



United States Department of the Interior



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IN REPLY REFER TO:
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Memorandum

To: Prineville District Manager

From: Jamie E. Connell
State Director, Oregon/Washington

Subject: Prineville District Resource Management Plan Evaluations and Recommendations

In August 2018, staff from the Bureau of Land Management (BLM) Oregon/Washington (OR/WA) State Office and the Prineville District Office completed a periodic plan evaluation of the Upper Deschutes Resource Management Plan (RMP) (2005), the Two Rivers RMP (1986), and the Brothers La Pine RMP (1989). These three RMPs, collectively, guide the management and administration of approximately 1.65 million acres of public lands under the Prineville District's jurisdiction. This letter documents and transmits to you the findings and recommendations that resulted from that evaluation. Minutes from the Prineville District RMP Evaluation are attached.

Summary of Key Findings

- The 2018 plan evaluations reaffirmed previous findings in the 2009 plan evaluations that plan revisions would be appropriate for the Two Rivers and the Brothers La Pine RMPs. These findings were primarily based on the plans' ages, new resource management issues, and the anticipated update of national planning policies in the BLM's Land Use Planning Handbook (H-1601-1) that is expected to be released in fall 2018.
- The 2018 plan evaluation identified significant new resource uses and user conflicts in the Bend-Redmond area that are not addressed by the Upper Deschutes RMP. The existing RMP direction did not accurately anticipate the level of growth that has occurred within Deschutes County, and significant urban and rural residential development has occurred adjacent to land managed by the BLM. In addition, the RMP's land tenure and other associated land use planning allocations pre-date the expansion of the Deschutes County Urban Growth Boundary.
- The 2018 plan evaluation found that travel management planning within the Upper Deschutes RMP's planning area has not occurred at the pace and scale envisioned by the plan. The completion of these plans could address the management of new types and levels of recreational travel and effectively alleviate many of the existing user and resource conflicts within the planning area.

Recommendations

1. Continue to analyze and implement projects, including the renewal of existing authorizations and the issuance of new authorizations, in accordance with the existing RMPs, as amended. However, the analyses for such projects must also consider and document conformance using updated regulations, policies, inventories, and/or best available science. Where updated regulation, policy, inventories, and/or science conflict with the direction in the existing RMPs, such project analyses should provide a clear rationale for the continued need to implement the decision and explicitly describe how such project decisions would continue to meet the applicable RMP's objectives.
2. Prioritize the development of travel management plans to resolve user and resource conflicts. If necessary, consider whether the travel management plans should also amend the RMPs to: modify any existing open, limited, and/or closed off-highway vehicle areas to meet the BLM's regulatory standards at 43 CFR 8342 and/or current national policies found in BLM Manual Section 1626 and/or modify any existing land tenure allocations that are currently precluding the BLM from utilizing land acquisitions or exchanges to expand and enhance recreational access for the public.
3. Reevaluate the Prineville District's capacity and competing priorities to determine whether initiating a plan revision process or an amendment to address immediate needs is more feasible in fiscal year 2020.

If you need any additional information regarding the RMP evaluation, please contact OR/WA State Office Planning Coordinator Leslie Frewing at 503 808-6088 or by email at lfrewing@blm.gov. Thank you for your participation and support, as well as that of your staff, in this important evaluation process.

Attachment

cc:

Teal Purrington, Prineville District Planner

Prineville District Resource Management Plan Evaluations July 10, 2018, 10:30 a.m. to 2:30 p.m.

Resource Management Plan (RMP) evaluations are used by the Bureau of Land Management (BLM) to determine if Land Use Plan decisions and associated National Environmental Policy Act (NEPA) analyses are still appropriate. Evaluations may identify resource needs and means for correcting deficiencies and addressing issues through plan maintenance, amendments, or new starts. They may also identify where new and emerging resource issues and other values have surfaced.

The Oregon/Washington State Office conducted routine, periodic plan evaluations in the Prineville District on July 10, 2018. Leslie Frewing, Program Analyst (Planning), led the evaluation. The District was represented by Teal Purrington, District Planner; Christine Ryan, Planning and Environmental Coordinator; Bill Dean, Associate District Manager; Greg Currie, Landscape Architect; Cari Taylor, Range Specialist; Rebecca Hile, Central Oregon Assistant Field Manager; and James Eisner, District Fish Biologist. Selection of resource/program specialists was at the discretion of the District Planner. The in-person review was conducted over three hours using a list of prepared questions to generate ideas and discussion. Questions included the required evaluation questions identified in section V.B. of the planning handbook (H-1601-1) and supplemental questions specific to the Prineville District or recent events. Written input was provided by Jeff Kitchens, Deschutes Field Manager, and Sarah Canham, Botanist/ESR Coordinator, because they were unable to attend.

The evaluation team evaluated three of the four existing plans on the Prineville District. Two of these areas are covered by plans that have been partially replaced by other plans. One plan, the John Day Basin RMP, was completed more recently and is not yet scheduled for evaluation. The three planning areas evaluated were:

- Upper Deschutes RMP (2005)
- Two Rivers RMP (1986) – West half (portion not replaced by John Day Basin RMP)
- Brothers La Pine RMP (1989) – East half (portion not replaced by Upper Deschutes RMP)

The Two Rivers and Brothers La Pine planning areas were evaluated in 2009. At that time it was determined that, due to plan age, issuance of new planning guidance (H-1601-1) in 2005, and new resource issues, including increasing recreational use, plan revisions would be appropriate. In addition, the following key recommendations were made:

1. The Prineville District should consider combining existing planning areas in any future RMP revisions based on potential efficiencies and similarity of planning issues. Subsequently, the Prineville District proposed revising/updating all three RMPs into one RMP.
2. The Prineville District should defer initiation of any plan revision until completion of the John Day Basin RMP. The John Day Basin RMP was approved in April 2015.

The purposes of the evaluation were:

1. To affirm the previous recommendation that plan revision is appropriate;
2. To garner management support for the recommended consolidation of planning areas;
3. To identify new guidance, information, uses, and other factors that would be appropriate to consider during a plan revision; and
4. To discuss and assess the district capacity and commitment to initiating a large-scale plan revision process.

AGENDA/MINUTES

1. Logistics and Introductions (Teal)
2. Overview of Purpose, Background, and Outcomes, Q&A (Leslie)
3. Are actions outlined in the plan being implemented?

Water quality monitoring specified in the Upper Deschutes RMP is not being implemented at this time. The district utilizes monitoring data from other sources such as Oregon Department of Environmental Quality to support NEPA analysis for project implementation.

The Upper Deschutes RMP specifies that travel management planning will be completed for all Special Recreation Management Areas (SRMA). Two of thirteen areas have completed plans. Travel management direction in the Two Rivers and Brothers La Pine RMPs is “light.” Except in a few areas, this is not a resource conflict; however, route densities have not been reduced to target levels identified in the Two Rivers and Brothers La Pine RMPs.

The Upper Deschutes RMP defers to the pre-existing river management plans. These river management plans are older and not responsive to the current levels of recreation demand.

The district is not currently managing at appropriate management level (AML) for the Liggett Table Herd Management Area (HMA), as directed in the Brothers La Pine RMP.

4. Does the plan establish desired outcomes (i.e., goals, standards, and objectives)?

All three plans establish goals and objectives. These are rarely specified in site-specific or measurable terms and are vague. A key example provided during the evaluations was visual resource management (VRM). Inventories have not been completed for all areas of the district and there are no VRM designations established in either the Brothers La Pine or Two Rivers RMPs. This lack of direction does not meet current direction in H-1601-1 and results in additional work at the project-scale to conduct inventories and adopt interim VRM standards for specific projects.

5. Are the allocations, constraints, or mitigation measures effective in achieving the desired outcomes? Are the desired outcomes specified by the plans still appropriate or provided with enough detail? If not, in what program/resource areas would more detail be desirable?

See discussion in Question 4 above regarding VRM.

In the grazing program, objectives established are vague and direct management calls for “improved condition.” However, specific animal unit month (AUM) levels and dates of

use are established by individual allotments. Given the age of the Two Rivers RMP and the Brothers La Pine RMP, the district has made adjustments over time through a variety of mechanisms. These include adjustments as allotment and pasture boundaries are changed, changed resource conditions, temporary rest post-fire, and ongoing permit renewals. In addition, in areas with Greater Sage-grouse additional direction is applied that provides for more measurable, desired outcomes (Table 2-2). The Prineville District is applying the Greater Sage-grouse direction as projects, including permit renewals, are implemented.

Land tenure direction is outdated. In the Two Rivers RMP and Brothers La Pine RMP, this is due primarily to plan age and does not present a significant barrier to project implementation. In the Upper Deschutes RMP area, this is due to a variety of factors associated with urban expansion, increased levels of public use, and demand for uses not anticipated by the RMP. Specific examples include limitations on land transfers to other public land agencies which may be better suited to manage the level of public use and utility corridor designations. Existing land tenure designations may also constrain future travel and access management planning.

6. Do decisions continue to be correct or proper over time? Are any of the decisions in conflict with more recent law, regulation, or policy? Can you provide examples?

The Two Rivers RMP and Brothers La Pine RMP do not provide specific direction for management of listed fish species because they pre-date those listings. In these areas, the district follows the Pacific Anadromous Fish Strategy (PACFISH) and Inland Fish Strategy (INFISH) protocols and consults with the U.S. Fish and Wildlife Services (USFWS) and the National Marine Fisheries Service (NMFS), as appropriate, during project implementation. When RMPs are revised, the districts will be required to develop an Aquatic Conservation Strategy (ACS) similar to the one completed as part of the John Day Basin RMP. During development of the John Day Basin RMP, USFWS and NMFS consultation resulted in an Aquatic Conservation Strategy that mirrored existing PACFISH and INFISH protocols. Plan revisions are not anticipated to change existing management within this program.

Both the Two Rivers RMP and Brothers La Pine RMP establish a limit of 60 percent juniper removal. The district currently implements projects with greater levels of juniper removal based on the current, best, available science and, where applicable, direction in Table 2-2 of the Greater Sage Grouse RMP Amendments.

Numerous new designations have been made since completion of the RMPs. Examples include designation of the White River Wild and Scenic River and the Badlands Wilderness Area.

7. Are there new data or analyses that significantly affect the planning decisions or the validity of the NEPA analysis?

The Prineville District has completed an updated inventory of lands with wilderness characteristics. This updated inventory does not impact the validity of the existing RMPs. The Prineville District utilizes the updated inventory information when preparing NEPA documents at the project scale.

Since completion of the RMPs, numerous corporate geospatial data layers have been developed or revised. Geographic Information Systems (GIS) were not utilized as an analytical tool in the development of the Two Rivers RMP or the Brothers La Pine RMP. This has resulted in the ability to analyze proposed actions and associated impacts at a much finer scale. The Prineville District utilizes these GIS layers when completing environmental assessments and other NEPA documents at the project-scale. Examples include: vegetation, hydrology, fish presence, allotment boundaries, and ecological site inventory data.

More recent road and route inventories indicate that average route density has increased since completion of the three RMPs, and the district is not currently meeting route density objectives in the RMPs.

Since completion of the Upper Deschutes RMP, the Bend and Redmond urban growth boundaries have expanded. This change has allowed additional growth to occur in proximity to lands managed by the BLM.

8. Are there unmet needs or new opportunities that can best be met through a plan amendment or revision, or will current management practices be sufficient? For example, are there outstanding requests for Area of Critical Environmental Concern (ACEC) designations to protect resource values? Lands with wilderness character? New public uses? Access concerns?

New uses that are not addressed by the existing RMPs include geocaching, drones, utility terrain vehicles, and e-bikes.

The BLM has received requests for shooting closures to protect public safety, particularly in areas of high recreational use. The Two Rivers RMP and the Brothers La Pine RMP do not address shooting closures. The standard closure that prohibits shooting in developed recreation sites is in effect throughout the Prineville District.

The Prineville District has seen an increase in long-term camping on public lands, and this has become an enforcement issue in some areas. The standard 14-day camping limit is in effect throughout the Prineville District.

9. Are new inventories warranted pursuant to the BLM's duty to maintain inventories on a continuous basis (FLPMA, Section 201)?
 - a. Have new inventories been completed that indicate a need for consideration of revised management direction?

New and updated inventories have been completed within the Prineville District.

Specific examples include: Ecological Site Inventory (ESI); lands with wilderness characteristics; and Assessment, Inventory, and Monitoring (AIM) of both terrestrial and aquatic resources. The Greater Sage Grouse RMPA prescribed use of the Habitat Assessment Framework. Ongoing route inventories are being conducted to support future Travel and Transportation Management Planning.

- b. How are these new inventories being utilized to inform the implementation of activities within the district? Have conflicts been identified between plan direction and new or updated inventories? How are these being addressed at the project scale?

These inventories are being utilized during the assessment of proposed implementation activities. Conflicts with existing direction were not identified during the evaluation process. However, the lack of Visual Resource Management Inventories and Designation was identified as an additional analytical need for some projects where inventories and interim designations must be included as part of the project assessment.

10. LUNCH – All

11. Have there been significant changes in the related plans of Indian Tribes, State or local governments, or other Federal agencies?

Urban Growth Boundary changes within Deschutes County have allowed increasing development adjacent to lands managed by the BLM.

Establishment of the Crook County Natural Resource Policy which contains recommendations for Federal land management and requests notification and the opportunity to review all NEPA documents.

Internal Oregon/Washington BLM Conformance Review process for projects within Greater Sage-grouse habitat. Recent revision of the review process now requires only a subset of projects (based on project type) be reviewed. This is an additional review; however, participating staff stated that the review is not burdensome and is completed quickly, typically in less than a week.

12. Are there new legal or policy mandates as a result of new statutes, proclamations, executive orders, or court orders not addressed in the plan?

Significant new planning direction for individual program areas was provided in Appendix C of the BLM Planning Handbook (H-1601-1) regarding the types of decisions, designations, and allocations required within RMPs. The Two Rivers RMP and the Brothers La Pine RMP predate this guidance and do not include all the required elements. Examples are provided in response to other evaluation questions.

13. The national GRSG Plan Amendment applied to the Upper Deschutes RMP and the Brothers La Pine RMP. As part of that process, an implementation plan was developed. Has the district continued to use that implementation plan? Has it been an effective tool for prioritizing projects and workloads?

Following completion of the Greater Sage Grouse RMPA process, the Prineville District developed an implementation plan utilizing a spreadsheet-based template. The original template has not been updated; however, a streamlined version is currently being utilized by the district management team to prioritize projects and workloads within the entire district, including areas without sage-grouse presence.

14. Has there been an increase in successful protests, appeals, or litigation that can be attributed to the age, plan direction, or lack of plan direction provided by any of the RMPs being evaluated?

There is very little historic or ongoing appeal or litigation activity within the Prineville District.

15. Does the entire evaluation team think that plan revisions could improve management outcomes and efficiencies in the long run? How and in what areas? What is the district capacity and commitment to initiating a large-scale plan revision process?

District commitment and capacity to initiate a plan revision process at this time is limited. Concern was expressed regarding the trade-off between RMP revisions and other, ongoing project implementation priorities.

The Prineville District implements projects in conformance with the existing RMP objectives but sometimes operates outside the detailed specifications outlined in the RMPs. The evaluation team identified specific actions where the RMP is not being implemented as directed, including juniper thinning and grazing permit administration (specific dates of use). These projects are implemented after completion of environmental assessments or other appropriate documentation and are informed by updated inventory data, current research, and direction included in the recent sage-grouse RMPA.

Updating the RMPs to reflect more current inventory information and best available science would streamline future environmental assessments by allowing tiering to the analysis utilized in the revised Environmental Impact Statement (EIS). Where plans do not specifically address uses or proposed actions, the Prineville District relies on law, regulation, policy (PACFISH, INFISH), and national programmatic EISs to determine the appropriate range of alternatives to consider within individual project environmental assessments or other appropriate NEPA documentation.

16. Discussion of preliminary observation and recommendations. Big surprises?

The evaluation team discussed the possibility of addressing existing resource conflicts associated with increases in public use (both numbers and types of uses) through

development of travel and transportation management plans. The portions of the district included in the Upper Deschutes RMP were identified as the highest priority for two reasons: 1. highest level of user conflicts and user created routes and 2. existing plan direction that requires development of travel management plans.

17. Manager's closing comments and observations – Management Representative – Bill and Rebecca

We do not have sufficient resources to implement travel and access management planning at the pace and scale envisioned by the Upper Deschutes RMP. In the two areas where travel and access management planning has occurred, it has been controversial and required extensive public engagement. However, the evaluation team participants and participating management representatives felt the overall outcome was positive and will result in fewer user and resource conflicts as the district proceeds with implementation.

The existing RMPs are not impairing project implementation. The inability to tier adds analytical needs at the project-scale (VRM for example).

Land acquisitions, specifically the Criterion Ranch area, receive only custodial management because the Two Rivers RMP pre-dates the acquisition and does not provide specific direction.

The Prineville District's largest challenge is urban expansion and the associated increased pressures on public land resources.

18. OSO review of next steps and thank you – Leslie

Circulate the evaluation minutes to the team for review. Incorporate comments and finalize minutes.

Prepare an evaluation conclusion with recommendations for signature by the State Director. The Prineville District Management Team and the District Planner will have an opportunity to review and comment.