



U.S. Department of the Interior
Bureau of Land Management

Determination of NEPA Adequacy

U.S. Department of the Interior
Bureau of Land Management
Prineville District
Deschutes Field Office
3050 NE Third Street
Prineville, OR 97754

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A. Background

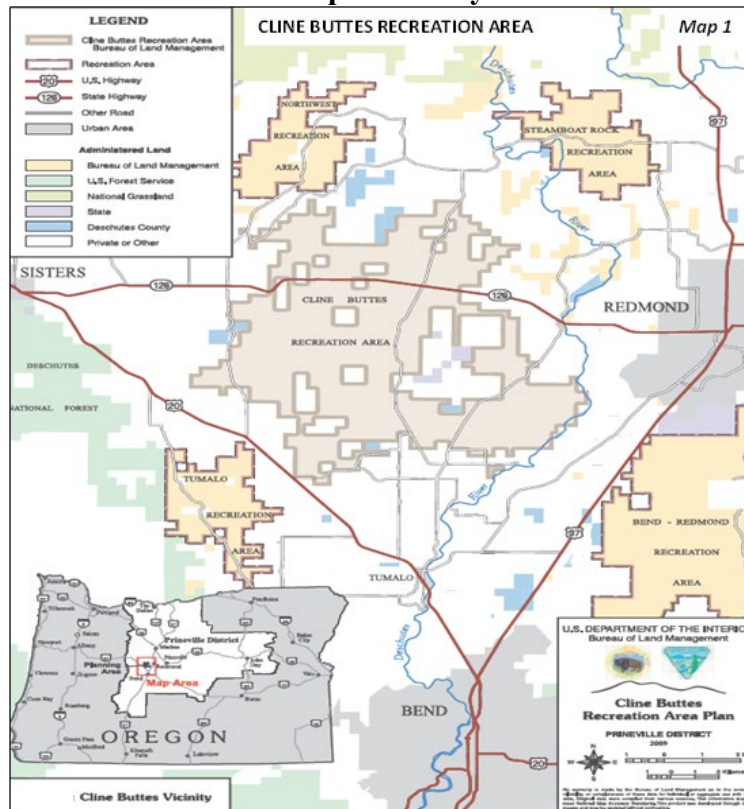
BLM Office: Prineville District, Deschutes Field Office

National Environmental Policy Act register #: DOI-BLM-ORWA-P060-2023-0014-DNA

Proposed action title: Non-motorized Recreation in the Cline Buttes Recreation Area

Location: Within the geographic boundary of the Cline Buttes Recreation Area (CBRA). The CBRA is in Deschutes County, Oregon and is approximately five miles west of Redmond, five miles east of Sisters, and twenty-four miles north of Bend (Map 1).

Map 1 Vicinity



Summary: The following actions are proposed to occur to the trail systems accessed from the Cascade View, Buttes East, Tumalo Canal, and Fryrear Trailheads. Trailhead improvements will occur at the Buttes East Trailhead.

- Designate the non-motorized trail system described in the proposed action which includes, hiking, equestrian, and biking trails.
- Construct the proposed hiking, equestrian, and biking trails listed in the proposed action.
- Maintain all trails listed in the proposed action.
- Construct an official parking area at the Buttes East Trailhead located on the eastside of the buttes.
- Install a CXT toilet at the Buttes East Trailhead.
- Install adequate trail related signs throughout the region discussed in the proposed action.
- Close trails that are not included as the official trails described in the proposed action.
- Create an official map of the designated trail system and make it available to the public.

Background: The purpose of this Determination of NEPA Adequacy (DNA) is to present an official trail system for hikers, equestrians, and bikers in the CBRA south of Highway 126 while assuring that such actions are compliant with National Environmental Policy Act (NEPA) standards as analyzed in the Cline Buttes Recreation Area Plan Environmental Assessment (EA).

The BLM-administered lands in Central Oregon are designated as the High Desert Special Recreation Management Area (RMP, p. 157). This designation recognizes the intense recreation use and demands as well as the need for increased recreation management to achieve specific recreation opportunities for the public. BLM has made several investments throughout the entire CBRA over the years; however, many of the non-motorized trails have not been officially designated. Furthermore, socially developed trails for hiking, equestrian, and biking use have added approximately twice the amount of mileage that was analyzed in the EA. Nearly 56.7 miles of non-motorized trails will be closed in order to be compliant with the analysis in the EA. The excess mileage of trails has created a series of problems and challenges, including:

- Increased habitat destruction for various plant and animal species. The EA assumed and analyzed for the protection of those resources.
- A decrease to important wildlife corridors and wintering ranges for animals such as mule deer and elk.
- Increased conflicts on trails and user confusion. People are not sure what type of trail they are on: hiking, equestrian, biking, or shared use trail.
- Increased soil erosion.
- Ingress to eagle nesting areas that are seasonally protected by Federal law.
- Decrease to visual and aesthetical experiences.

The CBRA is centrally located within the fastest growing urban area in the State of Oregon. The CBRA is an increasingly attractive destination for local and regional visitors in search of recreational opportunities including, but not limited to, off-highway vehicles (OHV), hiking, mountain bike riding, horseback riding, hunting, fishing, and wildlife viewing. The rapidly growing local population has resulted in the new development of homes, ranches, and resorts on private property adjacent to and within the boundary of the CBRA.

Equestrian use has long been popular in the CBRA and has mainly been enjoyed by local Central Oregon residents. Mountain bike use has increased over the past decade, with much of the visitation occurring on unauthorized, user-created downhill trails on the buttes themselves. The topography of the buttes offers highly desirable terrain for downhill enthusiasts that is closer to Central Oregon population centers than other bike trails. Walking and biking trails are in high demand regionally, especially the CBRA. The overall population growth, economic conditions, and demographic changes in the region have increased the use of and demand for non-motorized trails in the CBRA.

Proposed Action: The process of trail selection listed in this DNA involved numerous engagements with various recreational groups in the field and on-the-ground verification of the trails that will become the designated trail system (Map 2¹). The groups engaged during this planning process included: Central Oregon Trail Alliance, Deschutes Trails Coalition, Northwest Horse Trails, Back Country Horsemen of Oregon, and Oregon Equestrian Trails.

The CBRA EA was designed to provide a wholesome balance between recreational uses and environmental factors. Some bike trails are exclusive to bikes, while others are shared with hikers. All hiking trails are shared with equestrian users. Hikers are permitted to venture cross country off trail, but are encouraged not to create new trails. In most cases, bike and equestrian uses do not share trails in the CBRA. Creating and maintaining as much trail separation between biking and equestrians is essential to the transportation design in the EA (EA, p. 161) (Map 2).

All existing trails that are not included in the proposed action will be closed. Trails will be closed with the assistance of the recreational groups mentioned above and the BLM Prineville District Deschutes Field Office staff. Map 2 shows the current, proposed, and candidate closure trails in the Buttes and Southwest Areas. Approximately 56.7 miles of non-motorized routes are proposed to be closed. Trail closures will be handled in various ways depending on the type of use the trail currently gets (e.g., heavy or light).

- Heavily used user-created trails - large rocks and organic material (tree limbs/trunks/brush) located closest to the trail will be placed to physically block the trail entrance. Some trails will require recontouring with hand tools (rakes, pulaskis, shovels, etc.) for approximately 100 feet at the trail entrance and the scattering of nearby organic materials. Carsonite trail signs stating, “this is not an official route” will be installed, and some trails will be seeded or planted with seedlings.
- Lightly used user-created trails - recontour the trail with hand tools for about 100 feet; scatter nearby organic material over the first 100 feet of the trail at the trail entrance, install Carsonite signs stating, “this is not an official route,” seed and planting seedlings.

Trail improvements, construction, and closures could begin in the fall of 2023 and are likely to be completed by summer 2026. Work on some trails on the eastside of the buttes may be restricted due to eagle activity each year and will be assessed by BLM before work is authorized. It is important to clarify that most trails selected to become the official routes for hiking,

¹ Map 2 is in Appendix A of this document.

equestrian, and biking are not new trails. Rather they are existing and popularly used routes. The routes that have not been built/established and will require new construction are the following:

Southwest Area

- FR 7 (hiking/equestrian) - approximately 0.4 miles
- FR 8 (hiking/equestrian) - approximately 0.3 miles
- FR 9 (hiking/equestrian) - approximately 0.3 miles

Buttes Area

- Horse Middle Butte Summit (hiking/equestrian) – approximately 1.9 miles
- SW Horse Loop (hiking/equestrian) – approximately 1.4 miles
- TCH East (hiking/equestrian) - approximately 1.4 miles of the 2.4 mile trail will be new construction;
- Uphill #1 From XC (hiking/bike) - approximately 0.5 miles of new trail will be constructed;
- Buttes #2 Powerline DH (bike only) - approximately 0.15 miles of the 0.3 mile trail will be new construction;
- Saddle Exit (hiking/bike) - approximately 0.2 miles of new trail will be constructed to connect with the XC Trail to the east;
- DH 3 Lower Adjustment (bike only) - 0.5 miles of new trail will be constructed to connect DH 3 with the trailhead and trail system;
- XC Extension (hiking/bike) - approximately 0.6 miles of new trail will be constructed to connect the trailhead with the XC Trail and maintain a greater distance from the eagle territory;
- Saddle V2 (hiking/bike) - approximately 0.7 miles of new trail will be constructed for downhill travel;
- Saddle to Summit (hiking/bike) - approximately 0.3 miles of new trail will be constructed to access the summit of the middle butte;
- Southside Uphill (hiking/bike) - approximately 1.1 miles of the total trail length of 1.8 miles will be new construction;
- Trail C (hiking/bike) - approximately 2.2 miles of new will be constructed;
- Trail F (hiking/bike) - approximately 1.4 miles of new will be constructed;
- Stem Loop (hiking/bike) - approximately 1.3 miles of new will be constructed;
- Juniper Tie (hiking/bike) - approximately 0.6 miles of new will be constructed after proper investment has been made to safely cross Cline Buttes Highway to connect with the Juniper trailhead.

Hiking Trails - Buttes Area

Analysis of the “web” of unofficial trails between Eagle Crest and the eastern side of the Buttes Area shows that this is a popular area for people to access BLM-administered lands. However, the redundancy of trails causes high levels of impact. To reduce the duplication of trails and allow for the landscape and wildlife habitats to recover, a subset of trails is proposed to become part of the official trail hiker-only system (Map 2). These trails were selected to allow for

connectivity from various high traffic points to and from private properties surrounding the Buttes Area. All other non-designated trails are proposed to be closed (Map 2).

Equestrian Trails - Buttes and Southwest Area

After working with regional equestrian stakeholders (The Deschutes Trail Coalition, Northwest Horse Trails, Oregon Equestrian Trails, and Backcountry Horsemen of Oregon), the trails discussed below are included in the official BLM equestrian trail inventory (Tables 1-4).

In the Buttes Area, which includes Cascade View, Buttes East, and Tumalo Historic Area Trailheads (EA Table 15, p. 38), there are 5.7 miles of additional trails proposed to be built. The 5.7 miles would be added to the 17.8 miles of existing equestrian trails, making the total for all equestrian trails in the Buttes Area 23.4 miles.

In the Southwest Area, which is accessed from the Fryrear Trailhead, one mile of additional trail is proposed to be added. The 1 mile of trail would be added to the 30.7 miles of existing equestrian trails, making the total for all equestrian trails in the Southwest Area 31.7 miles.

**Table 1 Existing Equestrian Trails -
Buttes Area**

Trail Name	Miles
Horse SW Loop	1.9
Horse Silver Loop	1.1
Horse Southern Tie	0.3
Horse Round About	0.9
Horse Western Loop	2.1
103rd Trail	1.4
Antler Trail	1.2
TCH East 3	0.6
TCH East 2	0.8
TCH East1B	0.5
TCH East 1A	0.8
TCH East 5	0.1
TCH East Canal	1.5
TCH East 1C	1.2
TCH East 4	0.4
TCH East Forgotten Fields	1.9
TCH East 25	1.1
Total	17.8

**Table 2 Proposed Equestrian Trails –
Buttes Area**

Trail Name	Miles
Horse	1.9
Middle Butte Summit	
SW Horse Loop	1.4
TCH East	2.4
Total	5.7

**Table 3 Existing Equestrian Trails –
Southwest Area**

Trail Name	Miles
TCH West 1	0.3
TCH West 2	0.3
TCH West 3	0.2
TCH West 4	0.4

**Table 4 Proposed Equestrian Trails –
Southwest Area**

Trail Name	Miles
FR 7	0.4
FR 8	0.3
FR 9	0.3
Total	1.0

Table 3 Continued

Trail Name	Miles
TCH West 5	0.2
TCH West 6	0.4
TCH West 8	0.5
TCH West 9	1.0
TCH West 10	1.4
TCH West 11	1.1
TCH West 13	1.0
TCH West 14	1.6
TCH West 15	0.6
TCH West 16	1.4
TCH West 17	0.8
TCH West 18	2.4
TCH West 19	0.2
TCH West 21	0.6
TCH West 22	1.0
TCH West 23	0.3
TCH West 24	1.8
FR 1	1.4
FR 2	0.6
FR 3	3.3
FR 4	0.2
FR 5	3.6
FR 6	1.5
FR 29	0.3
FR 10	0.5
FR 11	0.2
FR 12	0.4
FR 80	1.2
Total	30.7

To reduce potential user conflict in the CBRA, the EA designed mountain bike and equestrian trails to be separated (EA, p. 36). To connect the Cascade View Trailhead to the Buttes East Area and provide access to the summit of the buttes, an existing trail, approximately 0.31 miles long, which crosses Oregon Department of State Lands (DSL) boarding the Eagle Crest property (to the south) would be maintained and designated into the official trail system (Map 2). This connector trail would be a shared use trail for hikers and equestrians and is wide enough to accommodate two-way traffic. A separate bike trail will traverse the DSL lands about 300 feet south of the shared use equestrian/hiker trail. These two trails are part of the official proposed Buttes Trail System but because they are not on BLM-administered lands, their mileage is not counted in the totals reported in this DNA.

A section of Trail 15 (FR5) is a shared route with equestrian and Class III OHV (dirt bikes). To avoid trail use conflicts on this trail, approximately 0.8 miles will be separated into two trails to allow safer use of the trail as it passes through a dry canyon east of Fryrear Canyon.

There is no official trail connection between the trails accessed from the Fryrear Trailhead with the trails accessed from the Tumalo Canal Trailhead. Each area will need to be accessed via their respective trailheads. There are many existing equestrian/hiker trails in the Fryrear area;

however, in order to comply with the total amount of equestrian and hiker miles allowed by the EA, only the trails found on Map 2, will be designated. All other routes not on Map 2 are proposed to be closed and rehabilitated in order to allow for habitat restoration and improved wildlife corridors. There are no officially designated bike trails accessed by the Fryrear or Tumalo Canal Trailheads (Map 2).

Once these routes have been approved, all other equestrian trails will be closed in the same manner as described for the bike trails. BLM will rely on partners to help educate equestrian trail users to only use the official trails and avoid others. The posting of accurate maps and signs will serve as an important tool to support this effort.

Equestrian Use - Trailhead and Access

Equestrian use and trailer parking will occur at the Cascade View, Tumalo Canal, Fryrear, and Maston Trailheads (EA, pp. 31 and 172). These four trailheads are specifically designed for large vehicles with trailers and have parking areas to accommodate. They are also equipped with picnic areas and CXT toilets. The proposed parking area at the Buttes East Trailhead is not designed to accommodate horse trailers.

Mountain Bike Trails - Buttes Area

The following existing and proposed trails are being considered as the official bike trail system in the Buttes Area. No biking trails are proposed in the Tumalo Canal, Southwest Region, or Fryrear areas (Tables 5-6 and Map 2).

**Table 5 Existing Mountain Bike Trails
Buttes Area**

Trail Name	Miles
DH1*	0.3
DH2*	0.3
DH3*	0.4
Jump Line (DH 1&2)*	0.3
Jump Return Line*	0.2
Saddle	0.5
The Slot*	0.2
Tower Perimeter	0.2
XC Trail North	1.0
Blue Belly Loop	2.7
Blue Belly Stem	1.4
Jack Rabbit	0.4
Stinger East	3.0
Stinger West	1.8
Total	12.7

*Indicates bike only trail designations, all other trails are shared with hikers.

**Table 6 Proposed Mountain Bike Trails
Buttes Area**

Trail Name	Miles
XC East Extension	0.8
Buttes #2 Powerline	0.3
DH*	
DH 3 Lower Adjustment*	0.5
Juniper Tie	0.6
Saddle Exist	0.2
Saddle V2	0.7
Saddle to Summit	0.3
Thornburg access east	0.2
Thornburg access west	0.1
Southside Uphill	1.8
XC Extension	0.2
XC Connector to Gate	0.4
Uphill #1 from XC	0.5
Blue Belly to State	0.3
Connector to F	0.3
Stem Loop	1.3
Trail C	2.2
Trail F	1.4
Total	12.1

The total amount of bike trails proposed to become the official trail system in the Buttes Area is 24.8 miles (EA, p. 38). This total includes designating 12.7 miles of existing bike trails and building 12.1 miles of new trails. Eight trails have been proposed as bike-only trails (Tables 5 and 6). These routes are categorized as bike only because the trail terrain is steep with varying degrees of rock features that provide difficult (black and double black diamond) riding opportunities. Additionally, they are connected to routes that allow easy flow for cyclists to return to key points on the eastside of the buttes area such as the parking lot, while being able to maintain sufficient speed to improve rider experience and reduce the potential for trail conflicts with hikers. Hikers are encouraged not to use these trails.

All existing and proposed trails have been verified for actual distance by BLM recreation staff to ensure that the quantity of bike trail miles does not exceed the maximum allowed by the EA. There are other trails within the CBRA trail system that are not considered part of the official bike trail inventory listed in Tables 5 and 6. These unofficial trails are proposed to be closed and efforts to not use these trails will be accomplished through various methods including the deployment of natural barriers, directional signs, updated maps and kiosks at trailheads, BLM website, and through the membership and social networks of key stakeholder biking groups.

Portions of the XC Trail will be closed permanently to avoid potential impacts with an eagle nest. Additionally, the XC Trail is proposed to be moved further away from the nest but within the 0.5-mile buffer. To reduce any potential impacts with eagles, signs will be installed between two points where the viewshed changes (Map 6), (the trail segment between the two bird symbols on Map 6). Signs will direct users to not stop between the two points from February 1 to August 31. Additionally, the Saddle Trail will be seasonally closed during the same period. A physical barrier, potentially in the form of a rustic/juniper swinging gate will be installed at the top and bottom of the Saddle Trail with closure signs during these time frames. Any future vegetation treatments will retain as much juniper as possible near the trails and parking area to maintain the current viewshed.

These recommendations will provide more clarity for recreational enthusiasts regarding what areas are seasonally closed during eagle nesting periods while offering year-round connectivity that is easily accessible via the proposed Buttes East Trailhead and the traditional convergence of trails on the eastside of the buttes.

Trail Construction

In partnership with qualified volunteer groups, the BLM proposes to implement the various trail changes described above. The EA lists Trail Objectives and Standards in Appendix I (EA, pp. 237-240). The information in the EA provides details on trail standards proposed for different trail types, methods used for trail construction and obliteration, and criteria used to determine specific placement or relocation of trails. Trail design standards will be applied to both existing and proposed routes. Trail design criteria will be followed as guidelines; not all criteria can be met on every segment of trail. The purpose of design standards is to create sustainable, low maintenance trails that provide quality recreation experiences and communicate trail design intent to agency staff and partners who are helping to create and maintain trails in the CBRA (EA, p. 237). Table 8 *CBRA Trail Standards* in the EA documents trail standards by trail type

(EA, p. 252). Specific routes described in this DNA would be flagged on the ground and site-specific survey work/clearances will be conducted prior to trail construction.

Gates, signs, and fences would be added as needed. Design standards for each are listed in Figure 32 *Gate Details* (EA, p. 246), Figure 33 *Sign Details* (EA, p. 247), and Figure 34 *Wood Fence Details*, and Figure 35 *Wire Fence Details* (EA, p. 248).

As part of construction and improvement of the existing trails in the Butte Area, BLM proposes to form an agreement with the Central Oregon Trail Alliance to use small trail building machines to supplement hand building techniques. Many of the existing trails will require some work in order to improve their stability and mitigate erosion. The Central Oregon Trail Alliance has considerable experience in trail design, maintenance, and construction in the Deschutes National Forest in the Bend and Sunriver areas and in the Ochoco National Forest (with the permission of the associated federal land management agencies). Certain areas along the proposed trails will require the use of specialized, light scale machinery to shape the trail beds. The mini skid (Image 1) is proposed for basic tread building of beginner to intermediate terrain. The skid steer has a bucket and blade, the blade is 3ft. 6in. wide. The mini excavator (Image 2) is used for building more advanced trails as well as berms and jumps. The excavator has a blade and bucket with a hydraulic thumb. Both operate on rubber tracks and will be used in the 3-foot width configuration unless the trail footprint is wider.



Left – Image 1. Mini skid steer; Right - Image 2. Mini excavator

Machine use is necessary to make the trail work manageable. Machines can cut trail in flat terrain very quickly and also allows for quicker work in more technical terrain that involves stacking or moving a larger amount of dirt and rocks. Building trails with berms and jumps requires shaping and dirt moving with the use of these machines. Doing this kind of work manually is very time consuming and not cost efficient. In some areas, especially in the CBRA where the terrain is very rocky, hand building would be nearly impossible on much of the proposed trail terrain.

Machines and manual building activities will be completed in a way that causes minimal disturbance to the land and vegetation. Operators work within the trail corridor to minimize ground disturbance and trail building activities will be supervised by BLM specialists to ensure compliance with the CBRA Trail Standards described in the EA (EA Table 8, p. 252). After the machine operator has created the trail tread, cut in drains, and built the correct slope angle, volunteers with hand tools will finish the trail. The hand finish work includes brushing and tree branch clearing, completing drains, and raking the tread to a narrowed and finished product. This hand work also involves fine tuning turning radiuses and slope for riders and water management. As shown in Image 3, a skilled machine operator working with a good hand finishing crew can create a trail that is barely distinguishable from a hand-built trail.

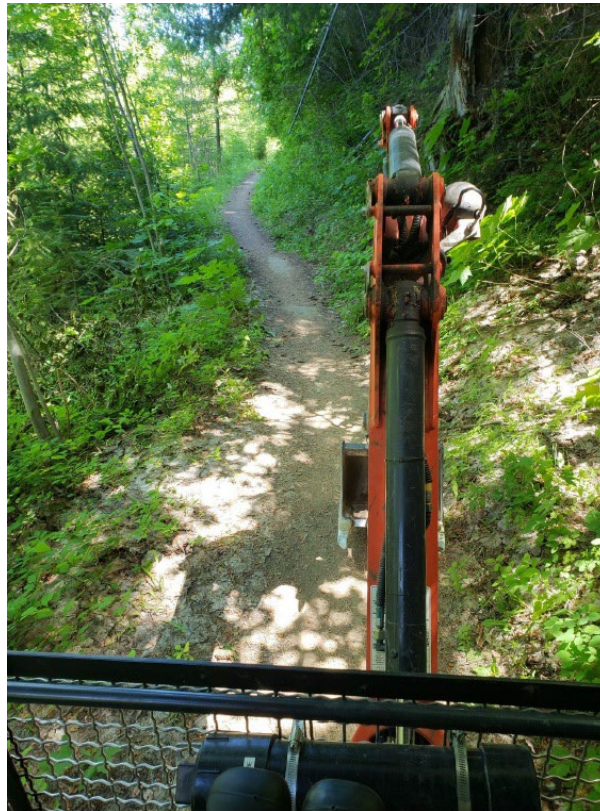


Image 3. Skid steer operation

All trail work is required to be completed in a safe and professional manner and all machine operators must have appropriate training. Operators are required to wear appropriate personal protective equipment: hard hat, eye protection, hearing protection, closed toed sturdy boots, and long pants. The machines operate at around 87 decibels. Sound levels would be expected to decrease to moderate levels around 100-200 feet from work sites. Signage will be displayed on trails where machine work is occurring to inform users of machine use and instruct the hand finishing crew to be on the lookout for trail users and to guide them through the area. The machines are equipped with an attached fire extinguisher and operators carry tools for fire abatement on hand and a fluid spill kit. Work hours and conditions will comply with Industrial Fire Precaution Levels. Additional measures will be taken to ensure minimal disturbance to the land. The machines are pressure washed before entering BLM-administered lands and when moving to different areas within the trail building region to minimize the spread of noxious

weeds. Trail layout and entry/exit points are designed to maximize the protection of resources such as wildlife and water sources. All reasonable efforts to minimize moving the machine off the trail and move it along the trail corridor will be made to minimize damage to surrounding vegetation and minimize erosion potential. BLM proposes to include regular maintenance duties, which are outlined in Appendix I (EA, pp. 237-240), in the agreement with COTA. However, whenever that is not possible, BLM may contract trail maintenance services with other non-profit organizations or volunteer groups. To learn more about COTA visit their website www.cotamtn.com.

Trailheads and Access

For many years, the buttes area has been accessed from a user-created parking area located on the Cline Falls Highway in Township 15 south, Range 12 east, sections 27 and 28, near the corner of BLM-administered land and private property (Vor Road). Since there is no way to access the buttes themselves from this site without crossing onto private land, BLM will develop the Buttes East Trailhead, which will be accessed from the Cline Buttes Rock Pit Road. The former parking area will be closed. Closing will consist of removing the gate and sign, adding information to guide users to the new Buttes East Trailhead, and the placement of additional fencing, boulders, or other means (EA, p. 31).

The proposed Buttes East Trailhead will be accessed by entering the Cline Buttes Rock Pit Road, which has been a popular parking and entry point for hikers and mountain bikers. Use will be restricted to single vehicles without trailers (EA, p. 31). Locating equestrian use and trailer parking at the Cascade View Trailhead, instead of the Buttes East Trailhead, avoids having lengthy and slow-moving vehicles turning on and off the Cline Buttes Rock Pit Road and Cline Falls Highway (EA, p. 209). This separation of access is recommended to help maintain separate trail systems for each user type on the buttes (EA, p. 31).

In addition to the major trailheads, numerous “neighborhood access” points were proposed to allow pedestrian access (EA, p. 31). The points are intended to serve locals accessing the CBRA by foot, horse, or bicycle from relatively short distances (EA, p. 31). These access points consist of a sign and entry gate, with few if any developed parking spaces (EA, p. 31). Most of these entry points are publicly accessible; however, some are from subdivisions and/or private roads. Entrances that provide legal access to homeowners’ associations or other private properties will not have directional signs to them from public roads and would be marked as “limited” or “private access.” The proposed action includes all access points listed in Table 11 *Neighborhood Access Points Common to All Action Alternatives* from the EA (EA Table 11, p. 32).

Buttes East Trailhead Restrooms and Parking Design

The proposed Buttes East Trailhead is located on the eastside of the buttes (Map 2). It is accessed via the Cline Falls Highway and the Cline Buttes Rock Pit Road. This site has been used as an unofficial parking area by biking enthusiasts for over 20 years. Many of the trails have already been built in a way that causes convergence at this location. The additional proposed bike trails also rely on this location as the official butte’s trailhead. The proposed trailhead is approximately 1.6 acres and has sufficient space for approximately 32 single vehicles and a double vault CTX toilet. The average dimension for a single full-sized parking space is 18ft. x 9ft., the example parking sites are 20ft. x 10ft. (Map 3). The example design has a 50ft. x 30ft. space available for a

double vault CXT toilet, although the actual footprint is closer to about 20ft. x 18ft. The final design will be assessed and defined by BLM engineers. Since this location has been used for decades as a parking area, the soil is already highly impacted. Combined with the topography that has a slight slope toward the east, this site will require minimal soil disturbance and no erosion is anticipated. Furthermore, the area allows for development with minimal impacts to junipers at this site, which complies with the golden eagle protection measures.

Map 3 Buttes East Trailhead, Proposed Parking Configuration, and CXT Toilet Location

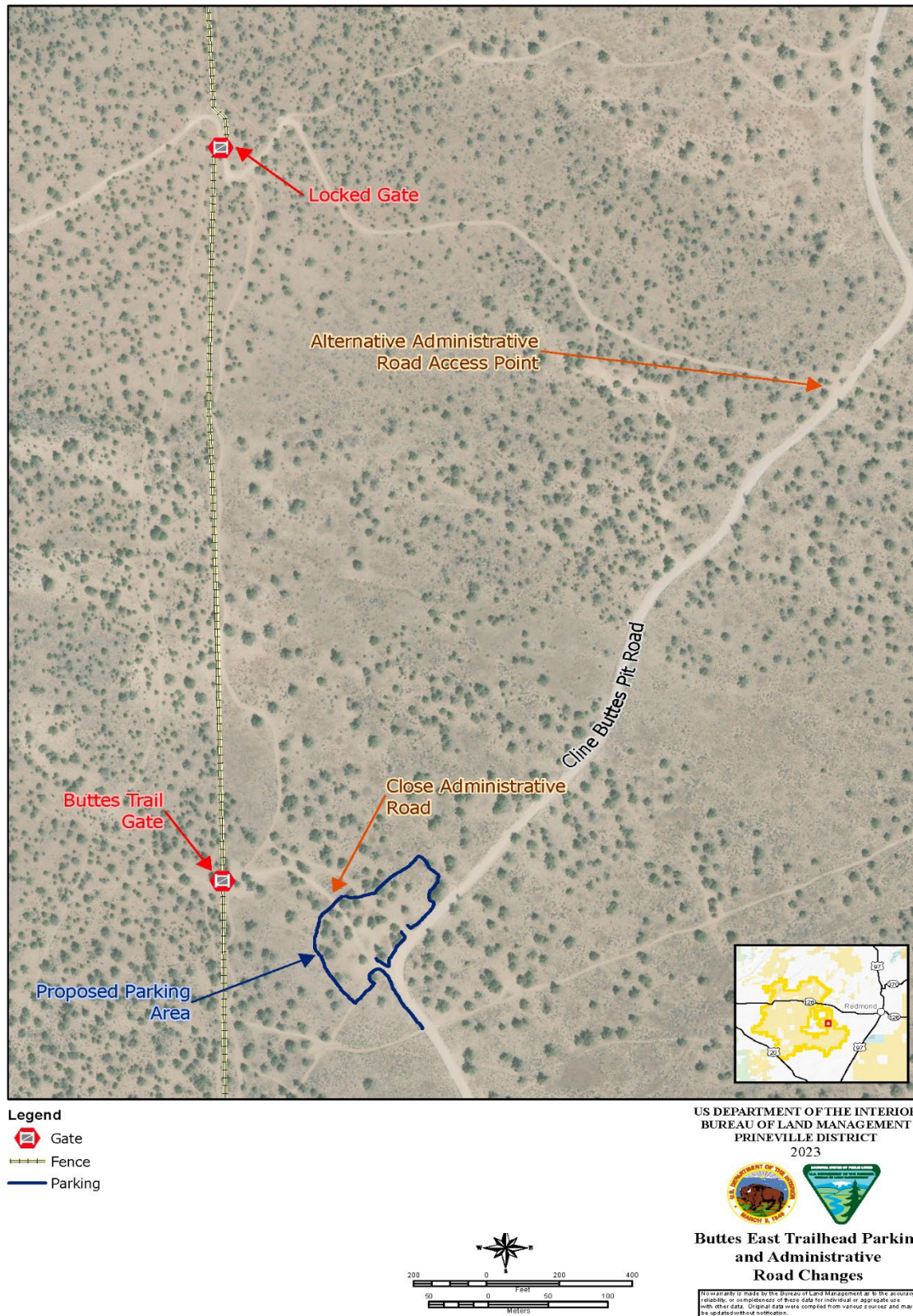


Excluding the Cline Buttes Rock Pit Road and a few administrative roads, the Buttes Area is designated for non-motorized use. There are many unauthorized roads that crisscross several acres of land. The trailhead design will incorporate various features which help restrict motorized access outside of the area. The strongest deterrent will be the installation of an approximately 1200ft. perimeter split rail and pole fence (outlined in green in Map 3) around the parking area. The fence would start approximately where the powerline access road crosses the Cline Buttes Rock Pit Road. Additional features such as boulders and a locked administrative access gate on the upper part of the Administrative Road (which travels to the top of the buttes) will create significant barriers to keep most recreationalists within the proposed trailhead and trail system. Boulders will be strategically placed to allow bike riders to pass freely but not allow four-wheeled Class II and most Class I and III vehicles to pass (see cyclist symbol on Map 3). Additional fence barriers are proposed along both sides of the Cline Buttes Rock Pit Road and west and southwest of the parking area to discourage motorized vehicle travel.

Considering that there are several roads within 0.5 mile of the parking area to the north that access the Administrative Road, and that authorized and unauthorized vehicles will continue to use this section of the Administrative Road, the segment that cuts through the proposed parking area will be permanently blocked. Official motorized vehicles can access the buttes themselves via the principal route approximately 0.4 miles to the north of the Cline Buttes Rock Pit Road (Map 4).

Official and authorized motorized traffic will be diverted away from the recreational parking area to the Administrative Road that accesses the summit of the buttes. To further reduce unauthorized motor vehicle travel the proposed action includes locking the gate located approximately 0.45 miles up the Administrative Road. The EA allows for adjustments to routes within the CBRA where unforeseen conflicts that can result in injury or death to recreationalists, private landowners, and right-of-way users, as a way to mitigate such risks (EA, pp. 4 and 237).

Map 4 – Buttes East Trailhead Parking and Administrative Road Changes



The following signs are proposed for the development of the new parking site:

- Directional sign from the Cline Falls Highway to the Buttes East Trailhead,
- Stops signs exiting the parking area,
- Signs directing equestrian access and use to Cascade View, Maston, and Tumalo Canal Trailheads,
- Kiosk map at the parking area trailhead,
- No parking/traffic direction signs within the parking area to control parking and traffic flow,
- No motorized entry sign along the Administrative Road that intersects with the XT trail toward the parking area. Restricting access to unauthorized vehicles may be challenging, but strategically placed signs notifying drivers not to travel in the direction of the parking area using the Administrative Road should help reduce use of these routes by OHVs. Additional barriers, such as boulders, may be required if repeat offenders cannot be controlled,
- Multiple interpretive signs; content may include but is not limited to: pollinators, bat species, and sensitive plant species including Peck's milkvetch (*Astragalus peckii*).

Trail Crossings

The EA analyzed various trail crossings (EA, p. 34) to facilitate trail network connections. The proposed action includes a connection between the trails accessed by the Buttes East trail system with the Juniper Trailhead system. Juniper Trailhead is approximately 0.6 miles to the east of the Buttes East Trailhead. The proposed action would establish a trail crossing and system connection from the Juniper Trailhead to the Cline Buttes Rock Pit Road, with connections to the Buttes East Trailhead and the Buttes trail system. This connection requires users to cross the Cline Falls Highway. The established trail crossing will require coordination with the Oregon Department of Transportation, Deschutes County Roads Department, and BLM to ensure the safety of both trail users and vehicular traffic. Funding is being pursued to create a safe crossing across the Cline Falls Highway. The connector route between these two areas is the Juniper Tie Trail (Map 2). To avoid encouraging bike riders to cross at that point on the Cline Falls Highway, the Juniper Tie Trail will not be constructed until a safe crossing is approved and implemented.

B. Land use plan conformance

Land use plan name: Upper Deschutes Record of Decision and Resource Management Plan Record of Decision (USDI BLM 2005)

Date approved: September 2005

The RMP provides direction that allows the BLM to designate roads and trails using new, modified, or existing trails, roads and rights-of-ways that will integrate the transportation and recreation needs expected in the CBRA (USDI BLM, pp. 135-140). This direction balances public, private, and administrative needs for access against the manageability of the road and trail systems while minimizing conflict among the various users and potential negative impacts on the landscape.

The proposed action is in conformance with the above plan because it is specifically provided for in the following land use plan decisions:

Integrating the transportation and recreation systems (USDI BLM, pp. 116, 135, and 136):

- Enhance the safety and quality of the recreational experience for all visitors and users.
- Minimize conflicts among public land visitors and adjacent landowners.
- Provide a transportation system that reduces conflicts between recreational users as well as between public land visitors and adjacent landowners.
- Provide for administrative operations access and ROW for private property access as appropriate.
- Designate access points and transportation/utility corridors to meet expected demands and minimize environmental impacts.

Wildlife, vegetation, and fire safety objectives (USDI BLM, pp. 27, 31, 51, 61 and 62):

- Support healthy, productive, and diverse populations and communities of native plants and animals.
- Maintain, promote, and restore the health and integrity of old growth juniper woodlands.
- Restore and maintain ecosystems consistent with land uses and historic fire regimes.
- Manage vegetation in the wildland urban interface (WUI) so wildland fire conditions allow firefighter safety and successful fire suppression.

The RMP is available at the BLM office or on the internet at:
<https://eplanning.blm.gov/eplanning-ui/project/36346/510>

C. Identify applicable National Environmental Policy Act (NEPA) documents and related documents that cover the proposed action

The following NEPA document(s) cover the proposed action:

- Cline Buttes Recreation Area Management Plan and Environmental Assessment, September 2009.
- Finding of No Significant Impact for the Cline Buttes Recreation Area Management Plan and Environmental Assessment, September 2009
- Decision Record for Transportation, Cline Buttes Recreation Area Management Plan and Environmental Assessment, August 2010

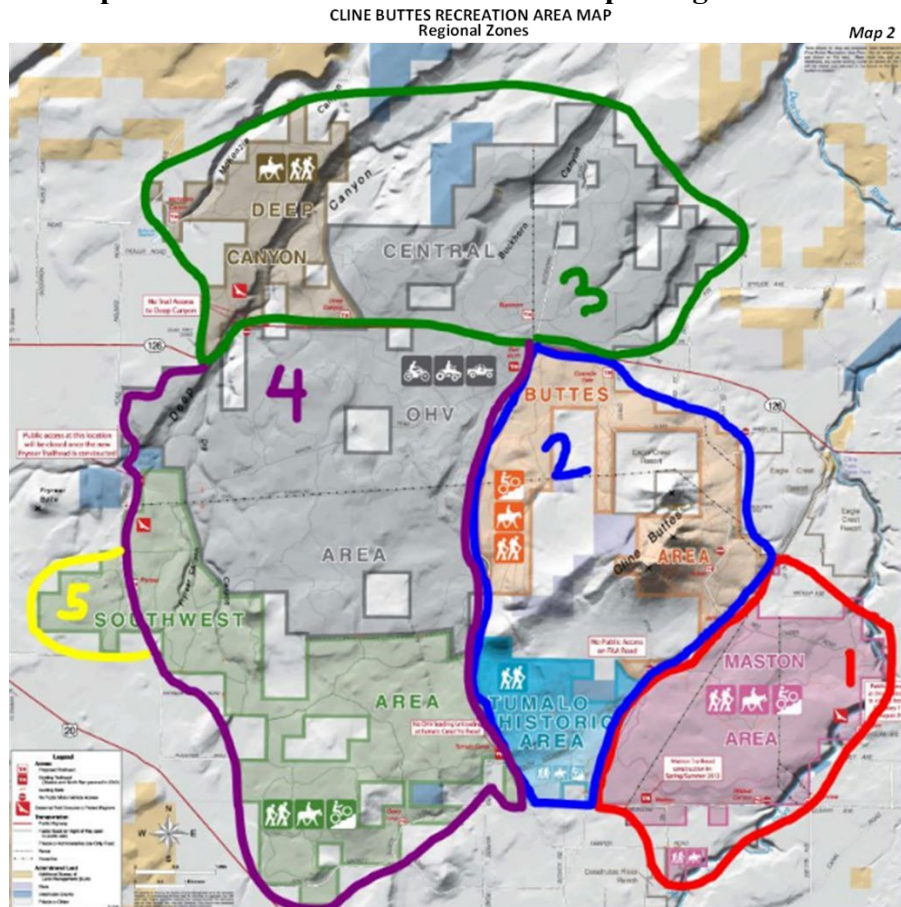
D. NEPA Adequacy Criteria

- 1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The proposed actions detailed in this DNA are a subset of the actions analyzed for non-motorized recreational use in the EA. All non-motorized trails described in this DNA are within the same areas that were analyzed in the EA (EA, pp. 3, 5, 19, 22-44, 83-88, 123, 143, 158-172, 238-239, 242-245, 251-252).

The EA defined five Regional Zones in the CBRA (Map 2). This DNA describes hiking, biking, and equestrian trail systems in the Buttes Area (Region 2) and the Southwest Area (Region 4). The Maston non-motorized trail system has already been established and will not be reviewed in this document.

Map 5 Cline Buttes Recreation Area Map – Regional Zones



- 1) Maston Area, 2) Buttes Area, 3) North of Hwy 126 Area,
- 4) South of Hwy 126 Area, and 5) West Fryrear Area

The two Regional Zones where changes are proposed in this DNA, Buttes and Southwest Areas, are the same as those analyzed in the EA (EA, pp. 33-34 and 38). Because the geographical areas are the same, the resource conditions present remain the same. Through the implementation of the trail designations and closures described in this DNA, resource conditions will be managed in a manner that meets the intent of the analysis in the EA.

The BLM proposes to implement portions of the “Non-motorized Trail System (Common to all Action Alternatives)” (EA, pp. 29-30) section, portions of the “Accessing the Non-motorized

Trail System” (EA, pp. 30-32) section, portions of the “Non-motorized Trail Use Common to All Action Alternatives” (EA, pp. 33-35) section, and portions of Alternative 2 Non-motorized Trail Use (EA, pp. 38-39).

Specifically, the DNA proposes to implement the following from each section:

Non-motorized Trail System (Common to all Action Alternatives) (EA, pp. 29-30)

The CBRA offers a variety of pedestrian, equestrian, and mountain bike trail opportunities that are separate from the motorized trail system. Pedestrians can use all trails, while there are different degrees and types of trail sharing for mountain bikes and pack stock use. Routes that use wide roads may be managed for use by different user types on each side of the road. Existing roads were used as trail routes in some cases, which accounts for the majority of the “easy” category trails. In order to provide a diverse trail experience, other trails were designed at a moderate or difficult skill level. The different types of non-motorized trails systems proposed in this DNA are listed below. Applicable trail design standards are provided in Table 8, Appendix 1 of the EA (EA, pp. 237-253) and will be applied to all newly constructed trails and to most of the existing trails proposed in this DNA.

- **Horse** - Trails designated, designed, and maintained for equestrian use (also available for other pack stock use and pedestrian use).
- **Bike** – Trails designated, designed, and maintained for mountain bicycle use (also available for hiking use).
- **Parallel** – Trails located within an approximately 200-foot-wide corridor that parallel each other and offer one route for mountain bike use and the other for equestrian use (hikers can use both trails).
- **Public road** – A public road, generally unimproved, that serves as a connector link in the proposed trail system. For example, portions of Barr Road are used in some instances as a mountain bike or equestrian route. In all cases, BLM would seek to provide a separate trail within the road ROW if possible.

The proposed action in this DNA proposes all types of trails: pedestrian, equestrian, and mountain bike. All equestrian and mountain bike trails are separate, hikers may utilize all trail types. The proposed actions above discuss the strategy for shared use trails in all areas, equestrian trails in the Buttes and Southwest Area, and mountain bike trails in the Buttes Area.

Accessing the Non-motorized Trail System (EA, pp. 30-32)

While most of the trailheads listed in the EA have been constructed (EA, pp. 30-31), the Buttes East Trailhead has not and is proposed to be constructed as part of the proposed action in this DNA. As described above, the proposed Buttes East Trailhead has been used for many years and the area is already impacted. To ensure further resource impacts are not caused elsewhere, the location proposed for the Butte East Trailhead is approximately 0.2 miles to the southwest of the location proposed in the EA.

CBRA equestrians and mountain bikers would access the non-motorized trail system at developed trailheads provided specifically for each use. As directed by the EA, trailheads have separated parking areas for hikers/mountain bikers versus equestrians. For the trail system on the

buttes, trailer parking for equestrians would be provided at the Cascade View Trailhead (off of Eagle Blvd.), while the Buttes East Trailhead (off the Cline Buttes Rock Pit Road) would have parking for single vehicles only (EA, p. 31). This separation of access is provided to help maintain separate trail systems for each user type on the buttes. As shown in Table 9 of the EA (EA, p. 27), a restroom (vault toilet) was anticipated at the Buttes East Trailhead, this area will also have a picnic and/or group area (EA, p. 27) and is part of the proposed action in this DNA (Map 3). As detailed in the EA in Tables 13 (EA, p. 37) and 14 (EA, p. 37), no camping or motorized use would be allowed at the proposed Buttes East Trailhead.

In addition to the major trailheads, numerous “neighborhood access” points were provided for in the EA to allow pedestrian access (EA, p. 31). The points are intended to serve local residents accessing the CBRA by foot, horse, or bicycle from relatively short distances. These access points would consist of a sign and entry gate, with few, if any developed parking spaces (EA, p. 31). Most of these entry points are publicly accessible; however, some are from subdivisions and/or private roads. Those that provide legal access only to homeowners associations or other entities would not have directional signs to them from public roads and would be marked as “limited” or “private access.” The proposed action in this DNA proposes the “Neighborhood Access Points Common to All Action Alternatives” identified in Table 11 (EA, p. 32). Not all access points are proposed for implementation at this time but may be implemented in the future.

Non-motorized Trail Use Common to All Action Alternatives (EA, pp. 33-35)

Non-motorized trail use is specific to the type of activity proposed; hiking, equestrian, or mountain biking, and whether the use of trails is shared amongst the types of activities. For the most part, the EA envisioned separate trails for equestrian and mountain bikes (EA, p. 36). There are also hiker only specific trails, but they make up a very small portion of the trails proposed in this DNA. Most of the trails are specific to either equestrian or mountain bike use, with hikers having access to both types of trails, as well as cross-county travel (EA, p. 38).

Each of the Regional Zones (described in greater detail below and Map 5), has specific direction for trail use. This DNA proposes actions within the Buttes and Southwest Area Regional Zones.

Within the Buttes Area (including Tumalo Canal ACEC) (EA, p. 34), the EA analyzed, and this DNA adheres to no trails in the Federal Aviation Administration (FAA) clear zone, a shared pedestrian/equestrian and mountain bike trail corridor through State land on an existing road would complete the loop around north butte, and trail crossing at the Cline Buttes Rock Pit Road and Cline Falls Hwy, and designated links between BLM trails and trails on Eagle Crest Resort and proposed trails on Thornburgh Resort.

Within the Southwest Area (Area West of Barr Road and East of Fryrear Road) the EA analyzed, and this DNA proposes to manage Fryrear Canyon as a non-motorized area with trail crossings at Barr and Fryrear Roads.

Alternative 2 Non-motorized Trail Use (EA, pp. 38-39)

In Alternative 2, the EA provided for a relatively high mileage of both equestrian and mountain bike trails (EA, p. 38). Proposed trail totals include newly proposed trails that will be built and existing trails. Together they will be designated as the official trail system.

Based on field assessments, the BLM determined that socially developed trails for hiking, equestrian, and biking use exceed the quantity of trails analyzed in the EA for the two areas described in Tables 10 and 11. The BLM proposes to close 22.6 miles of trails within the Buttes Area (all trail types), and 33.1 miles of trails in the Southwest Area (all trail types). The non-motorized trails proposed and designated through this DNA process will become the official trail network for the Buttes and Southwest Areas.

Tables 10 and 11 below contain mileage totals from the EA (EA Table 15, p. 38), quantities of new trails proposed in this DNA, existing trail miles that will become part of the designated trail system, and the total for the officially designated trail system for the two Regional Zones described in this DNA.

Table 10. Buttes Area Trails

Trail Type	EA Trail Miles	New Trail Miles	Existing Trail Miles	Designated Trail System Miles
Horse Total	24.7	5.7	17.8	23.4
Bike Total	25.2	12.1	12.7	24.8
Pedestrian Total	>50	7.8*	45**	52.8

* These trails already exist but are proposed to become hiking-only trails.

** Horse and bike trails are designed to be shared with hikers with the exception of the proposed eight bike-only routes shown in tables 5 and 6.

Table 11. Southwest Area Trails

Trail Type	EA Trail Miles	New Trail Miles	Existing Trail Miles	Designated Trail System Miles
Horse Total	33.5	1	30.7	31.7
Bike Total	34.3	0	0	0
Pedestrian Total	36.3	7.9*	33.5**	41.4

* 7.9 miles of new pedestrian trail will be reserved for hiking-only.

** Pedestrian trails are shared routes with horse riders. There are no bike trails in the Southwest Area.

The EA analyzed for approximately 6 miles of hiking-only trails in the Tumalo ACEC (EA, p. 33), which is part of the Buttes Area, and analyzed for a total of 36.3 miles of hiking trails in the Southwest Area. The proposed action is to reserve 7.8 miles of trails in the Tumalo Canal ACEC and 7.9 miles of trails in the Southwest Area as hiking-only trails. Because these trails currently exist, no new hiking-only trails are proposed to be constructed in either area. The trails in these regions are popular and already exist but have never been officially designated as hiking-only trails. There are 45 miles of existing shared-use trails in the Buttes Area. In the Buttes Area, the proposed action includes approximately 52.8 miles of total trails available to hikers as hiker-only trails or sharing with equestrian and mountain bike users. In the Southwest Area, the proposed action includes approximately 41.4 miles of total trails available to hikers as hiker-only trails or sharing with equestrian users. Because the proposed action for each

Regional Zone does not maximize trail miles in each category, exceeding the miles of hiker only trails is allowable and does not change the analysis in the EA.

The EA analyzed for a total of 24.7 miles of equestrian trails in the Buttes Area which includes Cascade View, Buttes East, and Tumalo Historic Area Trailheads (EA Table 15, p. 38) and analyzed for a total of 33.5 miles in the Southwest Area (EA Table 15, p. 38). In the Buttes Area, the proposed action is to add approximately 5.7 miles of new equestrian trails, when added to the 17.7 miles of existing trails, the total designated equestrian trail system in the Buttes Area will be 23.4 miles (Map 2). In the Southwest Area, the proposed action is to add 1 mile of trail that will be accessible from the Fryrear Trailhead, when added to the 30.7 miles of existing trail, the total designated trail system in the Southwest Area will be 31.7 miles. Map 2 includes the existing and proposed equestrian trails.

The EA analyzed for a total of 25.2 miles of mountain bike trails in the Buttes Area which includes Cascade View, Buttes East, and Tumalo Historic Area Trailheads (EA Table 15, p. 38) and analyzed for a total of 34.3 miles in the Southwest Area (EA Table 15, p. 38). In the Buttes Area, the proposed action is to add approximately 11.1 miles of new mountain bike trails, when added to the 13 miles of existing trails, the total designated mountain bike trails in the Buttes Area will be 24.1 miles. In the Southwest Area, the proposed action will not add any mountain bike trails, there are also no existing mountain bike trails. At this time, the Southwest Area will be focused on hiking and equestrian trails only. Map 2 shows the existing and proposed mountain bike trails in the Buttes Area.

The total proposed hiking, equestrian, and bike trails in the Buttes and Southwest Areas are within the maximum of all trail miles analyzed in the EA and are therefore acceptable for consideration. Maps 2 provides detailed information for the various trail systems.

To ensure resources are protected during trail construction, maintenance, and closure, the Trail Objectives and Standards outlined in Appendix A will be implemented (EA, pp. 237-253). The standards apply to all types of activities associated with trails including trail design criteria, trail access structures, trail construction, rehabilitation, maintenance, maps, signs, public information, trail difficulty ratings, and trail system implementation.

Based on the information presented above it is clear that the proposed action described in this DNA is a subset of Alternative 2 and the “Actions Common to All Alternatives” for non-motorized recreation in the CBRA, specifically the Buttes and Southwest Regional Zones. The trails described in this DNA are similar in-kind and do not counter the analysis in the EA. Although the Buttes East Trailhead proposed in this DNA is being moved 0.2 miles to the southwest, the development of this site is supported by the EA (EA, p. 27). A BLM Interdisciplinary Team analyzed all proposed actions contained herein and found them to conform to the analysis in the EA. In addition, the project is within the same analysis area and the resources conditions are sufficiently similar to those analyzed in the existing NEPA document.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

The range of alternatives analyzed in the existing EA is appropriate with respect to the new proposed action. For non-motorized recreation, the EA analyzed three action alternatives (EA, pp. 36-44). Alternative 2 contained the greatest mileage of non-motorized trails with Alternative 3 and 4 each having decreased mileages, Alternative 4 had the least.

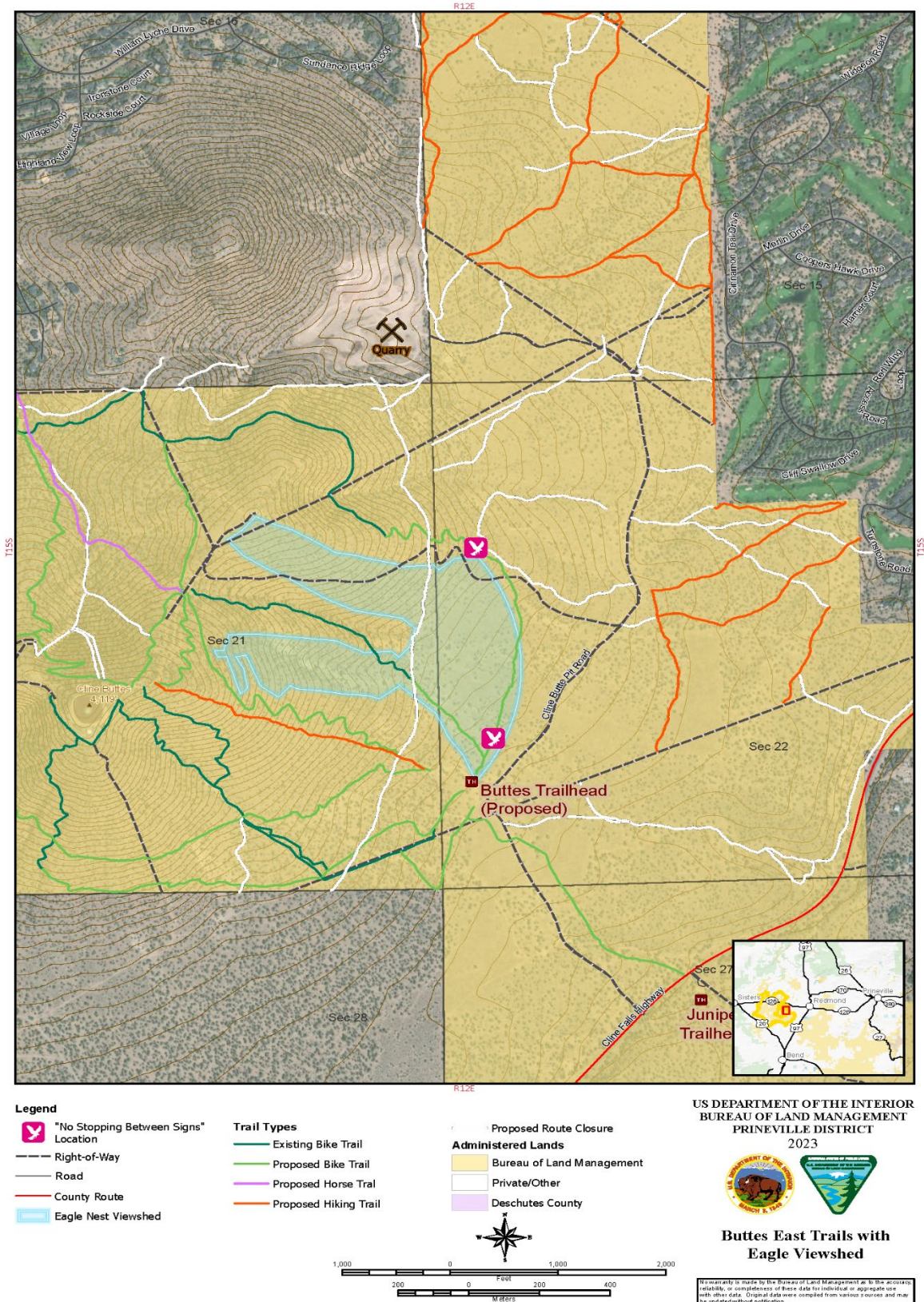
The current proposed action implements Alternative 2, including portions of the “Elements Common to All Action Alternatives” (EA, pp. 29-35). Alternative 2 was authorized in the 2010 decision for Transportation. The range of alternatives analyzed in the EA is appropriate given current environmental concerns, interests, and resource values.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

The BLM considers the golden eagle territory on the eastside of the buttes to be new information since the time the EA was published. The EA analyzed effects to golden eagle nests at three specific locations in the Cline Buttes Area (EA, p. 95); however, the Cline Buttes territory was not included because it was not established when the EA was originally published in 2009. In addition to analyzing the three nests, the EA analyzed effects to golden eagles from human activities in general (EA, p. 95). Although the buttes east eagle territory was not specifically analyzed for in the EA, the effects analysis within the EA remains valid. The EA determined that the combined activities of Alternative 2 on BLM-administered lands and actions on other lands in the planning area and immediately adjacent areas are expected to result in maintaining and improving the security of all active nest sites and increase the amount of suitable foraging habitat on BLM-administered lands. This improvement would be due to a reduction in potential disturbances within 0.5 mile of nest sites by locating most trails farther than 0.5 mile from nests, implementing seasonal closures of trails within 0.25 to 0.5 mile of the nests, decreasing the overall amount of travel routes within 0.5 mile of nests, limiting motorized, equestrian and mountain bike travel to designated routes and limiting pedestrian travel to designated travel routes seasonally (EA, p. 196).

To ensure effects to the Buttes golden eagle territory are minimized and within the bounds of the analysis within the EA, a viewshed analysis was performed during the consideration of the DNA proposed action (Map 6). The viewshed analysis considered land and vegetation features on the ground that affect line of sight visibility. Although the viewshed analysis provided a basis for analysis, it could not take into consideration microtopography or existing vegetation density on the landscape. On-the-ground, site-specific analysis allowed the BLM wildlife biologist to adjust the golden eagle buffer from 0.5 miles to 0.25 miles in some areas (Map 6).

Map 6 Buttes East Golden Eagle Viewshed



Based on the field verified eagle viewshed analysis, the closest edge of the proposed Buttes East parking area location is 0.3 miles away, but the entire parking area location is not within the viewshed of the nest. The user-created parking area that is about 0.25 miles away from the nest will be removed. The new proposed Buttes East parking area will be collocated with the Cline Buttes Rock Pit Road, thus reducing the amount of habitat fragmentation within the territory. Portions of the XC Trail will be closed permanently to avoid potential negative impacts with nesting eagles in the future (Map 6). Additionally, the XC Trail is proposed to be moved further away from the nest but within the 0.5-mile buffer. This alternative XC Trail has a low amount of juniper cover; therefore, to reduce any potential impacts to eagles, signs will be installed between two points where the viewshed changes (Map 6, the trail segment between the bird symbols). Signs will direct users to “not stop” between the two points from February 1 to August 31. This follows suggestions from Spaul et al. 2017, *Flushing Responses of Golden Eagles (Aquila chrysaetos) In Response to Recreation*. Additionally, the Saddle Trail will be seasonally closed during the same period (unless monitoring has indicated that the nest is not occupied, failed, or fledged. The earliest the closure could be lifted is May 15. This would accommodate late nesting or renesting eagles.) A physical barrier, in the form of a rustic/juniper swinging gate (or similar) will be installed at the top and bottom of the Saddle Trail with closure signs during these time frames. Lastly, any potential vegetation treatments conducted outside of this DNA, will retain as much juniper as possible near the trails and parking area to maintain the current viewshed.

To ensure the protection of nesting golden eagles, no surface disturbing or disruptive activities are allowed from February 1 to August 31 unless permitted by the authorized officer² (or the nest is documented to be inactive, unoccupied, fledged, or failed after May 15).

Additionally, the EA lacked project design features for the protection of wildlife. After review by the BLM wildlife biologists, it was determined that there is a need to add project design features for the protection of wildlife throughout the CBRA. For the protection of big game winter range, no surface disturbing or disruptive activities are allowed from December 1 to April 30, unless permitted by the authorized officer.

The existing analysis is valid in light of the Cline Buttes territory. It is reasonable to conclude that the new information will not substantially change the EA analysis as applied to the DNA proposed action. The BLM performed the necessary analysis to appropriately adjust the project and provide protection for the eagle nest and viewshed. The BLM is adhering to the requirements in the EA by reducing potential disturbance within 0.5 miles of the nest by moving trails, implementing seasonal closures within 0.25 to 0.5 miles, and decreasing the overall amount of routes within the 0.5 miles area. The Buttes East eagle nest has been provided protection as analyzed in the EA, therefore the analysis is not substantially changed.

² These restrictions may be lifted following BLM wildlife staff monitoring of the nest when the nest is deemed to be unoccupied, the young have fledged, or the nest has failed. Restrictions could be lifted no earlier than May 15th of any given year to allow golden eagles to attempt renesting.

4. Are the environmental effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

The EA analyzed the Buttes and Southwest Area for non-motorized use (EA, p. 38). Finalizing the official trail system for hikers, equestrians, and bikers, will provide clarity regarding which trails they should be using relative to their activity within these areas. The proposed action identifies the non-authorized routes that will be closed, which will improve wildlife concerns such as wintering ground and habitat health/connectivity (EA, pp. 90-97; 173-200), reduce raptor nesting conflicts, improve hydrology cycles (EA, p. 111-114), decrease erosion (EA, pp. 113, 114, 118, 119, 121-123, 149, 152, 153), improve fire safety objectives (EA, pp. 4-8, 11-18, 66, 67, 120-125), increase vegetation management (EA, pp. 1, 3, 11-17, 111-140), and aesthetics. The user created expansion of the trail network in the CBRA to well beyond what was analyzed in the EA is having a degrading effect on various resources analyzed in the EA. This DNA serves an important role in bringing the CBRA in line with the analysis as defined in the EA, which allows for an appropriate balance between social, economic, and environmental interests which contribute to the self-sustainability of the CBRA (EA, p. 38).

The Southwest Area Regional Zone contains Peck's milkvetch (*Astragalus peckii*), a special status plant species that is also a Bureau Sensitive species endemic to Central Oregon and Klamath County (EA, p. 62). The Upper Deschutes Resource Management/Record of Decision Plan (RMP/ROD) designated approximately 14,000 acres for Peck's Milkvetch Area of Critical Environmental Concern (ACEC), of which 10,000 acres are within the CBRA. The RMP/ROD specifies allowable uses within the ACEC, specific to this DNA, recreation activities – motorized, mechanized, and pack stock (e.g., equestrian use) is limited to designated routes (EA, p. 63). In addition, motorized vehicle use off designated roads and trails is not allowed in the ACEC during March 1 through August 15 (EA, p. 105).

The analysis within the EA determined that all action alternatives would decommission undesigned routes and limit bicycle and equestrian use to designated trails (EA, p. 116), resulting in a reduction of route density in Peck's milkvetch sites by 50-60% (EA, p. 116). The proposed action described in this DNA proposes to close approximately 33.1 miles of user created trails within the ACEC (Map 2). The majority of the proposed user created trail closures are located in the heart of the ACEC and will assist in meeting the goals of the analysis in the EA that presumed less disturbance in the ACEC (EA, p. 117).

There will be short-term periods of disturbance during trail construction and trail closure activities. The proposed new and closed routes will be reviewed by the BLM botanist and the location of the trails may be altered to avoid individuals and populations of Peck's milkvetch. The type of trail closure may also be changed due to the presence of Peck's milkvetch, specifically route closures may be implemented passively, meaning trail beginnings and endings would be blocked with downed vegetation or rocks and the remainder of the trail would be allowed to slowly repair overtime. There may be some instances where the trail surface will be scarified with hand tools, this should not have a detrimental effect to the species because individuals and populations would be avoided but also because the species appears to tolerate some degree of disturbance (EA, p. 63) so may benefit from trail closure activities. In the long term, the analysis in the EA expected an increase in plants occupying the sites, an increase in

flowering and fruit production, an increase in seedling establishment, and an increase in overall size and vigor (EA, p. 117), this remains true for the proposed actions described in this DNA.

Lastly, the EA states that due to a limited number of designated trailheads and access points, opportunity for education, signing, and enforcement due to trailheads and designated trails, all Action Alternatives would increase the likelihood that trail users stay on designated trails. The proposed action in this DNA includes the installation of educational signage at Tumalo Canal and Fryrear Trailheads.

The EA analyzed several categories of environmental concern (EA, chapters 3 and 4) and the proposed actions in this DNA do not contradict the existing analysis. There is no knowledge of any significant events that change the analysis. The BLM has determined that the environmental effects that will result from the implementation of the proposed action described in this DNA is a subset of the proposed actions analyzed in the EA and therefore the environmental effects will be the same as those analyzed in the EA both quantitatively and qualitatively.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

The BLM initiated planning for the CBRA recreation plan in 2006 with a public meeting, followed by eight field tours, and a two-day design workshop. BLM sent four informal newsletters and posted the public comments and summary maps from the design workshop on the BLM website (EA, p. 5). Preliminary concepts for recreation trail design were posted on the website, which were used to develop further input (EA, p. 5). The BLM invited participation of recreational groups, private landowners, environmental organizations, and individuals, as well as local and State government agencies, other federal agencies, and tribal governments (EA, p. 5). A detailed summary of public involvement can be found in Chapter 5 of the EA, Consultation and Coordination (EA, pp. 215-218). In addition to internal contributions, the proposed action was formulated in part based on past governmental and public comments, opinions, concerns, publications and observations concerning the current state of the CBRA and changes deemed desirable (or undesirable) in the area (EA, p. 215). Such input was received during meetings, design workshops, field tours, informal discussions, and written correspondence from 2006 to 2009 (EA, p. 217).

The original outreach played an important role in defining the terms of the EA and is adequate for the current proposed action. BLM engage a wide range of private and public persons, organizations, and agencies (EA, p. 216). The diverse engagement lasted approximately 3 years and was sufficient time for public and private representatives to be heard and involved in the decision-making process (EA, pp. 215-218).

In addition, several meetings, emails, and phone calls were conducted from September 2022 through April 2023 with various partner organizations that represent thousands of people with different recreational interests throughout Oregon. The objectives of the communications and meetings were to define the proposed routes listed in this DNA. Heavy emphasis was placed on allowing the partners to have input on the routes and locations that were most valued by each type of non-motorized enthusiast. BLM recreation planners met with partners to physically map

out routes within the CBRA in order to assure location and mileage accuracy. Community partner organizations involved in the development of the proposed action in this DNA include, Central Oregon Trail Alliance, Deschutes Trails Coalition, Northwest Horse Trails, Back Country Horsemen of Oregon, and Oregon Equestrian Trails.

Lastly, this document was made available to the public for a 15-day period through BLM's NEPA register, commonly known as ePlanning, to allow for public commenting. The public was invited to present input regarding this proposal. BLM's response to comments received is provided in Appendix B. BLM contact information is found in Section G below.

E. Preparers

Name	Title	Resource/ Agency Represented
Daniel Shaneyfelt	Outdoor Recreational Planner	Overall planning and coordination
Larry Ashton	Wildlife Biologist	Wildlife
Michael Rall	GIS Specialist	Maps and planning
Kurt Hunt	Archeologist	Cultural resources
Ian Grinter	Botanist	Special status plants and weeds
Ferris Couture	Planning and Environmental Coordinator	NEPA compliance and document preparation

Note: Refer to the EA for a complete list of the team members participating in the preparation of the original NEPA analysis documents.

F. Conclusion

Management Determination Based on the review documented above, the BLM has concluded that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Authorized Officer:
Kevin Weldon
Acting Field Manager, Deschutes Field Office

Note: Once signed, the conclusions on this worksheet are part of an interim step in the BLM's internal decision process and do not constitute an appealable decision.

G. Contact Person

For additional information concerning this DNA review, contact Daniel Shaneyfelt, BLM Outdoor Recreation Planner, Prineville District Office, 3050 NE Third St., Prineville, OR 97754, at (541) 416-6865 or by email at dshaneyfelt@blm.gov.

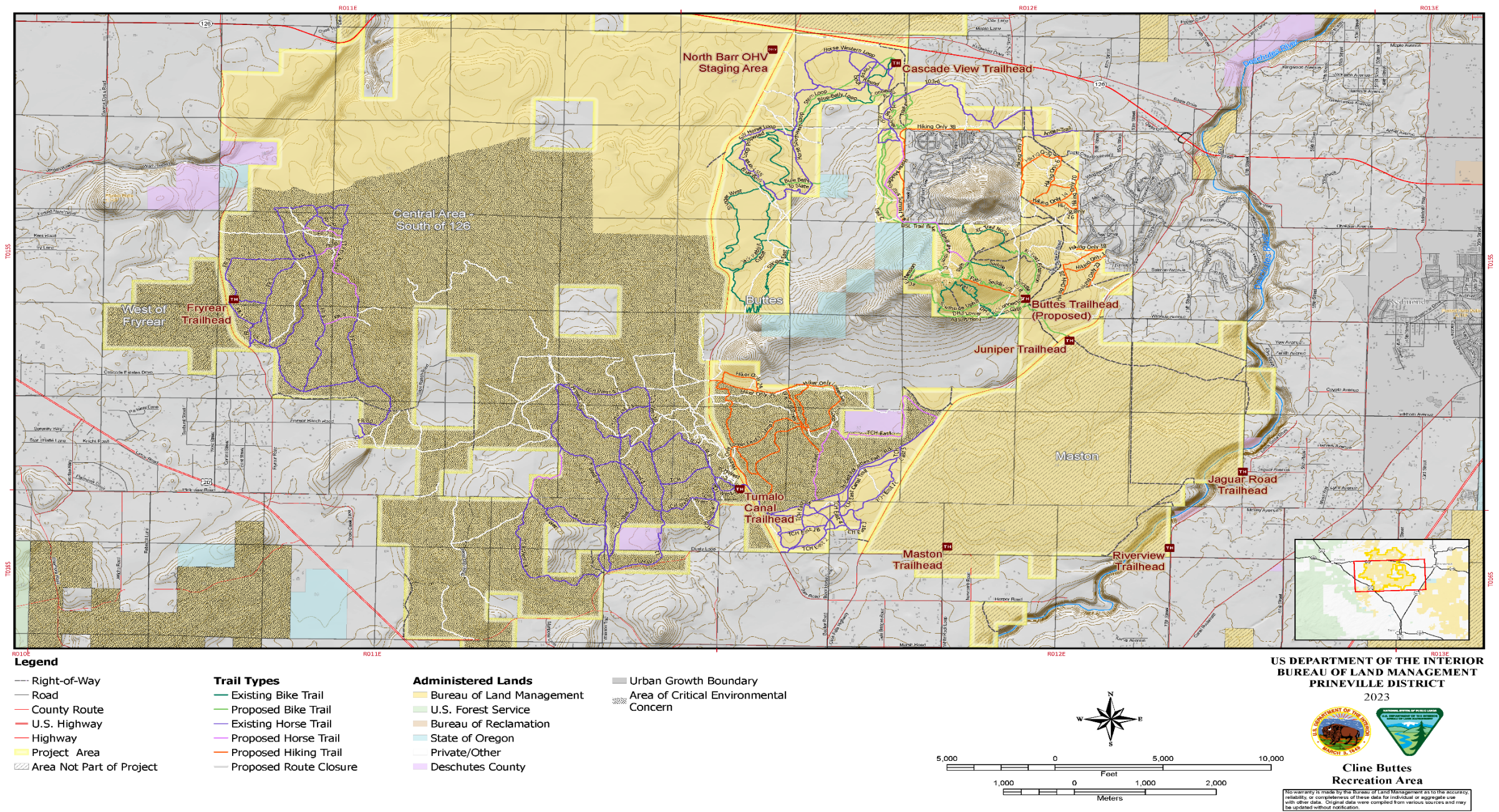
H. References

USDI BLM. 2005. *Upper Deschutes Record of Decision and Resource Management Plan*.
Prineville, Oregon.

USDI BLM. 2008. *BLM National Environmental Policy Handbook H-1790-1*. Washington, D.C.
–*Appendix 4 BLM Categorical Exclusions*.
https://www.ntc.blm.gov/krc/uploads/366/NEPAHandbook_H-1790_508.pdf.

USDI BLM. 2009. *Cline Buttes Recreation Area Plan and Environmental Assessment*.
Prineville, Oregon.

Appendix A – Map 2 Official Non-motorized Recreation Trails in the Buttes East and Southwest Area



Appendix B – Response to Comments

The BLM released the Cline Buttes Non-motorized Recreation Determination of NEPA Adequacy for a 15-day public comment period from September 7, 2023, to September 21, 2023. The BLM accepted comments via email, ePlanning, phone, and hardcopy. The BLM mailed 73 letters to neighbors and interested parties, sent emails to 11 partner groups, and advertised a news release with two local television channels, four newspapers, and five radio stations. The draft DNA and supporting maps were posted to ePlanning at the beginning of the comment period on September 7, 2023.

As a result of public outreach, the BLM received 84 total comments, 90% of the comments were in support of the proposal. The remaining comments offered concerns and suggestions to improve the proposal. Below is summary of the substantive comments received during the comment period. Substantive comments do one or more of the following: question, with reasonable basis, the accuracy of information presented, question the adequacy of or methodology for the assumptions used during the analysis, present new relevant information, present alternatives to the proposed action, or suggest reasonable changes to the proposed action.

The BLM considered the substantive comments before issuing the final Determination of NEPA Adequacy. Some substantive comments caused additions to the proposed action; the comment responses provided below offer clarification to the reader.

1. Comment Topic: Development of private property and trails on private property

Excerpt: Commenters expressed concern with the development of private property in the Cline Buttes area and how that development impacts access to trails in general and BLM-administered land in the area.

Response: The Cline Buttes Recreation Area is a mix of public and private lands, most of the public land is federally managed BLM lands. There is a small amount of Oregon Department of State Lands and Deschutes County lands. The BLM has no jurisdiction over actions occurring on private, state, or county lands. The BLM does not regulate development or the use of water on private lands. The BLM is unable to ensure trails located on private lands that were previously used to remain available. The only way to ensure trail access points and trails themselves remain open to the public is to locate them entirely on BLM-administered lands.

There are many trails in the Cline Buttes area that are user created and have developed overtime, this is true for trail access points and connections. The BLM is responsible to ensure access and use of public land occurs in an orderly fashion and is as safe as possible. In recent years, the Thornburgh property began to be developed and increased construction equipment and vehicles are common. The previous parking area, located directly off the Cline Falls Highway, was a commonly used access point to the buttes themselves via the FAA road (the majority of which is located on private property). This previous access point was located on a small sliver of BLM-administered lands and accessing the buttes from this location required traversing through private property, the BLM does not have an easement with the private property owner so is unable to secure accesses across the private parcel. The alternative buttes access point proposed in the

Determination of NEPA Adequacy, the Buttes East Trailhead, is located on BLM-administered lands and does not require users to traverse through private property when accessing the buttes. The establishment and use of the Buttes East Trailhead ensures public lands can be used in the safest manner possible without causing the need to traverse through private property to access public lands.

2. Comment Topic: Ebikes and adaptive bikes

Excerpts: Commenters suggested allowing ebikes within the Cline Buttes area, while other commenters expressed the need for BLM to more clearly identify current policy that prohibits ebike use in non-motorized areas.

Commenters suggested ensuring trail widths were 40-inches to allow three/four-wheel adaptive bike use.

Response: In December 2020 the BLM amended its off-highway vehicle regulations at 43 CFR 8340.0-5 to define ebikes, which are limited to Class 1, 2 and 3. The rule provides that the Field Manager may authorize, through subsequent land-use planning or implementation-level decisions, the use of ebikes on non-motorized roads and trails. The rule did not result in any immediate on-the-ground changes or site-specific allowances for ebike usage on BLM-administered public lands. In other words, the rule does not, by itself, open any non-motorized trails to ebike use.

This project is being proposed through a Determination of NEPA Adequacy (DNA). A DNA confirms that an action is adequately analyzed in an existing NEPA document and is in conformance with the land use plan. A DNA is not a land-use planning or an implementation level decision, rather a DNA is used to confirm that an action was previously analyzed and appropriately decided upon in a different document. Because this project tiers to the Cline Buttes Recreation Area Plan Environmental Assessment (EA) and that EA did not analyze for the use of ebikes on the Cline Buttes non-motorized trail system, the Field Manager is unable to make that decision at this time through this or any other DNA. The Field Manager could choose to do a new environmental assessment for the area that analyzes ebikes and issue a subsequent decision, but due to staffing and project prioritization issues that is not likely to occur in the near future.

Adaptive bikes with three or four wheels are permitted on the Cline Buttes non-motorized trail system so long as they are not classified as Class 1, 2, or 3 ebikes. New non-motorized trails and trail maintenance may create or widen trails to 40-inches to accommodate non-ebike, adaptive bikes.

All ebikes are welcome to use the motorized trail system within the Cline Buttes Recreation Area. Motorized trail systems can be accessed from the Buckhorn Staging Area and the Barr Road Staging Area.

For more information BLM's ebike policy visit: <https://www.blm.gov/programs/recreation/e-bikes>

3. Comment Topic: Environmentally focused implementation

Excerpt: Implement the proposed work in an environmentally responsible manner.

Response: To ensure resources are protected during trail construction, maintenance, and closure, the Trail Objectives and Standards outlined in Appendix 1 of the Environmental Assessment will be implemented (EA, pp. 237-253). The standards apply to all types of activities associated with trails including trail design criteria, trail access structures, trail construction, rehabilitation, and maintenance (DNA, p. 21).

4. Comment Topic: Golden eagles

Excerpt: Commenters expressed concerns that the proposed actions do not protect the golden eagle territory on the east side of Cline Buttes.

Response: The BLM is required to protect eagles per, *The Bald and Golden Eagle Protection Act* (amended), that prohibits anyone, including federal agencies, without a permit issued by the Secretary of the Interior, from “taking” bald or golden eagles, including their parts, nests, or eggs. This means the BLM is required to protect golden eagles, their nests, and territories.

The governing land use plan, the Upper Deschutes Resource Management Plan, requires the BLM to apply a 0.25 mile to 0.50-mile buffer to all known golden eagle nest sites. Based on site-specific analysis (viewshed, aspect, etc.) and the type of disturbance, BLM wildlife biologist may adjust the buffer, in some areas, between 0.25 miles to 0.5 miles. In addition, trail closures, trail changes, and seasonal closures will be implemented. The BLM is following required buffer distances from the Upper Deschutes Resource Management Plan. The BLM is not required to manage golden eagles based on recommendations, while the suggestion for recommended buffer sizes may be applied in some locations, it is not required to be implemented in all locations. Deschutes County data may display territory radii based on recommendations; data displayed by the County does not equate to implementation mandates applied to BLM actions.

5. Comment Topic: Off-leash dog areas

Excerpt: Commenter suggested the creation of an off-leash dog area.

Response: In the Cline Buttes Recreation Area there are no leash requirements for dogs. While leash laws are not required on trails, you should keep your dog close and under control when passing other trail users, especially children, equestrians, and users with other dogs. The BLM strongly encourages all dogs to be leashed even though it is not required. This helps protect wildlife and special status plant species present in the area and avoids conflict with other trail users.

6. Comment Topic: Road closures and rights-of-ways

Excerpts: Commenters expressed concerns with the use of public lands to access private property within the Cline Buttes area.

Commenter suggested gates be installed at all official right-of-way routes to detour off-road vehicle travel.

Commenter suggested changes to access in the Maston/Newcomb/Harper Roads area, through road closures or gating.

Response: The Federal Land Policy and Management Act authorizes the Secretary of the Interior, through the BLM, to issue right-of-way grants, “over, upon, under, or through” public lands for various uses, including for roads. Once the BLM receives a complete right-of-way application from an applicant and all associated processes are complete, BLM may issue a right-of-way through BLM-administered lands. During this process the BLM is not required to obtain public access or exchange access rights from the private property owners, especially if doing so may cause interference with the rights of private landowners. A single private property owner may hold multiple rights-of-ways with the BLM for ingress and egress and may indicate one access point as the primary access, but this is not required.

It is infeasible for the BLM to require gates to be installed at all rights-of-ways, this requirement would have been written into the original proposal and required as part of the right-of-way grant, subsequently requiring gating of all rights-of-ways in the area is beyond the scope of this Determination of NEPA Adequacy. Many of the rights-of-ways in and around the Cline Buttes area are held by Deschutes County and are public roads that may not be able to be gated or blocked.

The Maston/Newcomb/Harper Road area is outside of the geographic scope of the proposed action covered in this Determination of NEPA Adequacy. In addition, there are multiple rights-of-ways located on Newcomb and Harper Roads and any access changes would need to be coordinated between all valid and existing right-of-way holders.

7. Comment Topic: Trail closures

Excerpt: Trail closures should remediate the entire trail and incorporate the use of carbonite signs that read, “closed area under restoration.”

Response: The BLM has implemented trail closures that decommission the first portion of trails and has found this practice successful. The BLM is using the trail decommissioning strategy outlined in the Cline Buttes Recreation Area Plan Environmental Assessment (EA). This strategy outlines three types of decommissioning. The routes within the project area described in this Determination of NEPA Adequacy (Southwest and Buttes Area) are non-motorized trails and because of this the EA analyzed those trails for *Low Decommissioning*, meaning closure of these trails may include scattering slash, signs, and possibly seeding (EA, p. 47). The proposal to decommission the first 100 feet of trail is a measure that may be taken on areas determined to have a high likelihood of continued use. The EA directs trails that are within 1/8 mile of public roads be closed using the *High Decommission* strategy, meaning ripping and recontouring could be used over some portion of the trail surface (EA, p. 46). All proposed trail closures would rely heavily on appropriate signage.

8. Comment Topic: Trail connectivity

Excerpts: Commenters suggest linking the Maston trails to the Cline Buttes and Cascade View trails.

Commenters suggested retaining and/or creating trails to provide access to DSL land near Eagle Crest. In addition, access was requested through DSL and Thornburgh from Blue Belly to facilitate connectivity.

Commenters requested a dirt road proposed for closure to be retained or facilitate connectivity by creating a short stretch of trail.

Response: The proposed action in the Determination of NEPA Adequacy (DNA) includes a connection between the trails accessed by the Buttes East trail system with the Juniper trail system. The proposed action would establish a trail crossing and system connection from the Juniper Trailhead to the Cline Buttes Rock Pit Road, with connections to the Buttes East Trailhead and the Buttes trail system. This connection requires users to cross the Cline Falls Highway. The connector route between these two areas is the Juniper Tie Trail (DNA Map 2). To avoid encouraging bike riders to cross at that point right now, the Juniper Tie Trail will not be constructed until a safe crossing is approved and implemented (DNA, p. 15). While the trail connection between the Maston area and the Buttes area is proposed in the DNA, a safe crossing will need to be coordinated with the Oregon Department of Transportation and the Deschutes County Roads Department. The BLM is pursuing funding to create this crossing.

Because the BLM does not manage or have jurisdiction over private land or Oregon Department of State Lands, BLM is unable to secure connections over these parcels of land. The BLM has designed the trail system in the Cline Buttes area to be mostly on BLM-administered lands, doing this ensures trail connections and connectivity are assured. The BLM continues to coordinate with both private and other public land managers to develop future trail connections and expand the trail network in the Cline Buttes area.

Comments suggested extending a trail from Cascade View to reach the trail system in the Tumalo area. Although connecting the Cascade View Trailhead with the Tumalo Canal Trailhead is an interesting concept, BLM did its best to coordinate with various equestrian groups to find the optimum trail system possible based on their members preferences. Since trail mileage is limited by the Cline Buttes Recreation Area Plan Environmental Assessment (EA), the trail system in this Determination of NEPA Adequacy reflects the general preferences of these groups, while nearly maxing out the total trail miles permitted in the EA. In order to connect the Cascade trail system with the Tumalo trail system, taking the shortest route possible would add approximately one mile of trail over the EA allowable trail mileage. Additionally, the BLM is unable to plan trails through private property. The only way to travel from the Cascade View Trailhead to the Tumalo Canal trail system would be to navigate to Barr Road and follow it south to the Tumalo Canal trail system. Barr Road is a county road and is frequently used by street legal vehicles which raises various safety concerns for equestrians. Additionally, the proposed Determination of NEPA Adequacy trail system does not include access to Barr Road at

any point except at the entrance to the Tumalo Canal Trailhead. Connecting these two systems would require a significant change to the trail system resulting in the subtraction of mileage from the currently proposed trails and adding them elsewhere. Nevertheless, long distance riding opportunities were considered in the Tumalo Canal trail system and areas south of the buttes. For example, traveling the outside trails on both sides of Barr Road in this area offers nearly 14 miles of trails without duplicating travel on the same trail. One of the purposes of the EA is to allow for space between the trail systems in order to allow for wildlife corridor connectivity and in doing so, trail mileage maximums were established to find that balance (EA pp. 183, 186, 192, 193, 216).

9. Comment Topic: Trail location

Excerpt: Located some trails in areas that avoid shade to ensure snow and mud free trails in the shoulder-seasons.

Response: While this is an interesting concept it is not feasible to design trails to avoid shady areas. Because the Determination of NEPA Adequacy is tiered to the Cline Buttes Recreation Area Plan Environmental Assessment, all new trails are required to adhere to the Trail Objectives and Standards outlined in Appendix 1 of the Environmental Assessment (EA, pp. 237-253). This means that trails follow the natural topography of the area and often link together for relatively long distances, due to these and other factors such as micro topography from vegetation, it is not feasible to design a trail entirely out of shadowy areas or located on a single aspect. Additionally, since the number of miles of trail are set by the Environmental Assessment, BLM worked closely with various user groups to determine the best trails for each group. The user groups did not have this concept in mind when selecting the best available terrain.

10. Comment Topic: Trail names

Excerpt: Commenters suggested specific trail names.

Response: The BLM, in coordination with the various user groups, has tentatively proposed allowing user group members to suggest trail names that could be adopted by the BLM in the Cline Buttes area. The BLM is considering trail numbers over names if conflicts arise in the final trail naming process.

11. Comment Topic: Trails – shared use trails and trailheads

Excerpt: Designate an official trail system to ensure trail and trailhead separation and reduce user conflict.

Response: The Cline Buttes Recreation Area Plan Environmental Assessment (EA), to which this Determination of NEPA Adequacy (DNA) tiers, was designed to provide a wholesome balance between recreational uses and environmental factors. One purpose of the DNA is to establish an official trail system with the intent of separating trail use types to reduce potential user conflict. Some bike trails are exclusive to bikes, while others are shared with hikers. All

hiking trails are shared with equestrian users. Hikers are permitted to venture cross country off trail but are encouraged not to create new trails. In most cases bike and equestrian uses do not share trails. Creating and maintaining as much trail separation between biking and equestrian uses is essential to the transportation design in the EA (DNA, p. 3). In addition, the EA designated trailheads for specific vehicle types, with trailer parking designated at the Cascade View, Tumalo Canal, Fryrear, and Maston Trailheads and allowed but not recommended at all other trailheads besides Juniper and Buttes East. Trailer parking was not intended for the Juniper and Buttes East Trailheads, this separation of access is recommended to help maintain separate trail systems for each user type on the buttes (EA, p. 31) and avoids having lengthy and slow-moving vehicles turning on and off the Cline Falls Highway (DNA, p. 11) in an area with limited visibility.

12. Comment Topic: Trails – southwest area

Excerpt: Commenter points out that 34.3 miles of mountain bike trails were analyzed in the EA for the Southwest Area but none are proposed in the Determination of NEPA Adequacy.

Response: Due to the draw of downhill mountain biking on the buttes and the need to establish an official trail system to ensure protection of natural resources, the BLM focused attention on the buttes themselves for mount biking. In the future, the BLM may explore options to create mountain bike trails in the Southwest Area, as analyzed in the Cline Recreation Area Plan Environmental Assessment.

13. Comment Topic: Trailheads – vehicle use and camping

Excerpts: Formalize access for all user types from Fryrear and other nearby locations.

Commenters suggested limiting overnight camping at certain trailheads.

Response: The Cline Buttes Recreation Area Plan Environmental Assessment analyzed thirteen trailheads (EA, p. 37). The analysis envisioned formalized trailheads for different vehicle types, specially, the Buttes East and Juniper Trailheads are not ideal for larger vehicles with trailers due to the safety concerns with slow moving vehicles entering and exiting from the Cline Falls Highway. All other trailheads may accommodate all types of vehicles. Page 37 of the EA indicates the trailheads where camping is authorized, those include Barr North, Buckhorn, and Tumalo Canal. The remaining ten trailheads are closed to overnight camping, including the Maston Trailhead.

14. Comment Topic: Trails – visuals and erosion

Excerpt: Trails on the buttes may affect the visual quality of the area and erode topsoil.

Response: The Cline Buttes Recreation Area Plan Environmental Assessment (EA) determined that mountain bike trails on the southeast facing slope of the southern butte, would not be visible from State Highway 126. Where potentially visible from the highway, any trails on the buttes would be visible at a distance of about 1 mile or more and would not attract attention or create a

noticeable level of contrast. Existing trails on this portion of the buttes are not highly apparent from closer range views including Cline Falls Highway and the Maston area (EA, p. 143). The Trail Objectives and Standards outline in the EA in Appendix 1 and incorporated into the DNA ensure soil erosion will not increase and cause accelerated erosion on the Cline Buttes themselves.

15. Comment Topic: Use of public lands

Excerpt: Commenter suggested that the Cline Buttes area be somewhat unknown by tourist and leave it as is for local communities.

Response: The BLM's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations. Public lands managed by the BLM are owned by all Americans and are used for a variety of purposes and encompass large expanses of rangelands, forests, mountains, tundra, and desert. The BLM welcomes all users to public lands from both near and far. The BLM enhances the quality of life for all citizens through the balanced stewardship of America's public lands and resources.

16. Comment Topic: Wildlife corridors

Excerpt: Decrease the number of trails to ensure mule deer migration and protection of habitat.

Response: The land use plan governing the project area, the Upper Deschutes Resource Management Plan, does not provide specific guidelines for managing route densities in mule deer winter range or for managing both motorized and non-motorized densities combined (EA, p. 183). The analysis within the Cline Buttes Recreation Area Plan Environmental Assessment (EA) determined that over the entire planning area, the mule deer disturbance index indicates that BLM proposed routes in all alternatives would have moderate levels of human influence on mule deer winter range (EA, p. 183). The BLM anticipates the quantity of trail closures in the area to benefit all wildlife species using the area, but in particular, mule deer. Habitat security will be increased by closing a number of user created trails and concentrating users on approved trails. A large portion of the trail closures occur in the southern portion of the Southwest Area, which is particularly important to mule deer migration. The BLM acknowledges the importance of this area to mule deer and mule deer migration, the proposed action is expected to benefit the species within the Cline Buttes area.