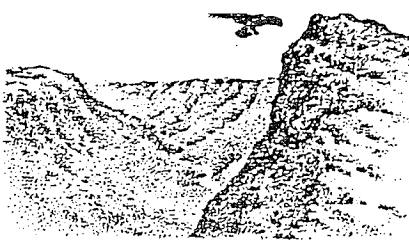


COMMENTS AND RESPONSES



COMMITTEE FOR IDAHO'S HIGH DESERT

Oct. 25, 1983

EAST IDAHO CHAPTER

392 Moonlite Drive, Idaho Falls, ID 83402

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

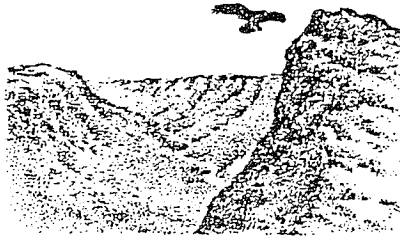
Dear Sir:

Thank you for the opportunity to comment on the Big Lost/Pahsimeroi Wilderness Draft Environmental Impact Statement. Please consider the following comments and suggested boundaries in preparing the final document.

I must take immediate exception to an unfair interpretation by Mr. Don Watson of the Idaho Falls BLM office (as reported in the Post-Register) claiming that the total absence of testifiers at the Arco and Challis hearings amounts to broad-based, popular support for the BLM's preferred alternative. Sentiments expressed to me by the membership of CIHD's East Idaho Chapter run distinctly to the contrary. Although the Chapter is not as yet very well organized, due to preoccupations with Senator McClure's wilderness actions, I did survey the wishes of the other ten members by phone (reaching eight). Half stated outright support for the all-wilderness alternative, feeling that BLM lands of marginal and poor wilderness quality were dropped before this phase of the review. The rest indicated a desire that more of Burnt Creek and at least some of Appendicitis Hill be recommended to better protect foothill-type wildlife habitat, especially winter range. I tried to achieve a consensus with the attached boundary proposal, while still taking into account peripheral manageability. I believe the result is worthy of serious, formal examination in the final EIS. See attached map.

The detailed boundaries were primarily derived from topographic maps and from my own field efforts. Burnt Creek was investigated by driving to Mahogany Ranger Station and up Long Creek road, and by reviewing my slides from the tops of the Donkey Hills and Mount Borah. Appendicitis Hill was researched from Antelope Creek road and Newman Canyon road, by hiking all of Rocky Canyon, and by hiking the ORV path up an unnamed canyon in sections 14 and 23 of the northeast WSA. The White Knob Mountains WSA was scouted from Antelope Creek road and by hiking cross-country from the road to Richardson Spring and down the jeep road to Mountain Spring. I was personally surprised at the beauty of the outcroppings in all areas visited, and didn't encounter another soul when off a main road.

- 1-1: Under either the All Wilderness or Partial Wilderness Alternatives, the last two miles of the Burnt Creek Road would, indeed, be closed. This was alluded to on pages v. and 38 in the DEIS. It is implicit in the fact that ORVs would be eliminated from the designated wilderness portion under each alternative.
- 1-2: Note that the proposed action for the Burnt Creek WSA has changed from the DEIS to this FEIS (see explanation on page 1).
- 1-3: We agree that development on ridges is unlikely in the near future. We do not see any particular justification for the CIHD's boundary. The logical conclusion to their argument would be the All Wilderness Alternative which would protect all ridges in the WSA. (The other six CIHD member comments in support of the CIHD proposal also recommend the All Wilderness Alternative for the Burnt Creek WSA.)
- 1-4: The road leading to Richardson Spring was identified as a road during the wilderness inventory and forms part of the WSA's boundary. Simply closing part of it does not solve all of the problems or difficulties with managing the area as wilderness. There are five other vehicle access routes into the area and boundary identification problems exist along private, State and Forest Service land.
- 1-5: The BLM's resource analysis during planning for this EIS did not identify cultural resource values which would be significantly impacted by either designation or nondesignation of the WSA as wilderness. Consultation with the SHPO did not reveal any sites within the WSAs which would be eligible for nomination on the National Register of Historic Places. For these reasons, a discussion of cultural resources was not needed nor appropriate.



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East
Idaho
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~~PO BOX 463 BOISE IDAHO 83701~~

Advantages of CIHD-proposed boundaries for reducing wilderness conflicts inherent within the all-wilderness alternative should be obvious. However, several items warrant special attention.

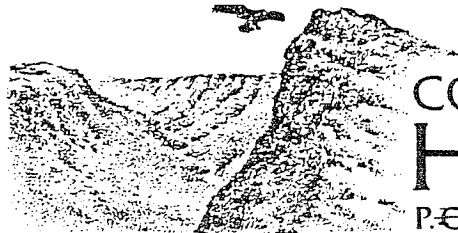
1 (1) The last two miles of Burnt Creek road should be closed to reduce wildlife impacts (mainly riparian) and to provide a better guarantee of solitude and quiet at Burnt Creek Lake. (DEIS intentions are most unclear in this regard.) The wilderness boundary coincides with where Burnt Creek Canyon becomes sufficiently narrow for a vehicle barrier to be practical, effective, and inexpensive. Please note that volunteer labor could be arranged to help construct such a barricade.

1-2
3 (2) CIHD Burnt Creek boundaries would protect several ridges excluded from the BLM's proposed action. Any conspicuous alterations to the natural landscape on these ridges would have a profoundly adverse impact on scenic views from the Rock of Ages (a popular destination point) and from part of the proposed Borah Peak Wilderness. Such development is admittedly unlikely for the near future, but wilderness planning is essentially for eternity.

1-4 (3) The jeep trail to Richardson Spring in the White Knob Mts WSA is used infrequently at most, and could be closed without undue difficulty above Mountain Spring. Thus, disqualifying this WSA from wilderness recommendation largely on grounds of manageability cannot be justified.

1-5 (4) ORV paths up Rocky Canyon and The Appendicitis Hill unnamed canyon are recommended for closure, although both appear used by hunters, due to a combination of archaeological features and habitat for several species of raptor. I didn't have adequate time for thorough site surveys of either canyon (I'm not a professional archaeologist, anyway.), but illegal trenchings for artifacts were common--albeit generally small in size. Several pictograph panels are located in both canyons, and are surprisingly free of spray paint. However, I found two places (one in each canyon) where large panels had been removed with hammer and chisel or a pickaxe. Many painted chunks were discarded by the looters and left lying, since they contained only partial symbols after the fracturing. Note that the East Idaho Wilderness DEIS thoroughly examined potential benefits of roadless management.

- 1-6: It is probable that what you saw was indeed a Peregrine falcon. However, it is considered to be a rare sighting and was probably a bird in transit to more suitable habitat. Neither BLM inventories nor consultation with the U.S. Fish and Wildlife Service show the existence of nest sites or nesting pairs of peregrines in the WSA.
- 1-7: Boundary adjustments were considered for the Appendicitis Hill WSA in the Big Lost MFP. At that time, a decision was made not to analyze further a boundary adjustment because of lack of manageability. While this is still considered valid, because seven of the sixteen comments suggested a partial alternative for Appendicitis Hill, the FEIS has been revised to add a new alternative for WSA 31-14 (page 7).



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-5 for preserving archaeological sites at the Black Canyon BLM WSA, where apparently an Area of Critical Environmental Concern recommendation will be made in the FEIS. I still feel a wilderness is more appropriate, but at least the vandalism problem was decently addressed in that document. The Big Lost/Pahsimeroi DEIS is notably deficient in this regard for Appendicitis Hill.

-6 I spotted eagles and smaller raptors in the unnamed canyon, which is full of potential nesting sites due to the eroded limestone, but was unable to get sufficiently close for identifications. However, I had the pleasure of leisurely watching a male peregrine falcon at two places in Rocky Canyon, within a single afternoon, from as close as forty feet. The dark head was quite prominent, and the dark "armpit" features on prairie falcons were definitely absent. The approximate 30-inch wingspan eliminates the smaller pigeon hawk (merlin) as a possibility. Unfortunately my slides, obviously taken from underneath the falcon, show only the outline and are not suitable for identification. I've alerted Eddie Chew of the Audubon Society for confirmation by an experienced bird observer, but he's not visited Rocky Canyon as of this writing.

Now that the CIHD boundaries have been explained and justified, more general arguments can be advanced as to why the Chapter feels more than one-seventh of the total acreage should be recommended for wilderness. This can be accomplished while refuting most of the BLM anti-wilderness contentions contained within the DEIS at the same time. Again, manageability problems are addressed by our boundary proposal.

FOR APPENDICITIS HILL/WHITE KNOB MOUNTAINS

(A) "Quality of the natural characteristics is low due to numerous unimproved vehicle ways and livestock watering sites."

-7 I did not find this to be the case at the White Knob Mtns WSA with the exception of the jeep road already discussed, which would revegetate in a short time after closure. Boundary adjustments at Appendicitis Hill per our proposal would essentially remove this problem, though the two canyons mentioned would have to be closed to traffic. Topographic screening at Appendicitis Hill is more helpful than generally

- 1-8: Reference to diversity in the National Wilderness Preservation System has been deleted from the FEIS.
- 1-9: Reference to opportunities for primitive recreation within a day's driving time (5 hours) from major population centers has been deleted from the FEIS.
- 1-10: Reference to balancing the geographic distribution of wilderness has been deleted from the FEIS.
- 1-11: Actually, very little mountain mahogany thinning would be allowed with the boundary suggested (the Partial Wilderness Alternative). Controlled burning is not a feasible alternative if the desired result is increased forage production (see pages 28, 31. and 33).



3 (B) "The sagebrush steppe ecosystem (M3110-49) is represented in the Red Rocks Lake National Wildlife Refuge Wilderness Area."

Frankly, I don't see much similarity between central Idaho foothill/transition areas and the flat marshes and grassland hills on the other side of the Continental Divide near Red Rocks Lake. The Bailey-Kuchler classifications are clearly too crude and coarse for meaningful use in this context. Moreover, who says a single representative of an ecosystem type is sufficient to fulfill National Wilderness Preservation System needs?

-9 (C) "Wilderness designation of both WSAs would increase primitive recreation and solitude acreage to residents of Boise, Idaho by only 1%."

So what? This logic could be used to systematically eliminate every sub-million-acre wilderness candidate in Idaho, no matter what wilderness values were involved. The 5000-acre cutoff for "island" wildernesses is clearly established, and the value of a small wilderness is definitely demonstrated by the Craters of the Moon Wilderness.

10 (D) "The WSAs would not help balance geographic distribution of wilderness. Instead, they would tend to concentrate it in central Idaho."

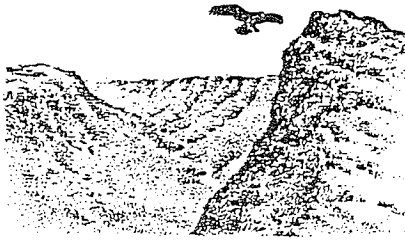
These two WSAs are relatively convenient to residents of Idaho Falls and Pocatello. If national forest wilderness proposals by the Idaho Fish & Game Dept. and by Governor Evans are any indication, there would be an east Idaho wilderness, excepting the Craters, and possibly the Great Rift and Borah Peak, none of which have much wildlife significance.

1 (E) "The no wilderness alternative permits mechanical manipulation of vegetation to improve mule deer habitat in WSA 31-14 Appendicitis Hill."

Some of this would be allowed with our boundaries. Other such areas could be handled with controlled burns. Possibilities for controlled burns should definitely be mentioned, because the implication is made that wildlife habitat improvement fundamentally conflicts with wilderness.

1-12: See Responses 1-1 and 1-2. The Short Creek and Burnt Creek Roads are constructed roads located outside of the WSA boundaries.

1-13: You make the argument that low ORV use in a nonwilderness translates to minimal ORV manageability problems in designated wilderness. We believe that ORV use at any level would be a management problem in designated wilderness.



FOR BURNT CREEK

(A) "The Burnt Creek and Short Creek roads intrude far into the WSA... Vehicle use... would reduce the solitude opportunities for wilderness users to less than outstanding by allowing outside sights and sounds to intrude into the wilderness environment..."

L-12

First, Short Creek road cannot be used very often, judging by the surface. Use of Burnt Creek road and the impacts thereof would both be substantially reduced by closure of the last two miles. As stated earlier, preventing scenic alterations to the ridges should be the primary consideration, since relatively few visitors will hike these ridges to be offended by these infrequent sights and sounds.

(B) "In order to manage the entire WSA as wilderness, fencing of the Burnt Creek and Short Creek roads as well as most of the WSA's northern and eastern boundaries would be required to control access since natural barriers do not exist."

-13

Maybe, but examination of our boundary proposal will show that a larger partial alternative can be accommodated with a small increase in boundary fencing. Besides, fencing presupposes serious conflicts with frequent ORV visitors. This is not a high-use area, and conflicts are likely to be occasional trespassing, at worst. Fencing could be provided where needed when a noticeable problem materializes. I seriously doubt that 30 miles of fence would be required to protect the whole WSA, in practice.

Scott Poyer

Scott Poyer, President
East Idaho Chapter
Committee for Idaho's High Desert

LAND STATUS

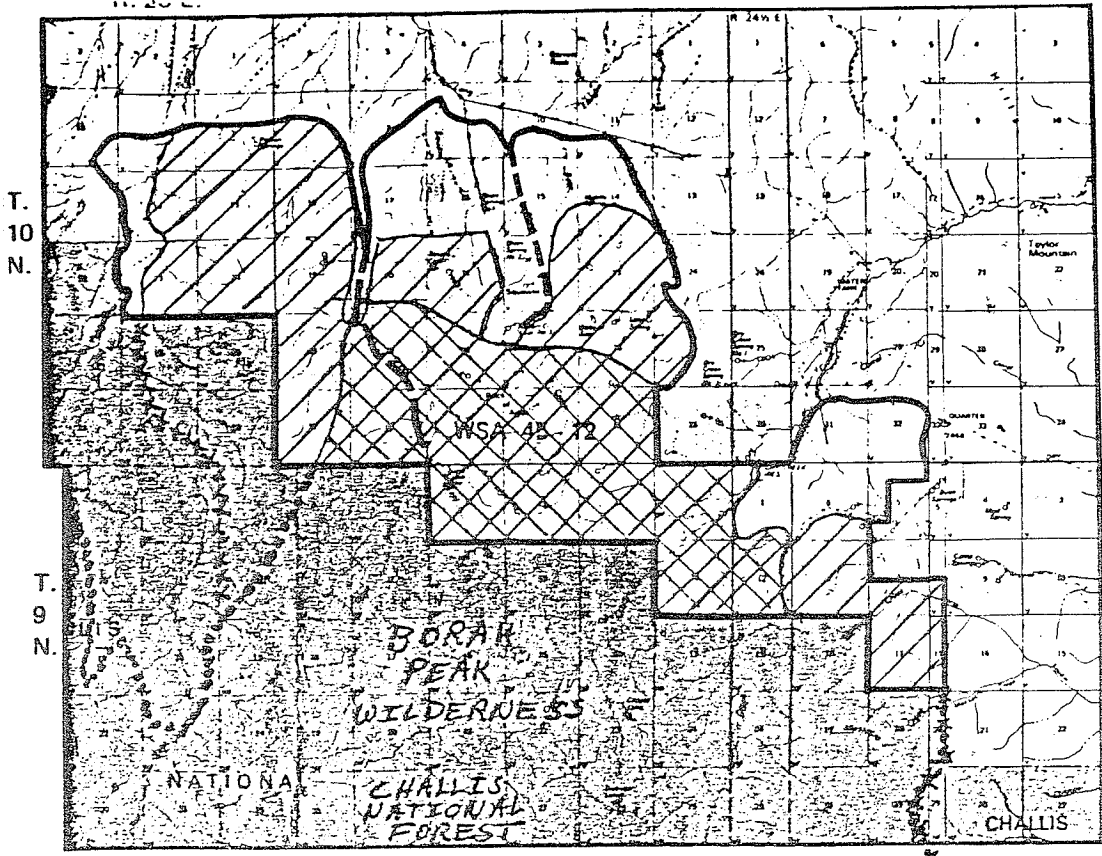
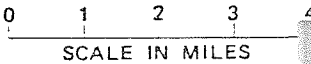
- PUBLIC LAND.....
- STATE LAND.....
- U.S. FOREST SERVICE LAND.....
- DEAD END ROADS.....
- WILDERNESS STUDY AREA BOUNDARY.....
- ALL WILDERNESS ALTERNATIVE.....
- NO WILDERNESS ALTERNATIVE.....

Forest Service - proposed wilderness boundary

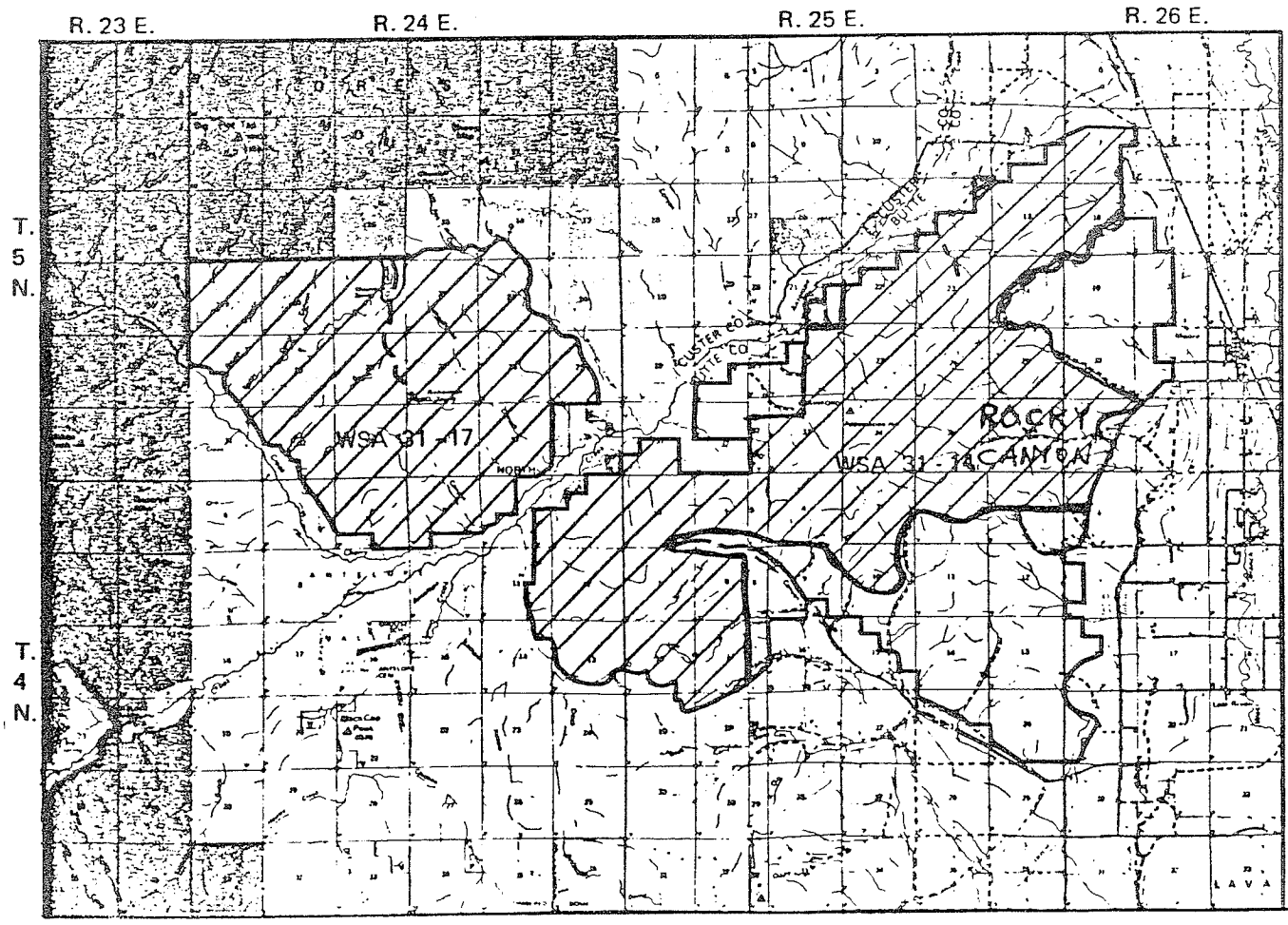
conservationists' Borah Peak boundary xxx

BLM - recommended wilderness

CIHD - proposed wilderness



BURNT CREEK WSA 45 - 12



WHITE KNOB MOUNTAINS WSA 31 - 17

APPENDICITIS HILL WSA 31 - 14

2-1: The California RARE II EIS and this EIS are not at all similar. The RARE II EIS attempted to analyze a large number of areas in the aggregate with little attention given to specific area analysis. The Big Lost-Pahsimeroi EIS analyzes the impacts of specific alternatives for each WSA individually. As stated on Page 7 of the DEIS, the overall proposed action is a combination of proposed actions for the individual WSAs. The FEIS has been extensively reorganized with very little reference to an overall proposed action, to more clearly show that alternatives analyzed were formulated WSA-specific, and that there was a range of alternatives for each WSA. Also, see page 8 in the FEIS for a discussion of alternatives considered but dropped from analysis.