower than current levels and do represent a decline in production capacity.
- Comment: The BLM believes that through worker migration, counseling, retraining, and other social programs, these impacts can be mitigated.
- Response: We have recognized these factors and programs that may assist displaced workers. However, no suggestion has been made that all workers will be assisted or that these measures will erase the lifestyle and emotional losses associated with the loss of employment.
- Comment: The BLM has underestimated the nontimber jobs that are potentially available (in stating) from recreation activities on BLM administered lands.
- Response: Our estimates of recreation visitation were based on Denver Hospodarsky's survey of recreation use by Oregonians. This dataset was used as the basis for the State of Oregon's SCORP (State Comprehensive Outdoor Recreation Plan) and was selected for use by BLM to be consistent with and supportive of that plan. The estimation methodology used has strengths and weaknesses. The net result appears to be recreation estimates that overstate out-of-district but within State visitors and does not estimate out-of-state visitors to BLM administered lands. An estimation methodology was used due to the very limited availability of recreation use counts on BLM lands, particularly for dispersed uses (driving for pleasure, sightseeing, wildlife viewing, hunting, fishing, primitive camping, etc.).
- Comment: The BLM has minimized how the natural environment will continue to attract people to the area that will increasingly support a recreational, service industry, and retirement community.
- Response: Additional discussion of amenity values has been added. Although certain industries may consider amenity values when selecting a location, quantifying economic impacts associated with these values is difficult and almost impossible to assign to a specific ownership or land allocation.
- Comment: To begin with, timber revenues paid to the Counties actually come from Congress, not the BLM. Current legislation ensures that Counties will receive at least 90% of average revenues generated over the past five years regardless of actual timber revenue. This means that with zero logging the Counties will still receive Federal money.
- Response: This legislation is temporary and subject to annual Congressional approval. In past legislative sessions, the specific provisions of the legislation have varied significantly. However, past legislation has stated that total payments made to the Counties shall not exceed total timber revenues collected.
- Comment: The Draft RMP/EIS does not attempt to perform a cost/benefit analysis to determine what would be

taken from the public by cutting down its forest lands.

Response: Assessing such efficiency would require placing dollar values on a variety of ecosystem management benefits that we do not believe can be effectively quantified on an equal economic standard with commercial product (e.g., timber) benefits.

Comment: There appears to be no explanation of how future stumpage prices were calculated in the plan. This information needs to be included in the final.

Response: A technical appendix has been added to address this request.

Comment: I feel that the information and discussion in the Medford Draft RMP/EIS Appendix 4-T-2 should be included in all District plans and expanded to cover long rotations up to 300 years and long cycle uneven age management.

Response: Much of the discussion in Medford Appendix 4-T-2 is unique to forest conditions in that District. It would not be appropriate to apply it to other Districts. In addition, extending this analysis to long rotations up to 300 years would require using stand growth stimulation models at stand ages beyond the data upon which they are based. We do not believe such expectations would be credible.

Comment: The use of Present Net Value (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: PNV is not presented as a management tool, but for information only.

Comment: Tables 4SE-1 and 4SE-2 do not identify their baselines.

Response: Additional and more recent employment, personal income, and County revenue information has been added to the PRMP/FEIS. Although the official baseline (1984-1988) remains unchanged, the added information allows absolute and relative comparison of the alternatives and their impacts. (In this FEIS, Tables 4-SE-1 and 4-SE-2 have been renumbered to 4-51 and 4-52)

Comment: Table 4SE-3 covers all ownership timber sources in western Oregon. A similar table for the Eugene District would be useful. Again, this table does not identify its baseline or its time frame for future impacts.

Response: No estimates of cumulative employment and personal income by District were made for any District. The IMPLAN model used to examine cumulative impacts addressed only the western Oregon region. However, the portion of the table detailing supply from all ownerships has been repeated using information for the Eugene District in Table 4-T-3. (In this FEIS, Table 4-SE-3 has been renumbered to 4-53 and Table 4-T-3 is now 4-34)

Comment: The text and tables on payments to O & C Counties by BLM are interesting. No time frame is put on the analysis of impacts by alternative. It appears to be short-term (average annual for the 1993-2000 period). A longer term look would be helpful to assess increases in flows of available private timber.

Response: You are correct in identifying 1993-2000 as the time frame used to examine O & C payments. This time frame was determined in the State Director Guidance (USDI, 1988) to be the time period in which stumpage prices could be predicted at reasonable levels of confidence.

Comment: Finally, the National Forest payment reductions must also be addressed in considering the overall impact of County receipt losses.

Response: Discussion referring to the SEIS analysis addressing this topic has been added in the PRMP/FEIS.

- Comment: The Klamath Falls Draft RMP/EIS provides an estimate of statewide effects of both BLM and USFS land management alternatives. We recommend that the Final RMP/EIS include an analysis similar to what is found in the Klamath Falls Draft RMP/EIS.
- Response: Table 4-A-1. Cumulative Effects of Western Oregon Timber Harvest in Klamath Falls Appendix 4-2 appears in all western Oregon RMP/EIS. Location and table title vary by District. In the Eugene District, it follows the discussion of timber supply at the end of Chapter 4, Timber Resources. Refer to 4-T-4 Western Oregon Timber Harvest (1993-2000) per Year—Millions of Cubic Feet (MMCF) per Year. We apologize for the confusion. (In this FEIS, Table 4-T-4 has been renumbered to 4-35)
- Comment: We recommend that the 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 RMP and moves away from the individual commodity based analysis traditionally conducted.
- Comment: The analysis would be substantially more useful if inputs to its input-output model included 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. Models are available that use variable and non-linear types of analysis. These types of models were not selected because we felt it would imply a greater confidence regarding the future of all economic/industrial sectors than appropriate.
- Comment: The final RMP/EIS should discuss and evaluate options for Federally sponsored displaced worker assistance programs that might be used to mitigate the adverse employment impacts of the selected management plan. Although such assistance may well be outside the scope of the authority of BLM or the Forest Service, it is not outside the scope of the authority of Congress. The Council of Environmental Quality (CEQ) regulations encourage the evaluation and consideration of alternatives not within the jurisdiction of the lead agency. [Section 1502.14(c)].
- Response: There are limitations to the level of confidence with which current and potential Federally sponsored displaced worker assistance programs can be discussed and evaluated. Discussion of mitigation measures has been limited to those that incorporate proposal or project design features and/or other actions within the BLM's scope of authority. We believe social mitigation is beyond the scope of a RMP/EIS.
- Comment: An analysis of each "revenue and cost" stream would clarify the magnitude of any subsidies involved and assist in determining whether continuation of these subsidies is appropriate.
- Response: Assessing such efficiency would require placing dollar values on a variety of ecosystem management benefits that we do not believe can be effectively quantified on an equal economic standard with commercial products (e.g., timber) benefits.
- Comment: We recommend the BLM consider a transition between past timber levels and proposed lower future harvest levels, as necessary, to allow individuals and communities time to adjust to the drop in harvest levels as proposed in the new RMP.
- Response: The O & C Act together with FLPMA requires the BLM identify long-term sustainable yields of the multiple resources identified for management. These yield levels must ensure even flows of resources during the life of the plan and into the future. Departure from nondeclining harvest is not a

viable alternative given existing legal constraints.

Comment: Include costs of all aspects of a timber sale in developing its economic analysis; such items as cost of road building, sale preparation, monitoring, site cleanup, mitigation of environmental impacts, and restoration costs (stream and fish management, noxious weed control following disturbance, etc.) must be factored in.

Response: Ecosystem management focuses on the many activities required to manage a specific geographic area. This type of management is different from traditional program based management that focuses on costs and units of accomplishments in each individual program. For this reason an estimate of funding required to fully implement the proposed RMP has been made. Other alternatives continue the more traditional funding output structure and were not examined.

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: Increase BLM's participation in Oregon's Statewide land use planning program.

Response: When the PRMP is approved for implementation, we expect to participate in Statewide and local planning whenever proposed adjacent land uses are perceived to be inconsistent with PRMP goals and objectives.

Comment: The BLM should have clear policy guidance for addressing rural interface issues.

Response: The PRMP 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 PRMPs 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.

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 Table 4-49, Relationship of Proposed RMP 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 to the PRMP/FEIS.

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, 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 PRMP. 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 that are specifically followed only in Alternative D.

Comment: The Draft RMP fails to comply with the USFWS Spotted Owl Recovery Plan.

Response: The Fish and Wildlife Service's Biological Opinion on the SEIS states that the SEIS plan, which is incorporated into the Proposed RMP, provides protection for more known spotted owl sites and currently suitable habitat than does the Final Draft Recovery Plan (FDRP), and that the number or acres subject to matrix management is less than under the FDRP. Thus, we believe it meets the objectives of the FDRP.

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 Based 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 1st and 2nd order streams, and apply protection as needed 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.

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 that 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, 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 Record of Decision. The proposed RMP Monitoring Plan parallels the SEIS Monitoring and Evaluation Plan.

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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 Based Management)? Does BLM have a long-range monitoring framework that will direct the agency over the next 100 years in order 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 on-site 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 systems 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 plan will define the extent of special status species monitoring for those species, which 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 with 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.

List of Responders

The following list of responders (comment letter authors) identifies individuals, agencies, and organizations who submitted written comments on the Eugene District Draft RMP/EIS document. All letters are filed in the Eugene Office and are available for review by requesting the appropriate letter number identified in this listing. (Alphabetic: individuals, agencies, organizations.)

Letter No. Name

E000310	James Abrahamson	E001058	Catherine A. Baldwin
E000495	Scott Adair	E000674	Jim Balumas
E000730	A. Angelica Adams	E000433	Susan Banky
E000736	David & Barbara Adams	E000652	Susan Banky
E000358	Henry C. Adams	E000015	Andrew Banson
E001145	Leslie Adank	E000199	Kenneth W. Bare
E000664	Steve Akehurst	E000017	Cara Barnes
E000438	Steven Akehurst	E000343	Harvey Barnes
E000362	Lella Akers	E000747	Dale Bate
E000820	Richard P. Alexander	E000868	Jonathan D. Bauer
E000312	Ryan Alexander	E000161	Larry & Sharon Bazor
E000748	William Allard	E000776	Brenton L. Beagley
E000238	David & Linda Allaway	E000026	Jerry Beal
E000854	Gary Alloway	E000336	Randy Beard
E000460	Ronald Ames	E000187	Andrea Beardsley
E001060	Betty Anderson	E000388	Beverly & Donald Beck
E000107	Jens Anderson	E000164	Keith S. Bedard
E000313	Michael D. Anderson	E000071	Eugene E. Beebe
E000694	Sherman D. Anderson	E001012	Rocke J. Bell
E000090	William S. Anderson	E000901	Rocke J. Bell
E001191	Kenneth J. Apland	E000140	Talley R. Bell
E000691	Daniel R. Applegate	E000732	Tim/Margaret Beller-Owen
E001131	Dorothy Applegate	E000546	Ted Bennett
E000791	Nona Applegate	E000379	Lela B. Bentley
E000789	Tom Applegate	E000847	Mike Berg
E000790	Thomas Applegate	E000565	John Berkland
E000456	Melissa Archer	E000620	Julie Berner
E000644	David & Ruth Archibald	E000716	Christopher A. Berner
E000941	Elizabeth Arias	E000008	Ben Berry
E000075	Tim Arms	E000453	George Bess
E001132	George C. Armstrong	E000454	George Bess
E000287	Matthew Arnold	E001075	Erick A. Bestland
E001170	Rhea M. Arthur	E000166	Mary Graham Betts
E000952	Edward H. Arvize	E000654	Ron Bevier
E001102	Robert D. Ashley	E000356	Niles Biboux
E000648	Michael Atkinson	E000354	Penny Biboux
E000217	Fred Attendrix	E000348	Vernon Biboux
E000835	James Ayers	E001193	Susan Biedendieck
		E000825	Sue Billings
		E000826	Floyd Billings
		E000794	Kenneth L. Bivens
		E001116	Vicki Bivens
		E000861	Jeffrey Bixley
		E000155	Rob Blickensderfer
		E000924	Dale W. Blomberg
		E000646	Bob Bodine
		E000168	Paul R. Boehner
		E000764	William H. Bolderg
		E001021	Daryl L. Bond
		E000545	Rick Lee Bond
		E000019	Millie Bonebrake
		E001201	Rick Booker
		E001232	Elizabeth S. Booth
		E000353	Tom Boreland
		E000352	Jean Borland
		E000246	Larry Bottemiller
		E000640	Catherine Boucher
E000124	Avon Lee Babb		
E000309	Greg Babcock		
E000677	Carol L. Baer		

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E000728	Catherine Boucher	E000240	Priscilla Carlson
E000386	Lee Boutell	E000501	Donald Carmen
E000627	Lynn Bowers	E000288	Cory Carroll
E001136	Margey Bowers	E001045	Paula Carson
E000759	Richard Bowers	E000449	Darrell Carter
E000461	Ron Bowers	E000306	Mark Carter
E001063	Ron Bowers	E000159	Robert H. Carter
E001216	Sue Bowers	E000613	Judson Carusone
E001122	Wayne Bowers	E001239	David Cassell
E000410	Jeffrey Bowman	E000662	Geri Castle
E000550	Larry Bowman	E000581	Dout Caudle
E000549	Suzanne Bowman	E000481	Teena Cavanaugh
E000055	David Boyd	E000779	Malcolm Cazimero
E000698	Michael Boyd	E000892	Malcolm K. Cazimero
E000695	Larry Boysen	E001113	J. L. Chaffin
E000858	Harold Braisher	E001152	Dave Chambers
E000109	Dan Branch	E000848	John O. Chandler
E001065	Thomas Brandt	E000363	M. Chaney
E000480	Kay Breaux	E000731	Ellen Chantrelle
E000653	Homer Brezler	E000091	Greg Chase
E000204	D. Bridges	E000280	Jim Childs
E001179	David M. Briggs	E000329	Jerry Chisholm
E000146	Dick Briggs	E000681	Britt Christensen
E000801	William H. Briggs	E000623	Harold Christianson
E001005	William H. Briggs	E000680	Harold W. Christianson
E000079	Adam Brittan	E001148	David T. Christofferson
E000533	Gary Brokaw	E000870	Albert Clark
E000144	Lawrence E. Broughton	E000276	Joanne Cleland
E000701	Bruce D. Brown	E000234	Clarena Clever
E000297	Dale Brown	E000669	Anthony D. Cline
E001080	Dale & Marianne Brown	E000459	Ruth Coblentz
E000065	Grant Brown	E000756	Phillip D. Coblentz
E001205	James M. Brown	E000744	Marilyn & Peter Cohen & Moulton
E000521	Mark Brown	E001194	Joe Coiko
E000689	Martin Brown	E000414	Ronald Cole
E001001	Martin A. Brown	E000975	Buddy S. Coles
E000891	Martin A. Brown	E000843	Larry A. Colter
E000060	Matt Brown	E000264	Candis L. Condo
E000839	Richard C. Brown	E001151	Mary Lou Confer
E000126	Thomas L. Brown	E001250	Charles D. Cook Sr.
E000961	Timothy Brown	E000966	Craig Cookingham
E001242	Doug Browne	E000606	Albert Copeland
E000552	Bernard Bunnell	E001049	Linda Cormier and F.E. Collins
E000984	David L. Burgin	E000561	Juan Corrilla
E000290	Peter Burke	E000749	James E. Coulter
E000990	Luke Burroughs	E000562	Joyce Counrod
E000594	Deanna Busalak	E000711	Susie Cousar
E000061	Otis Buzzard	E001101	Douglas D. Cox
		E000796	Lloyd Crafton
E000841	John Caballero	E000989	Lloyd Crafton
E000527	V. Caldwell	E001166	Lloyd Crafton
E000330	Judith Cameron	E001165	Lois Crafton
E000406	Cannot Read	E000544	Mark Crampton
E000944	Jose Carillo	E000478	William O. Craven
E000189	James Q. Carlie Jr.	E000391	Roger C. Crenshaw
E000372	Ernest F. Carlson	E000412	Bill Crocker
E000411	Joe Carlson	E000011	David Crowell

E000020 Robert V. Crowell
 E000632 Gordon Culbertson
 E001213 Terry Cunningham
 E001006 Malcolm K. Cuzinco

E001013 Gary Daben
 E001112 Mary Jo Dain
 E001249 Andy Dale
 E000528 P.L. Dammen
 E000631 Lynn M. Damon
 E000216 Terry Damon
 E000226 Edward Dart
 E000392 Richard H. Davenport
 E000044 Phil Davidson
 E000872 Harold G. Davis
 E000697 Joyce Davis
 E000485 Lisa Davis
 E001140 Pat Davis
 E001128 Lyle Dawson
 E000757 Charles E. Day
 E000687 Allen R. Dean
 E000995 Allen R. Dean
 E000890 Allen R. Dean
 E000409 Daniel Decker
 E000963 Cady Lyons Deen
 E000964 Cameron Nicholas Deen
 E000962 Richard L. Deen
 E000965 Valarie Deen
 E000954 Benny DeLa Cruz
 E000945 Ronald Delia
 E000844 John H. DeLoach
 E000160 Sheila I. Dempster
 E000425 Alice Denham
 E000487 William Denham
 E000477 William L. Denham
 E000237 Willow Denker
 E000643 T. M. Derrickson
 E001195 J. DesChamp
 E001198 Rusty A. DesChamp
 E000656 Rick Dice
 E000921 Debbie Dickinson
 E000778 Rick Dickinson
 E001011 Rick Dickinson
 E000919 Rick Dickinson
 E000102 Jim Dobson
 E000473 Don R. Doerr
 E000387 Tevis Dooley Jr.
 E000444 Arlene Doran
 E000806 Edward J. Dowdy
 E000882 Edward J. Dowdy
 E001004 Edward J. Dowdy
 E000671 Larry Dowdy
 E001033 Larry Dowdy
 E000289 Gary Downer
 E000688 Bill Dryden
 E000678 Colleen Dubois
 E000255 Pat Dubs

E001110 Cathy Duncan
 E001257 Kevin Dunnavin
 E000547 Gary Durbin
 E000030 Charles W. Durk

E000016 Louis D. Earle
 E000703 Robbie Earon
 E000211 Jack Eberle
 E000857 Diana Ebersbacker
 E000260 Brad Edwards
 E000768 Corwin Eells
 E000373 Daniel Elbaum
 E000374 Daniel Elbaum
 E001129 Gary O. Elliott
 E001134 Rachael Elliott
 E000137 Eldon E. Ellis
 E001174 Larry Ellis
 E000978 Allan D. Emmons
 E000270 David England
 E001248 Eric England
 E000302 Rick Enos
 E000167 Jerry Enyart
 E000463 Darling Epping
 E000512 David L. Eraser
 E000518 C. J. Eslick
 E000149 Ron Evans
 E000532 Merfin Evans
 E000209 Donald H. Evanson
 E000365 Earl E. Everett

E000229 Jean K. Farrington
 E000210 Raymond H. Fischer
 E000366 Lester Fisher
 E000960 Richard E. Fite
 E000419 Kelly Fitzgerald
 E000355 James Fleming
 E000064 Mike Fletcher
 E000555 Melvin Filippo
 E000402 Richard Fobes
 E000073 Rod Foster
 E000088 Roger Foster
 E000508 Steve Freeling
 E000047 Rob & Julie Freets
 E000218 Ted F. Freres
 E000257 Meegan Fringer
 E000750 R. N. Fromcki
 E000957 John W. Frost
 E000054 Tony Fuller
 E001071 Lita Furby

E000598 Susan Gabriel
 E000601 Robin Gage
 E001196 Clyde L. Gagmer
 E000553 Scott Gallagher
 E001046 Thomas P. Gawronski
 E001203 Boman Gentry
 E000836 Kamal Ghazal

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E000786 Betty Giesy	E000186 Carl S. Harrison
E000658 Reid Giesy	E000368 Duane Harrison
E000370 Guy Giffen	E000108 Bobby Hartman
E000577 Edmond Gilbert	E000381 Richard C. Hasbrouck
E000575 Frances Gilbert	E000584 Joan Hass
E000799 Jon A. Gilbert	E001056 Neva Hassanein
E000994 Jon A. Gilbert	E001106 Roy & Joann Hathaway
E000912 Jon A. Gilbert	E000332 Deanna Haugen
E001017 Keith Gillihan	E000315 David L. Haughton
E000918 Keith Gillihan	E000291 Gary Hawkenson
E000917 Patsie H. Gillihan	E000605 Susan Hawkins
E000793 L. Giustina	E000705 Darlene & Donald Hawkins
E000119 O. Glausi	E000284 Karen A. Hayes
E000249 Jack Gnchel	E000807 Kenneth R. Hayworth
E000821 Melvin Goddard Jr.	E000894 Kenneth R. Hayworth
E000317 Alfred J. Goggin	E000998 Kenneth R. Hayworth
E001258 J.D. Goins	E000078 Joe Hazlewood
E000319 Carlos Gonzalez	E000138 C. W. Heath
E000077 Jim Good	E000248 Junior A. Heath
E000635 Roger Goodwin	E000976 Richard Heats
E000587 Angela Gordineer	E000267 David Heavner
E000426 Phyllis Gowing	E000235 Doug Heiken
E000754 Ted Graham	E000959 C. Heindselman
E001245 Bonnie Graves	E000301 Larry Held
E001246 Louie Graves	E000081 Eldon Helfike
E001252 Melissa Graves	E000121 Erik Hellenthal
E000607 Vic Green	E001094 Sherryl M. Helman
E000241 Frank Gribble	E001197 Mike Helms
E000792 William Grimes	E000655 Daniel A. Henderson
E000434 Denia Grochuart	E000172 Jeff Hendrickson
E000271 C. L. Groshong	E000675 Ron Heninger
E000760 Ronald H. Groves	E000408 Mike Hensley
E000526 Lawrence Gurney	E000679 Julie Hernandez
	E000720 Erika E. Hess
E000713 Joanne Haines	E000542 Wayne Hibson
E000622 Matthew Hall	E000702 Donald & Janis Hicks
E000507 Chris Hallett	E000942 Raul Higuera
E000036 Terry Halsey	E001018 Fred Hill
E000132 Cecil Hamlin	E000504 John Hill
E000272 Wyman Hammer	E000782 Michael Hill
E000763 Mike Hammitt	E000884 Michael Hill
E000401 John L. Hammond	E000997 Michael Hill
E000188 Rick Harbick	E000524 Patricia Hill
E000247 G.J. Hardegger	E000233 Glenn E. Hilliard
E001215 Jane, Tom, Lillian Hardgrove	E000690 Fred G. & Diana Hills
E001177 Don Hardwick	E000914 Fred G. Hills
E001126 Rose Mae Hardwick	E000849 Bobby R. Hilton
E000250 Michael L. Harrington	E001167 Tim Hinrichs
E000491 Burton Harris	E000117 Lloyd S. Hockema
E000048 Daniel C. Harris	E000568 Pam Hoefling
E000169 Daniel C. Harris	E000285 Steve Hoffman
E000800 Daniel C. Harris	E000717 Dieter & Lynne Hoffmann
E000893 Daniel C. Harris	E000506 Nick Hogan
E001035 Daniel C. Harris	E000087 Sharon Holmes
E000227 Ed Harris	E000181 Demet Holomas
E000896 Patricia J. Harris	E000823 Jim Holt
E000116 R. D. Harris	E000293 Wayne Holt

E001190 James E. Hoover
 E000046 Donald E. Hopkins
 E000208 Lois Hopper
 E000758 Dianna Horn
 E000816 George E. Horning
 E000380 Eric Horvath
 E000867 Mark C. Hough
 E000684 Tim M. Housh
 E000889 Tim M. Housh
 E000899 Tim M. Housh
 E000996 Tim M. Housh
 E000056 Steve P. Howard
 E000156 R. S. Howarth
 E000853 James H. Howarth
 E000369 Dan Howler
 E000455 Ivan Hoyer
 E000557 Jeffrey S. Huber
 E000558 James E. Huber
 E001124 David Hughes
 E001207 Jason Hughes
 E000221 Roy Hughes
 E000773 Harold Huiras
 E000672 Debby M. Hulburt
 E000028 Dennis Hungerford
 E000902 Glenda Hunsaker
 E000898 Henry B. Hunsaker
 E001036 Henry B. Hunsaker
 E000191 Lee O. Hunt
 E000752 Brenda Hunter
 E000067 Joe Hurd
 E000068 Kevin Hurd
 E000324 James Hurst
 E000583 Charles Hutchinson

E000875 Harry Ingraham
 001139 Dennis Inman
 E000803 Howard Inman
 E000274 Curtis Irving
 E001089 Sue Irwin
 E000490 Bobbi Isom
 E000430 Masha Isotov

E000004 Carol Jacobs
 E001099 Phil Jacobsen
 E000925 Tom Jacobson
 E000486 Jim James
 E000634 Sondra Jameson
 E000503 Ken Janecsek
 E001185 Michael W. Jeans
 E001133 Gary Jensen
 E000364 Lafona Jensen
 E000427 Mrs. Neven Jensen
 E000400 Tessa Jensen
 E000496 Annette P. Johnson
 E001023 Brad Johnson
 E000405 Dale Johnson
 E000500 Johnie Johnson

E000178 Larry Johnson
 E000987 Martin C. Johnson
 E000482 Miles Johnson
 E000638 Paul R. Johnson
 E000175 William H. Johnson
 E001218 Hugh B. Johnston, MD
 E000165 Douglas Lee Jones
 E000351 Beverly Jones
 E000331 Blake Jones
 E000407 Bryce Jones
 E000472 Cassandra L. Jones
 E000683 Douglas Lee Jones
 E000999 Douglas L. Jones
 E000915 Douglas Lee Jones
 E000327 Earnest Jones
 E001154 Jim D. Jones
 E000651 Jody Jones
 E000908 Judy Jones
 E000483 Kevin Jones
 E000659 Marie D. Jones
 E000685 Ricky L. Jones
 E000907 Ricky L. Jones
 E001016 Ricky L. Jones
 E000916 Shirley Ann Jones
 E000842 Terry L. Jones
 E000852 Tom Jost

E001241 John J. Kaib, MD
 E000196 Dr. Keith Kale
 E000128 Mark E. Kalen
 E000105 Joe Kanw
 E001225 Virginia Kapsa
 E000573 Harry Karuzich
 E001158 Carolyn Kaufman
 E000539 Scott Keep
 E000511 Scott R. Keep
 E000781 Michael J. Kehoe
 E001002 Michael J. Kehoe
 E000922 Michael J. Kehoe
 E000173 Mary L. Kellis
 E001141 Patrick Kelly
 E000771 George Kelsey
 E001137 Kenneth E. Kennedy
 E001030 Tim Kennedy
 E000038 William Kenworth
 E000582 Robert Kephart
 E000559 J. Kershaw
 E000938 Robert Keyes
 E000494 Dan Kieft
 E000298 Mike Kienle
 E000574 Hideo Kimm
 E001220 Reida J. Kimmel
 E000811 Ron King
 E000498 Ronald W. King
 E000509 Gary King
 E000535 Deross Kinkade
 E000383 Gisela & Glen Kinney

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E001057 Gary Kish	E000314 Dennis Lyons
E000597 Abigail Klips	E000262 Judy Mabry
E001155 Bill J. Kluting	E000027 Deanna Mack
E000499 Karl Knight	E001187 Robert Macklin
E001202 Roger Knighten	E000616 Michael Madres
E000585 Paula Knighten	E000670 Wayne Madson
E001091 Cheryl Knox	E000722 Mary A. Magruder
E001014 Steve Knudsen	E000283 Tom Maks
E000113 John Knutson	E001053 Bill Malak
E000502 Donald A. Kofoid	E001027 Vincent Malley
E000092 Gene A. Kronberger	E000772 Johnnie Malone
E000534 Ralph Kundert	E001041 Josh Maltsberger
E000041 Rod Kvamme	E001255 Marcus Mann
E000762 Kenneth Lacoste	E000810 Mikel Mapes
E001210 Robbin/Angeline Lacy	E000346 Bonnie Marks
E000125 John Ladd	E000345 Frank Marks
E000012 Charles E. Lake	E000586 Mary Marks
E000147 Jackie Lang	E000774 Joseph J. Marovich
E000537 Bill Lang	E000445 Jim Marquardt
E001084 Ron Langham	E001119 Donna Marsh
E000986 Dale Larsen	E000567 Almo S.F. Martin
E000350 James Larson	E000979 Carolyn S. Martin
E000871 Richard A. Lashar	E000980 Len Martin
E000052 Robert Lassiter	E000152 G. C. Marx
E000086 Michael C. Lassiter	E000104 Barbara Mason
E000150 Thomas A. Lawler	E000887 Darel Mason
E000435 Susan Laycock	E000993 Darel J. Mason
E001067 R. D. Laycock	E001254 Tom Massey
E000376 Roy F. Leaf	E000814 James Masters
E001204 Darrell Ledford	E000862 Russ Matthews
E000834 Arlene Lee	E000094 Dennis Mattingly
E000983 John F. Leniger	E000665 Alan Mattson
E000967 Milton A. Levings	E000058 Jim May
E000968 Catharine A. Levings	E000224 Carol Maynard
E000010 Charles S. Lewis	E000251 Crystal Maynard
E000592 Bill Liang	E000934 William E. McCall
E001114 Howard Lindgren	E000530 Alair McCarty
E001107 Susan Lindgren	E000784 Christy McClellan
E000395 Lloyd Lindley	E001138 Thomas D. McClellan
E001111 Larry Little	E000045 Tim McCollister
E000488 Charles Livingston	E000130 Pat McCollum
E000416 Rick Lloyd	E001092 Irvy McCord
E000424 Richard & Alyce Lloyd	E000639 Michael L. McCrady
E000139 Paula Lockhart	E001108 Kevin McCrary
E001031 Melody Lohner	E000135 Robert McDaniel
E001034 Konrad Lohner	E000136 Mary McDaniel
E001125 Melody Lohner	E000275 Glen J. McGuire
E000883 Melody M. Lohner	E000070 James McKay
E000885 Konrad Lohner	E000770 Archie McLeod
E000937 Sandra Lopez	E000566 Darrel McMullen
E000281 Larry L. Lopp	E000029 Delbert L. McMurrrian
E000007 Nancy Louise	E000185 Katherine E. McKenzie
E001199 Bret Low	E000080 Guillermo Mendez
E000171 Robert Lowder	E000085 Jamie Mestdough
E000588 Claire Lunsford	E000294 Beverly Metcalf
E000618 Bill Lynch	E001172 Robert E. Metzger

E000183 Chris Meurer
 E000603 Victoria Meyer
 E000726 Viki Meyer
 E000450 Gary Mikkelsen
 E000296 Mervin Milani
 E000032 Rosalie V. Miller
 E000602 Neal Miller
 E000668 Ronald Miller
 E000863 Mark A. Mills
 E000802 Wm. B. Mitchell
 E000710 Curt Mitchell
 E001234 Curtin Mitchell
 E000737 Curtin Mitchell, MD
 E000970 Dennie Mitchell
 E000969 Lorena Mitchell
 E000608 Richard Mitchell
 E001051 Terry Mitchell
 E001087 Dale W. Moffett
 E001085 Haley L. Moffett
 E001088 Katy D. Moffett
 E001086 Terri Moffett
 E000431 Louisia Molver
 E000864 Sherry Monegan
 E000932 Don Monegan
 E000692 Mike Monegan
 E001010 Mike Monegan
 E000895 Michael C. Monegan
 E000888 Sharon M. Monegan
 E000589 Glenn Monroe
 E000660 Thomas C. Monroe
 E000973 David M. Montgomery
 E000974 Judy C. Montgomery
 E000305 Ernest Moore
 E000766 David A. Moore
 E000200 Helen Moore
 E000304 Ruth Moore
 E000335 Michael Morantz
 E000367 Roland Morehead
 E000357 Therin Moreland
 E000084 Steven Morey
 E001238 Boyd & Natalie Morgan
 E000982 Delaine M. Morris
 E000981 Ivan F. Morris
 E001168 Virgil Morris
 E000115 Anna Morrison
 E000421 Arthur F. Morton
 E000422 Jean Morton
 E000505 Wayne Moss
 E000753 Eugene Moyer
 E000377 Warner R. Muir, M.D.
 E000042 Steve Munsen
 E000222 Diana M. Murphy
 E000971 Eugene W. Murr
 E000471 Craig B. Myrmo

 E000783 Lester Namitz
 E001256 Erika L. Naumann

 E001103 Allen F. Naylor
 E001262 Oscar R. Nealy
 E000236 Jeffrey A. Neilsen
 E000089 Orville Nelson
 E000320 Bobby E. Nelson
 E000718 Bob Neustadt
 E001173 Robert F. Newbold
 E000554 C.E. Newland
 E001233 Eathal A. Newton
 E001135 Don Newton
 E000273 John Nicholas
 E000956 Judith A. Nichols
 E000141 David Niessner
 E000214 Robert A. Nisbet
 E000738 Ron C. Norton
 E000123 Doug Nowak
 E000935 Heracio Nunez
 E000953 Pascual Nunez
 E000256 Allen Nyphen
 E000833 Amy Nystrom
 E001259 Dave B. Nystrom
 E000829 Todd Nystrom

 E000162 Winifred E. O'Connor
 E000657 William O'Donnell
 E001097 Dennis E. O'Neil
 E001118 Robert L. O'Renck
 E000049 Jan O'Rorke
 E000832 K. William Oakes
 E001253 Milt Oumpaugh
 E000114 Colleen Ohran
 E000777 Robert G. Olmstad
 E000263 Anne Olsofka
 E000163 Wayne E. Orr
 E000451 Ernest Ortis
 E000946 Velia Ortiz
 E000704 Joan & James Ortlief
 E000855 Bay Osuna Jr.
 E001025 Duane Ottum
 E000039 Rex M. Overton

 E000118 Dorothy Paeschke
 E000933 Rosenda Pana
 E000571 Frank Paris
 E000798 L. Keith Parker
 E000903 L. Keith Parker
 E001003 L. Keith Parker
 E001015 L. Keith Parker
 E000876 Ross Parker
 E000906 Sandra L. Parker
 E001117 Tate Parmenter
 E001169 Jerry Parsons
 E001109 Alan L. Parsons
 E000202 Tom Parsons
 E001231 Ray Paschelle
 E000911 Gary Pasen
 E000593 Jeff Patterson

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E001024	Robert H. Patterson	E000133	Ronald Raines
E000170	Curtis Patton	E000992	Jerry Raish
E000928	Rhonda Payne	E000931	Jorge Ramirez Diaz
E000311	Arthur Jeremy Paz	E001007	Cory Randall
E000337	Lynn Peay	E001243	Ross Randrup
E000812	Genevieve Pedder	E000074	Dave Rawson
E000813	Harold Pedder	E001161	J. Sharon Ray
E001070	Judy Pegg	E000197	Richard A. Ray
E001026	Frank Penberthy	E001009	Rodney V. Ray
E000432	Suzanne L. Penegor	E001163	Rodney V. Ray
E000371	Suzanne & David Penegor	E000053	Ken Razoto
E000538	Charles Peoples	E000520	Rich Re
E000818	Garry Percell	E000334	Anita Rea
E000930	Antonio Perez Chavez	E000333	Keith Rea
E001209	Max Peter	E000278	Linda Reed
E000023	Daryl Peters	E001150	Tom Reents
E000106	Gordon O. Peters	E000340	Clint Reeves
E000347	Richard Peters	E000342	Christine Reeves
E000231	Everett Peterson	E000344	Jennie Reeves
E000462	Herman Peterson	E000339	Kari Reeves
E001175	Jeanette Phelan	E000341	Kenneth Reeves
E000845	Gary E. Phelps	E000201	Troy Reinhart
E000396	Roselyn Phibbs	E000476	Byron Rendar
E000447	Shana Phibbs	E000043	Donald Rice Jr.
E001093	David W. Phillips	E000936	Margaret Rich
E000398	Mark E. Phillips	E001206	Rod Richmond
E000062	Michael Phillips	E000205	Sam R. Riggs
E000203	Richard L. Pickett	E001265	June Ringer
E000437	Bradon Pillow	E000805	Gary Roben
E000621	Ron Pio	E000830	Donald A. Roberts
E000300	Glenda Pitcher	E000831	Donald A. Roberts
E000439	Sandra Pitcher	E000840	Glenn Roberts
E000452	Sandra Pitcher	E001120	Dan Robertson
E000338	Kenneth Platt	E000232	Elaine Robin
E000378	Bhagwati Poddar	E001069	David Robison
E000769	Savo Popovic	E001076	Richard B. Rohl
E000325	Mark Porterfield	E000714	Kyle Rolnick
E001149	Scot Potter	E000266	Roger Romans
E000950	Karrie Potts	E000580	Anna Ronan
E000860	Bill Powell	E000579	James Ronan
E000515	Quinton Powell	E000886	Mike Roop
E001095	Quincy Powers Jr.	E000988	Mike Roop
E001078	Bob Powne	E000548	Bob Rose
E001192	Brad S. Prescott	E000712	Donna Rose
E000626	V. Leroy Pruitt	E000540	Bob Ross
E000666	Charles Pugh	E000474	Chris V. Ross
E000591	Dean & Sharon Pugh	E001263	Lane Ross
E000815	Chris Pule	E000180	Christopher N. Roth
E000497	Tom Quesenberry	E000361	John Roupe
E000614	Lola Quinnaglix	E001160	Gladys Roush
E000866	Cheryl Racy	E000897	Jerry Roush
E000865	William Racy	E001104	Jerry Roush
E000153	Vickie Radek	E001230	John Rowan
E000093	Bill Radley	E001105	Blake S. Rowe
E000795	Richard Rahl	E000103	Dan Rowland
		E000595	Linda Rowton
		E000510	Earline Rust

E001181 Jeff Rutherford
 E000468 Arnold Ryland

 E000436 Manuel & Ester Salado
 E000955 Jose Arturo Saldana Zavala
 E001235 Robert C. Saltsgaver
 E000493 Michael D. Salvini
 E000951 Eustacio Sanchez
 E000564 Medado Sanchez
 E000673 Brenda Sanders
 E000326 Gary L. Sanders
 E000176 Sarah H. Sanford
 E000134 Forrest Sapp
 E001159 Jerome M. Sauer
 E000323 Larry Saunders
 E000194 Loretta C. Schacht
 E000253 Loretta C. Schacht
 E000600 Loretta Schacht
 E000560 A.G. Schaeffer
 E000037 Fred Schatz
 E000610 Roger & Sally Scheusner
 E000824 Paul P. Schindler
 E000569 Leroy J. Schmid
 E000667 Richard Schmidt
 E000541 Richard Schmitt
 E000129 Dan Schmunk
 E001066 R.C. Schoonover
 E000617 Matthew Schumaker
 E000057 Robert Scott
 E001183 Jerry Sedlak
 E001022 Nelson F. Sembach
 E000299 Rich Seto Jr.
 E000470 Carla Severe
 E000556 D.E. Sharp
 E001028 William Sharp
 E000458 Richard Shaw
 E000318 Paul Shear
 E000822 Fred Sherman
 E000417 Scott Shoemaker
 E000647 Jo Shroy
 E000111 James A. Silbernagel
 E000101 Randall Silbernagel
 E000724 J. Simonsen
 E000394 Henry Singleton
 E000127 Steve Skehurst
 E000576 John Sloan
 E000719 Clifton T. Smith
 E000785 Darold Smith
 E000958 Eric Tyrone Smith
 E000707 Eevan B. Smith
 E000661 Fred Smith
 E000529 Gary Smith
 E000519 J.L. Smith
 E000708 Karen L. Smith
 E001266 Lye Smith
 E000442 Maxine Smith
 E000415 Paul Smith

 E000827 Thomas Smith
 E000316 Zenk Smith
 E000590 Kile E. Snider
 E000245 M. R. Snidow
 E000927 Craig Soderberg
 E000926 Joe L. Soderberg
 E000303 Steven G. Sogge
 E001247 Lowell Solesbee
 E000063 Souliyaovong
 E000295 Nancy Southard
 E000517 Angie Sparks
 E000429 Ida Spaulding
 E000733 Linn Spaulding
 E000157 Jonathan Spero
 E000612 Joseph Spivack
 E000725 Joseph D. Spivack
 E000838 Dan Sprague
 E000492 Randy Springer
 E001130 Marcia L. Spurlock
 E000977 Doug Staff
 E000154 Lee Weatherly Stamer
 E001226 Julie Stangall
 E001127 Britta Stangell
 E001229 Dean A. Starr
 E000242 James L. Steele Jr.
 E000223 Robert A. Steinbacher
 E000788 Lester Stewart
 E000904 Lester Stewart
 E001008 Lester Stewart
 E000131 Gary Stillner
 E000850 Marvin Stone
 E000286 Lisa Stout
 E000282 John Strader
 E000110 Steve Streeker
 E000859 M. P. Strub
 E000382 Neil Summers
 E000947 Thomas K. Summers
 E001020 Tom Summers
 E000543 Jack Swanson
 E000475 Charles/Barbara Sweet
 E000328 Steve Sweet
 E000735 William Swindells
 E000220 Ron Sylvester

 E000780 Charles Tadlock
 E001019 Chuck Tadlock
 E000905 Charles H. Tadlock
 E000913 Charles Tadlock
 E000940 David M. Tait
 E000536 Ed Tate
 E001121 John Tatum
 E000523 Larry Taylor
 E000142 Miguel Tejada-Flores
 E000920 Donna Terman
 E000808 Glenn Terman
 E000900 Glenn Terman
 E000991 Glenn Terman

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E000514	Dirk P. Ten Brinke	E000397	John Weber
E000513	Loretta Ten Brinke	E001100	Stan Weber
E001147	Scott J. Terrien	E000076	Brian Weiler
E000051	Craig Thomas	E000034	Gerald J. Weis
E000403	Charles Thomas	E000279	Jill Weiss
E000739	Elizabeth Thomby	E000252	David V. Weissbeck
E000775	Rosemary Thompson	E000761	Margaret Wells
E000174	Steven Tichenor	E000349	Danele Welsh
E001029	Ronald O. S. Tipton	E000709	Jim Welsh
E000809	Wesley R. Toeus	E001144	Thaddeus V. Welsh
E000277	Charlotte Touhey	E000837	Walter A. Welton
E000069	Tom Trammel	E001090	Tim West
E000307	Bill Trano	E000082	David Westbrook
E001077	Sylvoa Troy	E000767	Eldon Weston
E000479	John Tsourman	E000856	Lloyd J. Weston
E000663	Joe Tuma	E000693	Sarah & James Weston
E000243	David P. Turner	E000706	David L. Weza
E001098	Terry Turner	E000939	M. J. Whalen
E000031	Dick Tutt	E000846	Randy Wheeler
E000611	Elizabeth Twimbly	E000083	Dale Whitlock
E000033	Sam Tyler	E000184	Donald Paul White
E000215	Samuel Tyler	E000874	Don Whitsell
E000828	John Unquera	E000649	Pamela A. Whyte
E000448	Thomas Utt	E000869	Dan Wiard
E000943	Andrew Valenzuela	E000787	John H. Wilhelm
E000985	Bob VanCleave	E000910	John L. Wilhelm
E000972	Richard VanDamme	E001032	John H. Wilhelm
E000484	Margo VanDrew	E001143	Scott Willems
E000877	Linda L. VanOrden	E000021	L. Charles Willett
E000878	Robert R. VanOrden	E000072	Darwin William
E000572	W.L. VanWinkle	E000727	Curtis L. Williams
E000633	Troy I. Vanderhoof	E000817	Daniel Williams
E000375	Alberta Nancy Vaughn	E000384	Frank J. Williams
E000359	Karen Vermeer	E000059	Ray Williams
E000360	David Vermeer	E001153	Ronald C. Williams
E000265	Jon Vermouth	E000909	Tom R. Williams
E000322	Rick Violette	E000308	Darren Willits
E000804	George Voelsch	E000112	Allan Willson
E001055	Josephine B. R. Von Hippel, MD	E000268	David H. Wilson
E000035	Dick Voorhees	E000258	Esther Wilson
E000457	Art Vosburg	E001157	Gary Wilson
E000464	Phil Voss	E000292	Janet Wilson
E001184	Jom Voytck	E000179	Kathleen Wilson
E000563	Harold Wagoner	E000259	Keith Wilson
E000022	Joey Waite	E001146	Loren Wilson
E000018	Brent C. Walker	E000177	Roger Wilson
E000399	James Walker	E000145	Bonnie Winans
E000418	Wade Walker	E000751	Sharon Winston
E000269	Bill Walton	E000740	Steven A. Winston
E000525	A.J. Warden	E000715	Jim Wisner
E000619	Key Warren	E000531	Wesley Wolcott
E000050	Bruce Watson	E000244	Mike Wolf
E000948	Howard G. Weatherman	E000182	Sue Wolling
E000489	Trudy Webb	E000949	Betty Wong
		E000487	Dale A. Wood
		E000851	David Wood
		E000873	Ford Wood

E000734	Phyllis Woodbury	E001043	Jan Wroncy
E001142	Kelly Woodke	E000682	Bill Wynkoop
E000413	Betty Woods	E001260	Eleanor Wynn
E000723	Ross & Cheryl Wootan		
E001164	Karen E. Workman	E001096	Timothy D. York
E001123	Thomas H. Workman	E000578	Donald Yost
E001162	Thomas Harvey Workman	E000746	Jeffrey Yost
E000066	Bob Worthington	E001189	William L. Young
E000321	Le Roy Wosnum	E000819	Glenn Younger
E001000	Lyman Wray	E001115	Carl A. Ysen
E001264	Ruth Wren	E001156	Jim C. Yser
E000686	Eric L. Wright		
E000923	Eric L. Wright	E000148	Tom Zellers
E000551	Steven Wright	E000389	Frank Zilla
E000420	Thomas Wright	E001200	Mark R. Zoll
E000100	Tom Wright	E000254	George Zustiak

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Agency

E001061	Greg Miller	BLM
E001062	Raul Morales	BLM
E000742	Wes Seckler	BLM
E000403	Charlie Thomas	BLM
E000002	Roger Wilson	BLM
E000596	Anne Squier	Office of Governor - Natural Resources
E000006	Tom Kaye	Oregon Dept. of Agriculture
E000009	Tom Kaye	Oregon Dept. of Agriculture
E000099	Larry L. Campbell	Oregon Legislative Assembly
E000005	Darrel Spiesschaert	OSDF - Western Lane District
E001186	Charles E. Findley	U.S. Environmental Protection Agency - R10
E001212	Sarah E. Greene	USDA—Pacific NW Research Station
E001261	Darrel L. Kenops	USDA - Willamette National Forest
E000466	John R. Norbert	USDI—Bureau of Mines
E001208	Patrick D. Wright	USDI—Fish & Wildlife Service

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Organization

E000604	Sam Konnie	A Konnie Enterprise
E000098	Bruce Newhouse	AICP
E000001	Ronald Greer	Animal Health Assoc. Hosp.
E000192	Russ Sapp	Assoc. Oregon Logger, Inc.
E000629	James E. McCauley	Associated Oregon Loggers, Inc.
E001064	Rocky McVay	Association of O&C Counties
E001180	Paul Ketcham	Audubon Society of Portland
E000630		Board of County Commissioners - Douglas
E000024	Sue Hallett	Bohemia Mine Owners Assoc.
E000198	Sue Hallett	Bohemia Mine Owners Association
E000741	Sue Hallett	Bohemia Mine Owners Association
E000570	Bill Dryden	Boise Cascade
E000636	Bill Dryden	Boise Cascade
E001040	Bill Dreyden	Boise Cascade
E000206	R. Skidmore	Boise Cascade Corp.
E000190	Michael W. Wiedeman	Citizens Natural Resource Group
E000225	Wilbur Ternyik	City of Florence

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E000440	Arthur D. Chase Jr.	City of Halsey
E001081	John Bianco	Clayton Hill Neighbors Association
E001042	Chuck Willer	Coast Range Association
E001224	Ted Ferrioli	Community Relations Associates
E000040	Skip Brainard	Conf. Tribes of Coos, Lower Umpqua, etc.
E000516	Todd Birkholder	Defenders of Wildlife
E000239	Julie Lewis	Deja, Inc.
E000628	Key Bacon	Dunes City
E001054	Erick Bestland	E. A. Bestland & Associates
E001211	C. Windle	Environmental Studies - UCLA
E001176		EPA - Duplicate Letter
E000467	Jeremy Starr	Eugene Assn. of Realtors
E000097	Jean Borland	Eugene District Advisory Council
E001221	Paul Ehinger	Eugene District Advisory Council
E000096	Brian Bauske	Eugene District Advisory Council
E000151	Brian Bauske	Eugene District Advisory Council
E001217	Laurie Power	Eugene Water & Electric Board
E000001	Lee O. Hunt	Fir Springs Tree Farm
E000001	Lee O. Hunt	Fir Springs Tree Farm
E000122	Lee O. Hunt	Fir Springs Tree Farms
E001068	Norm Marsh	Forest Resource Services
E000625	David Funk	Funk & Associates
E000879	L. M. Giustina	Giustina Land & Timber Co.
E001072	Ivan C. Hoyer	Grizzly Mountain Enterprises, Inc.
E000385	William Sibbett	Heceta Beach Neighborhood Association
E000609	Wayne Giesy	Hull-Oakes Lumber Company
E000721	James K. Coons	Hutchinson, Anderson, Cox, Parrish & Coons
E000003	Carol Ach	Institute for Regenerative Agroforestry
E000230	Richard R. Yarbrough	International Paper Company
E000615	Jerry Davidson	J. Davidson & Sons Construction
E000700	DeRoss Kinkade	Kinkade Insurance
E000441	Arthur Farley	Lane County Audubon Society
E001048	Doug Cooper	Larre, Kelsey, and Logan Cooper
E000261	David Bowden	Longview Fibre Company
E001083	Rob & Barb Murtaugh	Lucky-7 Mine
E000729	Barbara Becker	Mazamas
E001050	Jeff Helfrich	McKenzie Guides Association
E000880	Rebecca Solomon	McKenzie Valley Residents Assoc.
E000014	Lee E. Miller	Miller Timber Services
E001082	Ron Leach	Mineral Resource Association
E001079	Larry L. Irwin	National Council of the Paper Industry
E001171	Richard T. Brown	National Wildlife Federation
E001059	Kate Dwire	Native Plant Society of Oregon
E001240	Ethen Perkins	Native Plant Society of Oregon
E000193	C. A. Malpass	Neste Resins Corp.
E000212	Susan Noble	Noble, Hilborn & Associates
E000624	Norma Grier	(NCAP) Northwest Coalition for Alt. to Pesticides
E000881	Jim Geisinger	Northwest Forest Resource Council
E001236	R. K. Ivan Umovitz	Northwest Mining Association
E000743	Martin Jacl Desmond	NW Reforestation Contractors Assn.
E000393	Bradley K. Witt	Oregon AFL-CIO
E001052	Robert H. McKellar	Oregon Forest Products Trans. Assn.
E000645	Daniel Applebaker	Oregon Logging Conference
E000642	Mark Hubbard	Oregon Natural Resources Council
E001073	Mark Hubbard	Oregon Natural Resources Council
E000390	Res. Mgmt. Review Group	Oregon State University
E000465	Stephen D. Peterson	ORV Trail System Group

E000002	Tom Harris	Pacific NW Four Wheel Drive Assn.
E000120	Larry D. Wood	Pacific Corrugated Pipe Co.
E001222	Bob Doppelt	Pacific Rivers Council
E001047	Patrick Rank	Pope & Talbot
E001228	Lowell Russell	Public Land Foundation
E000423	Gene Peterson	Public Lands Foundation
E000428	Gordon Culbertson	Rosboro Lumber Company
E000143	Dennis Bottem	Ross Corporation
E000599	Richard Re	Seneca Sawmill Company
E001038	Hal Hushbeck	Sierra Club - Many Rivers Group
E001188	Steve Swisher	South Lane School District 45J3
E000158	Harry L. Cook	Southern Oregon State College
E000696	Thomas Chrestman	Spec. Wood Products Coop of SW Oregon
E000641	Jean E. DeYoung	Springfield Area Chamber of Commerce
E000095	Foster Robinson	Starfire Lumber Co.
E000469	Mike Randall	Swanson Bros.
E001244	Dick Vander Schaaf	The Nature Conservancy
E000637	Robert M. Freimark	The Wilderness Society - Oregon Region
E001039	Gene D. Silovsky	The Wildlife Society, Oregon Chapter
E000699	Charles B. Kimmel	University of Oregon
E000745	Neal Miller	West Fox Hollow Valley Association
E001214	Joseph B. McCracken	Western Forest Industries Assn.
E001044	Sue Bowers	Weyerhaeuser Company
E001178	Sue Bowers	Weyerhaeuser Company
E000025	Dick Rohl	Willamette Forestry Council
E001037	Julie Stangell	Willamette Forestry Council
E001182	Julie Stangell	Willamette Forestry Council
E001219	Julie Stangell	Willamette Forestry Council
E001227	Julie Stangell	Willamette Forestry Council
E001237	Julie Stangell	Willamette Forestry Council
E001074	Jim A. James	Willamette Industries, Inc.
E000213	Mike Searle	Willamette Timbermen Association

Comments from Governmental Agencies, Elected Officials, etc.

Due to the volume of comments received, only letters from government agencies, elected officials, and Native American groups are reproduced. This does not imply lesser importance of letters received from nongovernmental individuals and groups. Substantive comments were summarized as provided for in NEPA (40 CFR 1503.4) to save space and taxpayer money.

Letters Reproduced from Agencies and Elected Officials

	Letter Number
Federal Agencies:	
USDA, Willamette National Forest	1261
USDI, U.S. Fish and Wildlife Service	1208
USDI, Bureau of Mines	466
U.S. Environmental Protection Agency - R10	1186

Appendix KK

Native American/Tribal Governments:

Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians 40

County Commissioners, Douglas County 630

Cities:

City of Halsey, Oregon - Mayor Arthur D. Case Jr. 440

City of Florence, Oregon - Mayor Wilbur TERNYIK 225

Elected Officials:

Oregon Legislative Assembly, Larry L. Campbell, Speaker of the House 99

Association of O & C Counties, Rocky McVay, President 1064

Advisory Council to BLM, Eugene District:

Brian Bauske, member 96

Bruce Newhouse, member 98

Jean Borland, Paul F. Ehinger, Wilbur Heath, Rex Stevens, members 97

Eugene District Advisory Council, Brian Bauske, member 151

Eugene District Advisory Council, Paul Ehinger, chairman 1221

State of Oregon, Governor Barbara Roberts 596

Elected Officials:

Oregon State Senate, Gene Timms X027

Oregon House of Representatives, Delna Jones X045

Association of Oregon Counties, Michael J. Sykes, president X017

United States Department of Agriculture	Forest Service	Wilmington NF	211 East 7th Avenue B Eugene, OR 97401
		Superior's Superior	FAX #503-685-8177 Contact #503-685-8333

001261

Reply To: 1980
Date: January 15, 1980

Mr. Ron Kaufman, District Manager
Bureau of Land Management, Eugene District
Post Office Box 10422
Eugene, Oregon 97440

Dear Sir,

I appreciate the opportunity to comment on your Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS). I have read the Regional Forester's response on the RLM draft RMP/EIS and concur with his comments and the Regional Office Staff. I also appreciate the time that Jim Stronach and several other members of your district staff took to meet with our Forest Interpretive Team (FIT) to discuss the draft RMP. The feedback I got from the meeting indicated that there was a good exchange of information and comments.

I would like to take this opportunity to re-emphasize my support for cooperative and coordinated resource efforts to enhance management issues, particularly those related to cooperative management. Our cooperation, together with other partners through the Churned Learning Center, can effectively address key research and monitoring issues that are critical to the successful implementation of the management plan for both of our organizations.

Following are comments from the Forest Staff and FIT for your consideration as you develop the final RMP:

- Overall, the document is well organized and written. It is very readable and the key points are clearly explained.
- The selection of a preferred alternative with an ecosystem management emphasis is a positive step and is responsive to current issues of public land management. Considering the broad, landscape effects and final alternatives as a good approach for developing long range plans that consider cooperation (existing at a landscape level). Two examples of the approach include providing for old-growth conditions and managing for linkage areas, especially patterns across the southern end of the Willamette Valley.
- Special protection for Special Habitats also represents a positive step for recognizing the importance of these areas for biodiversity.
- There was very little discussion concerning special forest products in the draft RMP. We suggest that this topic be discussed in the final plan and that management direction for special products be included. During implementation of our Forest Plan, we discovered that we did not have adequate SFP direction, requiring that we now write an environmental assessment to amend the Plan to add management direction for SFP. Our mutual agency involvement in the Western Oregon Special Forest Products Council should provide the opportunity for coordinated actions in this area.

- One area of concern that we have seen in the projected declines in the conditions of seven analytical watersheds in the Preferred Alternative. We realize the difficulties and limitations of watershed management associated with mixed ownership. However, water quality is a critical resource value and options to mitigate further declines should be thoroughly examined and considered in the final RMP.

If you have any questions concerning these comments or identify other areas where our cooperation or coordination is needed to complete the final RMP, please call.

Sincerely,



DARRELL L. KENOS
Forest Supervisor

on
2/20/80:RMP/W



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Portland Field Station
2600 S.E. 98th Avenue, Suite 100
Portland, Oregon 97266

001206

GENERAL COMMENTS:

To attain a comprehensive management strategy and achieve a sustainable forest ecosystem, the RMP needs to: (1) identify the ecosystem variability that occurs naturally within each watershed under its jurisdiction; (2) clearly define the short- and long-term goals for restoring the natural landscape scale, pattern, and composition of various ecoregions within their land base; (3) identify the variation, intensity, and significance of the principal natural factors responsible for creation of present forest conditions; and 4) develop clearly defined implementation strategies for each land use allocation.

Each District management scheme, which encompasses its mapped land use allocations (SPMA, SMO, ODMA, and OMS) in conjunction with particular management objectives, need to reflect the landscape level patterns resulting from disturbance regimes of varying frequencies, durations, and intensities. None of the draft RMP/EIS adequately describe how the conversion of existing old-growth forest into managed forests with old-growth characteristics will provide for the compositional, functional, and structural attributes of a natural forest ecosystem.

While using deferred harvest and log rotations in some management areas, extended retention in other areas, and applying structural retention in some non-deferred ODMA and OMS, the Preferred Alternative will allocate approximately 15 percent of BLM's forest lands (1,042,000 acres) to the commercial timber base over the long-term and propose commercial harvest of 300,000 acres of reserve old-growth forests (greater than 200 years old) with full implementation of the RMP. It is important to note that no current natural old-growth forest outside of the Special Management Area designation will be left unharvested following implementation of the preferred RMP.

Given the short supply of old-growth forest systems in western Oregon and the critical status of some wildlife species dependent on or closely associated with old growth ecosystems, the Service recommends the District maintain existing old growth, where possible, for the life of the RMP. This would allow greater options for management of old growth dependent species in future planning efforts.

Prescribed Management. The "Preferred Alternative" outlines the proposed forest management practices may or will degrade the current watershed of riparian production watersheds (RWP) within the Eugene District. The Service believes that reevaluation of management prescriptions are necessary to avoid damage to an important resource base and avoid potential impacts to aquatic habitat and water quality. Stand management activities, such as harvest prescriptions, silvicultural methods, and retention frequencies, need to be tailored to particular watershed characteristics and conditions to minimize impacts and address fish and wildlife species of concern. This may require establishing wider buffers along stream channels, reducing harvest levels, and limiting road construction.

SPECIFIC COMMENTS:

Old-growth Habitat Areas (OHMA) It is difficult to determine, from the information provided in the Eugene RMP/EIS, whether or not the proposed 80-

MEMORANDUM

December 23, 1982

TO: Eugene District Manager, Bureau of Land Management, Eugene, OR.

FROM: Ronald L. Kaufman

Field Supervisor, Portland Field Office, Portland, OR.

SUBJECT: Review of Draft Environmental Impact Statement (EIS) and proposed Resource Management Plan (RMP) for the Eugene District.

The U.S. Fish and Wildlife Service (Service) offers the following comments for your consideration in preparing the final RMP/EIS for the Eugene District. We commend the Eugene staff for organizing a complex array of information and issues for a diverse group of public and private entities and formulating an exceptional draft document. Integrating ecological, economic, and social considerations for the management of 38,000 acres of forestland, identified as suitable for timber production, poses a monumental task. The draft RMP/EIS illustrates a commendable effort to balance local interests and concerns as well as a commitment to restore biological diversity and old-growth forest characteristics through timber management and habitat protection.

The Service supports the Bureau of Land Management's (BLM) efforts to manage its resource lands from an ecosystem perspective and to broaden its scope to include values beyond timber production. Land managers such as the BLM have long given a public trust to maintain the natural systems at their sites. Multi-use management will provide a dependable source of given commodities such as wood fiber, livestock products, and recreation, maintaining a full array of productive and healthy ecosystems, which replicates the variety and distribution of regional landscapes, will provide the values supporting timber production.

Franklin et al., 1981, state that habitat diversity contributes to ecological stability, which in turn sustains the natural openness of a forest system. Water yields, soil and fungal productivity, heterogeneity of microclimate, and fish and wildlife populations can be sustained in perpetuity with ecologically sound management practices. Past timber management practices with single focus objectives, closed rotations, and clearcut harvest regimes have fragmented and destroyed habitats, altered the current and potential distribution of plant communities, locally and regionally eliminated numerous forest-dependent species, and rendered certain species vulnerable to extinction. BLM's proposal could become a model plan for future forest management and provide a comprehensive framework for restoring forest systems to levels that mimic pre-settlement structure and function.

Several activities are proposed in deferred OGBAs that appear inconsistent with the draft Recovery Plan and other proposed management schemes. These include management activities within stream channel management, riparian zone at least dispersal condition and deferral of regeneration harvest for 50 years (with withdrawal) of the large stands. The RMP states that arrangements in deferred OGBAs 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. Approval or denial of these activities should be based on actions will be linked 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 OGBAs, non-deferral of OGBAs, and connectivity areas. This risk should be evaluated and discussed. Again, the RMP does not appear to provide within the RMP to allow evaluation of the risk and impact to the recovery of the spotted owl.

Large-scale salvage within the OGBAs also carries uncertainty for the future condition of habitat within the OGBAs. Given the lack of knowledge concerning the development of forests following catastrophic events, it is difficult to determine the level of salvage necessary to maintain natural recovery or speed development of natural condition. Therefore, large-scale salvage should increase 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 owl, especially in the Oregon Coast Range physiographic province, dispersal between the large deferred OGBAs and between provinces is critical to maintaining distribution and viability of spotted owl. The preferred alternative allows reduced dispersal to continue for up to 30 years before all capable quarter-township sized 100-ft x 400-ft conditions in the Oregon Coast Range physiographic province corresponds with the period of lowest suitable habitat and spotted owl populations, necessitating the concern for dispersal. The potential synergistic effects of low habitat, low population, and reduced dispersal should be addressed in the RMP.

Dispersal condition is of particular concern in the Oregon Coast Range and the South Willamette/Willamette areas of concern for demographic population movement. Without adequate dispersal across the area of concern, isolation of the Oregon Coast Range is likely. No information is provided on the current or future dispersal condition in the area of concern.

The non-deferred OGBA along the southern portion of the district provides some support for dispersal across the area of concern. Maintenance of conditions through minimal 100-ft x 400-ft in this area would improve the chances of successful movements across this area, particularly given that Federal ownership is well in excess to 90 percent of the area. The RMP should include a detailed habitat condition on the Federal lands. Unfortunately, the proposed management within the non-deferred OGBAs does not appear to specifically target the need for adequate dispersal. Management actions in this area of concern should be addressed in the RMP.

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The final rule designating critical habitat for the northern spotted owl (final rule) was published on January 18, 1993. The RMP should contain a discussion and evaluation of the impacts of the RMP on designated spotted owl critical habitat.

SPECIFIC COMMENTS - Spotted Owl

Page 2-63, Column 1, Paragraph 2. The Endangered Species Act (ESA) requires consultation with the U.S. Fish and Wildlife Service on all actions involving a Federal action that may affect a listed species or designated critical habitat. Regulations identify the actions that require a formal consultation and present alternatives and reasonable and prudent measures. The BLM should consult with legal authority to determine the appropriate rule of discretion in the determination of consultation responsibility. Non-Federal actions with no Federal nexus are limited only by the section 9 take prohibitions.

Page 2-65, Column 1, Para. 2. The document indicates that the connectivity areas have been intended to provide dispersal habitat for highly mobile species between OGBAs, yet there is no mention of which species are expected to have these areas. Why connect areas that are not intended to prevent isolation of the OGBAs? 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 OGBAs is based on the dispersal capabilities of species used on other projects.

The connectivity areas are also expected to "provide listed old growth structural characteristics needed by old growth related species. Again, provide a list of species that would be served, how these areas would contribute to their survival, and the connectivity areas for these species."

Page 2-65, Column 2, Paragraph 1. Describe the number, location, or condition of the sites for which the habitat management is proposed. Provide information on a "protect" selected spotted owl sites to supplement the OGBAs. In addition, the document should include a description of how these sites will be selected and how they are expected to supplement the OGBAs. Without such information, it is impossible to judge the functionality of this concept.

Habitat levels for selected spotted owl should be maintained at the maximum possible levels to increase the probability of survival of representative numbers, rather than a minimal or percent level. At habitat levels of 40 percent within the same range, the probability of survival of the individual reproductive potential and survivorship of the individuals on the site is likely to be already limited. The RMP should include a description of the habitat spotted owl sites to supplement OGBAs already deficient in population, maintenance of habitat levels on sites should include the maximum possible viability habitat within the title of the sites. It is also necessary to include in light of the fact that these sites are likely to be less "protected" than within the OGBAs and therefore more susceptible to geographic problems.

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contains specific standards and minimum conditions to ensure the improvement and maintenance of high quality dispersal conditions at all times.

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 is dispersed in very general terms in the Bugeye District RMP, but no standards or minimum conditions for the number of habitat provisions for these additional sites. The current and short-term population condition within the deferred OGBAs should be evaluated to determine the internal stability of these population clusters, and supplemental levels to ensure cluster stability. Additional sites should be provided to maintain the cluster effect. Short- and medium-term cluster stability is less severe critical in light of the already limited dispersal condition in the Oregon Coast Range and impact of the preferred alternative to the development of dispersal condition.

The concept of promoting dispersal of mobile old-growth species by providing connectivity areas between OGBAs at some level of old-growth connectivity 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 detailed information on the species expected to benefit from the connectivity areas, particularly listed species; the expected function of the area of 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 relative to old growth characteristics and the relation to the future dispersal condition.

The RMP 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 amount and conditions 100 years in the future are of little value if the spotted owl population are extirpated before habitat recovery. The RMP should include an evaluation of the viability of the spotted owl. It contains no evaluation of spotted owl viability. The monitoring needs 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 RMP, the BLM is attempting to manage forests in a manner different from all previous efforts. As a result, management prescriptions include numerous threshold and trigger points, and specified courses of action if thresholds are exceeded. In addition, experimental and theoretical 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 discussion of the concept of adaptive management in the RMP, but fails to carry this discussion to specific management. Given the consequences of failure, the RMP should have specific thresholds and trigger points, and specified courses of action if thresholds are exceeded. In addition, experimental and theoretical prescriptions should not be implemented unless monitoring is included. If monitoring is not funded, harvest should not proceed.

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Page 2-69, Column 1, Paragraph 2. The document states that 1,000 acres of woodland be managed to help maintain options to provide spotted owl throughout the landscape in the future through an 8 decade deferral of regeneration harvest. Provide an indication of how this will be placed on the landscape, why it would provide any options for spotted owl, and the reason it is only provided for 8 decades.

Page 2-62, Column 1, Paragraph 4. 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 104(i)(2) of the Act that requires all Federal agencies to "...ensure 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 no measures need to be taken to prevent their extinction. Such measures and procedures include, but are not limited to... habitat acquisition and maintenance..." (also related to Page 2-65, Table 1-1, Preferred).

Page 2-67, Column 2, Paragraph 3. It should be specifically noted that the first sentence of this paragraph is from the final rule designating critical habitat for the northern spotted owl (final rule) and is specific to that designation.

The definition in the second sentence is misinterpreted and should be correctly attributed. This definition is used for dispersal sites, specific to habitat capable of supporting nesting and roosting, but not necessarily foraging and dispersal. The final rule goes on to state that "[spotted owl use a wider variety of forest types for foraging, but not necessarily for nesting. This definition or include the entire definition from the final rule.

Page 4-65, Table 4-100-2. Check the values in this table relative to the time at which managed forests are expected to attain suitable spotted owl habitat condition. As is, the table indicates that this condition is attained more quickly in the preferred alternative than in the deferred alternative. Review the Areas under the preferred alternative. This seems counter-intuitive given the intended purpose of the OGBAs for maintain timber production and the lower level of legacy retained during regeneration harvest.

Page 4-65, Column 1, Paragraph 4. Provide information on the quality and distribution of suitable habitat, beyond simply stating that there will be more suitable spotted owl habitat in the preferred alternative after 100 years than currently available. Replacement of meeting quality habitat with higher quality habitat is not sufficient to ensure that the habitat is suitable in the viability of spotted owl. This problem is intensified if a substantial portion of this habitat is retained, and further exacerbated by the development of connectivity areas. 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, as yet unproven assumption.

Page 4-66, Table 4-100-3. As demonstrated in this table, while the amount of habitat may increase in the long term, there is a short-term loss of suitable

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habitat extending to at least 50 years in some areas. The accompanying text should include a discussion of the effects of the short-term loss of suitable habitat in the planning area on spotted owl viability, while the long-term condition area of interest, the short-term dependent on evaluation of the conditions at the "lowest" point are critical to assessing the impact to the species. Future habitat is of little use to the species unless adequate populations survive to take advantage of the habitat. This section should include a discussion of observed medium-term effects, and the lowest point.

Page 4-64, Column 1, Paragraph 1. Given the BIA'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 structural diversity inherent in old growth, a more realistic prediction that as much as 75 percent of the OGEAs may have been impacted (reduced by 100 year increments) is more realistic than the current prediction of the network concept. The RMP should evaluate the risk of failure of the network and the potential impacts on the species of such a failure.

Page 4-61, Column 1, Paragraph 1. This section should provide an assessment of the effects of the preferred alternative on spotted owls in the Oregon Coast Range province, rather than simply highlight the importance of RM zones to spotted owls in this section.

Page 4-67, Column 1, Paragraph 2. This paragraph discusses the importance of concentrating spotted owl habitat in large blocks to promote clusters of owl pairs enough to each other to ensure adequate 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 opportunity of the OGEAs and management proposed within the OGEAs in the preferred alternative to maintain population levels sufficient to provide internal stability.

This paragraph and the following discussion mention the need for successful dispersal between these large habitat blocks. However, in the general comments, the RMP does not indicate how this critical dispersal will be maintained.

Page 4-65, Column 2, Para 1. This paragraph should provide information on old growth and its role in "retaining the structure" of the preferred alternative. In general, comments, the RMP does not indicate how this critical dispersal will be maintained.

Page 4-65, Column 2, Para 1. This paragraph should provide information on old growth and its role in "retaining the structure" of the preferred alternative. In general, comments, the RMP does not indicate how this critical dispersal will be maintained.

Page 4-65, Column 2, Para 1. This paragraph should provide information on old growth and its role in "retaining the structure" of the preferred alternative. In general, comments, the RMP does not indicate how this critical dispersal will be maintained.

In addition, the document should include a discussion on the dispersal condition on quarter-townships in the South Willamette/North Oregon Coast Range of concern for inter-provincial movements. Dispersal through this area is

critical to preventing isolation of the Oregon Coast Range province and impacts to dispersal condition in this area should be explicitly discussed.

Page 4-76, Column 1, Para 2. 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 for this statement are provided. 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 4-76, Column 1, Paragraph 4. This RMP does not appear to meet the requirements of the Forest Service EIS that the RMA would adopt a long-range plan similar to the IUC Strategy to meet the lowest risk scenario. The RMP differs from the IUC Strategy in several key areas, including management responses in suitable habitat blocks and habitat within the large reserve areas and delay of recovery of adequate dispersal condition or losses of dispersal condition in the network.

Page 4-75, Column 1, Paragraph 3-4. The document should include an evaluation of the level of risk to criticality of spotted owl populations under the preferred alternative, rather than simply qualify the risk as higher than alternative 2. Risk is critical to the determination of whether the preferred alternative is sufficient to meet the RM objectives of contributing to the recovery of the northern spotted owl.

Page 4-66, Column 1, Paragraph 3. Many of the concerns for the suitability of habitat Under Alternative C, such as the uncertainty associated with the human disturbance and the uncertainty of the success of silvicultural systems in recreating suitable habitat, also hold for the Preferred Alternative. This should be evaluated relative to the risk of failure of the RMP.

Appendix

Page 2-26, Spotted Owl. Define the meaning of the restriction of disturbance around spotted owl nest sites and activity areas. As to disturbing activities and their property, potentially disturbing activities should be eliminated between March 1 and September 30 of each year.

Page 2-33, Column 2, Amplification Criteria. The criteria should include "facilitate the recovery of threatened and endangered species" as described in section 7(a)(1) of the Act.

Page 2-126, Column 1. The RMA 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 oversees even greater weight in plan that incorporates numerous updated 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 RMP. All actions should be taken to mitigate monitoring. If monitoring is not funded, actions affecting the listed species should not proceed.

Page 2-131, Column 1. Throughout the document the Preferred Alternative is described as contributing to the recovery of the spotted owl, "using a system that maintains and enhances old growth and native forest in areas considered most important for recovery of the northern spotted owl and links those areas with lands managed to provide connectivity." The better, rationale, or evaluation for this statement should be provided. Somewhere within the document is the presentation to recovery explicitly discussed and evaluated. While dispersal of spotted owls is discussed, the connectivity links between OGEAs is not presented as a means to provide for dispersal. Given the dispersed behavior of juvenile spotted owls, corridors of even moderate quality habitat are sufficient to provide adequate dispersal, now does this document contain any suggestion that it does.

SUMMARY COMMENTS

The draft RMP and EIS collectively provide the reader with a considerable amount of information that generally describes the proposed actions and expected results. In our opinion, the level of discussion would be considerably improved if they indicated: 1) a clear description of the long-term goals 2) measurable short-term objectives and indicators for such major outcome levels, that if attained would lead to the intended future condition; 3) a detailed monitoring plan to assess the RMP's impact on the measurable objectives, including clear points and/or milestones for monitoring; 4) a detailed prescription and the need to change direction; and 5) a discussion of the funding needs to implement 1, 2, and 3 and the degree to which funding could be expected.

Further, the Service strongly supports the selected or preferred alternative (include) 1) the protection of riparian habitats on all streams. Including old and mid order streams; 2) the adequate restoration of existing old growth and interior old growth habitats to ensure the short-term maintenance of truly viable populations of old growth dependent and their dependent species and enhancement over the long-term; and 3) the use of even-aged timber management systems to support greater species diversity on the landscape.

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 selected OGEAs, provisions for dispersal between OGEAs, and the lack of a viability assessment in light of the continuing loss of habitat in the interdependent areas. The Service recommends that the RMP include a viability assessment on the management in OGEAs and thresholds for dispersal condition. Given the untreated nature of the OGEAs and the interdependent provisions, the Service recommends that a detailed and sensitive monitoring plan be developed and revised prior to implementation of the RMP.

Finally, we once again want to commend the Eugene District for recognizing the need to manage their lands for biodiversity and ecosystem viability.

and attached to right



December 15, 1992

MEMORANDUM

To: Ronald L. Burson, District Manager - Eugene District, Bureau of Land Management, Eugene, Oregon

From: Chief-branch of Engineering and Economic Analysis

Subject: Eugene 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 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 the management proposals for either resource.

Although the Eugene District did not identify mineral resources as a major issue for detailed study and assessment in the RMP/EIS, we believe that because the RMP is the guiding document for resource management within the District for the next 10 years and perhaps longer, it should contain sufficient detail on the resources, including minerals. Programs of (un)desirable mineral resource management detail in the RMP/EIS. We are unable to determine what impact an "operator's management" will have on the mineral exploration and development activities in specific environments in the RMP/EIS. Furthermore, the RMP/EIS does not provide a clear assessment of the RMP/EIS suggest that the District's management approach is treating resource development as a subordinate activity to the management of BLM's primary policy to encourage exploration and development of this resource. Possible impacts in future mining as the result of this emphasis generally towards land management need to be clearly stated.

Our review of this document revealed some concerns. Additional work is needed to refine mine data, and the reliability of the data used to generate Tables 2-8 to 2-10), 2-11), and 2-12) to 2-14). These important tables do not appear to accurately reflect the general public resource data base due to incomplete and inconsistent information.

As noted with general mineral resource potential on the map used for the base data is misleading. Although it shows the potential for oil and gas, and other mineral resources, it does not show the potential for coal. The mineral potential for what is termed the "operating area." Because of this, the map does not include the potential for coal. The potential for coal is shown in the bottom-charge mining area with recorded past mineral production of approximately 11.2 billion tons. The potential for coal is shown in the bottom-charge mining area with recorded past mineral production of approximately 11.2 billion tons. This approach gives the appearance that the management of the listed mineral resources within the overall Eugene District are few and insignificant.

We also suggest that some mineral potential areas within the operating area are not shown. Identified "Bull Mountain" is a map for the Eugene District. It is also published. On it are areas identified as "Known Mineral Deposit Areas" (KMDAs). These include areas based on known mineral deposits, mining activity,

- 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 Ruth Squigra in our Environmental Review Section at 208/553-2143.

Sincerely,

Chad Filly
 Chad Filly
 Director, Water Division

Enclosures: Review Comments
 Impact Definitions
 Riparian Policy
 Rating Outline

cc: D. Dean Bibbes, BLM State Director
 Jon Stendorf, RMP/EIS Team Leader



CONFEDERATED TRIBES OF
 COOS, LOWER UMPQUA & SIUSLAW INDIANS
 435 S. 4th • Coos Bay, OR 97423 • (503) 267-9451

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November 5, 1992

Mr. Ronald L. Kaufman
 BLM District Manager
 P.O. Box 10229
 Eugene, Oregon 97440

Dear Mr. Kaufman:

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

In addition to our position on which alternative to support, we are including sage 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 Bunnell
 Skip Bunnell
 Council Chairman
 SL/ee

RECEIVED
 NOV 17 1992
 TRIBAL COUNCIL
 CLERK

000630

BOARD OF COMMISSIONERS

DOUG ROBERTSON DOBBS WADSWORTH JOYCE MORGAN

Corvallis • Roseburg, Oregon 97470 • (503) 440-0200

December 18, 1992



Ron Kaufman
 District Manager
 Bureau of Land Management
 Eugene District Office
 P.O. Box 10229
 Eugene, OR 97440

RE: Draft Eugene District Resource Management Plan

Dear Mr. Kaufman:

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 Eugene 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

Dobbs Wadsworth
 DOBBS WADSWORTH, CLERK
Joyce Morgan
 JOYCE MORGAN, COMMISSIONER
Doyle Robertson
 DOYLE ROBERTSON, COMMISSIONER

000440

Arthur D. Case Jr.
 Mayor
 124 N. Main
 Halsey, OR 97348
 December 16, 1992

Eugene District Office
 1800 Chad Drive
 PO Box 10229
 Eugene, OR 97440

Dear Sir:

I am writing this letter to express my concern as an elected official of the City of Halsey. The BLM preferred alternative of a 50% reduction in timber sales is not acceptable to us, and if implemented will cause a severe hardship on all County and City in Oregon that depend on timber receipts. Also this decision will impact several hundred jobs at our Halsey Pulp and Paper mill. We cannot no longer afford to close our mills, by cutting back on timber harvesting below reasonable levels. Its very past time to put some common sense back into the equation of jobs, mills, and the environment. In closing I would like to thank you for this opportunity to comment, and would ask that you give our concerns full consideration because the final Resource Management Plan will directly impact the City of Halsey, and my family.

Sincerely,

Arthur D. Case Jr.
 Arthur D. Case Jr.



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000225

City of Florence
200 WEST 3RD
SHEEN, OREGON 97140
200 HIGHWAY 101 NORTH
FLORENCE, OREGON 97139

October 7, 1992

Wayno Elliot
Coast Range Area Manager
United States Department of the Interior
Bureau of Land Management
P.O. Box 10289
Eugene, OR 97440

Re: Preliminary Investigation of Proposed Third Well Field
on Federally Owned Properties West of Sutton Lake in
Hecosta Area

Dear Mr. Elliot:

The recent Water Supply Plan Update 1992, done by HGE shows that the present well field and a proposed well field 2 (north well field) should provide adequate water supply to the year 2008, or to a server population of 13,100 persons. The study shows that another water source must be developed by the time population reaches this figure. Current estimates based on population growth put this at 15 years, which is within the City's present 50-year planning period.

The most promising area for this third well field site is the BLM/Forest Service Hecosta/Sutton area.

The City asks that you carefully review the proposed nomination of this Hecosta tract as an ACEC site.

The Bureau of Land Management's Resource Management Plan shows the preferred alternative for the 220 acre tract (Hecosta Sand Dunes Tract) is as an area of Critical Environmental Concern and Outstanding Natural Area (ACEC/ODNA). This designation would preclude conveyance to the City under the authority of the Recreation and Public Purpose Act.

LARRY L. CAMPBELL

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EUGENE, OREGON

SPEAKER
HOUSE OF REPRESENTATIVES

November 11, 1992

Ron Kaufman, District Manager
Bureau of Land Management
Eugene District Office
P.O. Box 102267
Eugene, OR 97440

Dear Ron:

I have reviewed the letter forwarded to you by members of the BLM
Eugene District Advisory Committee (see enclosed) and wish to
make the following comments on the proposed plan.

Your proposed action to reduce timber harvest by approximately
50% deeply concerns me. We are losing thousands of family wage
jobs in Oregon which is adversely affecting the state's economy.
This problem must be resolved and the direction changed to place
more emphasis on good forest management techniques and, most
importantly, job opportunities.

Unless this is accomplished the people of Oregon will not be able
to afford to continue to provide the services we now enjoy.

Sincerely,

LARRY L. CAMPBELL
Speaker of the House
Oregon Legislative Assembly
House District 143

LJC/jb

cc: Mr. Dean Bibbes

STATE CAPITOL, SALEM, OREGON 97331-3247
Phone: 503/584-9779, Fax: 503/584-3201

Letter to Wayno Elliot
December 8, 1992
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While the City agrees that this is an Outstanding Natural Area and should be managed to preserve natural resources and for educational and recreational purposes, the designation as an ACEC would prohibit many of the experiences normally enjoyed in this region. Passive recreational uses (hiking, bird watching, etc.), as well as studies of the vegetative and animal species could be allowed while protecting any critical areas such as the areas where the rain most characteristic August was found. The evaluation team report notes that this tract is similar to the 30,000 acre National Dunes Recreation area. An examination of the tracts in this larger region will probably result in many more sites where Sensituous Areas are found to grow.

The City's present 80-acre well field is similar to the BLM site and is made up of dunes, wetlands, creek and associated vegetation. It is managed as a passive-use recreational area and is used for educational field trips by local schools. The wells are housed in small unobtrusive 6x7' shelters that do not detract from the natural setting. DRVs are prohibited from using this area, but hiking is encouraged. If allowed by agreement with BLM, the Hecosta Tract could be managed in a similar manner.

Sincerely,

Wayno Elliot
Wayno Elliot, Mayor
Florence City Council

L.Greer

cc: Peter DeFazio
Mark Hatfield

ASSOCIATION OF O & C COUNTIES 001064



OWAS ASSOCIATION, INC.
1000 N. 10TH ST., SUITE 100
EUGENE, OREGON 97401
PHONE: 325-2222

OWAS ASSOCIATION, INC.
1000 N. 10TH ST., SUITE 100
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OWAS ASSOCIATION, INC.
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EUGENE, OREGON 97401
PHONE: 325-2222

December 16, 1992

Mr. Ronald L. Kaufman, District Manager
Bureau of Land Management
Eugene District Office
P.O. Box 10226
Eugene, OR 97440

Dear Mr. Kaufman:

We welcome this opportunity to provide written comments on the
Draft Resource Management Plan and its
Statement (DRMP/SIS) for the Eugene 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 Harvested 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 constant 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



R. L. Kaufman, District Manager
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or inconsistency between FPLMA and the DAC 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 forgo 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 management of timber production. This money was invested in the counties with the expectation that they would create 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, been a dominant force in the bargain, too. The result is that a highly productive, well-located forest has evolved that is second to none in the world. It has been estimated by the BLM that there are approximately 20 billion board feet of merchantable timber on these lands in 1997. The latest inventory stands at 14.7 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 DAC Act

Recent judicial opinions have affirmed that the DAC lands are reserved for purposes different from other federal lands. Other federal lands are typically managed to accomplish national objectives. The DAC 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 v. BLM. In that case, the Ninth Circuit stated: "...Moreover does the legislative history of the DAC lands suggest that wildlife habitat conservation and conservation of growth forms is a goal on a par with timber production, or indeed that it is a goal of the DAC 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..." Oldman v. BLM.

"This ruling was consistent with the prior statement of the Court that "It is BLM's duty to manage the DAC Sustained Yield Act...which provided that most of the DAC lands would be reforested

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Eugene District Office
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and the ripple effect throughout these timber communities will be devastating. In addition, the revenue 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 DAC harvests, those governments will have fewer funds available to meet the needs. This severe problem would coincide with rising demands for the recent property tax limitation provisions of the Oregon constitution, which limits the ability of local government to raise revenues to replace lost DAC monies or other decreasing monies. (This results from the fact that many DAC counties receive very small portions of the 110 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 have conducted an analysis of the social impacts of timber harvest reductions in the DAC counties with Dr. Robert Lee of the University of Washington. (See, L. G. P. Summers, B. Siras, C. Nelson and J. Sieniek, Social Impacts of Alternative Timber Harvest Reductions in the DAC 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. This stress-related weakness can produce symptoms resembling the "delayed stress syndrome" from which some of our veterans suffer. When coupled with stress originating from the blighting of loggers and other wood products workers, the 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 receive 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 AQO as proposed in the Preferred Alternative. The facts concerning the impact of the proposed cuts are discussed more fully in a memorandum filed with the Endangered Species Committee (ESC) on February 18, 1992, titled "DAC Counties Economic Committee Report: Reemployment Recovery Study BLM," and the Forest-Bearing Memorandum in Report of the Oregon Recovery BLM, Affidavits and exhibits in the record of the ESC hearings

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be managed for sustained yield timber production." Stoko vs. ANRUC.

In 1985, the Solicitor of the Department of the Interior rendered an opinion dealing with the DAC 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 owl must be measured against the dominant use of timber production.

...mainly, on lands subject to site provisions, the 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 DAC 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 is established producing timber on a sustained basis in DAC timberlands, the Act will preclude the application to that reality. As the DAC Act instructs on revealed or recovered reedy classified as timberlands in western Oregon, timber production is dominant." [Emphasis added.]

The Association is concerned that the BSEP/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 DAC lands over the years, except for a listing in Appendix "A," the document all but ignores the DAC 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 DAC lands on a par with the Preferred Alternative (PA) in the BSEP/EIS. Many of Oregon's communities will be denied the allowable stable quantity (ASQ) on the DAC lands in your district as proposed in the Preferred Alternative. Thousands of individuals will be thrown out of work

R. L. Kaufman, District Manager
Eugene District Office
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substantiate the points raised in these comments. The BLM is already in possession of these supporting materials.

If 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 amount is needed 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 20 years, has received 12th grade education. Thirteen percent of those who entered such programs are high school dropouts. The average age of those who enter such programs is 40. 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 was stated, "Dislocated workers are already being absorbed into the job market in 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 \$2.08 per hour reduction. In Douglas County, the average is a \$3.90 per hour reduction. In Coos County, the average reduction for those lucky few who make it into and out of retraining is \$4.54 per hour.

The costs of retraining are substantial. The most obvious costs are the direct retraining costs. These range from \$3,590 to \$5,449 per worker trained. Other costs include PERC grants, which run from a few hundred dollars to \$2,500 per worker trained, and unemployment benefits which normally are \$2.00 per week for anywhere from 10 weeks to 35 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 1997.

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 retrained, the job placement rate may decline in the future.

R. L. Kaufman, District Manager
Eugene District Office
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- Any increase in unemployment will be set 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 2. This would continue the current land use allocations coupled with the advantage of an updated timber inventory. We urge you to give Alternative 2 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 2, 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 poses 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 by the management framework. This would depend on the statutory requirement for community stability and that deviations from such harvest levels would 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 recognize the 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 current framework. This would depend in large part on whether harvest levels under the Preferred Alternative could be set at levels that would ensure compliance with the harvest levels required by the 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.

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MSAs be re-examined. As we understand the guidance, the only timber harvest permitted within MSAs is harvest of trees in support of resources other than timber and for limited crossings of MSAs for logging roads and yarding. In other words, acreage within MSAs is not included in the base acreage used to compute the ASQ, and a programmed timber harvest will not be taken from MSAs. 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. The riparian management areas of varying width. While full sustained yield production is not possible under the stream bank protection standards, if permitted, if silvicultural systems applicable to the Old Growth Emphasis Areas (OGEA) and/or Connectivity Areas (CA) were applied to the MSAs, we estimate that the ASQ could be increased by an estimated 4.5 WMF. 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 OGEA and CA 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 applied to the MSAs, then certainly the concepts are also appropriate for management of MSAs, 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 MSAs 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 4 guidance for MSAs were substituted for Preferred Alternative guidance to allow a reduction in acreage allocated to MSAs, and if such guidance were also amended to permit a programmed timber harvest from such areas, changes should result in an aggregate increase in the ASQ of an estimated 13.2 WMF.

Minimum Harvest Age (MHA)

The concept of minimum harvest age was adopted 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 DOWP/ES, it appears that the MHA was set at the 90-year age class. However, a scenario was developed that shows that the increase in ASQ could be realized if the MHA constraint were relaxed. This increase amounts to 1.6 WMF. The data in the DOWP/ES does not

R. L. Kaufman, District Manager
Eugene District Office
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Opportunities to Increase Allowable Sale Quantity

Based upon our review of the information set forth in the DOWP/ES, 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 timber harvest within the planning guidance through 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 projected 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 increases in ASQ, can be accomplished by revising 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 MSAs and thereby segregated from acreage available for programmed timber harvest on a sustained yield basis. This large acreage dedicated to riparian area protection more than doubles the acreage allocated for similar purposes under the current plan. According to the DOWP/ES, all alternatives meet the minimum legal requirements for riparian protection. However, as few as 10,530 acres of MSAs as designated in Alternative 4 meet legal mandates. This being the case, it appears that the allocation of 29,100 acres to MSAs, as proposed in the Preferred Alternative, amounts to significant overprotection of one resource to the detriment of another. A more reasonable and balanced approach would be to substitute Alternative 4 guidance for Preferred Alternative guidance with regard to RMA allocations. If Alternative 4 guidance were used, some 11,905 acres of forest land could be restored to the sustained yield timber production base. According to the analysis, such a change would increase the current level of riparian protection, the ASQ could be increased by 4.4 WMF by this action. We thus recommend that the State Director that Alternative 4 guidance for MSAs be adopted for the proposed Resource Management Plan (RMP).

We have also suggested to the State Director that guidance with respect to programmed timber harvest activities within the

R. L. Kaufman, District Manager
Eugene District Office
12/16/92
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indicate to what age the MHA would drop if unconstrained. If relaxing the constraints on MHA would require regeneration harvest of timber less than 60 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 revised to include one of the MHA options described above. Such a change could add upwards of 12.6 WMF to the ASQ and bring the ASQ closer to the minimum ASQ required for timber dependent communities and industries in the Eugene 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 81 percent of forest lands were dedicated to intensive timber management the Preferred Alternative for the 1990's dedicates only 29 percent of the forested acres to intensive timber management. This represents a reduction indeed! The current ASQ for the Eugene District is 233.0 WMF; the ASQ proposed by the PA is 111.9 WMF, a 51 percent reduction! Add to this scenario the reduction in timber output from the national forests in western Oregon as faced with a diesel 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 level projected for the future. We note that paragraph 3 of the March 15, 1983, O&C Forest Management Plan states that the ASQ, as follows, for departure from the nondeclining harvest level:

3. The allowable cut determination shall be based on nondeclining harvest level over time. Departures from nondeclining harvest level may be determined in any direction. Any increase shall not exceed the long-term

R. L. Kaufman, District Manager
Eugene District Office
12/16/92
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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 monoculture level, but suggest that a 10.0 RMP increase might be a reasonable estimate based on a departure of ten percent. We note that the original Forest Management Director Guidance required a sensitivity analysis for departure from the monoculture harvest level for the Preferred Alternative. However, this requirement was apparently dropped because the DMP/EIS does not indicate that such an analysis was undertaken. It should be carried out at a 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 monoculture harvest level in order to add to the ASQ and contribute to community stability.

Updating Timber Inventory

The DMP/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, 1989, 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 DMP/EIS. This 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. T. 1993. Also, we wish to point out that for the past five years timber sales 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 DMP/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.

P.O. Box 10913
Eugene, OR 97440

November 5, 1992

Ron Kaufman
District Manager
Bureau of Land Management
2890 Chad Drive
Eugene, OR 97401

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HAND DELIVERED

Dear Ron:

I have reviewed the Eugene District Resource Management Plan documents and attended the meetings at which it was presented and deliberated. I understand that it is now up to the Advisory Council to make our recommendations, and to that end I am stating my comments as part of our attempt to reach consensus.

I have four concerns about the content of the RMP:

1. In order to justify the level of management called for in the Plan, it is necessary to also accept the premise that old-growth characteristics can be induced in over-aged stands by intensive management practices, as a replacement for naturally occurring fire patterns. Yet despite that volume of research being carried out by the Bureau, the Forest Service, and the universities, the Plan does not cite any literature to support this contention.

As a researcher, I find this omission troubling and believe that the Plan should include a call for such studies to be conducted as early as possible and for caution and care in implementing these practices until supporting results are published.

2. In implementing the commitment to biodiversity expressed in the Plan, I would like to see stronger language in regards to replanting with a wide variety of native species without regard to their economic value.

3. I need to receive more substantial justification in order to support setting the ASQ figure at roughly half the current rate unless. The process of calculating this amount seems to have taken place on a parallel track from, and at cross purposes to, formulation

R. L. Kaufman, District Manager
Eugene District Office
12/16/92
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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 PA with regard to riparian area protection, minimum harvest age, departure from the monoculture harvest level, and updating the timber inventory to October 1, 1993, could add at least an estimated 35.8 RMP 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 DMP/EIS

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

We are grateful for the opportunity to comment on these critical and important issues. The future of such 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 McElroy
Rocky McElroy
President

Attachment

of the remainder of the Preferred Alternative. This suggests to me that the RMP would function even better in furthering its stated goal of biodiversity if the ASQ were set lower.

4. Finally, I would like to see the Plan, the District, and the Council itself, all make a stronger commitment to a program of public education to better inform the populace, who may not even adequately appreciate the difference between BLM, USFS, and private lands and forestry practices, of what our objectives are and what we are up to.

I do wish to commend the District for the excellent job you have done in assembling the RMP. You have obviously seen aided by staff work and planning tools of the highest quality. I am very much in favor of the process of reevaluation which clearly has guided the Bureau in development of the Preferred Alternative.

I know that it takes courage to make changes in attitudes and behavior which have been held for a long time, and that when made those changes often do not have short-term payoffs. I believe therefore, in taking a long-term approach in my own evaluation of the RMP. I have been trying to picture the likely consequences of the Plan beyond its intended lifetime, and I believe that it is the beginning of a new approach by the BLM which will work well in the long run.

If the new form of management being put forward does succeed in increasing rather than decreasing old-growth forests over time, it will prove to be a powerful force in building the economic value -- as defined not only by timber production but also water, air, wildlife, and recreational resources -- of the lands over which we are charged with stewardship. This should be our highest goal!

The concerns I have expressed are short-term in nature. I believe they are critical to gaining the public understanding and acceptance which are vital to its implementation. If they are addressed in our final deliberations I will be able to recommend approval of the RMP.

I ask that this letter as well as my previous correspondence be made part of the public record on this matter. Thanks again for the good work.

Cordially,



Brian Bauske
Eugene District Advisory Council

BB/mw

000098

5 November 1992

Doug Harrington
BLM - Eugene District
P.O. Box 10266
Eugene, OR 97440

Dear Doug:

Although I did not have time to analyze even one half of the proposed plan/EIS, I gave it many hours, and tried to focus on the topics I felt most familiar with. I recognize the attempts of the agency to redirect itself to a more balanced approach, and offer my strong support for the sincere attempts made at this new direction. I offer the following comments as suggestions where more improvements can be made towards a more cooperative ecosystem management approach. I apologize in advance for relating sections containing some of the information I was looking for. It is quite a complex document. (For some reason - perhaps because it is organized differently - I find the Willamette National Forest Plan and EIS much easier to use, even though it is a much larger document.)

GENERAL COMMENTS

Nearly one half of all foothills of the Cascades and Coast ranges rimming the southern Willamette Valley are in public ownership -- managed by the BLM's Eugene District. This is by far the largest public ownership in the region, and therefore, the opportunity is the greatest for protecting the integrity of some of the region's natural ecosystems. Although most "natural" areas in the southern Willamette Valley have been heavily altered by development, logging and timber management, hunting, grazing, and agriculture, a significant portion of the BLM ownership is in good enough condition that it can recover through sensitive management or by being left alone. Leaving an area alone is one of the most difficult management strategies for land managers and agencies to utilize. In the past, all land was managed to maximize commodity production. Now nearly all land is being managed for multiple use. Although this is still a desirable strategy for most of the District's lands, a significant amount of it (perhaps equal to the general timber harvest allocation area) should be set aside as places where natural ecosystems can function naturally, as undisturbed habitat for plants, animals, and other flora, and as pools for preserving genetic diversity. Candidate areas for these preserves should be remaining islands of old-growth and other undisturbed habitats, areas where large contiguous blocks of public ownership exist, and connecting areas between them.

The philosophical framework of the plan outlined in the "Preferred Alternative" pamphlet is more forward-looking than previous approaches -- which is good. The five "Conceptual Framework" points in the pamphlet are excellent in their recognition of balance, and in the importance of BLM's role in stewardship and promoting diversity. More stress needs to be

given to allowing and assisting in the recovery of heavily altered natural ecosystems. Also, more recognition needs to be given to the other habitat types besides old growth conifer forests that occur in the region (e.g., oak savanna, scrub-shrub wetlands, forested wetlands, meadows, etc.)

Another tremendous opportunity that exists in this new approach which needs to be brought out more in the Plan is the potential for creation of new employment:

- in the management, harvest, and processing of special forest products;
- through the implementation of habitat restoration programs;
- by utilizing manual labor for control of brush in newly-planted areas; and
- by utilizing manual labor for control of noxious weeds in all areas.

The final point in the pamphlet that implementation should be linked with research and monitoring is critically important, but not sufficiently addressed in the Plan.

SPECIFIC COMMENTS**Water Quality and Riparian Zones**

No mention is made of inventorying wetlands prior to timber harvesting or other activities, or protecting them during the activity. Consider moving the specific information on this topic from the appendix into the text.

Timber

Timber site planning should occur on a landscape or drainage basin (watershed) scale. The option of planning them on an individual basis should be deleted from the Plan.

Lands dominated by grass, shrubs, or hardwood stands should not be converted to conifer stands -- within timber allocations, or elsewhere. This practice conflicts with the overall goal of increasing biodiversity. Plant communities dominated by non-natives, however, should be converted to ones dominated by natives (not necessarily forested).

Routings of old roads should be alternated with rotations of conifers on lands allocated for timber production to replenish soil nitrogen content.

Numbers of trees retained after harvesting in OGEA's seem low and randomly selected. According to my understanding, they are below the recognized "defoliation" of old growth developed, tested and used by the USFS for the Oregon Cascades and Coast Range.

Special forest products are a separate commodity option, and should not be lumped under the "timber" heading. The harvest of special forest products, however, should be targeted in areas where disturbance is planned (timber harvest areas, road construction, etc.) and not permitted

in special habitat areas. Monitoring of populations, removal effects and amounts should be funded through a commercial user fee system.

Special Status Species Habitat

The concept of "Special Status Species" is too limited, as it addresses principally those species which have current or proposed listing areas under the Endangered Species Act. Many sensitive species have no assigned status at present, but will be proposed for listing if they are not managed now. Waiting until a species becomes endangered before managing for it is a critical mistake, as evidenced in the present situation with the northern spotted owl. Much more attention needs to be given to restoration of habitats of not only listed species and those proposed for listing, but all others which are on the most current ONHP list. The ONHP list is a tremendous resource that should be used for identifying habitats of species that have potential to become threatened or endangered. Standards addressing the protection of the ONHP-listed 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 to habitats and entire ecosystems.

For reasons useless to me, the location of most of the significant language addressing plants and wildlife is in the Appendix. It should be moved into the body of the text.

Instead of directing systematic inventories of sensitive species "as funding permits," the plan should state that "funding will be aggressively pursued" for this purpose.

Wildlife Habitat

This section needs an introduction to set a framework for more specific actions. This introduction is missing, and the section only addresses some specific topics. The introduction should present an explanation of the interconnection of animal, plant, fungi, and other life forms, soil, and air in every ecosystem, how our knowledge of these interconnections is relatively new and incomplete, and how diversity should be retained, or enhanced where it has been reduced. A category should be created entitled "Special or Unique Habitats," which should include strategies for restoring and recovering vantage habitats (e.g., oak savanna, and upland and wetland grasses). An increase in these habitats will achieve an increase in biodiversity and provide habitat for many of the species on the ONHP list.

As with timber management, wildlife management has tended to focus on commodities in this case, deer and elk. Populations of both of these species are at such high levels that damage is occurring in fragile areas, particularly where small islands of natural ecosystem remain, and surrounding easy water sources. Natural predators (e.g., cougar) should be encouraged to re-establish themselves by eliminating trophy hunting and by other means, to allow restoration of natural population and food chain cycles. Efforts to boost deer and elk populations should be dropped to allow a natural balance to restore itself, which will still accommodate hunting.

An unfortunate side effect of managing for such artificially high numbers of deer and elk is that their visibility gives a false impression to the public that wildlife is abundant. In fact, it is just the deer and elk that are abundant.

While management of these overemphasized species should be downplayed, management of all other wildlife species should be emphasized. A good approach could be had in adopting the ONSRP list to use as a guide for identifying the special and unique habitats necessary for species whose numbers are faltering.

Small species are just as important as large ones from an ecological perspective. Much more attention needs to be given to the smaller overabundant and other small animals.

According to the people who have done the most research in stream, little information is known about low elevation old growth forests. This limitation needs to be acknowledged in the Plan. A conservative approach should be followed, which ought to include the "ecosystem stability reserve" concept. This would allow some old growth areas to become "super" old growth, and achieve a much greater species diversity. OGRAs will be harvested between 200 and 300 years of age, which is well below the time maximum species diversity of mammals and plants is reached.

It is both a tragedy and an embarrassment to all of us that there are no remaining runs of native anadromous fish on any stream in the District (Dr. Armstrong, last meeting). Re-establishment of self-perpetuating runs using the closest available source of native stock should be attempted, and management activities negatively affecting such efforts should be changed or dropped.

The 200' buffering proposal around special habitats is commendable.

Special Areas

Roads within ACEC's should be closed. An obvious problem exists in allowing ORV's to use these roads. "ORV" means off-road vehicle, and they are frequently used for that purpose. Allowing their use on roads within ACEC's would allow for easy access off the roads.

Curiously, all four of the candidate ACEC's that were examined and dropped from consideration are now proposed for timber harvest. Perhaps they are not of critical concern, but since they were candidates, at least a portion of them must have very significant environmental values that should be preserved in a land use allocation other than timber harvest.

Noxious Weed Control

Noxious weeds cause extensive destruction of native plant communities and wildlife which depend on them. The best way to deal with noxious weeds is to minimize activities that encourage their establishment. This includes minimization of:

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Table of Contents

Put the Table of Contents in the front, where it is easily found. Check it for errors: the Chapter 1 heading doesn't list the contents of Chapter 1 - it lists the table therein and the contents of the first section of the Appendix - not a part of Chapter 1, nor even a part of Volume 1. Chapter 2 is followed by the heading "Table of Contents" rather than the actual heading of "Description of Alternatives."

Costs

An economic analysis of the plan should be undertaken, but only if all of the costs which are traditionally excluded are included. For example, timber harvest costs should include all materials, labor, and in-kind costs associated with:

- harvesting, including: road building, repair, maintenance, and closure/restoration; site preparation and monitoring; site cleanup and restoration;
- establishment of a new tree crop, including: all costs associated with nurseries, costs of planting and herbicides for use in combating brush and invasive weeds, fertilizers, thinning, boomers and deer control, etc. and
- mitigation for environmental impacts, such as: stream restoration and fish re-establishment programs; inventories, assessments, planning, and management costs for plant and wildlife species becoming rare from habitat disturbance; and control of invasive plants introduced from the harvesting disturbance or because of the presence of a road.

When all of these costs are considered, the economics of many timber sales would be classified as marginal. Much of the money spent on subsidizing marginal timber harvest activities could be redirected to creating employment in programs that have much lower environmental impact, and can improve environmental quality.

Thank you for wading through all of these comments!

Conditally,

Bob Zie

Bruce Newhouse, AICP

- planting of non-native species for erosion control and deer/elk forage;
- activities which disturb soil or vegetation, such as timber harvesting, road building and herbicide application, which often give non-natives a foothold over natives; and
- grazing, which tramples soil and native vegetation, and results in weed introduction from outside flocks.

The IPM approach mentioned in the plan is headed in the right direction, however, the use of herbicides in this system should be minimized. Herbicide use should be minimized or eliminated because:

- it often promotes invasion of non-native plant species;
- certain herbicides may be damaging to wildlife and soil resources;
- it is destructive to the environment in the extraction of raw materials; and
- it is energy intensive and dangerous in its manufacture and transportation.

Manual control and biological control methods should be the focus of the IPM. Manual control can create destructive employment. Some assistance with manual control can be obtained at no charge from local Native Plant Society, Audubon, and hiking club chapters.

A rigid monitoring program should be instigated to identify noxious weeds before they become a problem. This should be coordinated with the ODA as they are active statewide in monitoring and controlling noxious weeds in concert with many other agencies.

Fire

Kudos to the author of this section. It contains a thorough and balanced approach, and recognizes the many positive benefits of fire.

MISCELLANEOUS

Definitions

A definition of "climax vegetation" needs to be added or woven in with the definition of "old growth."

Appendices

Volume II should be labelled "Appendices to ..." on the front cover. References in the text of the Plan/FEIS specify subsections of the appendices which are not labelled on each page. For example, a reference to Appendix B sends on thumbing through looking for a "B" following the "2" on every page. Only there is no "B" - just page numbers. The Appendix B label is only on the first page of Appendix B and is very difficult to find.

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RECEIVED
BUREAU OF LAND MANAGEMENT
MAY 18 10 48 AM '92
EUGENE DISTRICT OFFICE
EUGENE, OREGON

November 9, 1992

Mr. Ron Kaufman, District Manager
Bureau of Land Management
Eugene District Office
P.O. Box 12255
Eugene, OR 97440

Dear Ron:

The four members of the Eugene District Advisory Council who are signatories of this letter sat and reviewed the situation with reference to the Eugene District Resource Management Plan. The view that we share regarding the entire planning process is that it was a political exercise. Politics have taken priority over scientific and good forestry principles. We understand the present day reasons for the agency to take this approach. We believe that this process has been the vehicle used to develop a Plan that the BLM considers to be the best possible acceptable one for the State of Oregon and the Eugene District given the current political climate. This assessment is probably on target. However, having said this, we make the following comments for your present and future guidance.

Initially, we are concerned that the plan does not appear to meet the legal requirements of the O & C Act as to the purposes of the Act for a sustainable timber harvest program to adequately meet the economic needs of the local communities and dependent industry as well as the needs of the county, state, and country.

More important to this in the near short term is the fact that there has been no attempt in the plan to have an orderly transition period between the present and the future Plans proposed here. A phasing in of the new Plan is necessary to allow the communities and individuals to adjust to the severe economic and social impacts brought about by the drastic changes between the two Plans. Certainly given the long time span for timber harvest set forth in the proposed Plan, a five to seven year transition period for people and communities to adjust is a reasonable request and should be given strong consideration.

The Management Plan is based on certain assumptions of the future plans of adjacent owners of private land. We believe greater effort should be made to stratify the age classes and types, as

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well as management options within the BLM ownership, and not remove activities or private ownerships as the basis for the Plan. This present policy forces the BLM Plan to react entirely to the actions of the adjacent landowners. To satisfy this aspect of the Plan would give greater flexibility and yield greater returns to the citizens of Lane County. In addition, CFR 90.11, specifically states that the O & C lands shall be treated as a single unit for the purposes of applying sustained yield.

Other opportunities that we see to yield a greater sustainable harvest of timber under the proposed Plan while protecting the environment include 1) increased timber management in the riparian zones, 2) increased harvest in the old growth emphasis areas while still accomplishing the long range yield growth stream characteristics, and 3) reducing the habitat areas to a smaller acreage, which would still provide an adequate area to protect the Northern Spotted Owl.

We are concerned that all the environmental factors have not been adequately considered or assured. The shortage of raw materials created by the recent changes in federal timber management policies throughout the Western United States is continuing to create a crisis in wood supplies to the local, national, and world markets. Throughout the country, the alternatives to the use of the timber being further restricted include other timber sources and substitute building materials, etc. which are all more demanding and stressful on the environment than timber from the highly productive RM lands; thus, in our view, this Plan creates a net loss to the protection of environmental quality in the country and the world.

After the discussions at the last Advisory Meeting, we conclude that the logging requirements will be more complex and a result more costly. This will in turn be reflected in further reduced revenues to the counties. More important, however, we see a greater safety risk to the individual loggers who will be required to accomplish their work in an environment with greater hazards.

A log expert has been suggested as a solution to the problem of timber supply. Oregon log exports since 1980 have declined and they are much less than the proposed drop in the BLM timber sale program required by the new Plan. Exports for the state of Oregon have declined almost 40 percent during this period of time, and in southern Oregon, our area of concern, it is over 50 percent. The trend in log exports is down, and hence the small log sale program is not an answer to the problem of timber dependent communities, even if it could be legally accomplished.

The new plan as set forth is going to have a severe impact on the budget of Lane County. Lane County in recent years has received between 10 to 15 million dollars annually from BLM lands and a combined revenue from O&B and BLM lands of 10 to 20 million dollars. This revenue is being significantly reduced. We recognize that some of today's catastrophic reductions are due to

litigation, but given the current planning process, we find ourselves absorbing a minimum loss in timber volume equivalent to a half of one year's historical harvest. The loss is even greater when we consider the potential of the new land inventory. Along with current litigation, we have today completely lost a full year's income during the current fiscal year because of no timber sales. This represents six dollars for every resident of Lane County or 180 dollars for a family of 4. This revenue will need to be made up elsewhere if we are to provide the needed services to the communities' residents. Add the O&B loss to BLM and the cost triples.

More important is that the impact of these actions lead to an increase in the misery index for many citizens in the County:

1. The loss of jobs.
2. The destruction of the economic base in rural communities.
3. Loss in value of home and businesses or the complete loss of one or both, and often a lifetime's investment.
4. The increase in costs to the county and state needed to compensate for unemployment benefits, lack of health insurance, and a whole array of social services needed to offset the personal hardships brought about by the proposed action.

We could go on and on, but these activities also have their impact on the people's current economic needs, their health, their self-esteem, and all the benefits that flow from a healthy economy of lands were transferred from private to federal ownership.

We believe that the responsibility of the BLM goes beyond the welfare of wildlife and must include a greater concern for the welfare of the citizens as was intended when the O & C Act was promulgated.

We urge you to take a serious look at the human effects of the planning process and direct some serious effort to reducing the adverse impacts in some of the ways we have discussed here.

Respectfully submitted,

Jean Borland
Paul F. Shinger
Silbur Heath
Rex Stevenson.

RECEIVED
BUREAU OF
LAND MANAGEMENT
EUGENE, OREGON

000151

P.O. Box 10913
Eugene, OR 97440

November 5, 1992

Ron Kaufman
District Manager
Bureau of Land Management
2850 Chad Drive
Eugene, OR 97401

Dear Ron:

I am writing this letter to clarify my position in the discussions on the draft Resource Management Plan in the last meeting of our Advisory Council (on a Friday 13th).

The RMP calls for an Allowable Sales Quantity of 119 MMBF, about half of the "current" figure. In response to Jean Borland's question, I stated that in my opinion, since there will in fact have been several years of greatly reduced harvest before the Plan is implemented, it was appropriate to consider whether the cut should be accelerated in the first years of implementation.

I am sympathetic to requests by the timber industry to provide for as painless as possible a transition to the new management methods, and since supply has been virtually curtailed recently, I see how this would help timber-dependent communities and families in the short run.

However, I am not in favor of increasing the total ASQ over the life of the Plan. In fact, as I also stated, I need to receive further justification beyond Appendix 2B in order to accept the figure given, especially the component of it which represents old-growth clear-cutting, a practice which I think should cease. Therefore, if the ASQ is increased in the early years of the RMP it must be reduced correspondingly in the later years.

I understand that you and the staff will be checking to see if the ASQ calculations for the RMP have taken into account the loss to sustained yield from the several years of curtailment. If they do not already, it is OK with me to include the increment so gained in the

initial accelerated cut. However if this is done it should be only at the rate envisioned by the new Plan, not at previous levels.

I also want to make something else clear. Although I am listed as a representative for "Environmental Protection" on our roster, I am not a member of, nor do I consult with, any environmental group. What I bring to the deliberations of this group are my own views and opinions, shaped by a career in research and planning and an abiding concern for the environment. In particular therefore, my positions should not be taken as somehow representing those of the "environmental community".

I ask that this letter as well as my previous correspondence be made part of the public record on this matter.

Cordially,

Brian Bauke

Brian Bauke
Eugene District Advisory Council

BB/mw

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JAN 1 1993

Mr. Ron Kaufman, District Manager
Bureau of Land Management
Eugene District Office
P. O. Box 10226
Eugene, Oregon 97402

December 21, 1992

Dear Mr. Kaufman:

The Eugene District Advisory Council met on November 13, 1992, to prepare formal comments on the District's Draft Resource Management Plan (RMP).

Present at the meeting were Stan Sanford, Bruce Hedstrom, Brian Baska, Rex Stevens, and Paul Shinger.

Several Council members had previously prepared comments on the RMP, and these were presented for discussion. Because the Council represents a variety of interests, it was evident that there were varying opinions on numerous components within the RMP. Therefore, it was decided that the specific individual comments are submitted as part of the Council's formal comments on the Plan.

However, the Council members in attendance were able to agree on several issues and these are also presented as formal comments on the RMP.

1. The Council would like to commend the Eugene District on an excellent job of preparing the Resource Management Plan. The Plan demonstrates professional staff work, and results in a high quality document.
2. The Council supports the concept of a broad, balanced approach to the management of all resources found on BLM Lands.
3. The Council identifies the need to educate the public on BLM's land management practices. The public can benefit through a better understanding of the trade-offs associated with managing resources.
4. The Council supports several of the key components within the Plan's conceptual framework: resource use and protection of the environment can occur in harmony; stewardship is essential to long-term ecological health and social well being; and implementation should be linked with research and monitoring, and should provide flexibility for adaptation.

5. The Council recommends that the BLM begin to consider options to reduce the major economic impacts the Plan will have on the region. We recommend the BLM consider a timetable between past timber harvest levels and proposed lower future harvest levels, as necessary, to allow individuals and communities time to adjust to the drop in harvest levels as proposed in the new Plan.

On behalf of the Eugene District Advisory Council, please accept these comments, as well as those previously submitted, as our formal response on the RMP.

In addition, we would like to thank you and your staff for providing the Council with all the necessary information to analyze the Plan. We look forward to working with you in the future.

Sincerely,

Paul Shinger
Chairman

BUDGETMENTAL

-2-

BARBARA ROBERTS
GOVERNOR



000596



OFFICE OF THE GOVERNOR
STATE CAPITOL
SALMON BUILDING 97310-3070
EUGENE, OREGON 97401-3070

December 18, 1992

THE STATE OF OREGON'S FINAL COORDINATED RESPONSE

TO THE
BUREAU OF LAND MANAGEMENT'S

DRAFT RESOURCE MANAGEMENT PLANS
AND
DRAFT ENVIRONMENTAL IMPACT STATEMENTS

Mr. Ron Kaufman, District Manager
Bureau of Land Management
2890 Chad Drive, P.O. 10226
Eugene, OR 97402

Dear Ron:

Enclosed you will find the State of Oregon's Final Coordinated Response to the Eugene 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

Governor's Forest Planning Team

December 1992

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) 378-8122

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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 are 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?

2

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 Clatsop 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 billions 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 public's 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.

1

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?

3

--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 congruent 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, animal 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, Ecosystems: A Coordinated State Response To BLM's Resource Management Plans (Appendix I), 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 as 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 Revised 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 defining management constraints, management approaches, and predictions of those ecosystems responses necessary to ensure proper maintenance of sustainable systems. People must 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.

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between the preferred alternatives' ecosystem management concepts and existing laws governing the management of O&C/CSWR lands need to be clearly articulated in this 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 I). 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 engineering 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 biologic 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 baselines conditions. Plans need to identify areas of concentrated biological diversity and management (e.g., old growth forests) 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 to improve the scientific basis of ecosystem management. This has not been sufficiently addressed in the draft plans.
- e. **Ecosystems 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

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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 space, 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 based on the fact that abundance, 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 Revised Oregon and California Railroad Grant Act (O&C lands) and Open Bay Region Road (CSWR) 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/CSWR 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/CSWR 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 mandates for O&C/CSWR lands. The relationship

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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 practice 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 associated stages of forest development, stand conversion, artificial regeneration and genetic improvement, 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 management activities to achieve regional/landscape biodiversity are compatible with plans

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and activities of these agencies. BLM plans should explain in more detail how they plan to coordinate their biological diversity programs 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 ecosystems 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, Conservation 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.

3. Land Use. How can BLM better address problems encountered in managing Rural Interface Areas? How does the Federal consistency requirements of the National Coastal Zone Management Act and Oregon's Coastal Zone Management Program. How have these 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 predominantly privately owned lands used 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 owners are expected to experience increasing levels of conflict with one another over the management and use of their respective ownerships.

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Unfortunately, after review of the six draft RMPs/IEIS, 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 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 is consistent to the maximum extent practicable with the 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 action which affects 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 management policies contained in the Oregon Coastal Management Program are:

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 resource issues in the wildfire 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 19,000 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 as a single 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 allowed 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 Rosier in December 1991. (Note Appendix 3) 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 work with the State and local government in achieving significant progress on various aspects of the interface problem, including policy development, agency coordination, information exchange, and conflict resolution.

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- 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 RMP 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 the final Federal consistency determination, BLM will need to document in the final EIS 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 block). 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 in looking and land tenure maps included in the plans are difficult to interpret. We strongly recommend districts develop common criteria and codes for land tenure decisions and decisions to interject uniformity into the process.

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Second, an in-lieu land allocation settlement has occurred between the State and BLM within the last year. The State, according to the Courts, is allowed to select 9,702.79 acres of BLM Public Domain land. Our concern is the type of section 106 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 election within the requirements of the law. (Note Division of State Lands response -- Appendix 2.)

Lastly, O&C and C&C Bay Hagen Road lands that are suitable and available for timber production should not be exchanged for unsteep 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 included 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 and upland watersheds 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 the State'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 humans and 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 areas and protected 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 stream improvements should help protect the fishery resources in western Oregon. As a general rule, BLM should not substitute restoration projects for riparian-dependent resources 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 on 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 370 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 deterioration conditions of our watersheds. Many believe it is a combination of many factors, all interested, 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 or planning sites include: chinook salmon (Lower Columbia River and South Coast fall run stocks), chin salmon, coho salmon, coho outflow (the Washington-Columbia River basin stock), coho salmon (Lower Columbia River and South Coast stocks), Oregon chub, Jenny Creek sucker, redbreast trout, Lost River and shortnose 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.

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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 standards that are not currently met 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 landowner. Landowner protection is a critical component to maintaining water quality on forest lands. BLM has identified fragile sites (unsuitable 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 simply 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:

- BLM needs to make BMPs more specific to assure that water resource 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.
- 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.
- 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 (streambank stabilization, 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 where adverse effects to beneficial uses would be minimized.
- BLM should evaluate future road design, construction, and maintenance standards to ensure protection of water quality. Noted in the Oregon State University response, adequate culvert sizes (consider 25 and 30 year flood) are necessary for draining runoff. Culverts with undersized openings, poor road design and plugged culverts, can have a major impact on downstream channels, riparian areas and sensitive fisheries resources. The Oregon Forest Practice rules are currently being revised to consider larger culvert sizes on private land.

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 in Land Management Situation. BLM is encouraged to share DEQ for the results of these monitoring programs especially on streams running through BLM lands. (Note DEQ comments in Appendix 2.)

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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 streamflow, beneficial use, community watersheds, and BLM wells. However, additional information is needed to strengthen the discussion on water quantity.

The State sees the following recommendations:

- The final plans should acknowledge the limits on the availability of surface water and address surface water quality problems.
- Districts should describe watershed improvement and stream restoration activities which increase low season flow.
- District plans should address ways to conserve and reduce water consumption and soil compaction.
- BLM should expand their discussion concerning the availability of groundwater and groundwater quality problems.
- 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 J).

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 provides BLM with the opportunity to plan management activities on a much smaller, more workable,

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- BLM should display severely impaired streams identified by DOE'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.
- 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 practical approach would be to 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 23 streams.
- BLM should analyze the relationship between calculated watershed condition indices and current flow and water quality conditions. This will 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.
- Management activities should be monitored in each watershed to determine the effect on water quantity, water quality, 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. Such cooperation 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 concern. This district had deferred some 28,000 acres from harmful activities for the next ten years because of poor watershed conditions.

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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 been questioned. 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 index 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 Falls District predicts that 18 of its 27 analytical watersheds (67 percent) conditions will either decline to a "large" or "significant" degree over the short-term under the preferred alternative. According to BLM's Executive Summary, Western Oregon Draft Resource Management Plans/Reconstructions, 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., sediments 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.

- 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.
- 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.

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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 Sensitive 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 riparian management areas which affect attainment of the State goal.

BLM districts have inventoried streams within their specific administrative area. Stream sillies by order, areas 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 present in their guide is the development of 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 resources in Oregon. These include ODFW through Oregon State University, Scientific Panel on Late-Successional Forest Ecosystems Report to the House of Representatives, the Upper Conocochee River Plan, Riparian Management Guide for the Willamette National Forest, and the State of Oregon (Division of Water) and the Fish and Wildlife 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 and aquatic habitat, fish and wildlife habitat, the State takes the following recommendations:

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- 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 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 best water quality standards, supply potential large woody debris (lossing of complex wood structure in streams) and down wood (logs/snags 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, uses, acreage, impact to sensitive species, and physical characteristics within/adjacent to stream area. Critical components that should be considered when developing buffer widths include, but are not limited to, overall watershed condition, shading (water temperature), 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 50% 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,

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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 prior plans to protect knowledge through 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 Madford District and the Kinship Palisade Resource Area inventory of wetlands in 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

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 these; 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 watersources.

- d. Riparian area buffers identified on-the-ground for protection of specific riparian area resources would have non-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 elder-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.

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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 ORC and the Oregon State 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 Madford-Ashland, Kinship Palisade, Grants Pass, Eugene-Springsfield, and Oxbow.

Although prescribed burning is not a significant contributor to PM10 levels in the areas noted above, there is still a need to reduce emissions. Impacts to air quality in these areas are 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 elevate PM10 levels in these areas leading to the nonattainment designation and development of control strategies as discussed above. In addition to the federal Clean Air Act contains pollution limits known as Prevention of

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significant deterioration increases 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 that BLM maintain visibility in these Class I areas. Air quality monitoring in the Cascades has shown a 60-75 percent improvement in visibility in recent years. The Oregon Visibility Plan, developed by DQG in 1982, is largely responsible for this progress and is closely linked to the OSMF.

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 "understudy" 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 OSMF. Continued coordination and communication among Federal and state agencies in addressing these air quality concerns should be stressed.

5. 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 tourists from outside a specific BLM district.

As Oregon's and the nation's population grows, the demand also grows for tourist attractions and 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 be well 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 1983-1993 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 recreational paper (Appendix I), 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 RMP/IEIS.

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:

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

- 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 1983 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 this on this effort and recommend that the five western BLM districts incorporate this rating into their final plans.

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

3. Wilderness

Soda Mountain Wilderness study area. -- BLM completed its Record of Decision for the Oregon wilderness study areas in October, 1981. BLM's final decision permits, 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 islanded) 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 Madras Resource Area of the Madras District, it encompasses some 5,895 acres of which 3,867 acres are being proposed for wilderness.

Soda Mountain - pilot rock area is an extremely unique transition zone where coastal, high desert, Cascade 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 such 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 recently 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 the study report. A 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 SMA 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 its recreation paper (Appendix I). Some of the recommendations noted in the paper include: developing trail plans within each proposed project area, buffering, appropriate signing, routing, and implementing individualized 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 increase especially. High priority for these sites 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:

- 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.

- 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) rating; and use of economic costs and local support criterion.

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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 are probably 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:

- Aggregated values of a given stream.
- Importance of aggregated values on both a statewide and SCORP regional level.
- Importance of smaller streams to program.
- 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 ORV's regardless of river designation. In terms of visual resource management, the State recommends the following management/protection standards:

- No scheduled harvest (visual resource management I) in river corridors, under its administration, designated as wild.
- 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) II, maintain the visual quality. Likewise, where VRM II exists mainly to protect its scenic value. When VRM III exists, BLM should attempt to enhance visual quality to VRM II.
- 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.

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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, 124, 133, 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/RISs.

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 local standards and increased protection of highways for protection. Visual quality must likely 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: AKO's; SRM's; Wild and Scenic Rivers -- McKenna's and Rogue travel corridors -- Mt. Hood Corridor, Toiyabe 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:

- 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.
- 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. Application of standards of silvicultural concepts by BLM may help mitigate visual concerns.

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

- In areas where more restrictive land allocations are already in place (e.g., private land ownership, SCORP or Specific Recreation Management Areas) the more restrictive standards should apply.
- BLM should concentrate on 1/4-mile corridor along rivers in designing plans for areas with wild and scenic designation. BLM should also manage adjacent lands beyond the 1/4-mile boundary, where necessary to protect ORV.
- All values on eligible rivers should also be maintained at their current levels 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 increases 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 demands. 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.

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- 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.
- 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 proportional forecasted recreational land base for this planning period. We concur with this methodology, but urge 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 cause 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 sustained harvest? 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

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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 OGC Act and the Forest Land Policy and Management Act. These laws and their implementing regulations have been the primary focus of this report. Directly address the management of lands administered by BLM. The OGC 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 fairly even-aged management practices followed by the application of intensive management practices (e.g. burning, thinning, fertilization, thinning and control of 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/ponderosa pine on a sustained yield basis. Other species are favored depending upon the discretion of the district.

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 OGC 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 checkboard ownership pattern makes it unlikely that the objectives for management will be achieved. In order to produce the desired future timberland and riparian forest areas, nearly complete watershed-level ownership is necessary.

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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 (TPCS). GIS mapping has helped identify the various TPCS 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, Riparian 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. 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 TPCS 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 base, timber inventory, management activities and yield models. The State believes that the assumptions are not correct, one may find in the decades ahead that either the land base or the yield level is unsustainable 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 that uses yield models and used a combination of two growth and yield models (Stand Projection System (SPS) and ORGMOD) for estimating future yields from managed forest stands.

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A variety of techniques have been used to provide older age class forest. Old Growth Management Areas (OGMAs) 1/3 use 300 year rotations and density management to accelerate forest characteristics. Connective Areas (CA) are managed using 150- or 100-year rotations. Due to the number of inventory leave trees planned, we anticipate that management in the General Forest Management Area will produce characteristics similar to older stands for about 2/3 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 developed for each unit based on conditions on the ground. Variations in conventional forest management practices are also being proposed in fire-prone areas. The State commends 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, 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, activities 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 financial resources to determine if the program is successful at levels and higher production costs. BLM should evaluate the possible impacts of a timberland program and outputs (e.g., allowable sales quantity) of lower funding levels.

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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 SW (an even-aged Douglas-fir or western hemlock calibrated model), to stands where green trees will be retained.

Some of the draft plans noted that the preferred alternative included 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 they 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 OGC even though they remain in harvest 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 insects or 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 plans. The 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, setting low management strategies of the preferred alternatives will address forest health problems and what strategies will be used to be implemented to improve unhealthy forest conditions on BLM lands. We encourage BLM to work with other forest landowners to improve forest health.

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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 the draft alternatives and how it will be used in formulating the record of decision. Please review the Department of Forestry's draft responses found in Appendix 1 for more details.

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

- Due to the uncertainty in timber supply, it is reasonable to assume that stumpage prices will increase substantially more than has been projected in the BLM analysis. We encourage BLM to reevaluate the stumpage prices used in its analysis to better align them with current projections.
- Overall, analysis of the timber supply situation is more optimistic than warranted. Current 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.
- The public's sensitivity toward harvesting young stands (10-20 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 age on all lands managed by BLM.
- 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 response to forest needs 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

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The reason given for these marginal conditions is past forest management practices on BLM and adjacent private lands. Under their preferred alternative, BLM districts are predicting no change in the short term for cover conditions. Cover conditions would improve in the long-term in the OSGAs 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 NE and herd number objectives. BLM should work with ODF 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 riparian 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. Use may, in particular, be wanting 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:

- The final RMPs should address how BLM proposes to improve marginal forage conditions and to meet NE and herd number objectives. BLM should work with ODF on meeting these management objectives.
- Expand, where feasible, the forage seeding program to benefit big game. BLM should increase its effort to search out and/or create native grass and legume seed sources for forage seedings on public lands species.
- BLM should fund forage seeding through timber sale receipts.
- 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 extending 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 available to big game in western Oregon. Open roads allow easy access to big game herds

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

- 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.
- The Bureau appears to have used a harvest flow constraint 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 "disrupture alternative" in its final plan.

6. Wildlife Management - How should BLM districts manage for big game? What game 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 preservation to the public in the form of hunting and viewing opportunities. The Great 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 attractiveness (HI) for big game in areas with low HI indices.

a. Cover

Cover is one of the critical components that needs to be available on BLM lands if management objectives (i.e., NE 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.

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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-Dumped 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. How long does 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 RMs 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-dumped wood. Where feasible, BLM should provide downed logs greater than 14" diameter at a minimum rate of 2/acre. BLM should include the retention of targeted dead-and-dumped 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 so it was determined that declining habitat conditions were leading to possible extinction. Current 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.

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A Recovery Team was appointed by Secretary of the Interior Jaym 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 owl 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 ecosystem 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 forest types and riparian areas 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 natural old growth stand conditions. The concepts revolve around creating Old Growth Riparian Areas (OGRA) and Connectivity Areas (CA) and Klamath Falls Resource Area's Protected Riparian Areas (PRAs) scattered throughout the districts.

BLM's Salem District has identified three classes of OGRA and the types of CAs in an effort to maintain/create older forest structure. The preferred alternative strategy for OGRA (Westwood block) is willing for more intensive management than in CAs. In blocks, due to the current stand structure existing in the Westwood 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 unrealistic 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 OGRA 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

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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.

II. 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 well 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 use concerns 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.

NM districts are proposing several different techniques to maintain/produce older-aged forests. OGRA's 1/6 use a 300 year rotation and density management to regenerate older forest types. CAs are managed with 150 or 200-year rotations. Klamath Falls Resource Area's preferred alternative calls for a system of riparian habitat allocation where each surrounded by a 1/4 mile buffer to maintain old growth in the western portion of the old growth trees. Westwood trees (4-26 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 nonforested oak and CA.

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, 325,000 acres of old growth would be remaining after 10 years; 475,000 acres after 100

years, current fragmentation of habitat within the corridors, the effect of timber harvest on current and future habitat mosaic including anticipated patch size, land ownership patterns, 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 in the Final Recovery Plan for the Northern Spotted Owl, due to be released in 1993. BLM's approach was previously reviewed by the US 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, OPW is specifically concerned about the bald eagle nesting area in the Westwood block which has apparently received no special protection in the Salem draft. BLM would ask BLM to contact OPW 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 independent analysis of the efficacy 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 current inventories and take interim measures to protect suitable habitat.

d. Other Sensitive Wildlife Species

Additional concerns have been expressed by OPW 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 impact of timber harvesting on these species may be severe, but applies to other allocations as well. The final RMA need to provide clear direction for site-

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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 producing 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 productive 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 examples of ecologically significant older forest stands. These stands should represent PMW 4/7 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 refuge 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 can retain biologically significant old growth stands while still producing economic opportunities. Conceptually, Alternative 1'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 maintain/produce old growth characteristics and riparian areas?

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

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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 96 grazing allotments (81 permits/leases) producing 13,869 Animal Unit Months (AUMs) of forage annually. An additional 9,046 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 38 percent on the west side. In total, this represents some 47 percent of the allotted AUMs.

Klamath Falls' draft preferred alternative proposes that 13,185 AUMs per year be available which represents a decline of 3 percent from the current level. Justification for the decrease is based upon a need to develop upland water developments, improve 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 the core team (if) be able to identify and 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 management plans. Without allotment management plans and monitoring, despite the use of the core team the Klamath Falls Resource Area is trying to protect or maintain could continue unchecked.

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6. 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 as 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 field 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 with a protection.

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 leaseable 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 geophysical region. BLM administrators both mineral estate and split estate lands are to mitigate conflicts.

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 acreage 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 RMP/EISs:

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Furthermore, the Klamath plan permits annual grazing in riparian areas with currently less than good conditions. BLM should allow grazing in such degraded areas except under strictly controlled management. If BLM cannot implement 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-necked 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.

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1. Each one of the final plans (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 consideration of current environmental protection and recreation 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 plan have on socio-economic stability in the Klamath Area and statewide?

The long-term socio-economic goals of Oregon's state government and its people are spelled out in Strategic Planning: A Guide to diversify its economy, particularly in nonmetropolitan areas. The state has specified in the draft RMA that BLM actions are not inconsistent with this goal. However, without a coordinated policy response to the impacts of the proposed timber harvest reduction (the State's highest priority strategic planning goal (Key and Lead Benchmarks) in two major areas are put at substantial risk.

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- 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.
- 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 and economic change which 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 revenues 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 gained 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 50 percent of its revenue from BLM and Forest Service timber receipts. In Josephine County, 16 percent and Coos County, 14 percent. In Josephine County, Oregon Counties received some \$10 million from timber receipts from O&C lands. The five-year average (1983-1988) of O&C payments to counties was \$63 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 (climbing, 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.

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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 Economist - 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. Retaining programs sponsored by the State and federal governments will play a major part in the 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 have strengthened their analysis and discussions in the final RMPs/EIS to include a better analysis of district economic base and the impact on this base of the alternative timber and timber worker skills and employment 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.

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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: Socio-economic Issues and Bureau of Land Management Planning transmitted to BLM from Governor Roberts in May 1989. (Note Appendix 1) This paper describes the economic and social analysis the State would like to see presented in each BLM plan. Appendix 1 (Economic 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 use of BLM in calculating direct timber and timber management jobs. To strengthen this analysis, we recommend the following additions and further evaluations:

- Simple economic base analysis showing export base for counties in each district.
- Demographic and occupational profiles for communities likely to be impacted.
- Occupational profile of displaced workers.
- Reevaluate (using a consistent set of models) the impacts to total employment of harvest reductions.
- 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 plan should estimate the preferred alternatives impact on community stability based on the structure, occupational mix and demographics of communities.

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1. Road Management - BLM should BLM districts/resource area manage their road networks to promote compatibility with resource users.

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 2) We trust that BLM will consider recommendations presented in this paper when developing its final RMP/EIS.

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., recreation, 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 dense road networks have on the landscape. 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 delta 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.

- The State recommends that BLM continue to aggressively pursue funding for its road management program.
- The State recommends that a comprehensive road management plan be completed within the framework of the RMP/EIS or shortly after approval of their RMP. (Note road management paper for suggested content of management plan.)
- 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

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with high road densities (i.e., greater than 4 miles/square mile); veterans with high off-road vehicle use resulting in unacceptable environmental damage; and sensitive wildlife areas. (Once 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.

N. 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 for 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

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through close coordination with the Tribes, set to inventory, evaluate, and protect sites of cultural, religious, and historic value as required by federal laws. As additional sites are located, BLM should allow its plans in order to protect them, while leaving 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 require 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, BLM to stand alone and meet the test of 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 litigants 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 RMP 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)?

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

- o. Long-term monitoring of special status species, especially listed plant 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 been proven 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 Salses 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

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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 for education, resource area, RMP/EIS 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 seek if a similar budget allocation occurs?

BLM districts present 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 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 is end by itself.

BLM's biological diversity is an experiment in land management which stands between a successful and unsuccessful outcome. Biological

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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.

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OREGON STATE SENATE
 SALEM, OREGON
 97310-1047

December 22, 1992

D. Dean Bibbes, State Director
 Bureau of Land Management
 PO Box 2965
 Portland, Oregon 97208

Dear Mr. Bibbes,

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 Timms
 Gene Timms
 Senate Republican Leader

DELTA JONES
 REPRESENTATIVE
 DISTRICT 6

REPLY TO ADDRESS PROVIDED
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HOUSE OF REPRESENTATIVES
 SALEM, OREGON
 97310-1347

December 21, 1992

D. Dean Bibbes
 State Director
 Bureau of Land Management
 P.O. Box 2965
 Portland, OR 97208

RE Draft Resource Management Plan & Environmental Impact Statement

Dear Mr. Bibbes:

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 farming productive lands for recreational purposes. However, it is clear from the draft plan that the BLM is doing just that. Now 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,

Delta Jones
 Delta Jones
 State Representative
 District 6

X-017



December 14, 1992

Dean Bibbes, State Director
 Bureau of Land Management
 Department of the Interior
 PO Box 2965
 Portland, OR 97208

Dear Mr. Bibbes:

The Association of Oregon Counties, representing all 36 counties of the State of Oregon, supports the comments submitted to you by the Association of O&C Counties on the Draft Resource Management Plans/Environmental Impact Statements for the five districts in Western Oregon and the Lakeview district.

Although AOC as an organization was not directly involved in preparation of these comments, there are solid reasons why we can support them without hesitation.

*AOC is well aware of the unique history of the O&C Act and its purpose to provide local community stability through the dominant use of these lands for timber production.

*The findings by Dr. Robert G. Lee and associates of potentially severe social and economic consequences, as discussed in the O&C Counties' comments, were based on a study funded jointly by the Association of O&C Counties and AOC (Social Impacts of Alternative Timber Harvest Reductions on Federal Lands in O&C Counties, June, 1991). Consequently, AOC is very familiar with findings and conclusions of the study, and share with the O&C Counties a deep concern about very real severe consequences if every effort is not made to mitigate potential impacts.

*Included in the comments are technical forest management suggestions that could produce within your preferred alternative an additional 200 million board feet of annual timber harvest. These suggestions were primarily developed by Herb Haglund, a private forestry consultant well known both to you as a former career BLM staff member and to AOC as a former contractor with us. Herb developed comments in 1990 for AOC that were intended to improve draft "State Alternatives" to national forest plans. Our effort was an unqualified success that resulted in significant "fine tuning" of "State Alternatives". This success was directly related to Herb's consistently reasonable, practical, and creative analysis. AOC encourages your agency to take full advantage of Herb's suggestions for the benefit of your plans and local communities affected.

As an organization devoted to the general welfare of Oregonians, AOC greatly appreciates this opportunity to offer our support of comments submitted by the Association of O&C Counties. AOC urges you to give them great weight as you proceed with your difficult task of planning O&C forest management for this decade.

Sincerely,

Michael J. Sykes
 Michael J. Sykes
 President

c. Association of O&C Counties

DEC 18 1992

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Resource management

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Proposed resource management
plan and final

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