



COMMITTEE FOR IDAHO'S HIGH DESERT

P.O. BOX 463 BOISE, IDAHO 83701

October 25, 1985

Mr. Kenneth G. Walker,
District Manager
Salmon District Office
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83647

Dear Mr. Walker:

The Committee for Idaho's High Desert is a statewide, grassroots organization dedicated to protecting Idaho's outstanding desert wildlands, waters, fish and wildlife, and other resources. On behalf of the Committee and its members statewide, I would like to offer the following comments on the Draft Big Lost/Pahsimeroi Wilderness Environmental Impact Statement.

GENERAL OBSERVATIONS

Overall, we are very disappointed with this document and its recommendations. It lacks the hard, specific information necessary to properly evaluate the resources, and effects on these resources, of the proposed action and the other alternatives examined; there is a definite lack of factual information. Much of the rationale for justifying the proposed action is highly questionable, such as the statement that 85% of the study acreage should not be protected as wilderness "because it would only add 1% to the wilderness acreage available to Boise residents (page 7). The general tone of the DEIS, as reflected in the significant issues developed in the study process, is decidedly biased against wilderness.

Range of Alternatives

We believe that the DEIS presents a range of alternatives which is legally inadequate in light of the California vs. Block decision. In this case (690 Fed 2d 753), Judge Karlton ruled that the Forest Service failed during RARE II to evaluate a legally adequate range of alternatives, and that as a result the Forest Service had violated the National Environmental Protection Act (NEPA). We believe that the range of alternatives presented in the Draft Big Lost/Pahsimeroi Wilderness EIS is clearly inadequate, based on this decision.

During RARE II, the Forest Service examined 10 alternatives, nine of which designated less than 36% of the possible wilderness acreage as wilderness, and one of which designated 100% to wilderness. As indicated above, the Court found that this was not a legally adequate range of alternatives, and that the Forest Service was required to examine partial wilderness alternatives which examined wilderness designations in the range from 36 - 100%. The Big Lost/Pahsimeroi DEIS fails to meet even the Forest Service's standards. There are only three alternatives, one which designates 0% of the study acreage as wilderness, one which designates only 14.6%, and one which designates 100%.

We believe that to meet NEPA requirements, the FEIS is required to examine additional partial wilderness alternatives. We particularly believe that you should examine additional boundary proposals for Appedicitis hill, because the impacts of potential ORV intrusion are largely confined to the southern periphery of the WSA. We recommend that the following additional alternatives be fully examined in the FEIS:

- 2-2: See page 8 in the FEIS for a discussion of alternatives considered but dropped from analysis (also see Response 1-7).
- 2-3: See Response 1-8.
- 2-4: See Response 1-9.

2-2

1) A moderate wilderness proposal consisting of the northern two-thirds of Appendicitis Hill and all of the Burnt Creek Wilderness Study Area. This alternative would protect as wilderness 31,680 acres of study lands, which is 55.7% of the total study acreage; and

2) A moderate-high alternative which would designate as wilderness all of Burnt Creek, the northern two-thirds of Appendicitis Hill, and the White Knob Mountains WSA. This would protect 41,630 acres, which is 75.3% of the total study acreage.

We strongly urge you to reconsider your preferred action, after considering the two alternatives outlined above. We believe the public interest would best be served by recommending the All-Wilderness Alternative as the proposed action, given the resource values and alternatives at stake in the WSAs under study. If you cannot select this alternative, at a minimum we urge you to select alternative 1) outlined above, the Burnt Creek-Appendicitis Hill proposal. We believe this is a balanced, reasoned alternative which will protect the Borah Peak ecosystem and the core of Appendicitis Hill, but also be a manageable alternative as well.

2-3

Representation in the National Wilderness Preservation System

We strongly disagree with your assessment that one representation of an ecosystem in the National Wilderness Preservation System is enough. The decision not to recommend additional wilderness in the sagebrush-steppe ecosystem because there already is a representation of this habitat type in the Red Rocks Lake National Wildlife Refuge is extremely short-sighted, and setting us up for the potential of a catastrophic event which would wipe out our entire representation of this habitat type.

The Bailey-Kuchler habitat classification system was developed for forest lands, and gives a rather cursory attention to desert and grassland communities. The system was not meant to be a determinant of the suitability or nonsuitability of specific areas for wilderness, but a general guide for BLM to assess the breadth of ecological diversity in wilderness areas. The adequacy of this classification system for desert habitats has been seriously questioned; this is evident by the fact that the Oregon BLM office is using the Oregon Natural Heritage Program classification system in their analysis of the ecological communities in the WSAs. We would like to request that, in the final EIS, you do a similar assessment using Dr. Minura Hironaka's habitat classification system for southern Idaho shrublands. This, we believe, would give a far more accurate assessment of the resources and values of these WSAs, and make possible a more meaningful assessment of the similarity between the WSAs and the existing wilderness in Montana. As stated above, in no case is there justification for excluding an area from wilderness protection simply because there is already an example of that habitat type in the Wilderness System.

2-4

Opportunities for recreation for Boise-area residents

We are amazed at your justification for non-wilderness for most of these WSAs on the basis that it would only increase the acreage available for wilderness recreation for Boise-area residents by 1%. This is an absurd criteria for evaluating wilderness characteristics! The WSAs should be evaluated on their own merits and characteristics, not on a pro-rating of total acreage in a given area.

Although the WSAs are only a potential 1% of the wilderness acreage available to metro Boise residents, they are some of the only areas within the Boise

2-5: The scoping and issue identification processes (see page 2 FEIS) derive their input largely from comments received from the public and other governmental agencies. The issues identified in the Draft EIS were a reflection of the comments BLM received. No bias towards any one viewpoint was intended.

We were, however, prompted by this and other comments to review the issues section of the EIS. This review resulted in a major rewriting of the issues section to clarify and more concisely define the issues (FEIS, page 2). At this time we also added an issue addressing impacts on wilderness values.

We agree with your statement concerning exchange of State inholdings in designated wilderness. This has been dropped from consideration in the FEIS.

In regards to your suggested issues:

1. After reviewing the actions which could occur in the WSAs if not designated as wilderness, BLM wildlife biologists concluded that no significant impacts to wildlife would occur. The possible actions are few in number, small in scale, scattered and in the case of range improvements similar to existing improvements. See page 5 for issues identified during scoping but not selected for analysis. Herbicide spraying was not mentioned anywhere in the DEIS nor is it mentioned in the FEIS.

2. There are no known threatened, endangered, rare, or sensitive plant or animal species inhabiting the WSAs (See Response 1-6 and page 6 of the FEIS).

3. Analysis of the impacts of nondesignation on wilderness values in each WSA is discussed in the FEIS.

2-6: Impacts to wildlife was not included for analysis in this FEIS (see page 6).

It is anticipated that logging would occur only on 300 acres in the Appendicitis Hill WSA, not over all the stands of commercial forest. Harvesting any of the remaining commercial forest is not economically feasible and trends in the industry indicate it will remain uneconomical in the foreseeable future.

Herbicide spraying was not mentioned in either the DEIS or FEIS as a method of sagebrush control. Prescribed burning is the most accepted method to control sagebrush. Prescribed burning can occur in designated wilderness as well as nonwilderness.

2-7: See Response 1-13.

driving circle which could be protected as wilderness within the Middle Rocky Mountains Sagebrush-steppe ecosystem. The combination of Bailey-Kuchler and zone of travel makes these areas unique, and even more valuable because the Idaho Falls District has already made non-wilderness recommendations for all the WSAs within this same habitat/driving zone. These areas also have great recreation and solitude values in and of themselves, which is a significant attribute to the metro Boise area.

Commodity bias in the DEIS

Throughout the DEIS, there is a persistent and pervasive bias towards the production of commodities and against the protection of wilderness values. This is evident most clearly in the "Significant Issues" identified on pages 5 and 6; for example, although the wildlife section includes discussion on the "ability to thin overgrown mountain mahogany thickets", it nowhere discusses the positive value wilderness has on many wildlife species, particularly in areas where brush control or logging are contemplated. There are no issues identified which examine what the impacts of non-designation will be on wilderness recreation, solitude, or other wilderness values. All the issues identified are ones which intrinsically oppose wilderness designation.

Some of the issues identified appear more significant than we believe they in fact are. For example, the DEIS (page 5) identifies access to State lands a significant issue, although there is a standing State policy that it will seek to exchange lands within designated wilderness areas for lands outside. This issue is one which can be easily dealt with in terms of policy, as it has in all other BLM DEISs relating to Wilderness.

We would like to suggest additional issues which need to be identified:

2-5

1. What will the impact of non-designation be on antelope, sage grouse, and other wildlife species? What will the impacts of herbicide spraying and other proposed projects be on fish and wildlife within the WSAs?
2. Are there any rare, threatened, or sensitive plant or animal species or community types within the WSAs? If so, what would the impacts of proposed developments be on these?
3. What will be the impacts of proposed activities within the WSAs be on wilderness qualities including (but not limited to) primitive recreation, solitude, naturalness, and special features?

SPECIFIC COMMENTS

2-6

Table 1 Impacts to Other Resources (Wildlife) We completely fail to understand how the table could show the Nonwilderness alternative as having No Impact on wildlife, particularly given the other resources affected. What would be the impact of logging on 1,279 acres be on wildlife, particularly old-growth dependent bird and mammal species? What would the impact be of herbicide spraying for brush control be on the winter range (or other seasonal range) for antelope, mule deer, and other species? How about the wildlife impacts of energy and mineral development?

(Recreation) Same concerns as above. How would development of oil and gas, mineral, logging, and range improvements impact primitive and unconfined recreation? Solitude? Special features? Certainly, there will be some impact!

2-7

ORV Use - A significant part of the justification for excluding most of Burnt Creek and Appendicitis Hill is the "management problem" of excluding ORV use from the areas. However, throughout the document the statement is made that

- 2-8: See Response 2-6.
- 2-9: The WSA as a whole appears natural. This is a requirement to get into study status. The area contains reservoirs and vehicle ways which have site-specific impacts on naturalness and these impacts are dispersed in such a way that a wilderness user would constantly encounter them.
- 2-10: Rehabilitation through wilderness management techniques of a few minor imprints would be reasonable. However, rehabilitating numerous imprints distributed throughout the Appendicitis Hill WSA is not considered reasonable and would cause future management difficulties.
- 2-11: See page 6.
- 2-12: See Response 1-8.
- 2-13: See Response 1-8.
- 2-14: The impacts on deer and elk winter range from range improvements would be negligible (see page 6 in the FEIS).

Hand trimming mountain mahogany would not be feasible because of the intensive labor involved. Further, tree cutting of any kind would not be allowable in designated wilderness (see pages 31 and 33 in the FEIS).

Impacts of sand and gravel extraction are discussed on pages 30 and 33 of the FEIS.

- 2-15: BLM inventories did not reveal any threatened, endangered, rare, or sensitive plants within the WSAs. Therefore, this was not an issue analyzed in this EIS.

Description of Proposed Action: Burnt Creek - We concur with your statement "The recommended suitable area complements the U.S. Forest Service's adjacent Borah Peak RARE II area (page 7)". However, we believe this applies to the entire Burnt Creek WSA, not just the portion recommended suitable. The current ORV use is low, and even without major topographic barriers, we believe fencing for a mile or more across the way boundary, accompanied with obliteration of the way, would effectively allow this area to be managed, without major problems.

- 2-8 Cumulative Impact Table - Forest Resources - the table lists the commercial timber harvest which would be foregone if the all-Wilderness alternative is adopted, but there is no discussion of the potential impacts of logging on wildlife, scenic values, recreation, watershed, and wilderness characteristics. Such discussion should be incorporated in the FEIS.
- 2-9 Page 14 - there is no documentation of the quality of natural characteristics being low due to numerous ways and watering sites. What is the density of ways? How does this compare to other WSAs in Idaho and elsewhere? Most important, does the area meet the naturalness criteria BLM used in identifying WSAs? Obviously, it does, which means it meets Congressional standards for naturalness.
- 2-10 Had the evaluation of WSAs been completed a century ago, we would have had the luxury of choosing from many pristine sites. We simply don't have that opportunity now, which is why stock watering ponds, etc. are allowable uses under the wilderness act. With proper management, ways can revert to good-quality grasslands, as can watering sites. We do not believe that this is a justifiable criteria for making a non-wilderness recommendation.
- 2-11 Page 16 - wildlife values. Numerous wildlife values are noted in the WSAs, including concentrations of chukar partridge and raptors and booming/brood rearing areas for sage grouse. What will be the impacts of range improvements, oil and gas exploration and development, and other proposed activities on these wildlife species and areas? What will be impacts on crucial elk and deer range?
- 2-12 Page 16 - ecological diversity: at present, there are no -administratively endorsed Forest Service wilderness areas in Idaho, due to the recent RARE III decision. Hence, the DEIS should not ascribe any potential wilderness protection to ecosystems represented in the old FS recommendations.
- 2-13 Page 17, Table 3 - the comments above apply. Also, the FEIS should note which of the WSAs listed in the Table have been recommended non-suitable by BLM or other administering agency (including areas in Idaho such as Corral-Horse Basin, Hawley Mountain, and others). Checks should be made for areas out-of-state as well. The final chart should give, both in total acres and percentage of study acreage, the preliminary suitable/nonsuitable acreage within this limited ecosystem type (as shown by the WSAs listed in Table 3).
- 2-14 Pages 22,23 - range improvements: what will be the impacts of brush control projects on the deer and elk winter range in the WSA if the area is not protected as wilderness? What non-chemical options exist for thinning mountain mahogany? Is hand-trimming an option? What are the problems and benefits associated with controlled burns, and is this a viable option? If not, why not? What would be the impact of sand and gravel extraction on wildlife, recreation, and solitude?
- 2-15 Rare plants - nowhere in the DEIS is there any discussion of rare or sensitive plant species, as identified by the Idaho Natural Areas Coordinating Committee. Has there been any rare plant inventory work done within the WSAs? What plants on the INACC list are found or likely within the WSAs? What would be the impact

- 2-16: The primary recreation activity occurring in all three WSAs is big game hunting. Because big game populations would not be affected, hunting would not be affected. Impacts to aesthetics are analagous to impacts to the wilderness values of naturalness and are discussed throughout the FEIS.
- 2-17: See Response 1-10.
- 2-18: This has been deleted from the FEIS.
- 2-19: Admittedly, vehicle use in the WSAs is currently low. Vehicle use at any level in a designated wilderness is inappropriate and creates management problems.

on these species of sand and gravel extraction, herbicide spraying for brush control, range improvement projects, logging, or other activities possible within the WSAs if they are not protected as Wilderness? Would wilderness designation enhance the survival of these species?

2-16 [Page 24 - recreation: what is your justification for a "No impact" statement for the No Wilderness Alternative? What would the impact of sand and gravel extraction, spraying projects, etc. be on aesthetics and other elements of recreation use?

2-17 [Page 28 - geographic distribution of wilderness (also mentioned elsewhere in text): We fail to see how you can consider designation of wilderness in these areas to be further concentration of wilderness in central Idaho. These areas are on the margin of the Snake River Plain or in the Pahsimeroi Valley, areas with ready road access from southern Idaho population centers (unlike the River of No Return or other areas more traditionally thought of as "Central Idaho").

Page 29 - Primitive and Unconfined Recreation: we disagree with the assertion that recreation opportunities for the White Knob Mountains are diminished because the WSA lacks a significant feature which would serve as a focal or destination point for visitors. The overall scenic and wilderness values of the area itself are of value, and the diminishing amount of wilderness makes this area of increasing value.

Page 32 - hunting: Surveys by the Idaho Department of Fish and Game have shown a majority of hunters believe there are too many roads in Idaho, and that a "quality" hunt is as important, or more so, than vehicle access. It is possible that closure of ways would enhance wildlife populations or hunting opportunities, increasing the value of the area to hunters.

2-18 [Page 32 - RARE II: as mentioned earlier, the Forest Service is in the process of re-studying lands for their wilderness characteristics. It is not correct to state that the Challis National Forest has dropped the contiguous Forest land from wilderness study.

Page 33 - Range: It should be noted that the Colorado Wilderness Act allows salting and other traditional range activities to be undertaken by motorized vehicle if there are no reasonable alternatives and it has traditionally been done in such a manner.

2-19 [Page 38 - Borah Peak: As mentioned earlier, the DEIS states that vehicle use is low, but then claims that vehicle use creates a significant management problem which is a major reason for not classifying the entire WSA as Wilderness. This basically doesn't make sense. If vehicle use is not a problem now, we can't see why BLM should assume it will be an insurmountable problem in the near future. The FEIS should explain in detail why this is the case, and why moderate amounts of fencing combined with rehabilitation of ways would not be sufficient to manage vehicle use.

Fencing is allowed within a WSA; in addition, much of the potential fencing necessary would be on the WSA boundary, which would not be in any way a diminishing of wilderness values within the WSA. Road closures were not even considered in the DEIS, and should be carefully examined in the FEIS for the Burnt Creek and Short Creek roads. Again, even if they are not closed, the fences would be on the WSA boundary, and not within the Wilderness. (Desert hikers are used to crossing fences!)

We strongly believe the all-wilderness alternative is the best alternative in terms of enhancing a Borah Peak Forest Service wilderness (which is one of

- 2-20: Impacts of commercial thinning on 300 acres in the Appendicitis Hill WSA are discussed on page 26 in the FEIS. Timber harvest was not an issue for analysis for the other WSAs (see page 6).
- 2-21: The roads are not included in the partial alternative thereby removing the manageability problem of controlling vehicle access onto lands along the roads.
- 2-22: The BLM analysis is based on our best estimates of projected future activities. The CIHD would appear to favor a worst case analysis which assumes that all potentially degrading activities will at some time occur.
- 2-23: The FEIS discussion of the impacts of development activities on wilderness values has been expanded from the DEIS (see Chapter 4).

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the least controversial Forest Service areas, and the most likely to be designated in the near future. Burnt Creek would provide low-elevation deer and elk range and otherwise help create a more viable Borah Peak Wilderness.)

Since vehicle use is low, we don't see why outstanding opportunities for solitude and primitive and unconfined recreation would be lessened by the Burnt Creek and Short Creek roads, especially if there is a closure to use by the public. Again, a road closure or partial closure (open to permittees only, on a restricted as-needed basis) should be examined. Similar schemes are being considered on the Boise and Shoshone Districts. An intermediate fencing scheme also should be examined; if vehicle use is low, it doesn't seem likely that the entire boundary would need to be fenced.

Fences don't significantly affect recreational opportunities, especially if they are properly designed and located. They are much less an impact than pipeline development, mining, logging, or other possible uses; given the alternatives, recreationists would very likely prefer fences to development which would destroy opportunities for solitude and primitive and unconfined recreation, as well as the aesthetics of the area.

2-20 [Page 41 - Standard No. 3: Although Table 45-12 mentions the potential harvest of 3003 MBF of timber, there is no discussion of logging in the following discussion of Impacts of Nondesignation on Wilderness Values. Because this is a possibility in the future (even though not contemplated now), it should be addressed in the FEIS.

2-21 [Page 40 - fences: If there are no natural barriers in the unit, how will the partial alternative reduce management problems, and create a more manageable unit?

2-22 [Page 45, Environmental Consequences : Given the possibility of timber harvest on 800 acres, pipeline construction, possible oil and gas development, and other activities, how do you justify the statement that projected future management under nonwilderness management would have no measurable impacts to visual, wildlife, soil and water resources and threatened, sensitive or endangered species? Again, where is the information on rare plants, a listing of sensitive wildlife species, a listing of old-growth dependent wildlife, and other pertinent information?

2-23 [Page 46 - Recreation: again, given the potential for the development described above, we need to see justification for the "No impact" determination, especially as it relates to solitude and primitive and unconfined recreation (for the No Wilderness alternative).

Page 47, last paragraph : the phrase "either alternative" in line 1 should be corrected to read "either non-wilderness alternative . . ."

Thank you for this opportunity to comment. We request that our comments be included in the Final EIS. Again, we believe that the FEIS is required to examine a wider range of alternatives; we urge you to recommend, at a minimum, at least all of Burnt Creek and the northern two-thirds of Appendicitis Hill (as per the map submitted by Scott Ploger). If you have any questions or need more information, please let us know.

Sincerely,
THE COMMITTEE FOR IDAHO'S
HIGH DESERT

3-1: See Response 2-1.

3-2: This has been deleted from the FEIS.