

RANDALL E. MORRIS, D.D.S.

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October 27, 1983

Mr. Kenneth G. Walker,
District Manager
Salmon District Office
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

I strongly concur with The Committee For Idaho's High Desert comments on the Big Lost / Pahsimero Wilderness EIS Draft.

I would like to make three general observations:

- 4-1
- 1) The Craters of the Moon-Lost River Range area is one of the most isolated, least developed, and least populated regions in the lower forty-eight states. It is undeveloped even by Idaho standards where we are used to wide open spaces and unravaged mountains. That is why the highest concentration of nuclear reactors in the world is located less than an hours drive away. How in the name of rationality can you find the greater portion of the units identified in the Intensive Wilderness Inventory--the most wild of a wild region--as unsuitable for wilderness? Repeatedly the DEIS describes the wild nature of the units than finds unsuitability for wilderness. Did the staff member who determined the suitability read the data?

4-2

 - 2) While this is not a large grazing area as far as AUM's are concerned, wildlife is given the short end of things as is the familiar pattern. While the wilderness EIS is not specifically a grazing document in the context of management plans, a wilderness alternative should offer at least one-half of the available AUM's to wildlife, as wildlife is one of the ten multiple uses under FLPMA and as no Congressional guidance is offered for distribution of grazing. One-half of the AUM's should be allocated to wildlife as stated.

4-3

 - 3) While some mineralization is present, reference is made to sand and gravel and lime deposits, do we really wish to sacrifice de facto wilderness to roadfill and plaster? Our children and grandchildren will remember that the BLM sold a native birth right for a bowl of hydrated lime.

Thank you very much for allowing me to exercise my right to comment. The Committee For Idaho's High Desert has stated the case factually and eloquently. I can add no more.

Sincerely,

Randall E. Morris
Randall E. Morris

1308 N. 20th St.
Boise, Idaho 83702
October 26, 1983

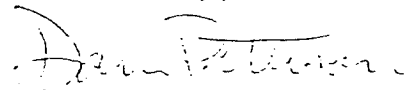
Mr. Kenneth Walker
District Manager
Salmon District BLM
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker

This letter is in regards to Draft Big Lost/Pahsimeroi Grazing EIS. These areas constitute some of the most unique high desert lands in Idaho. I urge you to recommend that the entire Burnt Creek WSA and the northern two-thirds of Appendicitis Hill be recommended for Wilderness protection. Aside from the wilderness qualities inherrent to these areas, close proximity to Boise enhances their recreational value.

By preferring the above alternative you comply with the California vs. Block RARE II decision. Also, Wilderness protection for these areas further enhances the proposed Borah Peak Wilderness and protects another truly outstanding area.

Sincerely,



Dan Peterson

P.S. Please incorporate these comments in the final EIS.

6-1: See Response 2-1.

6-2: See Responses 1-9 and 1-10.

5716 Randolph Drive
Boise, Idaho 83705
October 25, 1985

Mr. Kenneth Walker, District Manager
Salmon District Office
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Mr. Walker:

I would like to offer the following comments on the draft Big Lost/
Pahsimeroi Grazing EIS. Please incorporate these comments in the final
EIS.

- 6-1 [1. I believe the range of alternatives which was considered is legally inadequate, based on the Forest Service RARE II lawsuit decision. I urge you to examine additional alternatives. Specifically, I urge you to examine and support an alternative which recommends wilderness protection for all of the Burnt Creek WSA and the northern two-thirds of Appendicitis Hill. The Burnt Creek WSA will expand and help maintain the integrity of the Forest Service's Borah Peak Wilderness (as well as protecting an area which is outstanding in its own right), as well as the heart of the scenic Appendicitis Hill WSA. If you do not select the All-Wilderness Alternative as your preferred alternative, I urge you to select this one.
- 6-2 [2. I cannot accept your rejection of wilderness protection for the majority of these WSAs on the basis of "concentrating Wilderness in Central Idaho" and "would only increase the wilderness acreage available to Boise residents by 1%." I don't consider Borah Peak and the lands to the south to truly be central Idaho, certainly not in the same way as the River of No Return Wilderness is. These areas should be evaluated on their own merits, and not an arbitrary standard. I think that the opportunity to increase wilderness recreation for Boise residents, even if only by 1%, is valuable and would enhance the quality of life to we residents of the metro Boise area.

Thank you for this opportunity to comment.

Sincerely,

Carol Kriz
Carol Kriz

7-1: See Response 2-1.

819 South Roosevelt
Boise, ID 83705
25 October 1983

Mr. Kenneth Walker,
District Manager
Salmon District BLM
P.O. Box 430
Salmon, ID 83467

Dear Mr. Walker,

I am writing with regard to the Draft Big Lost/Pahsimeroi Wilderness EIS. I strongly urge you to reconsider the decision to classify only part of the Burnt Creek WSA as wilderness, and ask you to recommend for wilderness protection the entire Burnt Creek WSA as well as the northern two-thirds of Appendicitis Hill. Both these areas are outstanding examples of the high desert, offering outstanding recreation and solitude. They are also easily accessible from Boise, which enhances their recreation value.

7-1 [Based on the California vs. Block RARE II court decision, it is my feeling that you need to examine at least one additional alternative in the final EIS to comply with this ruling. I hope you will closely examine the alternative outlined above, and select it as your preferred alternative. This will enhance the proposed Borah Peak Wilderness, as well as protecting another area outstanding in its own right.

Thank you for this opportunity to comment. Please include these comments in the final EIS.

Sincerely,



Dale Aspelund

- 8-1: The FEIS analyzes in detail the impacts to wilderness values of various development activities; the FEIS also analyzes the impacts to other resources from designating the WSAs as wilderness.
- 8-2: Timber harvest (commercial thinning) is anticipated only in the Appendicitis Hill WSA; impacts of this activity on wilderness values are discussed on page 26. Page 32 discusses the positive impacts on wilderness values if there was no timber harvest in the WSA.
- 8-3: There does not appear to be any significant benefits to wildlife through wilderness management that cannot be realized through the existing land use plans.
- 8-4: "Planning issues" were deleted from the FEIS.

Nov. 5, 1983

Kenneth Walker, Manager,
Salmon District
BLM
P. O. Box 430
Salmon, Idaho 83467

Big Lost / Pahsimeroi
Wilderness Draft EIS

Dear Mr. Walker;

8-1 [Please consider the following comments on the Big Lost/Pahsimeroi Wilderness Draft EIS, and include this letter in the Final EIS, even though it is a few days late. I find the significant issues identified, and the apparent decision criteria, badly biased against wilderness.

The significant environmental issues identified are listed on pages 5 and 6, and they are almost all in regard to possible negative effects on existing uses which a wilderness designation would have.

I fail to see why range management is an issue, as wilderness designation permits continued grazing, and even the maintenance of existing improvements. Nor, why more sagebrush destruction programs would be needed there to maintain current grazing levels if they are not too high.

8-2 [Wilderness designation would prevent timber harvest, a use I hope you are not seriously considering in these 3 WSA's. No mention is made of the benefit to the preservation of diversity, naturalness, and habitat if the timber is not harvested; that is, a benefit of wilderness designation.

For the hard-rock minerals, wilderness designation has little effect upon existing claims. For the leasables, the oil and gas speculators have already "locked up" most of the public land, both BLM and F.S., in Eastern Idaho. Wilderness designation would be a real benefit in keeping exploration out of a few remaining wild areas.

Under recreation, one item listed is "Restrictions on vehicle travel". This sounds rather negative, but the exclusion of ORV's from a few roadless areas in Eastern Idaho would be very positive, not only for the wildlife, but also for the traditional foot and horseback users.

8-3 [Under wildlife, the only item listed relates to ability to thin overgrown mt. mahogany in the Appendicitis Hill WSA. This is a fairly trivial issue when compared with the preservation of natural ecosystems and habitat in the 3 WSA's, or the lack of it. But this item is not mentioned.

8-4 [The planning issues identified as major are also rather strangely stated. The first and second relate to the strong views on wilderness, both pro and con. That is certainly a good and accurate point. But to imply that proponents of, as you put it, "full resource utilization" (i.e., greed), have a currently valid land ethic is a cop out. This view is far from true multiple use. Wilderness on the other hand is multiple use. It prevents, on a small fraction of the public lands, those few uses which typically degrade or preclude the other uses. I would like to see BLM do a little more on public education on the matter.

The other planning issue listed says that the State will insist on exchange or purchase of State sections surrounded by wilderness. This would seem to be no great issue, as only 2 State sections are in all 3 WSA's, and the one in Burnt Creek WSA can apparently be excluded by a reasonable boundary change.

8-5: See Responses 1-8, 1-9, and 1-10.

In the Summary on pages iv and v are given major reasons why Appendicitis Hill WSA and White Knobs WSA are recommended for non-wilderness. Neither singly nor in the aggregate are they good enough reasons for a non-wilderness recommendation. In fact, some of them are trivial.

One reason is that neither of these 2 WSA's "is required in the wilderness system to attain ecosystem diversity", and that this ecosystem (M3110-L9, sagebrush steppe) is represented at Red Rocks Lake Wilderness. But the attempt to encompass ecosystem diversity should be used as a floor, not a ceiling. If possible, we should have at least one of each type in the wilderness system, not at most one. Red Rocks Refuge goes from flat terrain, up to steep mountains abruptly. Any sagebrush steppe would have to be in a narrow band on northern slopes at the foot of the Centennials. If the ecosystem classification is that coarse, as to include both Red Rocks Lakes and these 3 WSA's, then it's too coarse to be of much use, especially when used perversely as an upper limiting factor.

Another reason given is that designation of the 2 WSA's would increase primitive recreation for Boise residents by only 1%. So what? What about eastern Idahoans?

8-5 [It is stated that designation would not help balance geographic distribution of wilderness, but would instead tend to concentrate it in central Idaho. Again, the concept of geographic distribution of wilderness should be used to help determine a lower limit on wilderness areas, not an upper limit. The idea of "balancing" distribution is so absurd when used this way, that it would lead to a "lowest common denominator" approach. That is, there are obviously a number of other places in the U.S. where the distances between remaining or designated wilderness is greater than in the Northern Rockies, so why not use those distances in determining what to designate as wilderness in the Northern Rockies? It's just another device to discriminate against wilderness. The remaining wilderness is not at all uniformly distributed, but it's important to save as much of it as we can. If you're going to worry about distribution, remember that in eastern Idaho, in spite of all the great remaining unprotected de facto wilderness, there is no designated wilderness except Craters of the Moon. (I consider these 3 WSA's in eastern Idaho.)

No-wilderness designation would provide for greater opportunity for oil exploration, but just how much of the public lands do we have to provide for this? The attitude in BIM appears to be that wilderness is not important when compared with the opportunity to drill everywhere for oil and gas. I object to this attitude.

In summary, I see no good reasons for not recommending wilderness for the bulk of all 3 WSA's. I would support the proposal made to you by Committee for Idaho's High Desert, with wilderness recommended for all of White Knobs WSA, and most of the other 2 WSA's.

Sincerely,

Jerry Jayne
 Jerry Gayne
 1568 Lola St.
 Idaho Falls, Id.
 83402

cc: O'dell Frandsen, I.F. Dist. BIM