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APPENDIX E

Comments On Hellgate RAMP/DEIS's Appendix B Outstandingly Remarkable Values

Natural Scenic Qualities

NEPA Design Group's Comments. It is understood that natural scenic qualities met the criteria for a outstandingly remarkable rating, including its three separate elements: vegetation, geology, and topography. True?

Fisheries

Populations Page 310. Fish values may be judged on the merits of either fish population, habitat, or both. Consideration is given for potential as well as existing values.

Page 311. Populations of Rogue spring and fall chinook salmon are the largest among Oregon's river basins south of the Columbia River. They contributed about one-third of the state's commercial catch during 1979-1986 (Nicholas and Hankin 1988). Rogue chinook contribute to commercial and recreational fisheries off the coast of northern California and southwest Oregon. Fall chinook salmon in the Rogue River is the largest on the coast of Oregon (Nicholas and Hankin 1988).

Page 312. Fall chinook spawning in the Hellgate Recreation Area is approximately 14 percent of all fall chinook spawning in the Rogue River (USDI, BLM, MDO 1992). In some years, approximately 10 percent of the run spawns before October (Satterthwaite 1992). Fall chinook fry emerge from the gravel in the Hellgate Recreation Area between late February and May (ODFW 1992d).

Fall chinook begin entering the river in mid-July and support an important sport fishery in the Hellgate Recreation Area during August and September. An average of 2, 300 fall chinook spawn annually in the 3 miles of river between Lathrop Park, near Grants Pass, downstream to the mouth of the Applegate River. Another 5,400 spawn in the river between the Applegate River and Hog Creek (ODFW 1992b).

Habitat Page 313. The riverine habitat is primarily of high quality and generally produces adequate spawning substrate, rearing areas, flows and water temperature for all species. ... Salmonid habitat alone is an important consideration and may qualify as a determination of outstandingly remarkable.

Page 313. In general, good instream and riparian habitat quality exists in the mainstem Rogue River. The mainstem Rogue River is a migration corridor for anadromous fish. Habitat for fish includes: instream substrate, water quality, water quantity, and riparian vegetation.

Findings

Page 314. Approximately 14 percent of the basin's fall chinook salmon spawn in the recreation section. Juvenile wild salmon and steelhead rearing in or upstream of the recreation section use the river as a migration corridor to the ocean throughout the year.

The mainstem habitat is fair to good and is primarily important for chinook spawning and rearing.

Page 314. The affected habitat focuses on the mainstem Rogue River in the Hellgate Recreation Area and tributaries associated with this section of the river.

NEPA Design Group's Comments. It is understood that fisheries met the criteria for a outstandingly remarkable rating, including its two elements: populations and habitat. True?

We wonder about a few statements such as the last paragraph of the findings. This paragraph and a few others don't see to be documenting the value of the ORV for the entire National Wild and Scenic Rogue River as much as documenting general information about the Hellage Recreation Area.

There is some information on the fisheries ORV documented throughout the DEIS. Some of it is new or different information than documented in Appendix B. For example, *"Fall chinook have increased over the decades and represent one of the healthiest fisheries in Oregon, if not the world."* (page 189 of DEIS).

Recreation

NEPA Design Group's Comments. It is understood that recreation met the criteria for a outstandingly remarkable rating, including its seven separate elements: jetboating, white water floating, fishing, hiking, interpretation, fish and wildlife observation, and sightseeing/driving for pleasure. True?

Are hiking, interpretation, fish and wildlife observation, and sightseeing for pleasure equal value elements of the recreational opportunities ORV? Do they have the same importance as the watercraft elements of the recreational ORV? Have these ORV elements as well as all the ORV elements been coordinated with the U.S. Forest Service?

- Motorized Boating.
- Nonmotorized Float Boating.
- Nonmotorized Boat Angling.

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Overall — NEPA Design Group's Comments.

Except for a few issues and questions, the rationale and documentation of why natural scenic values, fisheries, and recreation met the criteria for ORVs seem reasonable. We think cultural and wildlife also satisfy the criteria for ORVs (see page 114 of DEIS). Why were the ORVs limited to Congressional intent?

We have two overall concerns.

- Relative Importance of the Documented ORVs.
- Coordination With U.S. Forest Service.

Our first concern is the relative importance of the documented ORVs. The BLM management goal for the Hellgate Recreation Area gives primary emphasis to protecting the values that make it outstandingly remarkable while providing a diversity of river related recreational opportunities in a developed setting. The assessment of ORVs in the DEIS identified three ORVs with equal value or importance: 1. natural scenic qualities, including vegetation, geology, and topography, 2. fisheries resource, including populations and habitat and 3. recreational opportunities, including whitewater floating, fishing, jet boating, hiking, interpretation, fish and wildlife observation, and sightseeing/driving for pleasure (pages 113 - 114 and Appendix B).

Many alternative elements are designed around the issue of protection and enhancement of an ORV or an element of an ORV. This was reasonable in alternative design. However, many documented "effects" in the environmental consequences chapter of the DEIS made unexpressed assumptions that one ORV had dominance over another, or was silent about the ORV, or ORV element being impacted. This was a problem.

How did the BLM decide which ORV had or has precedence over another ORV? For example, what criteria was used to determine which element of the recreational ORV would or will be protected over another element of the recreational ORV (e.g., angling, floating, motorized boating, etc.)?

It is recommended that the criteria by which one ORV, or one element of the ORVs, will be protected over another ORV, or element of another ORV, be documented in a supplemental DEIS.

Our second concern is the development of the National Wild and Scenic Rogue River's ORVs in coordination with the U. S. Forest Service.

In 1968, the United States Congress designated the U.S. Forest Service and the BLM as the lead agencies for managing the land and water within the identified National Wild and Scenic Rogue River corridor (page 3 of DEIS). In 1969 the U.S. Forest Service and the BLM decided to separately develop their own master plans without coordinating their management efforts (see

Appendix A of DEIS). The separate method did not work and the two agencies had to develop their joint 1972 Development and Management Plans for the Rogue National Wild And Scenic River, Oregon.

The BLM developed activity plans for the two river reaches it had responsibility to manage: 1978 Rogue National Wild & Scenic River Activity Plan Hellgate Recreation Section and 1983 Recreation Area Management Plan For the Rogue River Wild Section. The U.S. Forest Service continued to utilized the joint 1972 plan as its primary planning guidance.

The assessment of ORVs' section in the affected environment chapter documented that the ORVs had been identified by the U.S. Forest Service and the Bureau of Land Management interdisciplinary team (page 113 of the DEIS) and referenced Appendix B. Chapter 5, Consultation and Coordination, of the DEIS (pages 249 - 262) did not document any U.S. Forest Service and the Bureau of Land Management interdisciplinary team, nor identify any joint process where the agencies jointly developed the ORVs. Appendix B is also without documentation of any coordination in developing the ORVs.

It is recommended that documentation be provided in a supplemental DEIS that the U.S. Forest Service and the BLM jointly developed the ORVs, including all the elements of the ORVs for the National Wild and Scenic Rogue River.