

## APPENDIX H

### Comments On Hellgate RAMP/DEIS's Appendices D, E, F, H, And I

#### Comments On Hellgate RAMP/DEIS's Appendix D Resource Activities And Land Uses (pages 339 - 345)

It is not understood how the resource activities and land use information provided in Appendix D is applicable for inclusion in the DEIS. Valuable information is provided, but it does not seem to relate to the significant scoping issues, nor the alternatives, affected environment, or environmental consequences chapters.

**Recommendation.** It is recommended that an explanation be provided as to the value of Appendix D and its relationship to the issues, alternatives, affected environment, and environmental consequences sections, or that this appendix be eliminated from the DEIS, or at most, referenced in the affected environment chapter.

#### Comments On Hellgate RAMP/DEIS's Appendix E Recreation Opportunity Spectrum Inventory (pages 347 - 355)

We agree with the following which is documented in the introduction to Appendix E of the DEIS (page 349).

*"Recreation opportunity spectrum (ROS) classes are the basic framework for inventory, planning (descriptions and prescriptions), and managing (prescriptions) the recreation resource."*

However, it is not understood how the ROS inventory information provided in Appendix E is applicable for inclusion in the DEIS. Valuable information is provided, but it does not seem to relate to the significant scoping issues, nor the alternatives, affected environment, or environmental consequences sections of the DEIS.

Never-the-less the recreation opportunity spectrum inventory found in Appendix E is an excellent example of BLM's going the extra mile. The agency is congratulated for undertaking this complex inventory. NEPA Design Group believes that the agency's investment in this inventory will ultimately yield dividends.

Different ROS classes as management prescriptions were identified in the earlier public scoping process and recommended by the Hellgate RAMP/DEIS interdisciplinary team. The ROS classes

could have been identified as scoping issues and could have been part of the design of alternatives in the Chapter 2, but those actions did not occur.

**Recommendations.** 1. It is recommended that an explanation be provided as to the value of Appendix E and its relationship to the issues, alternatives, affected environment, and environmental consequences sections, or that this appendix be eliminated from the DEIS, or at most, referenced in the affected environment chapter.

2. It is recommended that the BLM consider different ROS classes as potential management prescriptions and identified as significant scoping issues; it is recommended that the range of alternative be redesigned in a supplemental DEIS to provide the decisionmaker and the public a clear basis for choice among new ROS management prescription class options.

### **Comments On Hellgate RAMP/DEIS's Appendix F Botanical Resources (pages 357 - 369)**

It is not understood how the botanical information provided in Appendix F is applicable for inclusion in the DEIS. We have the same observations as for the RAMP/DEIS's Appendix D.

**Recommendation.** It is recommended that an explanation be provided as to the value of Appendix F and its relationship to the issues, alternatives, affected environment, and environmental consequences sections, or that this appendix be eliminated from the DEIS, or at most, referenced in the affected environment chapter.

### **Comments On Hellgate RAMP/DEIS's Appendix H Other Maps (pages 377 - 385)**

The maps located in Appendix H are good general maps well suited to the DEIS; they should have been located in the affected environment chapter. It was very difficult finding these existing condition maps as they were not where one would have guessed. This was ironic as these maps were the only ones in the table of contents that were identified by name.

**Recommendation.** It is recommended that the BLM locate the camping, day-use areas, and trails maps in the affected environment chapter in a supplemental DEIS. It is further recommended that the table of contents for the supplemental DEIS identify by name all tables, maps, and figures.

## **Comments On Hellgate RAMP/DEIS's Appendix I Visitor Center Site Locations (pages 387 - 390)**

**Introduction** Appendix I appears to be an add-on to the Hellgate RAMP/DEIS, more like an after thought to the on-going EIS process. The rationale for this statement is that all the component parts of the appendix could have, and should have, appropriately been documented in other sections of the DEIS. Specific comments to support this assertion follow.

The following was documented about a new visitor center in the DEIS (page 257).

*In the interest of comprehensive detail, the issue of development a new visitor center was incorporated into the DEIS. The proposed "Smullin Visitor Center" (proposed to be located at Rand) was examined in a separate NEPA document earlier in the planning process for the Hellgate RAMP/DEIS. This was necessary at the time to meet fiscal criteria for project funding. Since that time, funding has been secured and will remain available until a record of decision is signed.*

The above quote is confusing as the last public river planning document for the Hellgate RAMP/DEIS, prior to the DEIS, was the 1994 *Issues and Alternatives for Management of the Hellgate Recreation Area of the Rogue River* document, and it clearly documented that a range of visitor centers were to be analyzed (page 60). Did interim decisions without public involvement occur where the range of visitor centers was removed from the Hellgate RAMP/DEIS process? What happened that changed the management decision? Was the public involved? If the public was involved, that process should be documented in Chapter 5.

The statement that the proposed Smullin Visitor Center was examined in a separate NEPA document earlier in the planning process for the Hellgate RAMP/DEIS is disturbing. As part of the DEIS process this NEPA document should be referenced to the bibliography. The disturbing part is not that it was examined in a separate NEPA document, but the allegation that it was part of the Hellgate RAMP/DEIS process — What is being stated here? This is the first time we have discovered the BLM position that the EA process for the Smullin Visitor Center was part of the Hellgate RAMP/DEIS process. We do not believe this statement is true. Please provide the documentation for this statement in a supplemental DEIS.

**Introductory Information** The visitor center site locations in Appendix I of the DEIS documented possible visitor center locations at Merlin, Grants Pass, Hog Creek and Rand.

The size of the possible visitor centers was defined as a range from the smallest being a configuration that would serve the needs of the existing staff currently working out of the Rand site; and in its largest configuration it would provide space for the entire River Program staff. However, it was never described by the normal building standard of square feet (page 390 of DEIS). Additionally, we were not provided any specific information on the kind of services these possible centers would provide. What kind of services are proposed for these centers

besides the generalizations of customer and administration services? The size generalizations and lack of information on services made it difficult, to impossible, for the decisionmakers and the public to understand any significant environmental impacts (i.e., beneficial and/or adverse) that might be associated with the range of visitor center alternatives.

## **Alternatives**

Alternative A documented that the existing Rand Visitor Center would continue to be maintained and a new visitor center would be developed in Merlin or Grants Pass (page 38 of DEIS). The Rand staff would provide customer service out of the new visitor center. The river program staff would provide administrative services out of the BLM Medford District Office (MDO). Is the location of the MDO in Medford? This alternative sounds like three different sized facilities would be maintained rather than two facilities identified in Appendix I.

Alternative B documented that the existing Rand Visitor Center would continue to be maintained (page 46 of DEIS). The Rand staff would continue to provide customer service out of the Rand Visitor Center and the river program staff would provide administrative services out of the Medford District Office. The Medford District Office is presently in Medford (Table 2-14). Will administrative services stay in Medford under this alternative?

Alternative C documented that the existing Rand Visitor Center would continue to be maintained and a new visitor center would be developed at Hog Creek (page 55 of DEIS). The Rand staff would provide customer service out of the new visitor center. The river program staff would provide administrative services out of the District Office. This alternative sounds like three different sized facilities would be maintained rather than the two identified in Appendix I.

Alternative D documented that the existing Rand Visitor Center would continue to be maintained and a new visitor center would be constructed at Rand (page 65 of DEIS). The Rand staff would provide customer service and administrative services out of the new visitor center. The river program staff would provide administrative services out of the District Office. We have the same questions that we had for alternatives B and C.

Alternative E documented that the existing Rand Visitor Center would continue to be maintained and a new visitor center would be constructed at Rand (page 75 of DEIS). The Rand and river program staff would provide customer and administrative services out of the new visitor center. What will happen to the existing Rand Visitor Center?

The visitor services table (i.e., Table 2-14) documented possible administrative/visitor centers as Merlin, Grants Pass, Hog Creek, Rand, and Medford (page 106 of DEIS).

## Affected Environment

The existing Rand Visitor Center and the Medford administrative center were not described in the affected environment chapter. The possible visitor center site locations in Merlin, Grants Pass, and Hog Creek were not described in the affected environment chapter.

## Environmental Consequences

Except for the socioeconomics and visitor services sections, there is almost no documentation in the environmental consequences section about the impacts of the range of visitor centers provided in the alternatives (Appendix I is relied on). There is documentation in the socioeconomics effects section that a new visitor facility would be part of Alternative D (page 232 of DEIS), but the other alternatives (i.e., A, C, and E) also receiving new visitor centers have no mention.

The visitor center size generalizations and lack of information on services made it difficult, to impossible, for the decisionmakers and the public to understand any significant environmental impacts (i.e., beneficial and/or adverse) that might be associated with the range of visitor center alternatives.

Appendix I needs to be rewritten as part of the environmental consequences chapter to comply with the procedural requirements of the NEPA. The documentation in Appendix I and the general lack of documentation in other parts the DEIS (besides general identification information in Chapter 2) reflects a great deal of confusion about the relationship of significant issues, range of alternatives, affected environment, and environmental consequences sections, and especially the purpose of an EIS — “*An EIS is intended to provide decisionmakers and the public with a complete and objective evaluation of significant environmental impacts, both beneficial and adverse, resulting from a proposed action and all reasonable alternatives.*”

## Management Standards For Visitor Centers — Appendix I

This section of Appendix I (page 389 of DEIS) appears to be an add-on to Appendix C of the Hellgate RAMP/DEIS. However, if they are management standards they are not designed like standards as most of the standards, except for a few, are permissive without the requirement of “shall.” However, the possible “standards” documented in Appendix I follow.

- *Management goal of enhancing and protecting the recreation ORV.*
- ***To best serve the public**, the visitor center **should be located** near the peak use area of the river.*
- *A key factor in the placement of such facility is to minimize the impact on the visual resource.*
- *Although **it is necessary** to place the structure near the river for the convenience of users, design measures must be employed to maintain a natural appearing river environment.*
- *The selected site should enhance as many ORVs as possible.*

We take exception to the following two standards: 1. ***To best serve the public**, the visitor center **should be located** near the peak use area of the river;* and 2. *Although **it is necessary** to place*

*the structure near the river for the convenience of users, design measures must be employed to maintain a natural appearing river environment.* The rationale for our disagreement can be found in the next two sections on management standards for visitor centers (Appendix C of DEIS and Appendix 2-WS-2 of the BLM Medford Draft RMP/EIS).

In summary, the “would” standards appear designed to enhance the potential for a new visitor center to be located at Rand and the “should” and “necessary” standards are in conflict with the “certain” wild and scenic river standards documented in the BLM Medford District Office’s Resource Management Plan.

### **Management Standards For Visitor Centers — Appendix C**

The management standard for recreation facilities in Appendix C of the Hellgate RAMP/DEIS (page 332) documented concerns about protecting river resources and generally locating development away from the river (i.e., safe parking areas will be provided out of view of the river; except for launching ramps, facilities will not be built immediately adjacent to the river; and interpretive centers, administrative headquarters, campgrounds, and picnic areas may be established near the river). The management standard in Appendix C for interpretive centers and administrative headquarters seemed like an exception for the normal management approach of having facilities away from the river. It appears to be in conflict, if not in scope, then with the spirit of the statement on page 389, *“To best serve the public, the visitor center should be located near the peak use area of the river.”*

### **Management Standards For Visitor Centers — BLM MDO Resource Management Plan**

The “certain” BLM Medford District Office management guidelines and standards for its national wild and scenic rivers are documented in the BLM Medford District Office’s Resource Management Plan (see pages Appendix 2-75 to Appendix 2-81, Appendix 2-WS-2 of the BLM Medford Draft RMP/EIS). The “recreation facilities” management standards for a recreational river area follow (see page Appendix 2-76).

*Recreation facilities may be established in proximity to the river, although recreational river classification does not require extensive recreational developments. Recreational facilities may still be kept to a minimum with visitor services provided outside the river area.*

*Recreation Facilities. Interpretive centers, administrative headquarters, campgrounds, and picnic areas may be established near the river; although, a recreational river classification does not require extensive recreation development.*

The “recreation facilities” management standards for a scenic river area follow (see page Appendix 2-78).

*Recreation Facilities. Larger-scale public use facilities, such as moderate-sized campgrounds, interpretive centers, or administrative headquarters are allowed if such facilities are screened from the river.*

The “recreation facilities” management standards for a wild river area follow (see page Appendix 2-79).

*Recreation Facilities. Major public use areas such as campgrounds, interpretive centers, or administrative headquarters are located outside wild river areas.*

In summary, the “certain” management standards in the BLM MDO RMP are dominate and in conflict with the “should” and “necessary” standards documented in Appendix I of the DEIS. Recreation facilities like interpretive centers and administrative headquarters can be placed in proximity to a recreation river, however, facilities may also be kept to a minimum with a visitor center provided outside the river area — It is permissive. Visitor centers for scenic rivers are the same as recreation rivers and visitor centers and are allowed if screened from the river. Visitor centers for wild rivers are located outside the wild river area.

### **Impacts/Location Criteria By Site — Appendix I**

Except for acreage (i.e., one acre of space -- page 390 of DEIS), characteristics (e.g., size in square feet, numbers of full and part-time staff, etc.) of the possible visitor center sites were not documented.

Appendix I documented impacts to the three ORVs from the different possible visitor center sites. This attempt appeared to be trying to do what was required, but not attempted in the environmental consequences chapter. Again, it appears that this section is an add-on, and not coordinated with the rest the DEIS (e.g., no documentation in the affected environment chapter, few references in the environmental consequences chapter, etc.).

Standards for estimating impacts continued to be in error such as “*Convenience of use is a key concept in choosing a location for such a facility.*” Convenience of use is not an ORV. The management guidelines and standards for national wild and scenic rivers documented in the BLM MDO’s RMP allow the range of sites identified (i.e., Merlin, Grants Pass, Hog Creek and Rand). They can all be designed to satisfy the location requirements for a recreation river.

Another important statement made in Appendix I was:

*“Any proposed location would in concert with the existing building and traffic density found in the area.”*

This statement is erroneous as any new high quality visitor center will probably increase visitor use, in and of itself, perhaps from 100 to 200 percent over existing use (see analysis that follows for Yaquina Head).

## **Impact Analysis Site Development at Yaquina Head Outstanding Natural Area**

In 1990 the BLM contracted with private industry for an impact analysis of a new visitor center.<sup>1</sup> The overall objective of the impact analysis was to prepare information which facilitated planning and developing a visitors center at Yaquina Head. Specific objectives were to profile visitors, forecast visitation to Yaquina Head and a new visitor center, and analyze economic impacts associated with Yaquina Head and new visitor center. The visitor volume forecast had three scenarios: 1. current development, including an expansion of existing interpretive and education programs, 2. proposed development, including the construction of a high quality visitors center, and 3. same as scenario 2 with a modest admission fee to the visitor center.

Annual visitor volume forecasts for scenario 1 in the year 2000 were documented as approximately 352,000 visitors per year, about 30 percent greater than the baseline attendance of 271,604 in 1988. The annual visitor volume forecast for scenario 2 in the year 2000 was documented as approximately 633,560 visitors per year, over a 200 percent increase from the baseline attendance in 1988. Scenario 3, with the modest admission fee, was projected to have 145,674 visitors in 2000, an amount less than the base year.

One simple conclusion of the Ruyan study was that new high quality visitor centers, without admission fees, would in themselves and of the services they provide, create user visitations up to 200 percent higher than the base year with no other management changes.

### **NEPA Design Group's Overall Recommendation.**

An EIS is intended to provide decisionmakers and the public with a complete and objective evaluation of significant environmental impacts, both beneficial and adverse, resulting from a proposed action and all reasonable alternatives. It is recommended that BLM focus on significant issues, and inform decisionmakers and the public by documenting a full and fair discussion of significant environmental impacts resulting from potential new visitor centers in a supplemental DEIS.

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<sup>1</sup> Dean Runyan Associates. 1990. Visitor profile and impact analysis site development at Yaquina Head Outstanding Natural Area. Prepared for the USDI, BLM. Portland, OR.