

# Steens-Alvord Coalition

c/o Oregon Chapter Sierra Club  
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Portland, OR 97214

## Steering Committee

Jill Workman, Chair  
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## Member Organizations

American Lands Alliance  
Audubon Society of Portland  
Defenders of Wildlife  
National Wildlife Federation  
Native Plant Society  
Oregon Council of Trout  
Unlimited  
Oregon Natural Desert  
Association  
Oregon Natural Resources  
Council  
OSPIRG  
Oregon Trout  
Oregon Wildlife Federation  
Sierra Club  
Soda Mountain Wilderness  
Council  
The Nature Conservancy  
The Wilderness Society  
WaterWatch

November 14, 2003

Gary Foulkes  
Bureau of Land Management  
Burns District Office  
28910 Highway 20 West  
Hines, OR 97738

**Re: *Andrews Management Unit/Steens Mountain Cooperative  
Management and Protection Area Draft Resource  
Management Plan/Environmental Impact Statement***

Dear Mr. Foulkes:

The Steens-Alvord Coalition (SAC) appreciates this opportunity to comment on the Andrews Management Unit/Steens Mountain Cooperative Management and Protection Area Draft Resource Management Plan/Environmental Impact Statement (RMP). Staff and volunteers of our member organizations have a long history of interest and involvement in improving the ecosystems within the planning area, as well as personal use of its many outstanding features for recreation, spiritual rejuvenation, education, and aesthetic enjoyment.

We ask the Bureau of Land Management (BLM) to adopt the Steens-Alvord Coalition's Citizens' Alternative, outlined in this letter, in its Record of Decision on the RMP. Alternative D, the BLM's current preferred alternative, does not meet the intent of the Steens Mountain Cooperative Management and Protection Act of 2000.

In order to provide the Citizens' Alternative to the BLM and the public for consideration early in the comment period, we have chosen not to cover all issue areas. Instead, our comments are focused on the most critical issues covered in the RMP, leaving more expansive coverage to individual members of the SAC.

The National Environmental Policy Act (NEPA) requires that federal agencies analyze a reasonable range of alternatives. When BLM writes Environmental Impact Statements (EIS), such as this RMP, they must include "a detailed statement [of] . . . alternatives to the proposed action" and must "study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources."

BLM's Instruction Memorandum No. 2001-075 states, "The impacts of all alternatives addressed must be fully analyzed in the NEPA document. They must also reflect the actual situation on the ground." In short, this RMP must present and analyze a range of alternatives that comply with the planning criteria and existing law and should therefore include the elements of the SAC's Citizens' Alternative.

We are concerned that, though several hundred pages long, the RMP lacks critical details in many places, thus making it difficult for the public to make informed decisions and comments. We will provide some of those details in this document.

Mixing the Transportation Plan, Wilderness and Wild and Scenic River Management Plans, and other aspects required by the Steens Mountain Cooperative Management and Protection Act of 2000 (Steens Act) with general discussions of all issues required for the AMU is confusing to readers. Telling readers that specific plans will be separated out after the RMP is finalized may be convenient for BLM but not the public. Because this is confusing, BLM should give the public additional opportunity to comment on the specific plans when they are finalized.

The Purpose of the Cooperative Management and Protection Area (CMPA), as stated in 102 (a) of the Steens Act, is the guiding principle of how the CMPA is to be managed: "*to conserve, protect, and manage the long-term integrity of Steens Mountain for future and present generations.*" The fact that this quote cannot be found anywhere in this RMP is disturbing. It appears BLM has chosen to not implement the Steens Act according to its mandates.

### **\*\*\* Steens-Alvord Coalition's Citizens' Alternative \*\*\***

#### ***Wilderness and Wild and Scenic Rivers***

The opportunity to designate new Wilderness on the Steens and surrounding lands is outstanding. Coupled with new information on public lands and acquisition of private inholdings, BLM should now revisit its outdated Wilderness inventory. The Federal Land Policy and Management Act (FLPMA) requires BLM to maintain an on-going inventory of its lands having Wilderness characteristics and values, and to manage them so as not to impair them for future designation as Wilderness. Wilderness Study Area (WSA) additions of only 160 acres in the Preferred Alternative and only 6364 acres in Alternative C do not meet this FLPMA requirement.

Under BLM's new guidance memo for inventory of lands with Wilderness values (IM 2003-275), BLM has the duty to identify lands that exhibit Wilderness characteristics through this planning process and the authority to manage lands to retain or protect Wilderness characteristics.

In its decision on a roadless area review EIS, the Ninth Circuit held that even where an agency's "decision criteria" were diverse, the resulting alternatives were not adequate when none of eight alternatives in that case allocated more than 33% of the planning area to Wilderness.

The BLM's Preferred Alternative recommends no rivers as *suitable* for designation as a Wild and Scenic River (WSR) and drops all protective management for the 120 miles (of eleven rivers) designated as *eligible* in 1997. The RMP identifies 800 miles of perennial rivers in the planning area. Yet the 580 miles of perennial streams in the planning area that are not WSRs, or among the eleven streams reported on, are not even discussed. This seems to violate the BLM Manual 8351.2 instruction that, "All rivers which may have potential for wild and scenic river designation must be identified and evaluated. Care should be taken to avoid overlooking any river segment located on BLM-administered lands."

It is very difficult to tell exactly how the eventual Wilderness and Wild and Scenic River Plan will look in this RMP, but in general BLM needs to be more protective of the qualities that make these areas special. BLM needs to manage the Steens Mountain Wilderness as a place "where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." Only by honoring this definition as provided by the Wilderness Act will Steens take its rightful place in the National Wilderness Preservation System.

**The BLM should adopt the following Steens-Alvord Coalition's Citizens' Alternative recommendations for Wilderness, Wild and Scenic Rivers, Wilderness Study Areas, and related issues (see attached maps).**

- Grant WSA status to an additional 582,920 acres of land based on the recommendations submitted to BLM by the Oregon Natural Desert Association (ONDA) on behalf of the SAC in September and November of 2002. BLM should manage the Wilderness qualities of these areas in order to protect them against impacts from off-road vehicle use, mining, and grazing developments.
- Designate 179 miles of rivers suitable for Wild and Scenic River status. BLM should enhance the water quality of these streams and protect their existing *outstanding remarkable values* (such as scenery, recreation, geology, history, pre-history, cultural, wildlife, fish) from the negative impact of dams and other water developments, construction of buildings and roads, mining activities, and overgrazing.
- Use the percentage guidelines of Alternative B for each recreational use impact indicator in the Wilderness Management Plan. If the Steens Mountain Wilderness receives increased recreational use, mitigation must come promptly to assure Wilderness characteristics do not degrade from where they were when the Steens Act passed.
- Set up a plan to coordinate and manage commercial recreation and large public outings to enable solitude and other aspects of a true Wilderness experience to those who come to the Steens Mountain Wilderness for those reasons.
- Control and mitigate for any reasonable use of vehicles or machinery allowed ranchers and inholders, and establish criteria to use for this purpose in each environmental assessment that deals with individual situations.

- Establish criteria to determine whether actions proposed by BLM or any other agencies (emergencies, predator control, horse gathers, game control, etc.) are “necessary to meet minimum requirements for the administration of the area” as required by the Wilderness Act. Such activities must then be shown to be the minimum tool necessary so as “to preserve its Wilderness character.”

## ***Livestock Grazing***

The Steens Act created a 100,000-acre cow-free zone within the Steens Mountain Wilderness—a first in the West. Yet, nearly 325,000 acres within the Steens planning area, and all the surrounding lands within the planning area, remain open to livestock grazing.

**The BLM should adopt the following Steens-Alvord Coalition’s Citizens’ Alternative recommendations for Grazing and related issues.**

- Phase out livestock grazing where it does not conserve or protect the ecological integrity of the land, especially on Steens where required by the Purpose of the CMPA.
- Determine the suitability of all public lands within the planning area to support livestock grazing.
- Upon receipt of a grazing permit that has been voluntarily relinquished by a permittee, BLM should immediately and permanently close the allotments involved to grazing when they are in special management areas, including, but not limited to, Wilderness, Wilderness Study Areas, Wild and Scenic Rivers, Areas of Critical Environmental Concern, and areas where resource conflicts exist (e.g., water quality-limited streams or habitats of sensitive species).
- Assess the ecological impacts of livestock grazing on microbotic (soil) crusts.
- Assess the impact of livestock grazing to the on-going invasion of weeds and juniper encroachment.
- Adopt a ten-year goal of attaining state water quality standards on all streams; aggressively monitor all streams with poor water quality.
- Establish long-term photo points within the cow-free portion of the Steens Mountain Wilderness to establish a scientific baseline for future reference.

## ***Transportation***

Section 112 of the Steens Act requires BLM to develop a "a comprehensive transportation plan for the Federal Lands within the Cooperative Management and Protection Area, which shall address the maintenance, improvement, and closure of roads and trails as well as travel access" and limit vehicles "to such roads and trails as many be designated for their use." BLM's

approach of leaving all routes open unless a Steens Mountain Advisory Council (SMAC) member could find eight more votes among the other eleven members to close a specific route does not satisfy this requirement. Closing all roads unless provided with justification for leaving them open is an approach that is more consistent with the Steens Act.

The Draft Washington and Eastern Oregon Districts Transportation Plan (TMP) is over 100 pages long. The Final Western Oregon TMP is 53 pages long. The Cascade Siskiyou Draft TMP is 58 pages. The RMP coverage of transportation contains only 15 pages and lacks the detail of these other plans, thus failing to meet the “comprehensive” requirement of the Steens Act.

The planning area has 2,328 miles of vehicle routes, yet the preferred alternative would only close 7 miles of routes – all of which are within the CMPA, which amounts to less than 1% of the routes within that boundary. In comparison, a recent inventory of vehicle routes on Steens Mountain (see enclosed map of proposed route closures and ONDA’s 2003 road closure submission on behalf of the SAC) shows that many of the 655 miles of routes can be closed because they actually go nowhere, are rarely used by the public, are redundant as far as access is concerned, and are causing resource damage.

Motor vehicle use of these backcountry routes transport invasive species, displace wildlife, cause ecological damage to streams and upland soils, and conflict with the use and enjoyment of these areas by non-motorized recreational users. All of which violate the Purpose of the CMPA.

It is not correct, as BLM maintains in Alternative A, that the Alvord Desert WSA was designated as an off-road vehicle open play area in the Oregon Wilderness Study Report of 1991. BLM has been managing it as such without authorization to do so, and now is the time to correct that situation. Continued use of motor vehicles on the Alvord threatens snowy plover nesting sites and invites incursions into the Alvord Desert Area of Critical Environmental Concern.

**The BLM should adopt ONDA’s road closure recommendations discussed above as well as the following Steens Alvord Coalition’s Citizens’ Alternative recommendations for Transportation and related issues.**

- Prepare a TMP based on a comprehensive motorized vehicle route inventory for the entire planning area by January 1, 2005; designating routes open and closed to motorized use starting from the position that routes are closed unless good reason is shown for their being kept open. This is the intent of Executive Orders 11644 and 11989, which apply to all BLM lands.
- Permanently close and rehabilitate all routes in, and adjacent to, WSAs (unless shown necessary by ranchers for livestock management). We support BLM in its recommendation to seasonally close routes into the Pueblos and Trout Creek Mountains, recognizing the damage that use of these routes have caused in meadows. This same consideration needs to be given to all WSAs.
- Close all cherry stems in the Steens Mountain Wilderness to motor vehicles. Of special concern are: Bone Creek, Cold Springs west of Nye Cabin to Riddle Brothers Ranch, and

Fish Creek. Cherry stems make it difficult to experience the solitude and the escape from civilization expected in Wilderness and lead to hundreds of side roads that are impossible to monitor adequately.

- Leave the Steens Mountain Road unimproved, and severely restrict any use of motorized transport in the winter.
- Establish specific criteria that BLM must consider before any exceptions to the prohibition of off-road travel in the CMPA is allowed by Section 112(b)(2) of the Steens Act. Each case in which the prohibition is allowed must be treated individually and the consequences seriously considered.
- Close the Alvord Desert Wilderness Study Area to all vehicular use.

### ***Threatened Species***

**Great Basin redband trout, *Oncorhynchus mykiss***, thrive in the Blitzen River and its tributaries. Receding glaciers, changing geography, and lower water levels stranded the steelhead ancestors of these desert fish when the ancient connection between the Blitzen and the Snake River was severed. Ten thousand years of isolation and evolution have adapted the Blitzen redbands to tolerate high water temperatures, and led them to pursue alternate life history strategies, such as migrating between the headwaters and Malheur Lake.

The RMP presents an opportunity to protect these fish and help restore the Blitzen to a more natural condition. Within the final RMP, the BLM should include greater protection of water quality, riparian vegetation, and reduced impacts on riparian areas in order to benefit redband trout.

**Sage grouse, *Centrocercus urophasianus***, known as an indicator species for sagebrush habitat, have declined across their range over the past several decades. A BLM “sensitive species” in most states where it occurs, sage grouse depend on sagebrush species for food, shelter, nesting habitat, and escape cover. Steens Mountain and adjacent areas were once strongholds for the species, and the Steens Act supports the restoration of degraded sage grouse habitat.

BLM points out that there are 73 special status plant species, but makes the reader count the number of special status animal species in Table 3.12. There are 71. The preferred alternative provides much information on game species and their habitat requirements, but offers very little that enhances the chance of survival for special status species.

**The BLM should adopt the following Steens-Alvord Coalition's Citizens' Alternative recommendations for Threatened Species and related issues.**

- Review all grazing allotment management plans, and revise as necessary, to expedite meeting state water quality standards in all 303(d) listed streams.
- Remove the Page Springs gauging station weir to allow natural migration of redband trout in the Blitzen River system.
- Manage big sagebrush communities to meet the life history requirements of sage grouse and other sagebrush-dependent, special status species.
- Use prescribed burns and other actions if necessary to eradicate invasive species and hinder juniper encroachment resulting from skewed fire regimes of the past, if such actions will enhance special status species survival by restoring or protecting their habitat.
- Take into account all impacts that vehicular routes have on sage grouse, redband trout, and other special status species when preparing the comprehensive transportation plan referred to earlier. Prioritize the rehabilitation of closed routes that will benefit special status species.
- Limit the application of herbicides near perennial streams, especially those inhabited by special status species.
- Control the placement and construction of new utility structures and fences throughout the planning area to avoid impacts on sage grouse survival and mitigate for habitat damage already incurred by existing fences and structures.

Thank you for taking the time to consider our comments and concerns. We urge the BLM to modify the preferred alternative as recommended by the Steens-Alvord Coalition's Citizens' Alternative so that we can give the Record of Decision our support.

Sincerely,

Jill M. Workman, Chair  
Steens-Alvord Coalition

cc: SAC Steering Committee  
Coalition Member Groups