

8-145,336

DEPARTMENT OF INTERIOR

Bureau of Land Management
Idaho Falls and Salmon Districts, Idaho

Big Lost - Mackay Grazing Final

Environmental Impact Statement



Cathy Johnson



IN REPLY
REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Idaho Falls District
940 Lincoln Road
Idaho Falls, Idaho 83401

We have forwarded for your review the final environmental impact statement (EIS) on proposed range management in the Big Lost-Mackay units of central Idaho. This final has been prepared by a team of resource specialists from the Idaho Falls and Salmon districts, Bureau of Land Management.

The statement describes and analyzes the economic, social and environmental effects of five alternatives for grazing management on 310,962 acres of public land.

The final statement differs from past procedures when the entire draft statement was reprinted in the final. This statement includes only those changes that are necessary in the draft EIS and responses to public comments received on the draft EIS.

This document includes a summary of the four alternatives that were analyzed in the Draft EIS as well as the description and analysis of one additional alternative that was developed to respond to public comment.

This document, used with the draft statement, constitutes the final environmental impact statement. This final EIS is not the decision document. The decision will be based on the analysis contained in the final EIS, the BLM's personnel and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs. No action can be taken for at least 30 days following filing of this statement with the Environmental Protection Agency and distribution to the public. A brief summary document outlining management direction for the Big Lost and Mackay areas will be prepared and made available as soon as a decision is reached. More specific decisions will then be developed on an allotment-by-allotment basis.

Thank you for your interest and participation.

Sincerely,

O'dell A. Frandsen
Idaho Falls District Manager

Kenneth G. Walker
Salmon District Manager

DEPARTMENT OF THE INTERIOR
FINAL ENVIRONMENTAL IMPACT STATEMENT

PROPOSED RANGE MANAGEMENT PROGRAM

FOR THE

BIG LOST-MACKAY AREA

(To Be Used With Draft)

Prepared by

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

Idaho Falls and Salmon Districts

BIG LOST-MACKAY GRAZING
ENVIRONMENTAL IMPACT STATEMENT

() Draft (X) Final Environmental Impact Statement

1. Type of Action: (X) Administrative () Legislative

2. Responsible Agencies:

a. Lead Agency: Department of Interior, Bureau of Land
Management

b. Cooperating Agencies: None

3. Abstract: The Big Lost-Mackay Grazing Environmental Impact Statement analyzes the effects of livestock grazing on 310,962 acres of public land in central Idaho. Five grazing management alternatives are presented for consideration and are analyzed in terms of their projected economic, social and environmental effects. Each alternative analyzes a different level of forage use, methods by which livestock grazing would be managed, and as necessary support facilities (such as water developments, fencing, brush control and revegetation projects). Alternative E of the Big Lost-Mackay grazing statement is selected as the preferred alternative.

4. Comments Have Been Requested and Received from the Following:

See Reviewers and Respondents Section.

5. Date Draft Statement Made Available to the Environmental Protection Agency and the Public:

Draft EIS: Filed April 29, 1983

Final EIS: September 1983

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SUMMARY

The Big Lost-Mackay Grazing Environmental Impact Statement (EIS) analyzes the effects of livestock grazing on 310,962 acres of public land administered by the Bureau of Land Management, Idaho Falls and Salmon districts, in central Idaho.

The EIS is being prepared between the recommendation and decision phases of the districts' land-use planning process. That process has included detailed resource inventories, individual resource development plans, conflict analysis and multiple use recommendations. The draft EIS analyzed four alternatives that were developed to assess impacts from different levels of livestock use and related support facilities. Based on public comment, Alternative E was developed and assessed in the final EIS.

The general public, special interest groups, other federal agencies, and state agencies were consulted at regular intervals throughout the planning and EIS scoping process. Contributions were received from individuals and agencies. As a result of this consultation, the principal issue related to livestock grazing was economic effects on ranchers. The planning issues included in this EIS are described below.

1. Are decreases in the level of livestock grazing in the Big Lost and Mackay units needed to maintain or improve long-term production, and what are the related economic effects to local livestock operators?
2. What range improvements are needed to implement a more intensive range management program?
3. Would more intensive range management have adverse effects on other resources in the unit such as water resources, soils and wildlife habitat?
4. Are forage and cover sufficient for populations of deer, antelope, elk and sage grouse, and how would more intensive range management affect these species?

The identification of issues led to the formation of alternatives to be analyzed in the EIS with the economic effects on ranches from intensive livestock management being the principal issue being addressed in the draft EIS. As a result of public comment on the draft EIS, issue number 4 surfaced as a major issue and prompted the development of Alternative E. Alternative E has been selected as the BLM's preferred alternative.

ALTERNATIVE E

Description Summary

This alternative was developed in response to public comments on the draft EIS to address those areas where wildlife habitat could be adversely affected. The alternative is designed to maintain or improve wildlife habitat quality or to mitigate adverse impacts to an acceptable level. The quantity of forage is adequate for both current and projected big game populations. The initial stocking level for livestock would be a total of 24,225 AUMs, the same as in Alternative A. This level of use would include no changes in livestock use in 10 allotments, would reduce the use in 14 allotments, and would increase the level of livestock use over the 5-year average in 31 allotments. Proposed range improvements needed to ensure the success of grazing systems include 1 cattleguard, 23 ponds, 18 springs, 16.75 miles of pipeline, 2.5 miles of fence, 5.5 miles of waterhaul roads, 1 storage tank relocation with a pump, 5 water catchments, and 9,490 acres of vegetation manipulation. This alternative is the same as Alternative A for the 12 allotments in the Mackay unit.

Environmental Consequences Summary

Under this alternative, the 24,225 AUMs of livestock use represents an 8 percent increase over the 5-year average and an 8 percent decrease from the active preference. After 15 years, grazing use could be increased to 26,052 AUMs, 16 percent increase over the 5-year average and only about 1 percent less than the preference. Vegetation would improve in quality and quantity. Range condition would be improved where poor or fair conditions currently exist and good condition range would be maintained.

Soil erosion greater than 2 tons/acre/year that is now taking place on 27 percent of the EIS area would be reduced to 23 percent, and watershed conditions would show no appreciable change from current trends.

This alternative presents a more desirable approach to livestock grazing management on crucial wildlife habitat than Alternative A as analyzed in the draft EIS. Although some allotments would receive increased use by livestock, sufficient forage would be available for current and projected big game populations made by the Idaho Department of Fish and Game. Reductions in the level of grazing, implementation of grazing systems, fencing, and salting would stabilize or improve some riparian areas while other riparian zones would be unaffected. Water developments would include mitigation (fencing) for some riparian areas and would result in both positive and negative impacts to wildlife habitat. Proposed vegetation manipulation could have positive results for deer, antelope, and sage grouse due to mitigation measures included in the standard operating procedures and design criteria.

It is estimated that rancher income would be increased by about \$18,000 initially and \$20,000 after 15 years. Secondary economic impacts would be about \$55,000 initially and \$7,000 after 15 years. Range improvement costs if all were constructed would total \$358,000.

ALTERNATIVE A

Description Summary

The initial stocking level for this alternative is the same as Alternative E at 24,225 AUMs. Proposed range improvements include 8 cattleguards, 31 ponds, 32 springs, 22.25 miles of pipeline, 25.5 miles of fence, 8 miles of waterhaul roads, 1 storage tank relocation, 5 water catchments, and 15,533 acres of vegetation manipulation.

Environmental Consequences Summary

As in Alternative E, 24,225 AUMs represent an 8 percent increase over the 5-year average and an 8 percent decrease from the actual preference. After 15 years, there would be a total of 28,502 AUMs available for livestock use, a 27 percent increase over the 5-year average and an 8 percent increase over the preference. Range condition, soil erosion, watershed, and environmental consequences would be essentially the same as for Alternative E.

Wildlife habitat would be expected to decrease in quality under this alternative. The quality of winter range for elk, deer and antelope would decrease to some extent along with summer range for deer. A more substantial decrease in the quality of elk summer range and sage grouse habitat would be expected, largely as a result of proposed range improvements. Riparian zones would continue an apparent downward trend in condition.

It is estimated that rancher income would be increased \$18,000 initially and \$22,000 after 15 years. Secondary economic impacts would be about \$56,000 initially and \$7,500 after 15 years. Range improvement costs would total between \$667,000 and \$481,000.

ALTERNATIVE B

Description Summary

The initial stocking level would be the same as the 5-year average level of grazing use for livestock at 22,446 AUMs. Permittees could increase livestock use up to their total preference which is 26,326 for the EIS area. Range improvements would only be constructed where needed to maintain livestock grazing at the current level as funds were available. The level of range improvements would not be expected to exceed 25 percent of those identified for Alternative A.

Environmental Consequences Summary

If grazing use were to continue at 22,446 AUMs, range condition would

be expected to remain static or slightly decline after 15 years. It is estimated that 10 percent of the present condition class acreage would fall to the next lower condition class in 15 years. Production would decrease to about 22,232 AUMs in 15 years.

Wildlife habitat would remain unchanged under this alternative along with soil erosion and watershed conditions.

Rancher income would not change as a result of this alternative. Secondary economic impacts would amount to about \$12,800 initially and \$610 after 15 years. Range improvement costs would be about \$100,000.

ALTERNATIVE C

Description Summary

The initial stocking level would be 21,931 AUMs under this alternative. Proposed range improvements include 1 cattleguard, 13 ponds, 16 springs, 15.75 miles of pipeline, 2 miles of fence, 5.5 miles of waterhaul roads, 1 storage tank relocation, 5 water catchments, and 8,303 acres of vegetation manipulation.

Environmental Consequences Summary

The 21,931 AUMs of livestock grazing represents a 2 percent decrease in use from the 5-year average and would be a 17 percent decrease from the preference. Decreases would be made in those allotments where use exceeds carrying capacity, but no increases would be made above the 5-year average.

Soil erosion would decline somewhat from 27 percent of the EIS area greater than 2 tons/acre/year to about 23 percent. Bank vegetation would show some improvement, but watershed conditions would essentially remain unchanged.

Wildlife habitat quality would be improved for elk winter and summer range and for deer summer range. Other wildlife habitat would be expected to decrease in quality. Riparian zones would continue an apparent downward trend in condition.

Rancher income would decline an estimated \$61,000 initially but would increase by \$18,500 after 15 years. Secondary income changes would be about \$7,600 initially and \$5,600 after 15 years. Range improvement costs total \$174,000.

ALTERNATIVE D

Description Summary

Livestock grazing would be discontinued under this alternative and no AUMs would be authorized. All forage in the unit would be reserved for other uses. No new range management projects nor any livestock management facilities would be constructed.

Environmental Consequences Summary

No livestock grazing would represent a 100 percent reduction in grazing use by livestock. All public land would show a long-term improvement. It is estimated that 50 percent of all the good, fair and poor range condition class acreage would improve to the next condition class in 15 years. Vegetation would increase by about 7,058 AUMs, a 31.6 percent increase.

Soil erosion and watershed conditions would show significant improvement. About 17 percent of the area would remain at a rate of 2 tons/acre/year and all facets of streambank stability would improve between 5 and 19 percent.

Wildlife habitat would improve in riparian areas. Elk and sage grouse habitat would improve, but deer and antelope range would decline over the long term where livestock grazing is now maintaining shrub cover. Elk habitat would improve more than habitat for other species. Reproductive success would be improved for all species due to elimination of competition for forage and cover.

This alternative would have a devastating effect on rancher income with annual losses of \$836,000 or about 91 percent of total rancher income. A secondary income loss of about \$204,600 would be expected, making a total regional annual income loss of \$1,040,500.

ALTERNATIVE E

Preferred Alternative

This alternative was developed in response to public comments to address areas where wildlife habitat could be adversely impacted and areas left with unmitigated, adverse impacts in alternatives A and C. The quantity of wildlife forage is adequate for both current and projected big game populations. This alternative is designed to maintain or improve wildlife habitat quality or to mitigate adverse impacts to an acceptable level. It is consistent with resource objectives and recommendations made during the BLM planning process. Following the analysis of environmental consequences, this alternative was chosen as the BLM's preferred alternative. It should be noted that this alternative is identical to Alternative A for the Mackay unit. Comments received concerning the effects of Alternative A on wildlife habitat were not considered to apply to the Mackay unit. Levels of grazing use for all alternatives analyzed are shown on Table 1. The last twelve allotments are in the Mackay unit.

Objectives

1. Improve range condition throughout the EIS area within 15 years from present condition classes of about 6.4 percent poor, 26.6 percent fair, 61.5 percent good, less than .5 percent excellent, and 5 percent unclassified to 4.3 percent poor, 21.3 percent fair, 68.9 percent good, less than .5 percent excellent, and 5 percent unclassified. These percentages are a result of changing some land areas from one condition class to another.
2. Increase the usable livestock forage from the present production of 24,225 AUMs to an estimated 26,052 AUMs within 15 years. (AUM stands for animal unit month, or the amount of forage needed to feed one cow or five sheep for 1 month.)
3. Increase acreage in upward range trend.
4. Maintain or improve crucial wildlife habitat or mitigate to an acceptable level any adverse impacts to crucial wildlife habitat areas. Vegetation use, livestock grazing management, a monitoring program, administrative procedures and implementation schedule would be the same as under Alternative A.

Range Improvements and Land Treatments

Proposed range improvements would be subjected to a detailed site analysis and an analysis of costs and benefits by allotment. A number of the proposed improvements will very probably not be completed. Range improvements would be completed as funds become available. The improvements proposed under this alternative are considered to be needed for proper livestock management and would receive priority for

TABLE 1
ALTERNATIVE AUM LEVELS OF GRAZING USE

ALLOTMENT NAME	PREFERENCE	5-YR AVG	ALT A	ALT B	ALT C	ALT D	ALT E
ALDER CREEK	501	493	501	493	493	0	501
ELBOW	330	459	497	459	459	0	497
BEAVERLAND PASS	1024	321	538	321	321	0	538
ARCO PEAK	257	81	303	81	81	0	303
KING SPRING	460	426	460	426	426	0	460
SERVICEBERRY	382	382	382	382	382	0	382
DEADMAN	2550	2049	2550	2049	2049	0	2550
BLIZZARD MOUNTAIN	540	234	270	234	234	0	270
DRY FORK	640	639	640	639	639	0	640
JUDD BROWN	540	529	540	529	529	0	540
LAVA CREEK	475	359	475	359	359	0	475
CRATERS	342	0	342	0	342	0	342
CRAWFORD CANYON	35	31	12	31	12	0	12
MARSH CANYON	139	111	139	111	111	0	139
WADDUPS CANYON	1384	1223	1384	1223	1223	0	1384
EARL SMITH	426	307	196	307	196	0	196
SHEEP MOUNTAIN	720	705	720	705	705	0	720
LESLIE BUTTES	142	159	116	159	116	0	116
BECK CANYON	175	175	128	175	128	0	128
NEWMAN CANYON	428	394	251	394	251	0	251
SORENSEN	152	15	150	15	152	0	150
HARGER POINT	320	272	280	272	272	0	280
DRY CANYON	23	22	23	22	22	0	23
MAHOGANY	300	180	300	180	180	0	300
MCGEE-BERRY	442	353	442	353	353	0	442
HAMMOND CANYON	205	206	205	206	205	0	205
TECHICK CANYON	139	112	159	112	112	0	159
LATHAM HOLLOW	665	651	545	651	545	0	545
CHAMPAGNE CREEK	205	204	182	204	182	0	182
HICKEN CREEK	585	465	585	465	465	0	585
RAIL CREEK	400	384	320	384	320	0	320
GOODMAN CANYON	129	122	129	122	122	0	129
APPENDICITIS HILLS	360	360	300	360	300	0	300
AIKELE	120	100	120	100	100	0	120
GEORGE	94	37	94	37	37	0	94
NICKLES	10	10	45	10	10	0	45
BLISS	118	119	118	119	118	0	118
STODDARD CREEK	86	86	86	86	86	0	86
ERA FLAT	55	10	55	10	10	0	55
ROCKY CANYON	300	144	119	144	119	0	119
MARTIN PASTURE	97	39	97	39	39	0	97
RAMSHORN CANYON	974	943	974	943	943	0	974
HUGGINS	58	58	58	58	58	0	58
ARENTSON GULCH	407	406	448	406	406	0	448
DICKEY	518	518	570	518	518	0	570
WHISKEY SPRINGS	500	301	250	301	250	0	250
MACKAY	1581	1337	1267	1337	1267	0	1267
ASAY	108	108	108	108	108	0	108
WOODBURY	30	30	30	30	30	0	30
COPPER BASIN	1198	987	1198	987	1198	0	1198
BOONE CREEK	709	716	716	716	716	0	716
WILDHORSE	2096	2086	1781	2086	1781	0	1781
SAGE CREEK	930	931	1023	931	931	0	1023
THOUSAND SPRINGS	801	801	881	801	801	0	881
WILLOW CREEK	121	121	121	121	121	0	121
TOTALS	26,326	22,446	24,225	22,446	21,931	0	24,225

implementation. Proposed improvements include 1 cattleguard, 23 ponds, 18 springs, 16.75 miles of pipeline, 2.5 miles of fence, 5.5 miles of waterhaul roads, 1 storage tank relocation with a pump, and 9,490 acres of vegetation manipulation. Water troughs would be included as part of the spring and pipeline water developments. Proposed developments by allotment are shown in Table 2, and estimated project costs are shown in Table 3.

The environmental impacts of these projects to the EIS area are discussed in Environmental Consequences of Alternative E. Environmental assessments will be prepared for all individual projects as part of a detailed site analysis.

Project Development and Design Criteria

The project development and design criteria identified in Alternative A of the draft EIS would be applied to those range improvement projects identified under this alternative.

Alternative E design criteria for vegetation manipulation would also include: All vegetation manipulation projects in crucial wildlife habitat areas would be designed to leave about 50 percent of the total acreage identified for wildlife purposes.

Standard Operating Procedures

The standard operating procedures identified in Alternative A of the draft EIS would be applied to those range improvement projects identified under this alternative. Two additional standard operating procedures would be applied to projects in Alternative E.

1. If an environmental assessment determines that a significant impact to riparian vegetation would occur from project installation and subsequent livestock grazing of the area, the project or riparian area will be fenced to prevent or reduce the impact.
2. Spring development costs would include provisions for fencing the water source and providing free water flow at the headbox.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE E

This section analyzes the expected impacts of Alternative E. Impacts listed are only those that are determined to be different or in addition to those already listed in the draft EIS under Alternative A.

TABLE 2

Proposed Range Improvements,
Alternative E

Allotment	Management Category	Ponds	Springs	Cattleguards	Pipelines	Fences	Roads	Vegetation Manipulation
		Number	Number	Number	Miles	Miles	Miles	Acres
Alder Creek	Improve	4	1	0	.00	.25	.00	0
Elbow	Improve	0	0	0	3.50	.00	.00	800
Serviceberry	Improve	0	0	0	.00	.50	5.50	0
Deadman	Improve	0	0	0	.00	.00	.00	2,500
Blizzard Mountain	Improve	0	1	0	.75	.00	.00	0
Marsh Canyon	Improve	0	0	0	.00	.00	.00	160
Waddoups Canyon	Improve	11	1	0	2.00	.00	.00	0
Earl Smith	Improve	0	0	0	.00	.00	.00	400
Sheep Mountain	Improve	0	1	0	1.00	.00	.00	500
Beck Canyon	Improve	2	3	0	.00	.00	.00	600
Newman Canyon	Improve	4	0	0	.00	.00	.00	0
Hammond Canyon	Improve	0	1	0	.00	.00	.00	0
Latham Hollow	Improve	1	2	0	.00	.00	.00	400
Champagne Creek	Improve	0	1	0	.00	.50	.00	0
Trail Creek	Improve	1	1	0	.00	.00	.00	0
Craters	Improve	0	0	0	.00	.25	.00	0
Rocky Canyon	Improve	0	0	0	.00	.00	.00	500
Ramshorn Canyon	Improve	0	0	0	.00	.00	.00	600
Whiskey Springs	Improve	0	1	0	2.50	.00	.00	0
Mackay	Improve	0	2	1	5.00	.00	.00	0
Boone Creek	Improve	0	0	0	.00	.50	.00	1,700
Wildhorse	Improve	0	1	0	.00	.00	.00	480
Arentson Gulch	Maintain	0	0	0	.00	.25	.00	0
Dickey	Maintain	0	1	0	.00	.25	.00	400
Copper Basin	Maintain	0	1	0	1.00	.00	.00	0
Sage Creek	Maintain	0	0	0	.00	.00	.00	450
Thousand Springs	Maintain	0	0	0	1.00	.00	.00	0
TOTALS		23	18	1	16.75	2.50	5.50	9,490

*Miscellaneous projects include relocating a storage tank and pump in the Elbow allotment, a pump installation in Harger Point, and 5 water catchments in the Boone Creek allotment.

TABLE 3

Range Improvements, Alternative E

Improvement	Total Units	Cost/Unit Installed	Total Cost	Acres Disturbed Per Unit	Total Acres Disturbed	Personnel Per Unit	Total Workday Requirements
Ponds	23 ea.	\$5,000	\$115,000	3.45	79.35	9	207
Springs (Include fencing, stock tanks, and pipeline)	18 ea.	\$3,000	\$54,000	0.35	6.3	28	504
Pipelines (Include stock tank every 2 miles)	16.75 mi.	\$4,200	\$70,350	1/mile	16.75	5	84
Storage Tank	1 ea.	\$5,000	\$ 5,000	.05	.05		
Waterhaul Roads	5.50 mi.	\$ 200	\$ 1,100	1/mile	5.0		
Fence Construction	2.5 mi.	\$2,500	\$ 6,250	1/mile	2.5	2	5
Vegetation Manipulation							
Controlled burn	4,000 ac.	\$ 3	\$12,000	1	4,000		
Chemical or Mechanical	5,490 ac.	\$ 15	\$82,350	1	5,490		
Cattleguards	1 ea.	\$1,800	\$ 1,800	.005	.005	4	4
Water Catchments	5 ea.	\$2,000	\$ 10,000	1.2	6.0	9	45

ALTERNATIVE E

Soil Resources

Grazing systems would remain the same as in Alternative A described in the draft EIS. New improvements would be reduced, which would also reduce short-term impacts. Construction of improvements would cause temporary disturbance of vegetative cover on 116 acres, which is a minor portion of the EIS area. Vegetation manipulation contained in this alternative would affect 9,490 acres or about 3 percent of the area (refer to Table 3).

The increased erosion occurring following implementation would decrease with time as vegetation recovers and surface protection increases.

Alternative E is expected to have essentially the same decrease in erosion as Alternative A. Individual environmental assessments will be completed before any projects are developed as stated in Alternative A.

Water Resources

Water development projects include mitigation (fencing) for some riparian areas. However, initial stocking rates would continue to negatively impact some riparian areas. Some riparian areas are in an apparent downward trend due to a long history of livestock grazing. Generally cattle are not herded out of the riparian zone and forage utilization remains high. Most recent sources tend to indicate that unless riparian utilization can be kept below 50-60 percent, then a downward trend in the vegetation and channel stability can be expected to continue.

Vegetation and Livestock Grazing

Forage Use

Initial stocking rates under this alternative are the same as under Alternative A and would serve to bring livestock use levels in line with the estimated carrying capacity of each allotment. Based on present forage production estimates, 67,606 animal unit months (AUMs) of forage are available for all resource uses in the Big Lost-Mackay area. Based on the level of grazing management and range improvements proposed in this alternative, a total of 24,225 AUMs (36 percent of the present total) would be available for livestock grazing. This represents an overall 8 percent reduction of current active grazing preference and a 7.9 percent increase from the 5-year average use. This stocking rate is well below the 33,803 AUMs (50 percent of the present total) that could be allocated to livestock under the 50 percent utilization level allowed by livestock of the total forage production in the EIS area.

Vegetation would benefit from this adjustment because livestock distribution would be improved, more uniform utilization would occur and stocking rates would not exceed the estimated forage production on the allotments. Fifteen years after implementation, vegetative production is estimated to increase 3,654 AUMs from the present total forage production of 67,606 AUMs. Of the 3,654 AUMs, 1,827 or 50 percent would be available for livestock use. This represents a 5.4 percent increase from 33,803 AUMs that could be allocated for livestock utilization and would result in a 7.5 percent increase over the proposed initial stocking rate of 24,225 AUMs. This would total 26,052 AUMs after 15 years.

Several years of on-site observation and analysis of allotment data by BLM staff indicate that implementation of intensive management would meet the objectives outlined in Alternative E. Increases would be satisfied by additional forage projected to accrue through range developments and the operation of grazing systems.

Livestock Grazing Management

Livestock grazing management would be the same as described under Alternative A of the draft EIS.

Improvement in range condition and trend would result through intensive management of the vegetation resource. Table 4 summarizes changes in range condition to the year 1998. Ground cover increases are expected to be about the same as in Alternative A of the draft EIS.

TABLE 4

Condition Class Summary in 15 Years by Acres Alternative E

	<u>Excellent</u>	<u>Good</u>	<u>Fair</u>	<u>Poor</u>	<u>Unclassified</u>
Present	1,781	209,727	90,721	21,689	17,133
Future	1,781	234,746	72,614	14,777	17,133

(About 10,531 acres of private and state land located within the allotments are not included.)

Range Improvements

This alternative includes provisions for various developments and land treatments. These range developments would improve livestock distribution, providing better utilization and reducing the amount of overused and underused range (Valentine, 1966).

Table 2 lists proposed range improvements for Alternative E. The impacts of these projects would be the same as those described for Alternative A in Chapter 4, Environmental Consequences, in the draft EIS. An environmental assessment would be prepared for each project once site-specific locations are determined.

Terrestrial Wildlife

Alternative E presents a more desirable approach to livestock management on crucial wildlife habitat than Alternative A. Forage use would be the same as in Alternative A, but range improvements and land treatments would be considerably more oriented toward wildlife habitat. This discussion does not include tables showing acres of crucial wildlife habitat affected because this was a source of confusion in the draft EIS. In these tables, acres of crucial habitat were tabulated in positive, negative and no impact columns. Four different discrete actions were analyzed for seven different crucial ranges. This presented a complex display of data and a confusing situation to some readers. This narrative addresses both positive and negative effects of this alternative to principal species of concern.

The Big Lost and Mackay land use plans contain draft decisions to maintain and improve wildlife habitat which are not discussed in this (or any other) alternative. This EIS discusses the effects of the range management portion of the draft land use plan on wildlife habitat. Further information on decisions for the wildlife resource is available at the Idaho Falls or Salmon BLM district offices.

Forage Use

Livestock forage use would increase over the 5-year average as presented in Alternative A. However, authorized use would be less than the level of livestock grazing that could have been authorized if the livestock operators had applied for full use of all of their grazing privileges. Although some allotments would have more livestock, sufficient forage would be available for current and projected big game populations by the Idaho Department of Fish and Game. Crucial ranges would continue to provide the quality of key habitat components presently available. The quantity of forage utilized by livestock would not limit big game population goals.

Reductions in the level of grazing, implementation of grazing systems, fencing and salting would stabilize or improve some riparian areas while other riparian zones would be unaffected. Water development projects include mitigation (fencing) for some riparian areas. However, initial stocking rates would continue to negatively impact some riparian areas.

Positive effects are expected on allotments scheduled for reductions. Grazing adjustments would provide more big game forage on allotments that have been overutilized by livestock (such as Whiskey Springs, Wildhorse and Appendicitis Hills). Livestock utilization would be monitored to ensure that levels of use are consistent with the carrying capacity of each allotment.

Livestock Grazing Management

The effects of grazing management would be the same as described under Alternative A. Rotational grazing systems would provide riparian zones with periodic rest from livestock grazing. Riparian vegetation would be exclusively available to wildlife during these rest cycles. This is an improvement over the current situation.

Seasonal grazing systems (no rotation) would continue to cause some livestock distribution problems. Without constant herding, cattle would continue to concentrate in some riparian areas. Water developments may help redistribute livestock pressure, but no significant improvement is expected in riparian zones without fencing or rotation grazing systems.

The Elbow Allotment is scheduled for a 51 percent increase over the present license. This grazing intensity has been authorized the last 2 years in conjunction with a rest-rotation grazing system. The grazing system with early grazing season has shown desirable results. However, the success of this stocking level depends on rest, early removal of livestock, and regrowth of grazed vegetation. Any further extensions of the grazing season or stocking level could be detrimental to wildlife habitat.

Range Improvements

The number of range improvements would be reduced from those proposed under Alternative A. More uniform livestock distribution is expected on allotments where springs and ponds would be developed. Both positive and negative impacts to wildlife would be associated with these developments. Rangeland that is now heavily utilized due to poor livestock distribution could receive some benefit by distributing livestock into areas that have received little use in the past. Allotments scheduled for water developments and rotation grazing systems would provide high quality habitat on rested pastures. However, on grazed pastures and where water developments are proposed with seasonal (no rotation) grazing systems, heavier livestock use in riparian zones and adjacent dry land habitat is expected. Riparian zones would provide high quality habitat only if livestock are rotated often enough to allow regrowth of riparian vegetation. The increased cattle use could cause some behavioral conflict with wildlife on areas that have received little livestock use in the past. However, utilization levels should maintain sufficient forage on dry land areas for wildlife.

Fencing of riparian zones would improve wildlife habitat if livestock were excluded from these areas. Some fencing would occur in conjunction with spring and pond development. The amount of habitat improvement would depend on the amount of riparian vegetation fenced. Habitat monitoring will identify key areas to be fenced and environmental assessment of water development would include mitigation for riparian vegetation.

Wildlife watering devices, fenced seep areas, and fencing of spring sources would improve wildlife habitat near pipelines and water troughs. Leaving water systems operational from June 15 through October 1 will provide water throughout the dry summer season. Water availability does not appear to be limiting wildlife production except in the Deadman Canyon area. Still, creation of new watering areas should expand distribution of some wildlife species into areas that were previously unused.

Fencing proposals under Alternative E would be significantly reduced from Alternative A. Some minor migrational disruption to big game would be mitigated by design options stated in the project development and design criteria. Improved livestock management resulting from these fences would enhance wildlife habitat.

Road construction in the Deadman allotment would have little impact on wildlife. Improved livestock distribution resulting from water hauling along this road would improve wildlife habitat in the Deadman allotment. These roads would help implement a rest rotation system.

Vegetation Manipulation

Brush control proposals would cover fewer acres than in Alternative A. Brush proposals would not control more than 50 percent of the total acreage identified for allotments in crucial wildlife habitat. Design would provide a vegetative mosaic with irregular edges of brush control. Habitat requirements for sage grouse and antelope would be preserved. Brush control could have positive results for deer, antelope and sage grouse if planning and execution incorporate habitat requirements for forage and cover. This appears to be the case under Alternative E.

The following table summarizes the acres of crucial habitat affected by brush control proposals.

TABLE 5

Acres of Crucial Habitat Affected by
Brush Control, Alternative E

<u>Allotment</u>	<u>Winter Range</u>			<u>Summer Range</u>			<u>Sage Grouse</u>
	<u>Elk</u>	<u>Deer</u>	<u>Antelope</u>	<u>Elk</u>	<u>Deer</u>	<u>Antelope</u>	
Elbow	0	0	800	0	0	0	750
Deadman	0	1,500*	2,100	0	0	0	1,000
Marsh Canyon	0	160	80	0	0	0	0
Earl Smith	0	400	0	0	0	0	400
Sheep Mountain	0	500	0	0	0	0	500
Beck Canyon	0	0	600	0	0	600	600
Latham Hollow	0	0	0	0	0	0	400
Rocky Canyon	0	300	0	0	0	0	500
Ramshorn Canyon	0	300*	200	0	0	100	600
Boone Creek	0	0	0	0	0	0	1,700
Wildhorse	0	0	0	0	250	0	480
Dickey	200	0	0	0	0	0	400
Sage Creek	0	0	0	450	450	0	0
TOTALS	200	3,160	3,780	450	700	700	7,330

*Deer density is very low in these allotments.

ECONOMICS

Economic Efficiency

The net present worth of this alternative would be -\$113,155.

Rancher Income

The initial impacts of this alternative would be the same as those described in Alternative A. In the long term, after range improvements and land treatments are installed, the AUM allocation would be 1 percent below active preference and 16 percent above average use. This would

increase the gains in rancher income to \$20,000 by year 15. This alternative would not put any permittees out of business.

Range Improvements and Land Treatments

The improvements necessary to implement this alternative would cost \$358,000. Maintenance costs associated with these developments would be borne primarily by the user.

Grazing Fee Distribution

Initially, the annual gain in grazing fees would be \$2,542. By year 15, the gain would be \$5,048. These collections would be distributed as follows.

	<u>Initial</u>	<u>15-Year</u>
Federal Treasury	\$ 953	\$1,893
State of Idaho	\$ 318	\$ 631
Range Betterment	<u>\$1,271</u>	<u>\$2,524</u>
	<u>\$2,542</u>	<u>\$5,048</u>

These gains would make total annual collections in the EIS area amount to \$33,967 initially and \$36,473 after 15-years.

Secondary Income Impacts

Table 6 shows the secondary income impacts of this alternative.

TABLE 6

Secondary Impacts, Alternative E

<u>Stocking Rate</u>	<u>Directly Affected Industry</u>	<u>Direct Impact</u>	<u>Secondary Impact</u>	<u>Total Impact</u>
Initial	Livestock	\$18,163	\$ 4,445	\$22,608
	Construction	<u>\$71,570</u>	<u>\$50,772</u>	<u>\$122,342</u>
	TOTALS	<u>\$89,733</u>	<u>\$55,217</u>	<u>\$144,950</u>
15-year	Livestock	\$19,696	\$ 4,820	\$ 24,516
	Construction	<u>\$ 3,062</u>	<u>\$ 2,172</u>	<u>\$ 5,234</u>
	TOTALS	<u>\$22,758</u>	<u>\$ 6,992</u>	<u>\$ 29,750</u>

Employment

This alternative would have no significant impact on employment levels in the economic region.

Capital Position

The impact to capital position with this alternative would be the same as that described in Alternative A.

CONSULTATION AND COORDINATION

The Big Lost-Mackay Grazing Draft Environmental Impact Statement (EIS) was filed with the Environmental Protection Agency on April 29, 1983, and made available to the public on May 4, 1983. The public review period ended July 9.

Two open houses were held in lieu of formal hearings. One open house was held at the Arco Memorial Building, Arco, Idaho, on June 1, 1983, and a second open house was held at the American Legion Hall, Mackay, Idaho, on June 2. Both open houses were held from 2 to 8 p.m. The open houses were attended by a total of seven people; two persons presented written comments at the open houses. BLM responses to the substantial portions of these comments are presented in this final EIS.

About 390 draft EISs were distributed for review to individuals; federal, state, and local governments; and to non-government organizations. All written comments are reproduced in this final EIS. Substantial comments are identified; the BLM response follows the comment.

All comments will be considered in making final decisions on rangeland management in the Big Lost and Mackay units.

REVIEWERS AND RESPONDENTS

The following list identifies agencies, organizations and individuals to whom copies of the draft were sent. Those individuals, agencies and organizations who returned written comments are denoted by a letter and page number.

	<u>Letter</u>	<u>Page</u>
<u>Elected Federal Officials</u>		
Senator James McClure		
Senator Steve Symms		
Representative George Hansen		
<u>Elected State Officials</u>		
Governor John V. Evans		
State Senators and Representatives		
<u>Advisory Councils</u>		
Idaho Falls District Advisory Council		
Idaho Falls District Grazing Advisory Board		
Salmon District Advisory Council		
Salmon District Grazing Advisory Board		
<u>Organizations</u>		
AEC Sportsmen's Club		
American Horse Protection Association	9	36
American Humane Society		
American Mining Congress		
American Wilderness Alliance		
Amoco Mineral Company		
Anaconda Minerals		
Arco Advertiser		
Atlantic Richfield Company		
Butte County Soil Conservation District		
Challis Messenger		
Challis Snowmobile Club		
Committee for Idaho's High Desert		

Cyprus Mining Company
Earth First!
Earth Search
Environmental Management Services
Federation of Western Outdoor Clubs
Gold Diggers Club
Homestake Mining Co.
Hunt Oil Co.
Idaho Archaeological Society, Inc.
Idaho Association of Counties
Idaho Cattlemen's Association
Idaho Cattle Feeders Association, Inc.
Idaho Conservation League
Idaho Environmental Council
Idaho Falls Gem and Mineral Society
Idaho Farm Bureau Federation
Idaho Mining Association
Idaho Motorcycle Association
Idaho Motorcycle Club
Idaho Outfitters and Guides Assoc.
Idaho Petroleum Council
Idaho Power Co.
Idaho State Journal
Idaho Statesman
Idaho Trail Machine Association
Idaho Wildlife Federation
Independent Petroleum Association of America
Institute for High Desert Studies
Intermountain Gas Co.
Isaak Walton League
KSRA Radio
League of Women Voters of Idaho
Lemhi Cattle & Horse Association
Lost River Electric
Mackay Chamber of Commerce
Magic Valley Gem Club
Motorized Recreation Vehicle Coalition
Natural Gas Corp. of California
Natural Resources Defense Council
Northern Rockies Chapter Sierra Club
Northwest Steelheaders Association
Outdoors Unlimited
Pacific Power & Light
Pacific Transmission Supply
Paintbrush Petroleum
Panhandle Eastern Pipeline
Phelps Dodge Corp.
Phillips Petroleum Co.
Post-Register
Recorder-Herald
Republic Geothermal, Inc.
Rocky Mountain Oil and Gas Association
Salmon River Trail Ride Association
Sierra Club

Small Business Association
 Snake River Audubon Society
 Southeast Idaho Rod and Gun Club
 Standard Oil Co.
 Tri-County Cattleman's Association
 Texas Oil and Gas Corp.
 Texaco, Inc.
 Teton Exploration Drilling Co.
 Trout Unlimited
 United 4-Wheel Drive Association
 Union Oil Company of California
 Western Environmental Trade
 Wildlife Federation
 Wilderness Studies Institute
 Woolgrowers Association

Federal Agencies

Advisory Council on Historic Preservation		
Agricultural Stabilization and Conservation Service		
Bureau of Indian Affairs		
Department of Energy		
Environmental Protection Agency	1	24
Fish and Wildlife Service	4	26
Forest Service	11	38
Geological Survey		
National Park Service		
Soil Conservation Service		

State of Idaho Agencies

Bureau of Community Affairs		
Bureau of Mines and Geology		
Department of Fish and Game		
Department of Health and Welfare	5	27
Department of Lands		
Department of Parks and Recreation		
Department of Water Resources		
Idaho State University		
Office of Energy		
State Clearinghouse		
Tourism and Industrial Development		
Transportation Department, Division of Highways		
University of Idaho Extension Service		

County Commissioners

Butte County
 Custer County

City Mayors.

Arco
Mackay
Salmon

Individuals

All permittees in the Big Lost and Mackay Units

Brent Morgan	8	33
Sheldon Bluestein	7	30
Kenneth R. Freitas	6	30
Ruth B. Doe	3	26
Ned R. Walker	12	39
Clifford C. Mitchell	2	25



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

1

REPLY TO
ATTN OF:

M/S 443

MAY 25 1983

Don Watson, EIS Team Leader
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Re: Draft EIS--Big Lost - Mackay Grazing Plan

Dear Mr. Watson:

The Environmental Protection Agency (EPA) has reviewed the Big Lost - Mackay Grazing Plan Draft EIS. While the Draft EIS was generally of good quality, we have the following comment which should be addressed in the Final EIS.

Vegetation Management

In discussing environmental consequences of the four alternatives, the draft indicates (on page 62) that "vegetative manipulation ... may impact water quality and will be addressed in individual action plans and environmental assessments." Later (on page 67) there appear statements that "effects of chemical spraying can vary with range condition" and that "selection of the chemical to be used will depend upon environmental conditions at the proposed application time."

To effectively evaluate the environmental impacts of herbicide use, the EIS should discuss all options BLM is considering for treatment under different range and environmental conditions. This analysis should list and discuss the herbicides to be used and the conditions under which they could be used; any adverse consequences which may occur for water, soil and other living resources, and measures to be taken to mitigate any anticipated adverse environmental effects.

EPA has rated this Draft EIS LO-2 [LO--Lack of Objection; 2--Inadequate information]. We appreciate the opportunity to review the report. Should you wish to discuss EPA's comments and recommendations, please contact Richard Thiel, Environmental Evaluation Branch Chief, at 442-1728 or (FTS) 399-1728.

Sincerely,

L. Edwin Coate
Acting Regional Administrator

1-1. The type or types of chemicals to be used for vegetation manipulation projects would be determined when site-specific resource data have been collected. Analyzing environmental impacts of all potentially suitable herbicides would be a lengthy process and we believe would serve no useful purpose if detailed on-site analysis determined that herbicides could not be used for vegetation manipulation. All vegetation manipulation projects will have a complete analysis of environmental impacts. If herbicides are selected for vegetation manipulation, they will be EPA-approved.

24

1-1

6/11/83

2

Dear Mr. Watson,

I'd like to comment on the EIS for rangeland between Arco + Willow Creek Summit.

2-1

Alternative C is much cheaper + ecologically better. You say ^{you} will improve range. That means get rid of sagebrush + replace it with grass. Antelope, deer, ~~sage~~ sagegrass and other nongame species need sagebrush.

Maintaining more livestock does not always mean better range. It's better politics.

2-2

I hope you'll involve Fish + Game in your planning to set wildlife population targets for winter range. You should use their target populations established for game species in the state plans. Why don't you coordinate

population targets with the Forest Service since they manage the summer range for many game species.

Alternative A is no good. It's the easy way out. No flak from the ranchers. Leave enough sage habitat so that antelope + sage-grouse populations can increase.

Clifford C. Mitchell

2-1. Brush control is proposed on areas that have been dominated by sagebrush to the point of limiting grass and forb production. Only 5 percent of the total EIS area (15,533 acres) is proposed for control in Alternative A. These projects would be designed to maintain sagebrush in lower densities than at present but in sufficient quantity to provide forage and some cover for wildlife. Fewer acres of brush control are proposed in Alternative E. These proposals are not intended to get rid of the sagebrush, but to provide a more desirable mix of grasses, forbs and sagebrush.

2-2. The BLM has in the past and will continue to consult with both the Forest Service and Idaho Department of Fish and Game. The BLM is responsible for managing wildlife habitat on public lands, but the Fish and Game sets wildlife population targets, harvest levels and so on. In this EIS, the discussion of impacts on wildlife is aimed at changes in habitat quality.

June 6, 1983

3

Bureau of Land Management
Idaho Falls District
940 Lincoln Road
Idaho Falls, Idaho 83401

Attention: Personnel working with BLM public land Management,
Recommendations, EIS, etc.

I think natural land with it's native vegetation intact or nearly so has much value. I attended the recent Public Hearing held at the Idaho Falls Littletree Inn concerning the Draft Wilderness EIS for Eastern Idaho, and wish to express my opinions and make the following comments.

I would like to recommend that Black Canyon and Hawley Mt. be included along with Hell's Half Acre to be recommended for Wilderness designation, and Cedar Butte and Petticoat Peak be managed to protect their natural features without being so restrictive about motor-sized vehicles. It seems like a few trails and trail roads should be permissible in most roadless and natural areas.

In my opinion the things which do the most damage to the natural vegetation of a natural area are over grazing and manipulating the rangeland vegetation with sagebrush spraying, chaining, planting crested wheat grass etc. It appears this destroys all the native vegetation and wildlife habitat and turns the natural rangeland into a domestic pasture. I do believe in balance, and I hope that much of the privately owned land which is already cultivated and lying idle or raising surplus grain crops can be used to provide pasture and forage for livestock in the future. There are fast becoming so many other needs and uses for the public lands especially the natural areas.

On the draft Big Lost-Mackay Environmental Impact Statement dealing with grazing management on public rangeland from Arco to the Willow Creek Summit, of the four alternatives offered by the BLM, I favor C. -- Less funding of range improvement facilities and a decrease in livestock use that would ultimately improve the range conditions. I have traveled the Arco to Challis highway many times, and think it is very scenic and interesting. Most range improvements would surely detract from the wildness of the country, and I do not favor them (with the exception of an occasional water storage device) for the same reasons listed in the above paragraph.

I do not know if the many little islands in the South Fork of the Snake River were ever in a (WSA), but I hope they too will be managed to preserve their wild and natural character.

I appreciate this opportunity to make comments and express my ideas and opinions. Thank you.

Sincerely,

Ruth B. Woe



United States Department of the Interior

FISH AND WILDLIFE SERVICE
ENDANGERED SPECIES PROGRAM
4620 Overland Road, Room 209
Boise, Idaho 83705

DATE: June 15, 1983
TO: District Manager, BLM, Idaho Falls, ID
FROM: Acting Field Supervisor FWS, Ecological Services, Boise, ID
SUBJECT: Big Lost-Mackay Grazing Draft, EIS

As requested in your recent letter, we have reviewed the draft environmental impact statement (EIS) on the proposed range management program in the Big Lost-Mackay units of Central Idaho as it relates to threatened and endangered species. The EIS fulfills the requirements under the Endangered Species Act, as amended, to address federally listed species that may be present in the project area.

It is the Service's conclusion, based on our own current information and that which was provided in the EIS, that there will be no effect on threatened or endangered species as a result of implementing any of the alternatives. However, should future studies reveal that listed species occurring in the area may be affected, we request that you informally consult with us.

Thank you for your cooperation and for the biological assessment of threatened and endangered species provided in the EIS.


James F. Gore

cc: RO, Portland, OR (AFA-SE)

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26



June 27, 1983

Mr. O'dell Frandsen
District Manager
Idaho Falls District
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear O'dell:

Region 6 personnel have reviewed the draft Big Lost Mackay Grazing EIS. We appreciate the opportunity to review this document and offer the following comments.

General Comments:

This EIS is totally livestock oriented. It is deficient because the alternatives do not reflect the complete range of possibilities for managing this area. Although four alternatives are presented, two are not given serious consideration (B and D). The EIS forces the BLM and the public to choose between two one sided livestock alternatives (A and C). This amounts to no wildlife choice at all.

Alternative A is the all out livestock alternative. Crucial wildlife habitat quality is significantly reduced from current condition. Alternative B is the required "no action" alternative. Crucial wildlife habitat quality remains unchanged from current status. Alternative C is a livestock compromise alternative. Crucial wildlife habitat quality is decreased about half as much as alternative A. Alternative D is the "eliminate livestock" alternative. Crucial wildlife habitat quality is significantly increased from current condition. None of the alternatives improve wildlife habitat except the "no livestock grazing" alternative which is never given serious consideration, and probably shouldn't in most cases. We feel the EIS is deficient on two major points:

1. It does not present an alternative which improves wildlife habitat and allows livestock grazing. We feel this is a major flaw. The final EIS should include an additional alternative which improves crucial wildlife habitat quality.
2. The cost benefit analysis does not include wildlife recreational values. Therefore, the EIS does not accurately reflect the cost/benefit ratio for all alternatives.

5-1. In response to this comment and other comments concerning wildlife habitat, a new alternative was developed, Alternative E. This alternative is analyzed as having more beneficial and fewer adverse impacts on wildlife habitat. Several draft decisions to improve or maintain wildlife habitat are included in the Big Lost and Mackay draft land use plans. These are available for inspection at the Idaho Falls and Salmon district offices.

5-2. The cost/benefit analysis in the draft EIS was general in nature and was intended to reflect economic efficiency in a general sense. The analysis did not include reduced soil movement, water quality, hunting, fishing, and other recreation values. Before a range improvement project is constructed, a site-specific environmental assessment is completed and a more detailed cost/benefit analysis performed. Examples of the cost/benefit analysis on an allotment basis for units other than Big Lost and Mackay are located in the Idaho Falls District office. (See also response 7-12.)

Analysis of the Alternatives:

TABLE 1
USABLE AUMs OF FORAGE PRODUCTION

	Alt A	Alt B	Alt C	Alt D
Present = 22,446				
5 years	24,225	22,446	21,931	
% Change from Present	+7.9%	0%	-2.3%	
15 years	25,133	22,169	24,166	26,994
% Change from Present	+12%	-1.2%	+7.6%	+20.2%

Alternative A, the BLM's preferred alternative, "...attempts to balance all resource uses so that no single interest group benefits to the detriment of another." (p. 29) This statement is in direct contradiction to the fact, stated in several places, that under alternative A the quality of crucial wildlife habitat would decrease for all species and all seasons except antelope fawning habitat. These decreases are in the quality of crucial wildlife habitat from their current condition. The EIS makes no statement concerning the current quality of wildlife habitat. In many allotments wildlife habitat quality is currently below the potential for the site.

Alternative B (no action) assumes no changes in the current status of wildlife habitat, AUMs or range condition. For this reason it is given little consideration.

Alternative D (remove all livestock) is a proposal that received little serious consideration.

Both alternatives A and C increase AUMs of forage production and improve range condition. Over 5 years, alternative A will produce 10% more usable AUMs than alternative C. However, over a 15 year period alternative A produces only 4% more AUMs of forage than alternative C. As far as improvement in range condition is concerned, there are no significant differences between alternative A or C.

Alternative A requires between \$394,000 and \$900,000 of capital improvements to increase AUMs as described. Alternative C requires \$174,000 to \$235,000 to accomplish nearly the same increase in AUMs, and with half the decrease in crucial wildlife habitat quality.

Alternative A depends on numerous and expensive capital improvements to get the projected short term increase in AUMs over alternative C. It has been our experience that many of these "range improvement" projects, especially vegetation manipulation, are failures and do not necessarily contribute to any increase in AUMs or pounds of red meat production.

Most of the difference in decrease of wildlife habitat quality between alternatives A and C is the result of heavy forage utilization under alternative A. This is caused by increasing cattle numbers and is indicated by the short term (5 year) increase in AUMs under alternative A (Table 1).

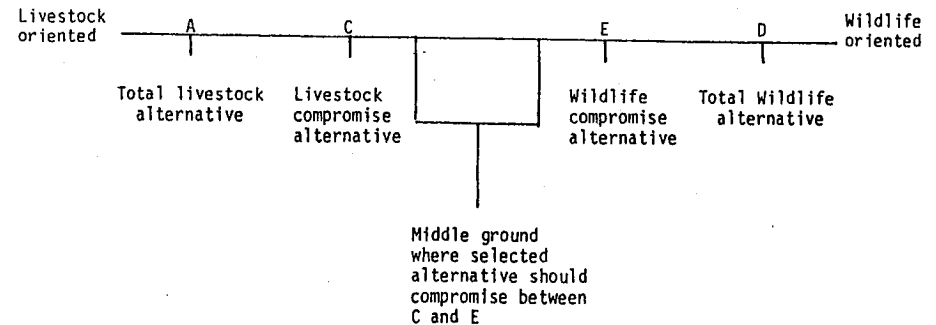
It is clear to us that alternative A is a capital intensive program to provide the negative short term gains at the expense of wildlife. We are particularly concerned about the negative effect of increased forage use on elk summer and winter range, deer winter range and sage grouse habitat.

Alternative C is simply a scaled down version of alternative A. Increases in AUMs are still made at the expense of wildlife habitat. However, the cattle numbers will be decreased in the short term in order to improve range condition. This alternative requires less capital and depends more on improved management. Alternative C is much closer to the kind of alternative we would like to see than alternative A.

It is difficult for us to select an alternative in an EIS which gives only two choices, both of which have a negative effect on wildlife habitat quality. We feel very strongly that another alternative is necessary. This alternative should address improving crucial wildlife habitat quality while improving range condition and maintaining AUMs at their current level. This alternative should be management intensive. This would give the public and managers an opportunity to look at a complete spectrum of alternatives:

5-3

SPECTRUM OF ALTERNATIVES



5-4

Alternative A is the livestock extreme; alternative C is the livestock compromise. Alternative D is the wildlife extreme (the opposite of A) and alternative E (the omitted alternative) is the wildlife compromise. In our opinion the middle ground is not alternative C but some alternative between C and E.

In the absence of another alternative to balance alternatives A and C we are compelled to select alternative B (no action) because this alternative

5-3. Alternative E was developed in response to comments concerning wildlife habitat. The alternative represents the range management portion of the land use plan and does not reflect all wildlife habitat management measures. Following this EIS and completion of the land use plan, wildlife activity plans (habitat management plans) are proposed. The draft land use plan calls for three habitat management plans in the Big Lost Unit. A plan for the Willow Creek elk herd has already been written by the Salmon District.

5-4. Alternative E provides both wildlife habitat improvement and improvement of livestock forage. A "compromise" between livestock and wildlife implies conflict with them on opposite sides of a balance. Competition for forage in the units is not a factor with the species involved except the dietary overlap with elk and livestock. Proper management of the vegetation resource should ensure that use by livestock and wildlife is harmonious and represents an optimal use of the resource. We feel this is the case with Alternative E.

5-5. This has been accomplished in the final.

5-6. This error has been corrected in the final EIS. Detailed data concerning the various components of cover are on file in the Idaho Falls and Salmon district BLM offices.

5-7. Rotational grazing systems should provide more uniform cattle distribution and relieve some pressure on riparian zones. Ungrazed (rested) pastures would allow riparian vegetation to grow while livestock are grazing other pastures. Monitoring these areas should show whether or not the grazing systems are maintaining riparian areas. If needed, grazing systems will be modified to meet the objectives, and additional fencing may be constructed.

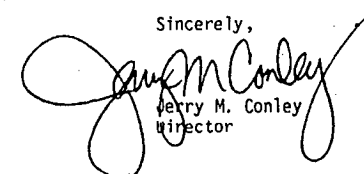
Mr. O'dell Frandsen
Page 4

does not decrease crucial wildlife habitat quality. Its major shortcoming is no improvement in range condition, although this could be achieved with a reduction in cattle numbers.

Other Comments:

- 5-5 | 1. There are numerous inconsistencies and inaccuracies between the tables that need to be corrected in the final form.
2. Page 29, #5. We disagree with the statement that, "The preferred alternative attempts to balance all resource uses so that no single interest group benefits to the detriment of another." Alternative A benefits livestock producers to the detriment of wildlife interests.
- 5-6 | 3. Page 42, second paragraph. The statement that, "...about 80 percent of the bare ground being protected by litter, vegetation, stone or bedrock" is contradictory and useless in terms of cover. If it is bare ground, it is bare ground, there is no cover. In addition, cover should be broken down into the various components (e.g., vegetation, litter, pebbles or gravel, stone or bedrock) to have meaning and value.
- 5-7 | 4. Page 62, Water Resources. In desert situations, developing new water sources does not usually reduce livestock impacts to riparian areas. Cattle prefer the shade and succulent vegetation found in riparian areas to sunlight (i.e., heat) and dry vegetation around stock tanks and ponds. In other words, cattle are attracted to riparian areas for shade and succulent forage in addition to water. To successfully protect riparian areas they must be fenced. Also, page 68, General, second paragraph.
5. The draft EIS did not include any appendices and they should be included in the final.
6. The EIS is confusing and difficult to understand and use. It is poorly organized, tables are hard to use and compare. The impacts of the alternatives are not summarized in one table. The summary of the EIS is inadequate.
7. Cost estimates for capital improvements for alternatives A and C are presented as a range (394,000 to 900,000 for A and 174,000 to 235,000 for C). This represents a significant variability of cost, especially for alternative A, and casts doubts on the value and meaning of the cost/benefit analysis.

Sincerely,



Jerry M. Conley
Director

July 1, 1983

6

Mr. O'dell A. Frandsen
District Manager
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

Thank you for your reply of June 28, 1983.

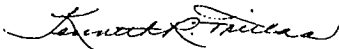
6-1

However, you failed to enclose a copy of the Department of Interior's draft news release and did not address yourself to the issue regarding the environmental impact statements' relationship to the state's open range codes.

May I ask that you do so?

Thanking you, I remain,

Yours truly,



Kenneth R. Freitas

Star Route, Box 148
Salmon, Idaho 83467

6-1. None of the alternatives considered in this EIS would have any direct bearing on Idaho's open range code. Under any of the alternatives except Alternative D (no livestock grazing), livestock operators would be subject to State law.

30

July 6, 1983
Caldwell ID

7

O'dell Frandsen
District Manager
Idaho Falls BLM

Dear Sir:

I write to comment on your Big Lost-Mackay Grazing Draft EIS. I find it very poorly done, with both assumptions and conclusions more worthy of the Division of Grazing than of the Bureau of Land Management. As you recall, the former had a single use mission to regulate grazing; the latter, a multiple use mission that gives grazing equal standing with wildlife, water quality, soil conservation, recreation, and wilderness.

I find no alternative under this Draft EIS to be acceptable. I dismiss Alternatives B and D outright. I then look at A and C. 'A' I find unacceptable because of its impacts on riparian zones, wildlife, soils, and recreation. I find 'C' unacceptable for the very same reasons, although it does come closer to what I can accept.

7-1

I request that you develop ^{and adapt} a fifth alternative that: brings at least 10% of the rangeland to an "excellent" condition class; reduces soil erosion over 2 tons per acre by at least 7%, to a 20% level; recognizes the important recreation resource around the Borah Peak trailhead area near Mackay, and reduces or eliminates all grazing in that area; has fewer overall impacts on wildlife than either A or C; and improves riparian quality to at least a "good" level on 50% of your streams.

I will now address specific comments to your document.

7-2

Page 6: Please elaborate on your statement that 61% of the range in your area is in "good" condition class. This conflicts strongly with my on-the-ground observations of widespread pedestalling, widespread invasion by non-native vegetation, and decline in extent and health of native forage species.

7-3

Page 7: Where are the 4182 acres of land which you are donating to wildlife, and how much forage is on them?

Page 11: I find your proposed 10% increase in grazing on the Dickey allotment to be absolutely unacceptable. The area of the Borah Peak trailhead is too important to all Idahoans to allow any more grazing. It should be allowed to go to "excellent" condition class.

7-4

Also, where are the "Craters" and "Lava Creek" allotments on Map 2? Are these the ones shown on Map 2 as North Lava Craters? If so, I believe you should not allow grazing to resume in this area. It could provide an excellent chance for summer tourists to see real Idaho deer from highway 93, while

7-1. An additional alternative, Alternative E, has been developed. With existing grazing management techniques and available funding, areas in good condition can be maintained and areas in fair or poor condition improved. However, in our assessment, significant improvement in the rate of soil erosion and the percentage of rangeland in excellent condition could only be realized under the "no livestock grazing alternative, Alternative D.

Riparian habitat quality will continue to be in poor or fair condition except where it is fenced and livestock are excluded. We do not anticipate funding to fence about half of the streams in the unit. Some fencing has been recommended in the land use plan under the watershed and wildlife programs. Future monitoring and habitat management planning will consider key riparian areas for fencing and funding will be requested at that time.

7-2. A vegetation inventory was conducted during the summers of 1981 and 1982 following approved and accepted techniques. These data show most of the area (61.5 percent) to be in good range condition. These data are available for inspection at the Idaho Falls and Salmon district offices.

7-3. Because 16 tracts totalling 4,182 acres of public land in the EIS area have no authorized grazing by livestock and no livestock grazing is proposed in any of the alternatives, they are unaffected. These tracts are shown on Map 2 in the draft EIS.

7-4. North Lava Craters was divided into 2 allotments, Lava Creek and Craters. This is the area shown on Map 2 as North Lava Craters.

7-5. Tagging can be required by the BLM as a condition for issuing a grazing license. Tagging can be required at any time at the discretion of the District Manager or Area Manager.

traveling to Craters of the Moon National Monument.

7-5 | Page 19: Under Administrative Procedures, I find no mention of livestock tagging. This has proved an effective method of reducing trespass on BLM range. It should be used in this area.

7-6 | Page 23: Again, all alternatives should reduce grazing near the Borah Peak trailhead. Even a "no change" level is not adequate, given its recreational importance.

7-7 | What is interesting to me is that even this "reduced grazing" alternative only reduces grazing by 2.3%. Why can't BLM plan for the long term trend in reduced beef consumption, which will reduce demand for beef by 10 to 20%?

7-8 | Page 26: I am sorely troubled by your failure to include the National Park Service on this list. How early and often were they consulted? What impacts does this plan have on Craters of the Moon National Monument and its visitors?

7-9 | Page 30: I see nothing in this entire document that justifies Alternative A's reduction in elk habitat quality. Your utter failure to include wildlife values in your cost-benefit analysis bewilders me. Why are you reducing elk habitat quality? Note that Alternative C does not reduce elk habitat quality! The same applies to deer habitat quality. Also note that with further reductions in grazing than Alternative C calls for (see Alternative D), you could substantially improve habitat quality across the board. Any attempt to introduce balance into this planning process must reject Alternative A outright.

One more point: I am very impressed that your rangeland is in such good condition that as much as 31.4% could be restored to excellent condition--this is much better than most districts in Idaho. This should be viewed as a management challenge, and an alternative developed that improves more range to excellent quality, as I outlined earlier.

7-10 | Page 47: I note that McGee-Berry is heavily used by elk and deer in winter. It also is slated for a pipeline, a road, and a reseeded. Why? What will the impacts be on the 75 elk that winter there? Similarly, what will the impacts be of the 10% increase in grazing on Arentson Gulch, where 300 elk winter? Why an increase in grazing in that area?

7-11 | Page 48: Why build a 15 mile fence on the Deadman allotment when it will have predictable bad impacts on antelope there?

Page 53: Your recreation section must be enlarged. You must consider fishing when you consider riparian quality and stream sedimentation. You must consider camping, at the very least around the Borah Peak trailhead. Also, whose problem is it if hunter success ratios go down. You seem to imply it is certainly not the BLM's--this despite a projected 36% increase in hunting, and a 25% decrease in beef consumption.

7-6. The Borah Creek trailhead is located on the National Forest across lands administered by the BLM. The BLM is coordinating with the Forest Service in several areas so that one agency manages the area instead of two. Recreation management for this area will be addressed in the land use plan now in draft form.

7-7. The BLM manages rangeland under the regulations in 43 CFR part 4100. not to regulate beef production or consumption.

7-8. The BLM consults with Craters of the Moon National Monument on a continuing basis. The National Park Service received a copy of the Big Lost-Mackay Grazing Draft EIS and made no comments.

7-9. A new alternative has been developed, Alternative E and is included in this final EIS as the BLM's preferred alternative.

7-10. No projects are now proposed for the McGee-Berry allotment in Alternative E. The inventory conducted in 1981 and 1982 shows that ample forage exists for both livestock and wintering elk in Arentson Gulch. Monitoring will ensure that vegetation is maintained or improved.

7-11. This fence project has been dropped and is not part of the Alternative E. The net effects to wildlife of the preferred alternative are considered to be beneficial for the Deadman allotment.

7-12. Hunting, fishing, and other types of outdoor recreation employment is included in the retail trade and services sector of the economy and cuts across some other sectors. The trade and services sector is usually large, and recreation can not be specifically identified. Existing data do not allow the BLM to specifically identify recreation related employment. (See also response 5-2.)

7-12

Page 55: In line with the previous sentence, your employment section is inadequate. You seem to be only considering employment in the livestock industry, when you consider economic impacts. What employment increases would result from less grazing but more hunting, fishing, and other outdoor recreation in the region? Would these balance out the livestock industry losses?

7-13

Page 63: I believe that 50% poor quality riparian land is far too much. Your failure to consider fisheries has prevented you from identifying possible fishing streams which could be fenced off with range improvement funds. This should be considered in your EIS. Again, look to Alternative D for what is possible.

Page 69: I cannot accept Alternative A's adverse impacts on elk and deer habitat. I see no reason to make hunting suffer at the expense of stock grazing.

7-14

Page 72: Please note that grazing fees go down every year. In 15 years, they will be near zero and no more money will go into local treasuries.

Page 80: The Soil Resources section makes it clear why Alternative C is inadequate. There must be a greater effort to reduce erosion.

Page 81: One good thing about Alt C is its dropping of the Deadman fences...

Page 84: Here is the strongest argument for Alternative C-- the much more favorable wildlife impact figures. I think even these are not good enough, given the impending 36% increase in hunting.

That concludes my comments.

Sincerely,



Sheldon Bluestein
Box 1852
Boise ID 83701

7-13. See Alternative E, Environmental Consequences, in this final EIS.

7-14. Grazing fees on public rangelands are adjusted annually upward or downward based on a formula that considers beef prices and production costs. A national grazing fee study is now underway.

July 9, 1983

Don Watson, EIS Team Leader
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Id 83401

Dear Mr Watson,

I am submitting the following comments in regard to the EIS on proposed range management in the Lost River - Mackay units of Idaho.

I am specifically commenting on the proposals for the Beaverland Pass Allotment. As a matter of information, I have purchased the sheep range rights recently from Bill King, Steve King, and Paul King. I also control the range rights that formerly belonged to Charles Johnson who is now deceased. I am notifying Mr. Frandsen of these changes by separate letter.

I am making the following comments on the draft EIS:

- 8-1
- (1) I noticed in several places the EIS indicates the proposed changes in AUM rights were based on the usage over the past 5 years. In the case of the sheep rights on Beaverland Pass, this would be a very poor assumption to use. All of the Kings have been off the allotment for several years mainly due to pressure from predators, but mainly because they have decided to get out of the sheep business. The active sheep rights used over the past 5 years has

no bearing on what amount of sheep the Allotment will carry

- (2) In my opinion the EIS should have been discussed more thoroughly with Bill King, Steve King, Paul King, Jack Johnson, and those of us that are surviving relatives of Charles Johnson. These individuals all represent numerous years of running sheep on the Beaverland Pass and they are very familiar with the range conditions. In discussing the carrying capacity of the Beaverland Pass allotment for sheep, these individuals have all definitely stated the present AUM sheep rights are indicative of the carrying capacity of sheep on the allotment. They have all indicated there was plenty of carrying capacity when they were all using their rights at the same time. They have all particularly indicated excellent range for the sheep on the higher portions of the allotment. The only indication that ~~any one made~~ ~~less range conditions,~~ regarding poorer range conditions, was in very dry years. In this instance it would appear more fair to adjust turn in and out dates due to moisture conditions. All of the older range operators mentioned above have expressed concern that the cattle are overgrazing the lower portions of the allotments. The cattle basically are not ranging the higher country like sheep are more inclined to, particularly under herding conditions.

8-1. The present situation is best represented by the level of grazing use that has occurred over the past 5 years. The total grazing use that could take place under the existing active preference amounts to 26,326 AUMs for the EIS area. However, the actual licensed use has averaged 22,446 AUMs--a significant difference. The present situation is used as a point of comparison for the other levels of grazing use considered in the EIS. In any case, active grazing use must consider the carrying capacity. Initial stocking rates are apportioned on an equitable basis.

8-2. The intent of Standard Operating Procedure #2 was to avoid constructing new roads to proposed project sites where trails or roads already exist. The BLM transportation network will be a part of the land use plan for the area following completion of this final EIS.

In my opinion, particularly in ~~some~~ years of good moisture, there should be good enough conditions to adjust the sheep range rights upward.

(3) The ~~economic~~ economic impact on my proposed sheep operation will be substantial if BLM implements the cuts in AUM rights indicated in the EIS. Based on the extensive experience the prior operators had with sheep on this allotment, I definitely do not believe the cut in rights is justified or necessary for the sheep portion of the allotment.

8-2

(4) Page 17 of the EIS, under "Standard Operating Procedures", #2, says "Use of existing roads and trails would be encouraged". Tom Gorek of your office has indicated BLM does not want to maintain the road over Braunland Pass. This road was originally built by Steve King and is very necessary for us to move sheep camp, supplies, etc., to the upper levels of the allotment where the best range conditions exist. I would definitely like to see this existing road maintained. Because I have access to the necessary equipment, I would offer to help maintain the road because ~~of the obvious~~ it is obviously very necessary to the sheep operation on the upper levels.

8-3

(5) The EIS does not address the Carey Act filing that I made on 640 acres on the crested wheat and just north of the crested wheat. A few years ago when the filing was made BLM told me the EIS would have to be completed before any chance of withdrawing the land under the Carey Act could be made. This portion of the allotment that was filed on lies on the western boundary of the allotment and has very good soil. This can visually be observed now because I have private ground across the county road that presently has an excellent crop of barley on it, plus Bob Bowman who borders the same filing north of me has excellent alfalfa just across the county road. ~~I would~~ I would invite you to observe this for your own information at your convenience. It also should be noted that I presently have the water and power available if this filing was withdrawn from public lands under the Carey Act. Additionally it should be noted that the Kings provided the bulk of the work in plowing, planting, and fencing the crested wheat. Because I have purchased their rights, I can not see any adverse affect if a portion of the crested wheat was withdrawn. If the total 640 acres of filing was withdrawn, some adjustment would need to be made in the total Auml rights.

35

As you can see I have some definite concerns on the proposals in the EIS. Although your staff has obviously put a lot of time into the study, I would appreciate your close attention to some of the comments I have made. We are just in the stages of building our sheep operation, but I definitely feel there is excellent carrying capacity for sheep under the existing Auml sheep rights. In addition, I have waited for several years to see the results of the EIS and its affect on our Carey Act filing. This ground definitely has very good potential as you can verify by private ground next to it.

Your help in these matters will be appreciated.

Sincerely,
Brent Morgan

8-3. The draft grazing EIS has no direct bearing on Carey Act applications. The land use plan for the Big Lost unit is now in draft form. The plan has identified all of the public land in the Beaverland Pass allotment for retention in federal ownership and long-term management for multiple uses. The State of Idaho considers Carey Act applications and develops a priority ranking for feasibility studies. The BLM is unaware of any Carey Act applications in the Beaverland Pass allotment.

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July 8, 1983

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Don Watson
EIS Team Leader
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

re: Big Lost-Mackay Grazing
Environmental Impact Statement

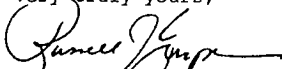
Dear Mr. Watson:

I am writing on behalf of the American Horse Protection Association, Inc., to comment on the Big Lost-Mackay Grazing Draft EIS.

Since wild horse use of the area is at best incidental (DEIS at 57), AHPA has no comments of substance to offer. I assume that no permanent forage allocation was made for the horses because their use is seasonal and at a very low level (about 27 AUMS). Conceivably, however, that use could increase because of changes in grazing patterns on the Challis National Forest or natural population growth. In that case, an allocation would become necessary.

AHPA believes that the final EIS should include some clarification of this issue to insure that the failure to make a forage allocation for wild horses does not become an excuse for their removal in the future.

Very truly yours,


Russell J. Gaspar
Attorney for AHPA, Inc.

cc: Joan R. Blue
RJG:af

9-1. After the winter of 1982-1983, only four horses remained in the Waddoups Canyon-Cherry Creek allotments. The BLM will work with the Forest Service to (1) determine if there is a viable horse herd that should be maintained, and (2) providing a wild horse herd is to be maintained, develop a management plan jointly between the two agencies. No plans have been made to gather the horses, and we believe a specific allocation of forage for the horses is best addressed in a management plan, not this final EIS. Although accessibility of forage may be a problem in the winter, forage availability is adequate.

36

9-1



SIERRA CLUB
MIDDLE SNAKE GROUP
Box 552 Boise, Idaho 83701

7 Jul 83

Don Watson
EIS Team leader
Idaho Falls District, BLM
940 Lincoln Road, Idaho Falls, ID 83401

SUBJECT: Big Lost-Mackay Grazing Draft EIS

Dear Mr. Watson:

This EIS is fatally flawed in that it lacks a reasonable alternative designed to examine the possibility of management with the objective of meeting BLM's obligation to combine multiple use (as contrasted to grazing enhancement) with protection and enhancement of the natural resources in the area in question. While Alternative "D" (No grazing) has some of the attributes of such an option it is not felt to be a alternative with a reasonable chance of adoption.

Alternative "C" appears to be your attempt at such an option. We feel it fails for several reasons:

1) It appears to be based on a premise that the public has no interest in "excellent" condition range. Range in excellent condition continues the current and unacceptable level of one half of one percent. BLM should develop an alternative based on a goal of continual increase in the amount of excellent range if your goal is multiple use management as opposed to developing range quality to the point where it is good for grazing with no further improvement.

2) Range "improvements" appear to be discussed only in the context of increasing the utility of the range for grazing. This is not multiple use. A range improvement option should be developed which would use the range improvement budget for improvement of other multiple use values. For example: fencing of riparian zones, wildlife habitat improvement, etc.

3) This EIS addresses grazing in one area with overwhelming implications for recreation. The Mt. Borah Trailhead. Since recreational use is concentrated here the effect of grazing on this use should be examined. An alternative should be developed which provides the same level of intensive management for this resource that you are so willing to provide grazing.

4) Wildlife. In all alternatives wildlife is discussed in the context of what will be left for this important resource after the designated level of grazing has been met. An alternative should be developed which examines the amount of grazing possible when forage and habitat are provided for an optimum level of wildlife.

... To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness ...



SIERRA CLUB
MIDDLE SNAKE GROUP
Box 552 Boise, Idaho 83701

My comments to this point have addressed the question of the adequacy of the alternatives. I also have a more general criticism. The document does not contain enough data to allow a reader to determine if the conclusions reached are supported by the data.

Thank you for the opportunity to comment on this EIS. It is my hope that an alternative based on the concept of tailoring (no pun intended) grazing use to the enhancement of the natural values of the land can be developed.

Charles C Yoder

Charles C Yoder
Vice Chair, NORTHERN ROCKIES CHAPTER
box 552, BOISE, IDAHO 83701

P.S. Would you please send a copy of the DEIS (+Final) to

Sierra Club
Public Lands Committee
Box 8049
Reno NV 89507

*Thank you
cy*

... To explore, enjoy and preserve the nation's forests, waters, wildlife, and wilderness ...

Big Lost-Mackay Grazing Draft
Environmental Impact StatementNAME Ray MitchellADDRESS Last River Ranger District
Mackay, Idaho

Please use the space below to give us your comments on the Draft EIS. To be most useful, your comments should address the adequacy of the document. Any information you have that would help us improve management of the area would be welcome.

10-1. Due to the severe climatic conditions and slow responses of vegetation to changes in grazing levels, we believe that a significant percentage of excellent condition rangeland could only be realized through discontinuing livestock grazing for several years. We believe that significant improvement in range condition can be made through adjustment of stocking levels and improved management to reduce the percentage of range now in fair or poor condition. Because about 61 percent of the unit is considered to be in good range condition and forage and cover is adequate for wildlife populations, discontinuing livestock grazing would be both an extreme and unwarranted measure.

10-2. This EIS considers only the impacts of the range management portion of the land use plan (management framework plan or MFP). The MFP will be finalized after completion of this EIS and will represent a multiple use plan. The MFP, now in draft form, will contain decisions to maintain and enhance wildlife habitat, cultural resources, recreation, and other resources. The range improvements that are part of the alternative grazing programs for the EIS area are being analyzed to assess impacts to other resources.

10-3. See response to comment 7-6.

10-4. Adequate forage exists for both future and projected population of wildlife. Of the total forage produced in the unit, only about 36 percent has been designated for livestock grazing. Up to 50 percent of the existing vegetation could be used by livestock and still maintain plant vigor and production. Some areas are grazed by livestock for short periods of the year where all of the unit is available for wildlife. The vegetation resource can be optimized through utilization by several different kinds of animals under careful management.

11-1

The wildhorses need to be addressed more thoroughly. If we are going to manage them as mandated by the law then it should be identified what we intend to do. The objectives we are going to manage towards should be spelled out in the EIS. The way the Forest Service interprets the Wild Horse and Burro law, even if all the horses died or were rounded up and moved or adapted out we would still have an established wildhorse territory as of 1973. What information the draft statement contains concerning wildhorses is misleading. The horses spend 8-9 months on the BLM and summer on the Forest; this has been documented for the past 6 years. For this reason the two agencies need to

11-2

get together, identify some long term objectives and develop a management plan we can live with.

11-1, 11-2. See response 9-1.

Date June 1, 1983

12

PUBLIC COMMENT FORM

Big Lost-Mackay Grazing Draft
Environmental Impact Statement

NAME Ned R. Walker

ADDRESS Box 32, Arco, Idaho

Please use the space below to give us your comments on the Draft EIS. To be most useful, your comments should address the adequacy of the document. Any information you have that would help us improve management of the area would be welcome.

It is proposed that the AUM's
For Ned R. Walker be increased by
about 120 for the Arco peak
allotment from May 16 thru Oct.
15.

The allotment has long history
of being under grazed since
12 of the larger permittees have
taken Mon-use over the
years-

Furthermore, the Spring
that has been dry or nearly
dry for the past 40 years
might be promised of
live water. Due to development
work done by Ned R. Walker
the Spring has a potential
of providing water for 30

(Continued next page)

12-1

-2-
More additional cows -
Permission is requested
to further improve the
drinking facilities to the point
that it will water all
the cattle and wild life
that come that way to water.

12-1. Development of this particular spring was not included in any of the alternatives in the draft EIS, nor in Alternative E. The BLM will consider this proposal in developing a detailed management plan for the Arco Peak allotment.

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TEXT REVISIONS

Page vi

Environmental Consequences, Alternative A

Change "watershed conditions would improve slightly" to "watershed conditions would not change appreciably."

Delete the sentence "The increased level of grazing in some pastures could damage cultural sites."

Page 11

On Table 2-3, the preference in the Stoddard Creek allotment should be 86 AUMs.

Page 21

On Table 2-5, the acres of federal land in the Alder Creek allotment should be 6,222, and the State lands for the EIS area should total 14,909.

Change the footnote to read "The Deadman allotment is located in the Big Lost unit, but is used in conjunction with allotments in the Big Desert unit."

Page 23

On Table 2-7, the preference in the Stoddard Creek allotment should be 86 AUMs.

Page 31

Table 2-9, delete all reference to benefit/cost ratio.

Page 42

In the second paragraph, change "80 percent of the bare ground" to "80 percent of the EIS area."

Page 44

Livestock Grazing

Change "(26,326 AUMs)" to "(24,239 AUMs)."

Page 49

Table 3-8

Change the spring-summer-fall dates and numbers for the North Lava Craters allotment to "04/01-11/30, 110" and add "04/01-11/30, 15" for the Martin allotment.

Page 51

Table 3-9

Add the winter dates and numbers "07/15-03/15, 15" for Upper Elbow allotment. Add spring-summer-fall dates and numbers "04/01-10/30, 10" for the Arco Peak allotment. Change "25" to "15" antelope in the Serviceberry allotment and "35" to "20" antelope in the Lower Elbow allotment.

Page 72

Economic Efficiency

Delete the sentence "The benefit/cost ratio (present worth of benefit divided by present worth of costs) is 0.637."

Page 73

Table 4-6

Under "unassigned" change "1,716" to "1,627" and "+114%" to "+103%."

Page 83

Economic Efficiency

Delete the sentence "The benefit/cost ratio would be 0.023."

REVISED TABLE 3-6

BIG GAME AND SAGE GROUSE CRUCIAL HABITAT
ACREAGES BY ALLOTMENT

ALLOTMENT	WINTER RANGE			SUMMER RANGE			SAGE GROUSE
	ELK	DEER	ANTELOPE	ELK	DEER	ANTELOPE FANNING	
ALDER CREEK	1420	0	0	0	1100	0	6222
UPPER ELBOW	600	600	5900	0	0	530	6500
BEAVERLAND PASS	0	1965	1100	0	0	0	700
ARCO PEAK	0	2775	0	0	0	650	0
KING SPRING	0	1920	0	0	0	100	400
SERVICEBERRY	0	4000	0	0	0	250	3100
DEADMAN	0	9000	20000	0	0	2400	13613
BLIZZARD	0	0	0	2052	2052	150	0
DRY FORK	0	0	0	4116	4116	200	0
JUDD BROWN	0	4048	2650	0	0	0	0
N LAVA CRATERS	0	0	0	1800	6550	6000	3500
CRAWFORD CANYON	0	110	0	0	0	0	0
MARSH CANYON	0	1250	500	50	0	0	0
WADDUPS CANYON	2300	7700	0	6000	13000	5700	10500
EARL SMITH	0	2409	600	0	300	0	2409
SHEEP MOUNTAIN	0	6064	0	4000	2000	0	3400
LESLIE BUTTES	0	1141	0	0	0	0	1141
BECK CANYON	0	0	750	0	0	1150	1852
NEWMAN CANYON	400	3000	0	0	0	920	3000
SORENSEN	0	0	0	0	0	1000	1148
MARGER POINT	350	2300	0	0	0	0	1400
MAHOGANY	1200	3600	2000	0	0	0	2250
MCGEE-BERRY	4000	4000	0	0	0	0	1200
HAMMOND CANYON	400	0	0	0	0	0	2675
TECHICK CANYON	1300	0	0	0	0	500	1100
TIMBERED DOVE	800	0	0	0	0	0	4777
CHAMPAGNE CREEK SW	0	0	0	752	752	752	752
CHICKEN CREEK	0	600	600	200	200	1000	5528
TRAIL CREEK	0	925	585	0	0	1000	4598
GOODMAN CANYON	0	1410	0	0	0	0	0
APPENDICITIS HILL	4700	5000	0	0	0	0	0
AIKELE	0	0	1871	0	0	0	1871
GEORGE	0	0	972	0	0	0	972
NICKLES	0	0	0	0	0	0	603
BLISS	0	0	0	0	0	940	940
STODDARD GULCH	0	0	0	0	0	0	0
ERA FLAT	0	0	907	0	0	0	907
ROCKY CANYON	0	325	0	0	0	0	597
MARTIN PASTURE	0	0	0	0	1700	1658	1658
LOWER ELBOW	0	1300	3000	0	0	1800	3400
CHAMPAGNE CREEK NE	0	0	0	0	0	325	1065
HUGGINS	0	0	380	0	0	686	686
ARENTSON GULCH	2115	800	0	320	0	0	4563
DICKEY	700	640	1300	0	0	4636	5333
WHISKEY SPRINGS	0	1370	3950	0	0	0	1950
MACKAY	0	1030	300	0	0	950	9920
ASAY	0	140	0	0	0	0	0
WOODBURY	0	0	0	0	0	0	0
COPPER BASIN	0	2510	10660	0	1840	894	13455
BOONE CREEK	0	1410	5750	0	1730	1000	9826
WILDHORSE	0	500	4300	0	690	7440	18589
SAGE CREEK	0	0	0	3250	3250	0	4174
THOUSAND SPRINGS	0	3700	0	0	0	2000	6424
WILLOW CREEK	0	680	0	0	0	0	1261
TOTALS	20,285	78,222	68,075	22,540	39,280	44,631	169,959

REVISED TABLE 4-5

Acres of Crucial Wildlife Habitat Affected, Alternative A

	<u>Winter Range</u>			<u>Summer Range</u>			<u>Sage Grouse</u>
	<u>Elk</u>	<u>Deer</u>	<u>Antelope</u>	<u>Elk</u>	<u>Deer</u>	<u>Antelope</u>	
<u>Forage Use</u>							
Positive	1,100	0	3,200	650	725	13,094	47,889
Negative	5,392	0	0	14,004	25,489	27,168	80,761
No Impact	13,793	78,222	64,875	7,886	13,066	4,369	41,309
<u>Grazing Management</u>							
Positive	4,667	0	9,550	5,374	6,384	27,454	125,530
Negative	0	16,974	19,915	0	0	0	0
No Impact	15,618	61,248	38,610	17,166	32,896	17,177	44,429
<u>Brush Control</u>							
Positive	500	0	0	500	2,300	0	2,543
Negative	0	3,485	5,800	0	0	2,600	10,300
No Impact	19,785	74,737	62,275	22,040	36,980	42,031	157,116
<u>Water Development</u>							
Positive	0	0	3,950	0	0	0	44,623
Negative	2,742	0	0	6,224	14,599	10,200	0
No Impact	17,543	78,222	64,125	16,316	24,681	34,431	125,336

REVISED TABLE 4-9

Acres of Crucial Wildlife Habitat Affected, Alternative B

	Winter Range			Summer Range			Sage Grouse
	Elk	Deer	Antelope	Elk	Deer	Antelope	
<u>Forage Use</u>							
Positive	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0
No Impact	20,285	78,222	68,075	22,540	39,280	44,631	169,959
<u>Grazing Management</u>							
Positive	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0
No Impact	20,285	78,222	68,075	22,540	39,280	44,631	169,959
<u>Brush Control</u>							
Positive	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0
No Impact	20,285	78,222	68,075	22,540	39,280	44,631	169,959
<u>Water Development</u>							
Positive	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0
No Impact	20,285	78,222	68,075	22,540	39,280	44,631	169,959

REVISED TABLE 4-13

Acres of Crucial Wildlife Habitat Affected, Alternative C

	Winter Range			Summer Range			Sage Grouse
	Elk	Deer	Antelope	Elk	Deer	Antelope	
<u>Forage Use</u>							
Positive	1,100	0	3,200	650	725	13,094	47,889
Negative	0	0	0	0	0	0	0
No Impact	19,185	78,222	64,875	21,890	38,555	31,537	122,070
<u>Grazing Management</u>							
Positive	4,667	0	4,250	5,374	6,384	27,454	125,530
Negative	0	16,974	19,015	0	0	0	0
No Impact	15,618	61,248	44,810	17,166	32,896	17,177	44,429
<u>Brush Control</u>							
Positive	0	0	0	0	100	0	2,143
Negative	0	860	3,100	0	0	600	5,500
No Impact	20,285	77,362	64,975	22,540	39,180	44,031	162,316
<u>Water Development</u>							
Positive	0	0	0	0	0	0	18,711
Negative	1,610	0	0	2,200	3,400	1,800	0
No Impact	18,675	78,222	68,075	20,340	35,880	42,831	151,248

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REVISED TABLE 4-17

Acres of Crucial Wildlife Habitat, Alternative D

	Winter Range			Summer Range			Sage Grouse
	Elk	Deer	Antelope	Elk	Deer	Antelope	
<u>Forage Use</u>							
Positive	10,307	0	600	17,773	33,273	41,652	164,346
Negative	0	39,204	52,705	0	0	0	0
No Impact	9,978	39,018	14,770	4,767	6,007	2,979	5,613
<u>Grazing Management</u>							
Positive	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0
No Impact	20,285	78,222	68,075	22,540	39,280	44,631	169,959
<u>Brush Control</u>							
Positive	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0
No Impact	20,285	78,222	68,075	22,540	39,280	44,631	169,969
<u>Water Development</u>							
Positive	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0
No Impact	20,285	78,222	68,075	22,540	39,280	44,631	169,959

REVISED TABLE 2-9
 COMPARATIVE ANALYSIS OF IMPACTS
 (15-Year Projection)

Resource Categories	Alternative E (Preferred)	Alternative A	Alternative B	Alternative C	Alternative D
<u>Soil and Water Resources</u>					
Watershed Erosion (greater than 2 ton/acre/ year)	About a 4% decrease	About a 4% decrease	About a 1% increase	About a 4% decrease	About a 10% decrease
Stream Channel Stability					
Lower Bank Cutting	No change	No change	No change	No change	Improve all classes from 5-19%
Mass Wasting	No change	No change	No change	No change	Improve all classes from 5-19%
Bottom Deposition	No change	No change	No change	No change	Improve all classes from 5-19%
Bank Vegetation Protection	Slight improvement (<5%)	No change	No change	Slight improvement (<5%)	Improve all classes from 5-19%
<hr/>					
<u>Vegetation and Livestock</u>					
<u>Grazing</u>					
Estimated AUMs Total Forage Production	1,827 AUM increase (+7.5%)	4,277 AUM increase (+12.7%)	214 AUM decrease (- 0.6%)	2,736 AUM increase (+ 8.1%)	7,098 AUM increase (+21.0%)
AUMs Livestock Forage Use					
Active Preference	2,101 Aum decrease (-8.0%)	2,101 AUM decrease (- 8.0%)	0 AUM change (0.0%)	4,395 AUM decrease (-16.7%)	26,326 AUM decrease (-100%)
5-Year Average	1,779 AUM increase (+7.9%)	1,779 AUM increase (+ 7.9%)	0 AUM change (0.0%)	515 AUM decrease (- 2.3%)	22,446 AUM decrease (-100%)
Proposed Range Developments (acres disturbed)					
Vegetation Manipulation	9,490 acres	15,533 acres	0 acres	8,303 acres	0 acres
Other Developments	116 acres	174 acres	Less than 44 acres	80 acres	0 acres
Range Condition					
Excellent	0.5%	0.5%	0.5%	0.5%	31.4%
Good	68.9%	71.3%	60.1%	69.7%	43.9%
Fair	21.3%	19.4%	27.1%	20.7%	16.5%
Poor	4.3%	3.8%	7.3%	4.1%	3.2%
Unclassified	5.0%	5.0%	5.0%	5.0%	5.0%
<hr/>					
<u>Wildlife</u>					
Elk	Winter Range	No change	Decrease in habitat quality	No change	Increase in habitat quality
	Summer Range	Slight increase in habitat quality	Substantial decrease in habitat quality	No change	Increase in habitat quality
Deer	Winter Range	No change	Decrease in habitat quality	No change	Decrease in habitat quality
	Summer Range	Slight increase in habitat quality	Decrease in habitat quality	No change	Substantial increase in habitat quality
Antelope	Winter Range	No change	Decrease in habitat quality	No change	Decrease in habitat quality
	Summer Range	Slight increase in habitat quality	Slight increase in habitat quality	No change	Substantial increase in habitat quality
Sagegrouse		slight increase in habitat quality	Substantial decrease in habitat quality	No change	Substantial increase in habitat quality

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Economics

Net Present Worth	-\$113,155	-\$110,967	-\$ 33,448	-\$447,994	-\$ 7.2 million
Rancher Income Change					
Initial	+\$ 18,163	+\$ 18,000	No change	-\$ 61,000	-\$836,000
15-Years	+\$ 19,696	+\$ 22,000	No change	+\$ 18,500	-\$836,000
Range Improvement Costs	\$358,000	\$394,000	\$ 98,000	\$174,000	0
Grazing Fee Changes					
Initial	+\$ 2,542	+\$ 2,542	No change	-\$ 1,099	-\$ 31,424
15-Years	+\$ 5,048	+\$ 6,128	No change	+\$ 2,731	-\$ 31,424
Secondary Income Changes					
Initial	+\$ 55,217	+\$ 56,000	+\$ 12,800	+\$ 7,600	-\$204,600
15-Years	+\$ 6,992	+\$ 7,500	+\$ 610	+\$ 5,600	-\$204,600
Employment Changes	No change	No change	No change	No change	-100
Capital Position (number of ranchers)					
Better	21	21	No change	9	0
No Change	33	33	No change	13	0
Worse	40	40	No change	72	94
