

November 26, 2003

John Neeling  
Bureau of Land Management  
Burns District Office  
28910 Hwy 20 West  
Hines, OR 97738

Dear Mr. Neeling:

This letter provides comments on behalf of the Oregon Chapter of the American Fisheries Society on the preliminary scoping document for the Environmental Assessment to address motorized access by grazing permittees into the Steens Mountain Wilderness. The scoping document has limited detail and no map to indicate the proximity of roads to streams and wetlands, but does indicate that there are potential impacts on water quality, wetland and riparian areas, and wild and scenic rivers, among other items. The Steens Mountain area contains redband trout and whitefish. It is important to protect these, as well as all other aquatic species within the Wilderness to maintain healthy and functioning watersheds.

We are concerned that grazing will likely have a larger impact on aquatic environs than motorized access. Grazing does not seem to be under discussion for this Environmental Assessment, and has hopefully been permitted with aquatic concerns in mind. Given that grazing will occur, it may be possible to allow motorized access in a manner that will have little impact beyond grazing on streams, riparian zones, and wetlands. For instance, roads should not be in proximity to these areas, off-road use should not be allowed, and road-stream crossings should only be allowed if absolutely necessary and if they are completely passable to fish, other aquatic species, and small wildlife.

Clearly, roads and vehicles can have negative impacts on aquatic environments. However, approaches may be used to limit these impacts if grazing will occur. It was unclear in the scoping document whether these details could be negotiated and binding under Alternatives B (Voluntary Reduction) or C (Limited Vehicle Access). If not, the Oregon Chapter of the American Fisheries Society supports Alternative D (No Vehicle Access).

Thank you for the opportunity to comment on this scoping document. The Oregon Chapter of the American Fisheries Society is comprised of over 400 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, and diverse private employers, including students and retirees. The Chapter was established in 1964 as part of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals. Please let us know if we can help with future reviews.

Sincerely,

Tom Stahl  
Aquatic Habitat Committee Chair

For the Executive Committee  
Oregon Chapter of the American Fisheries Society