

APPENDIX F

Comments On Hellgate RAMP/DEIS's Appendix C

Management Standards for the Hellgate Recreation Area, A Recreation Area

1. Introduction. The introduction to Appendix C follows (page 321), “*The following are program management standards that apply to the Hellgate Recreation Area (I.B. No. OR-90-73).*” What does this mean? What is I.B. No. OR-90-73?

1. Recommendation — Introduction Statement. It is recommended that the introduction statement be clarified in order for the decisionmaker and the public to understand what authority these management standards represent and how they are being used (i.e., their relationship to the rest of the river DEIS).

2. Question — Structure Of Appendix. Why are the management standards sometimes structured into a section without a title and a section entitled, “Supplemental Information”? Is the first part (excluding the supplemental information) like the direction/policy identified in Appendix A (1972 Rogue River Plan)? On page 296 of Appendix A it is written.

“Emphasis is on the development of sound management objectives for the river and adjacent lands together with the necessary directions for reaching these objectives. In this sense, then, the river plan can be considered policy which establishes the framework to guide detailed implementation plans for recreation, wildlife, and fisheries habitat, timber management, etc.”

2. Recommendation — Structure Of Appendix. It is recommended that BLM explain the meaning and important of the structure of the appendix's structure. What is the importance of the management standards with, or without, supplement information sections?

3. Question — Management Standard The glossary defines “standard” as, “*Criteria for measuring fulfillment of goals.*” What is the importance of a management standard? Do these standards have to be met under real law or administrative law?

It is not clear what the term “management standard” means. One would have assumed that management standard means a decision and/or allocation that has already been made; there are no issues worthy of consideration and changes to management standards will not be analyzed or considered for change by developing a range of alternatives. The policy or standard has already been analyzed under the procedural standards of the National Environmental Policy Act. Most of the information (except for supplemental sections) in the appendix is actually written that way, but what does it really mean? However, the glossary definition of standard suggests that standards do not have to be met just as goals are not a legal standard, but an intention or purpose trying to be meet.

3. Recommendation — Management Standard It is recommended that BLM define the term management standard in a clear concise way that addresses the concerns in Question 3.

4. Instream Flow Assessment (page 327) Perhaps there should be, but NEPA Design Group does not believe that a instream flow assessment management standard exists in the sense of policy identified in an existing plan, decision record, or record of decision and, therefore, there is no merit or rationale for its inclusion in the management standards appendix — It is believed that there is no NEPA analysis for this policy statement.

4. Recommendation — Instream Flow Assessment It is recommended that BLM provide the NEPA analysis and decision and/or plan (s) that establish a policy decision or allocation for this standard. If it can not be found it is recommended that this section be removed from Appendix C and that other sections dependent on the assumption of a management standard be changed to reflect the actual policy.

5. Instream Flow Assessment for the Outstandingly Remarkable Value of Natural Scenic Qualities (page 327) Our observations are the same as for the preceding 4. above.

5. Recommendation — Instream Flow Assessment for the Outstandingly Remarkable Value of Natural Scenic Qualities Our recommendation is the same as for the preceding recommendation 4 above.

6. Instream Flow Assessment for the Outstandingly Remarkable Value of Recreation Opportunities (page 327). Our observations are the same as for the preceding 4. above.

6. Recommendation — Instream Flow Assessment for the Outstandingly Remarkable Value of Recreation Opportunities Our recommendation is the same as for the preceding recommendation 4 above.

7. Mining, Minerals and Energy Resources (pages 329 - 330).

What are the existing mining claims in the Hellgate Recreation Area. Is the Almeda mine location an existing claim? Can a mining claim be established on the Argo Boat Landing gravel bar?

“Digging, scraping, disturbing, or removing natural land features for the purpose of mineral prospecting or mining is allowed for: (1) valid existing mining rights, (2) recreational gold panning that does not require digging into the bank,...” (page 330). Please explain the relationship between not being able to dig into the bank and digging, scraping, disturbing, or removing natural land features for the purpose of recreational gold panning. What is the definition of a bank? Does it mean river bank or an upland bank within the corridor? What if digging occurs under the bank and the bank falls in? What if digging occurs behind the bank and the bank falls in? Can water be channeled from the river to areas uphill of the bank for the

purpose of digging and scraping?

7. Recommendation — Mining, Minerals and Energy Resources

It is recommended that information about mining claims, and areas closed and open to mineral entry be described in the affected environment chapter. It is recommended that acceptable recreational gold panning activities be clarified.

8. Recreation Opportunity Spectrum The following information is found on page 333 of the DEIS.

Standard recreation opportunity spectrum classes for a river segment with a federal classification of recreational river is normally in the range from natural motorized river to urban river.

Supplemental Information - The recreational opportunity spectrum objectives for the Hellgate Recreation Area are primarily “modified natural motorized river.” The following characterizations represent the desired conditions for the experience opportunities.

- *Naturalness - modified natural motorized river.*
- *Access - modified natural motorized river.*
- *Remoteness - modified natural motorized river.*
- *Social Encounters - rural river.*
- *Visitor Management - modified natural motorized river.*
- *Facilities - modified natural motorized river.*

It is not clear what the ROS management standard represents or where it originates. The standard appears to be a statement of condition rather than of existing policy or direction. Objectives are identified in the supplemental section, but it was assumed that this was not a management standard of direction/policy, but information that supports the management standard. This section needs clarification.

NEPA Design Group does not believe that a ROS management standard exists in the sense of policy in an existing plan(s), decision record, or record of decision. It is believed that there is no NEPA analysis for this policy statement.

8. Recommendation — Recreation Opportunity Spectrum It is recommended that BLM provide the National Environmental Policy Act analysis and decision and/or plan that establish a policy decision or allocation of “modified natural motorized river, including the social encounters for a rural river.”

If the documented rationale can not found it is recommended that this section be removed from Appendix C and that other sections dependent on the assumption of a ROS management standard be changed to reflect the actual policy.

9. Sound (page 334) Our observations are the same as for the preceding 4. above.

9. Recommendation — Sound Our recommendation is the same as for the preceding recommendation 4 above.

10. Universal Access (page 335) It is believe that there is law that make this a management standard applicable to all alternatives.

10. Recommendation — Universal Access Our recommendation is that the law and policy relating to this management standard be referenced and its relationship to the alternatives be clarified.

11. Watchable Wildlife Areas (page 336) There might be policy that make the watchable wildlife areas management standards applicable to all alternatives.

11. Recommendation — Watchable Wildlife Areas Our recommendation is the same as for the preceding recommendation 4 above.

OVERALL RECOMMENDATION References should be given for all management standards in Appendix C. The public needs to understand where these standards originated and that these standards have already satisfied the National Environmental Policy Act's procedural requirements.