



Oregon

Theodore R. Kulongoski, Governor

Department of Fish and Wildlife

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Ms. Pustis:

This letter is in response to a request for comments on the proposed Stockade Block (SB) Area Management Plan (AMP). The Oregon Department of Fish and Wildlife (Department) appreciates the opportunity to meet with DSL staff on November 25, 2008 to scope out fish and wildlife issues. Additional issues were discussed with Department of State Lands (DSL) staff as the draft plan was developed. Most of the issues the Department identified were addressed. However, we would like to submit comments on several items. Comments related to suggested corrections or clarifications will identify the section, subsection, and page number. Comments addressing the Departments concerns over proposed activities reference the implementation portion of the plan, although these same activities may also be discussed in other areas of the text.

Project Description

The draft AMP provides a vision for the management of approximately 230,000 acres of Common School fund lands straddling the Harney and Malheur County lines in SE Oregon for the next 20 years. The ultimate goal of the plan is to articulate a sustainable management strategy that maintains (and even enhances) the land base/environment while producing the maximum possible financial gain to the Common School Fund.

Basis for Comments

The Department's comments on the AMP are intended to help DSL fulfill the stated goal by offering suggestions to maintain or enhance the value of the SB for fish and wildlife. The Department's comments are based on the habitat management strategies and guidelines of the Oregon Conservation Strategy (OCS), and various species management plans adopted by the Oregon Fish and Wildlife Commission. The SB contains several strategy species and habitats identified in the OCS, and is adjacent to the Saddle Butte Conservation Opportunity Area.

Much of the AMP details ongoing and proposed activities the Department supports as compatible or beneficial to fish and wildlife habitat. These include the ongoing efforts to; improve riparian conditions, control noxious weeds, limit juniper invasion, and ensure grazing is conducted in a balanced sustainable manner.

Comments on the AMP

Suggested Corrections/Clarifications

1. The terms livestock grazing and forage lease used in the AMP should be defined to exclude domestic sheep and goats. Domestic sheep and goat grazing near bighorn sheep ranges poses a significant risk of disease transmission that can result in large die offs of bighorns. Because bighorn sheep are present on the SB the Department recommends domestic sheep and goat grazing be prohibited.

2. Riparian Corridors page 14

Camp Creek, Duck Creek, the South Fork of the Malheur River are identified as the primary riparian corridors in the AMP and associated maps. However, based on drainage area and aspect it is likely that Indian, Deadman, Lambing Canyon, and Quail Creeks have substantial riparian vegetation. The Department recommends these areas be inventoried and added to the AMP.

3. Current Uses –Fish & Wildlife pages 17 -21

Big Game (page 17) – The statement about big game, particularly mule deer and antelope, congregating around agricultural fields is somewhat mis-leading. There is no doubt that in the arid climate of SE Oregon irrigated fields attract big game; however these fields are only valuable to big game seasonally. In contrast native rangelands on the SB provide important year round habitat and receives substantial use by big game, although these animals are not as visible as those in the fields.

Fish (page 18) – The Department recommends that sentence 1 would be more accurate if revised to “To date, limited aquatic surveys have been conducted on the SB. Most effort has focused on the South Fork Malheur River.”

Wind Energy (page 21) – As written this section implies the main wildlife concerns with wind energy is the location of transmission lines. The same discussion on page 33 lists several additional concerns. The Department suggests either listing all the topics of concern with the potential placement of wind farms on the SB in this section, or refer the reader to the discussion page on 33.

4. Current Management Activities, page 27

Riparian Corridors and Aspen Stands – the Department suggests adding wet meadows as a category in with riparian corridors and aspen stands.

Together these three habitat types are the most limited on the SB, yet provide the most value to fish and wildlife. These are the habitats that require the most management attention to prevent degradation. There is good current management of riparian corridors on the SB, but a need to better identify (map) these additional corridors. Aspen stands and wet meadows should be given similar management effort.

5. Land Resources Page 46 and Table 6

This paragraph and table are confusing. The Department suggests acreage would be a better metric for monitoring changes in vegetative communities than percentage. As written, if areas proposed for development are excluded from certain vegetation community management standards, the percentage of a certain plant community would remain unchanged while acreage or distribution would decrease.

6. Land and Water Stewardship, Page 46

Paragraph 2 is somewhat confusing and could be construed in a way that will limit options for juniper management. The Department suggests replacing “historic range” with “suitable sites” or “historic sites” and adding language that juniper will be controlled outside historic sites.

Comments on Potential or Proposed Activities in the Vision Plan

Conversion of rangeland to agriculture or improved rangelands Action Item A1, A2

The conversion of rangelands to agriculture or improved rangelands concerns the Department if it involves removal of sagebrush habitat. Thousands of acres of sagebrush habitat on and adjacent to the SB have been lost in recent years to fire, previous range conversion projects, juniper invasion, and noxious weeds. The loss of sagebrush has resulted in population declines of many sagebrush obligate species with the sage-grouse and pygmy rabbit (both present on SB) being petitioned for Endangered Species Act protections. Deliberate conversion of habitat would exacerbate the problem. As a signatory to the Departments Sage Grouse Plan, DSL has agreed not to pursue large scale sagebrush eradication programs.

In addition the creation of irrigated agriculture would likely attract extensive seasonal big game use, potentially causing loss of productivity. The Department’s damage policy limits options for depredation response on crops or fields resulting from this type of land use conversion. If agriculture conversion is considered, the expense of controlling big game use should be factored into the cost benefit analysis.

The Department agrees that sagebrush density has likely increased in some sites resulting in reduced production of forbs and grasses. As a result manipulations of sagebrush stands designed to rejuvenate the stand and increase plant diversity could be beneficial to wildlife while at the same time increase forage capacity of the rangeland. The Department recommends rangeland management projects not result in net reduction of sagebrush distribution. The Department staff

would be available to help with design of these types of projects that conserve and improve sagebrush steppe habitat.

Wind Energy, and Communications Facilities - Action Item A3

Both wind energy facilities and communications facilities (towers) can be threats to wildlife, in particular sage-grouse. The Greater Sage-Grouse Conservation Assessment and Strategy for Oregon (2005) recommends siting standards for wind farms and communications facilities to protect critical sage grouse habitat. If wind energy development on the SB proceeds beyond the testing phase early consultation with the Department will be important to identify potential conflicts with sage-grouse conservation or other species of concern.

The impact of solar energy development on wildlife is less well understood but would at the minimum involve conversion of large areas of habitat. As with other development projects involving the Department early in the scoping process will help to identify potential conflicts with wildlife conservation.

Leases for Recreational Uses - Action Item A4

Oregon has a strong tradition of maintaining public use of public lands and the wildlife resources on those lands. A proposal to lease hunting rights on the SB would be controversial with the public and could be counter to the legislative intent of Oregon's Wildlife policy ORS 496.012. This statute charges the Oregon Fish & Wildlife Commission, among other duties, to represent the public interest in developing and maintaining public access to lands and waters of the state and the wildlife resources thereon.

Vegetation Management Plan B1

Given the limited extent of aspen stands, wet meadows, and riparian areas on the SB these should receive added attention in the development of the vegetation management plan. There appears to be a need for increased inventory and mapping of sites, monitoring of condition, and implementation of actions to maintain or enhance them.

Roads, Trails, OHV Management - Action Items B2, B7

As mentioned in the AMP, roads and trails can contribute to resource damage; in addition disturbance associated with extensive vehicle use especially cross country travel by OHV has been shown to displace big game to other areas. The Department supports the development of vehicle regulations designed to maintain adequate public access while protecting habitat from degradation and minimizing wildlife disturbance.

Experience gained from ODFW wildlife areas and travel planning with other agencies shows that a closed unless posted open strategy seems to be the most effective for regulating vehicle use. Department staff is available to assist with designating the system of roads and trails to meet to public access needs and protect fish and wildlife habitat.

Conclusion

The Department appreciates the opportunity to participate in the development of the SB AMP. If you have questions about these comments, or if the Department can provide any additional assistance please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Robert M. Hooton". The signature is written in a cursive style and is positioned to the left of a vertical red line.

Bob Hooton
Klamath/Malheur Watershed District Manager

C:

Doug Parker, DSL