



Oregon Natural Desert Association

August 21, 2006

VIA EMAIL

Clines Buttes Recreation Area Plan  
c/o Prineville BLM  
3050 NE Third St.  
Prineville, OR 97754

Re: Cline Buttes Recreation Area RAD/EA Scoping Comments

Dear Planning Team:

Please accept the following comments on the Cline Buttes Recreation Area Recreation Area Design/Environmental Assessment (RAD/EA) scoping proposal, submitted on behalf of the Oregon Natural Desert Association (ONDA). ONDA is a non-profit public interest organization dedicated to preserving and protecting the public lands of eastern Oregon. ONDA has a long history of interest and involvement in Bureau of Land Management activities with respect to recreation, off-road vehicle (ORV) use, and wildlife habitat protection. ONDA's mission is to protect, defend, and restore forever the health of Oregon's native deserts. ONDA and its members use and enjoy the public lands, waters, and natural resources within the planning area for countless recreational, scientific, spiritual, educational, aesthetic, and other purposes. ONDA looks forward to working with the BLM in drafting an RAD/EA for the Cline Buttes Recreation Area.

## **I. NEPA and Range of Alternatives**

As an initial matter, ONDA believes that the BLM should prepare an Environmental Impact Statement (EIS) for this plan. An EIS is required when an EA determines that an action will have significant environment effects, where significance is determined by "context" and "intensity." 40 C.F.R. §§ 1501.4, 1508.9. Context and intensity include consideration of such factors as uniqueness, public controversy, cumulative impacts, and Endangered Species Act (ESA) designation. 40 C.F.R § 1508.27. The Cline Buttes Recreation Area is a natural area in close proximity to expanding urban centers, and has characteristics which cause any management plan to have "significant environmental effects" in the language of the National Environmental Policy Act (NEPA). The public and the Cline Buttes Recreation Area deserve the higher standard of detail and analysis which an EIS will provide.

The National Environmental Policy Act requires the BLM to discuss fully a reasonable range of alternatives and to provide full public disclosure of significant environmental impacts. 42 U.S.C. § 4332(2)(C)(iii). ONDA recommends that the Cline Buttes RAD/EA create and seriously consider alternatives which emphasize protection and restoration of wildlife habitat, non-motorized recreation, and reductions in ORV use. The BLM should also consider the cumulative impacts of other activities in the area, including livestock grazing, mineral extraction, and the effects of development in the surrounding area. None of these activities exist in a vacuum. Furthermore, the RAD/EA should provide detailed analyses of each alternative's impact on wilderness values, soils, biological crusts, vegetation, wildlife, and other natural and social characteristics.

## **II. Wildlife Habitat Protection and Restoration**

ONDA requests that the Cline Buttes RAD/EA create and consider alternatives which emphasize protection of wildlife habitat, and where necessary, active restoration of habitat and native vegetation. The BLM's proposed management alternatives should reflect the ecological uniqueness and importance of the Cline Buttes. ONDA recommends that the BLM pursue designations for the area which protect its important natural features, including but not limited to Area of Critical Environmental Concern (ACEC), Wilderness Study Area (WSA), and Research Natural Area (RNA). The RAD/EA alternatives should generally subordinate other uses of the Cline Buttes area to the overall ecological health and wellbeing of wildlife habitat and native vegetation.

ONDA strongly believes in "upstream" solutions that aim to prevent and pre-empt ecological problems before they occur. Restoration and post-facto efforts to improve wildlife habitat and native vegetation are rarely effective when they fail to address root causes of problems. ONDA asks BLM to undertake a detailed and thorough analysis of the cumulative impacts of livestock grazing and ORV use on wildlife habitat and native vegetation, per NEPA requirements. 40 C.F.R. §§ 1508.7, 1508.25(a)(2). ONDA encourages the RAD/EA to contain alternatives which promote proactive solutions to ecological problems, as opposed to reactive solutions which fail to address root causes. Efforts to protect and restore habitat and vegetation should take precedent over other uses of the Cline Buttes area.

## **III. Recreational Use**

ONDA encourages the BLM to consider management alternatives which promote non-motorized and primitive recreation over other forms. The BLM should manage recreational use of the Cline Buttes area so as to minimize impacts on wildlife habitat and native vegetation. In light of a rapidly increasing population in the surrounding region, the BLM should develop plans to deal with increased recreational use in and around the Cline Buttes. Encouraging low-impact recreation offers one way to mitigate the ecological effects of increased use. The RAD/EA alternatives should also consider designating trail systems and establishing trailheads to limit the impacts of use. ONDA encourages the BLM to improve non-motorized public access through land acquisition, easement acquisition, and working with nearby landowners and communities.

#### **IV. ORV Use**

In general, the BLM's planning decisions with regard to ORV use in the Cline Buttes Recreation Area must subordinate ORV use to the health of the desert ecosystem. The BLM should adopt a policy of closing areas to ORV use until the agency can rationalize why a particular area should be open to ORV use. The decision to open areas to ORV use should only occur after careful and reasoned consideration of the impacts to wildlife habitat, native vegetation, and wilderness values. ONDA recommends that the BLM consider a RAD/EA alternative that would prohibit ORV use in Sensitive and Special Management Areas such as ACECs, WSAs, and RNAs.

The BLM should consider creating a use-management matrix to determine what areas should be open and closed to ORV use, that gives protection from ORV use to areas containing critical habitat and sensitive native ecosystems.

Where the BLM has not had time or resources to complete an inventory of potential ORV trails, we urge the BLM to keep the area closed, since it cannot accurately determine the effects of vehicle use in the area. The BLM should anticipate growth in ORV use in the near future and ensure that it is capable of managing it. In areas designated for limited ORV use, the BLM should ensure that it can enforce the limits. If not, we encourage the BLM to close the area to ORV use entirely. In support of any decisions to allow ORV use in the Cline Buttes Recreation area, the BLM must present inventories and evaluations that provide evidence showing that ORVs do not damage ecosystems and are compatible with other management objectives. Unless and until the BLM provides this information, public lands should be closed to ORV use. Similarly, areas open to ORV use must minimize harassment of wildlife and disruption of wildlife habitats and minimize conflicts with other recreational users of the public lands. 43 C.F.R. § 8342.1.

The BLM's own laws and directives obligate the BLM to minimize damage to soil, watershed, vegetation, air, and other resources, and to minimize harassment of wildlife and wildlife habitats. The BLM should ensure compliance with FLPMA's principles of multiple use and the requirement to prevent unnecessary and undue degradation of the Cline Buttes Recreation Area. Other relevant management guidelines include Executive Orders 11,644, 11,989; the BLM's "National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands"; and the BLM's Off-Road Vehicles regulations. Please explain how the plan will be consistent with these laws and directives. The Cline Buttes RAD/EA alternatives should reflect a close and careful analysis of the environmental effects of ORV use.

#### **V. Livestock Grazing**

ONDA asks that the BLM undertake efforts to reduce and eliminate domestic livestock grazing in the Cline Buttes Recreation Area. The RAD/EA should consider alternatives which aim to permanently reduce and eliminate livestock grazing. Any efforts to improve and protect wildlife habitat and native vegetation will prove fruitless if grazing is present in the Cline Buttes Area. More than any other factor, domestic livestock are a major cause of weed invasions and ecological degradation. See A.J. Belsky *et al.*, *Survey of Livestock Influences on Stream and*

Riparian Ecosystems in the Western United States, 54 J. Soil and Water Cons. 419 (1999), available at <http://www.onda.org/library/papers/index.html>; Belsky, A.J. and J.L. Gelbard, Livestock Grazing and Weed Invasions in the Arid West, Oregon Natural Desert Association (2000), available at [www.onda.org/library/papers/index.html](http://www.onda.org/library/papers/index.html).

The BLM should make efforts to permanently retire grazing permits in the Cline Buttes Recreation Area. Livestock grazing is incompatible with efforts to protect and restore the desert ecology. The RAD/EA should adopt a means for permit relinquishment, similar to the grazing matrix in the Upper Deschutes RMP. It should contain the means to weigh the ecological value and ecological condition of the allotment, a permittee's willingness to retire the permit, the demand for the allotment, and any special status of the allotment (like Area of Critical Environmental Concern, Research Natural Area, Wilderness Study Area, and Wild and Scenic River designation). As an example for how this matrix works, ONDA offers its efforts in the Badland WSA. Any decision to authorize grazing in the Cline Buttes Recreation Area should be accompanied by a detailed, reasoned, and informed assessment of grazing impacts. The assessment should consider not only the ecological impacts of grazing, but also the value of grazing relative to other uses, including recreational, scientific, cultural, and historic. ONDA asks that grazing in the Cline Buttes Recreation Area be subordinate to other uses.

## **VI. Other Issues**

Please address the issue of illegal garbage dumping in the Cline Buttes Recreation Area. Garbage is pervasive along Barr Road and in the southern reaches of the BLM land. ONDA has recently inventoried the area and can provide images and GPS coordinates of several illegal garbage dumps on request.

Thank you for considering ONDA's comments. Please retain ONDA on the mailing list and send the draft RAD/EA **to both addresses below** when completed. If you have any questions regarding these comments, please feel free to contact ONDA at the addresses below.

Sincerely,

s/ Colin Zook

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