

November 19, 1986

Mr. Richard A. Geier  
Area Manager  
Cascade Resource Area  
Bureau of Land Management

page three

17.4

In conclusion, while we endorse the leasing availability recommendations contained in Alternative E, we recommend that the BLM revise its final EIS to comply with the BLM's draft planning guidance for fluid minerals. These guidelines require specific disclosure of how minerals are considered and related decisions made. For example, the RA would be categorized as having low, moderate or high potential for oil and gas. A matrix would then be prepared which would indicate how many acres are subject to withdrawals, no surface occupancy stipulations, seasonal or other special stipulations, and standard stipulations. These areas would then be identified on a map and included in the plan. This type of information aids public review efforts because rationale for decisions is more easily identified.

We appreciate this opportunity to provide you with our views. If you have any questions regarding our comments, please contact me.

Sincerely,

*Alice Frell Benitez*  
Alice Frell Benitez  
Public Lands Director

AFB:cw

The recreation plan accommodates ORV users in play area and cycle parks. Hikers get little, which is unfortunate for there is a real need for hiking trails near the population center of the state. The Hull's Gulch trail is well developed and gets a lot of use. We hike it 3-5 times a year. More trails should be developed, especially on the Boise Front, Squaw Butte, and Dodson Pass. Perhaps the BLM could take the lead and co-ordinate with the Forest Service and Idaho Fish and Game to establish a trails Committee to promote hiking trails on the Boise Front.

Box Creek should be managed as an outstanding natural area as proposed in Alternative C.

The unsatisfactory camping situation at Paddock Reservoir needs some solution. The BLM should take the lead in this, perhaps even trading some land to acquire the camping area which could then be developed for camping.

Thank you for the opportunity to express our views.

Sincerely,

*Frederick R. Ward*

Frederick R. Ward

*Jamet D. Ward*

Jamet D. Ward

1910 Manitou  
Boise, Idaho 83706  
November 25, 1986

Richard A. Geier  
Cascade Area Manager  
Bureau of Land Management  
Boise District Office  
3948 Development Avenue  
Boise, Idaho 83705

Dear Mr. Geier.

We appreciate the conservative and realistic approach reflected in the draft Cascade Resource Management Plan. This land use plan seems to be truly based on environmental considerations.

The plan doesn't include extensive and expensive range manipulations. This is a sound approach considering the Federal deficit, available funding, and environmental constraints of slope and soils. Yet most of the area is in poor ecological condition (Map J 2 in the appendix) reflecting a long history of abuse. Therefore the proposal making grazing increases dependent on monitoring studies indicating range improvement is absolutely necessary.

The plan needs to be amended to indicate the extent of the damage to range and wildlife habitat done by the wide-spread wildfires in the summer of 1986. The proposals of the Range Restoration and Rehabilitation Committee need to be included. At the meeting Nov. 12, you indicated affected allotments would have several seasons of non-use and that AUM's on other allotments would not be increased to compensate for these losses. This should also be included.

The 1986 fire damage to 80% of the mule deer winter range is tragic. The 20 year wildlife projections obviously need to be adjusted. The reseeding efforts with a mixture of grasses, forbs, and shrubs is a fine approach--far better than the prevalent seeding with a crested-wheatgrass monoculture.

Especially admirable is the plan's recognition of wildlife needs. We were pleased to read of the habitat management for sage grouse (page 51) for this species is entirely dependent on sage. There is a fine proposal for 6 research natural areas to protect Federal category II and sensitive plants. The 3 Areas of Critical Environmental Concern are essential for protection of the Columbian sharp-tailed grouse, the long billed curlew, and the watershed on the Boise Front. Recognition of the Boise Front as a critical watershed is long overdue. The BLM seems committed to these proposals: we were encouraged to read that the Honegater land exchange (page 4-89) for 80 acres in long-billed curlew habitat was rejected.

However, we recommend more concern for the red-banded trout. The plan includes fencing on segments of 4 streams (page 4-81). We prefer the proposal in Alternative C (page 4-43) which includes fencing on 6 streams.

Dave Van De Grooff  
4310 N. Maple Grove Rd.  
Boise, Idaho 83704  
November 26, 1986

Richard A. Geier  
Cascade Area Manager  
Bureau of Land Management  
Boise District Office  
3948 Development Avenue  
Boise, Idaho 83705

Having reviewed the "Draft Resource Plan and Draft Environmental Impact Statement" for the Cascade Management Area, I would like to submit the following comments as input into the planning process.

1 - The plan as presented has minimal analysis of the impact BLM timber has on the economy of local communities. Several mills are affected by timber availability. In the Southwest Idaho area all mills are dependent upon a "wood-basket" for raw materials. This common source of timber includes the Forest Service, State of Idaho, Private, and BLM.

In the past, BLM timber has not been a major source of raw material. However, the impact of BLM offerings will be more critical to the timber industry as time goes on. The reasons for this is as follows:

A - Timber availability from the Forest Service is declining. Indications are that the Payette National Forest will hold their harvest level to about historic levels. Initial contact with the Boise National Forest Plan indicates a reduction in cut from 92.6 MMBF to about 74 MMBF.

B - State of Idaho timber is projected to remain about constant.

C - During the period from 1979 to 1985, the timber industry in Southern Idaho moved heavily to private timber for raw material. This was done to survive depressed lumber prices. Much of the private timber was already owned at low stumpage. This trend is now over. Increased harvest on private lands has depleted much of this source for the next decade. Fortunately, lumber demand has increased, making government wood more attractive.

For the above reasons there is a serious shortage of timber for the near term. This will increase demand. If the needed raw material for current facilities in this area is to be provided, all sources of mature material must be made available. It is desirable to maintain current operating levels to:

A - Provide employment in local communities. This is especially important in view of the lack of other employment opportunity in towns such as Horseshoe Bend, Cascade, New Meadows, Council, and Emmett.

B - Utilize growth of a natural resource providing funds to local state, and the Federal government. This is critical at a time of budget constraint at all levels.

The BLM plan has looked at five alternative levels of timber management. The Preferred Alternative (E) recommends 1 MMBF of timber to be offered annually. In view of the above discussion, I feel that the harvest level should be set between the 1.7 MMBF in alternative B, and the 2.9 MMBF in alternative D.

2 - I am very pleased that the BLM intends to continue selective logging. This system removes over-mature, high risk trees decreasing loss from mortality while providing raw material of a size which industry can use. In addition, selective logging provides cover for game animals.

3 - At this time you have not addressed the wilderness issue. I oppose the inclusion of any lands into wilderness which can provide livestock forage, timber, or minerals. Idaho has all the single use lands it can stand. I would recommend multiple use on every acre available.

Thank you for the opportunity to provide my personal input into your planning process.

Sincerely,

Dave Van De Graaff

Comments of Idaho Natural Resources Legal Foundation on the Cascade Draft Resource Management Plan and Draft Environmental Impact Statement.

20.1 1. The plan does not conform to the CEQ Regulations under NEPA. 40 C.F.R. § 1508.7 defines "cumulative impact" as

the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

40 C.F.R. § 1508.25(a)(2) requires "(2) Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts ... be discussed in the same impact statement."

20.2 An example of the failure to live up to the standards of these regulations, and thus NEPA, is the discussion (or more accurately, the complete lack of discussion) of the cumulative effects of pipelines. The DEIS, on page 2-43, and the proposed plan, on page 24, both say 15 miles of pipelines will be put in during the planning period. The DEIS, on page 4-77, says 12 miles of pipelines are proposed. That completes the discussions of pipelines.

For the purposes of these comments, it is assumed that the pipelines are going to be installed to take water from

IDAHO NATURAL RESOURCES LEGAL FOUNDATION, INC.

"To Restore, Preserve and Protect" P.O. Box 1946 Boise, Idaho 83701 (208) 343-8978

- William R. Meiners, Chairman; Terry-Ann Spitzer, Vice-Chairman; Russ Houghins, Secretary/Treasurer; Richard McKinley, Martin Starnelle, D. Michael Harton, David Meyers, Chet Bowens, Glen Foster; Edwin W. Stockly, Lawyer and Chief Executive Officer.

November 25, 1986

Richard A. Geier, Cascade Area Manager, Bureau of Land Management, Boise District Office, 3948 Development Ave., Boise, ID 83705

Re: Cascade Draft RMP and DEIS

Dear Sir:

Here is Idaho Natural Resources Legal Foundation's comments on the Cascade Draft Resource Management Plan and Draft Environmental Impact Statement. The Legal Foundation appreciates the opportunity to submit these comments for your consideration.

Very truly yours, Edwin W. Stockly

EWS/ng Enclosure

20.2 one spot, such as a river, stream or well, and apply it to an area which now is used only by wildlife. When water is applied, the area will be reseeded and cattle will be turned out on it. If the pipelines in fact are intended to be transportation for oil, natural gas or slurry, this discussion will need revision.

The effect of these actions on the wildlife must be considered. We are not dealing in terms of numbers here, we are dealing in terms of areas used by wildlife (one of the approved multiple uses) that is going to be turned into cattle grazing area. Can the wildlife compete with the cattle? Will the range be planted with seeds that produce a crop the wildlife presently using the area will be able to use? Will the wildlife habitat be preserved or destroyed in the transformation? What sort of an area are we talking about? Are the 12 or 15 miles the mainstems or do they include all laterals? The Legal Foundation recognizes that the proposed plan and the DEIS are not the appropriate places for site specific analyses. They are, however, the required place (40 C.F.R. § 1501.2) to discuss the environmental impacts of the proposed actions.

20.3 Pipelines are just one example. Land transfers, for instance, are another example. Other range improvements such as are mentioned in the plan, are another example. The plan speaks of "burning, discing and spraying" (e.g. page

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24). The danger of noxious weed infestations from land disturbing activities are not discussed. The Legal Foundation assumes that any spraying to control noxious weeds or other pests will be in accordance with an approved weed or pest control plan. It is doubtful that any such plan would permit indiscriminate spraying. So the indiscriminate work will be the burning and the discing. The effects of such work on wildlife, water quality, and other natural resources should be discussed.

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2. The planning criteria on page 8 of the RMP are totally inadequate. These are not the planning criteria called for by 43 C.F.R. § 1610.4-2, which call for criteria "to guide development of the resource management plan". The criteria on page 8 couldn't guide anything. The BLM Regulations require public input into the planning criteria. The regulations require the planning criteria be developed before the development of the plan and the DEIS. If the regulations have any meaning, they require the Cascade Resource Area to start anew, develop adequate planning criteria, with good public input, and then -- based on the criteria decided upon -- develop the proposed plan and DEIS anew. The Legal Foundation considers the development of adequate planning criteria, with appropriate public input, to be essential to the development of an adequate plan. The

- 3 -

P.O. Box 339  
McCall, Idaho  
83638

November 25, 1986

Mr. Richard A. Geier  
Cascade Area Manager  
Bureau of Land Management  
Boise District Office  
3948 Development Ave.  
Boise, Idaho 83705

Dear Mr. Geier:

After reviewing your Cascade Resource Management Plan for 487,466 acres of BLM administered public lands in the Cascade Resource Area, I wish to make several comments concerning the plan.

1. More importance should be on Multi Use Management, with emphasis on those uses that complement each other. An example would be using logging to enhance big game winter range and improve wildlife habitat.
2. Your preferred alternative indicates 26,663 acres of timber management acres with an annual harvest of only one million board foot of timber. The one million board foot harvest equates to an annual growth of only 37½ board foot per acre per year. Even under average growing conditions one can expect 150 board foot/acre/year on the 26,663 acres of timberland resulting in an annual harvest of approximately four million board foot. As a professional Forester working out of the Cascade, Idaho area, I am familiar with some of your timberlands. Many of these timbered acres contain an abundance of high risk timber which should be harvested.
3. Federal grazing fees should be raised to reflect a fair market value, at least \$3.25/animal unit month. All area of public lands that are grazed by domestic livestock should be grazed under some type of grazing management plan, preferably a three pasture rest rotation system.
4. The so called wild horses should be greatly reduced or better yet eliminated. The wild horses are not wild but descendants of domestic horses. They are damaging to the range, have no natural enemies, and your present control

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Legal Foundation intends to make sure that the BLM Regulations, 43 C.F.R., part 1600, are complied with.

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3. The Legal Foundation questions whether the plan contemplates realistic budget levels. On page 46 an extensive monitoring program is called for. Does the Bureau have the money now for such monitoring? Is it now being performed? Does the Bureau contemplate such funds?

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4. The plan should be revised so that it accurately reflects the conditions following the 1968 fires. At a public meeting the Director of the Resource Area indicated that it is not intended to revise the plan. This is a mistake. Significant elements of the Area's resources have been changed to such an extent that the plan no longer represents reality.

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5. The entire burned wildlife habitat north of Emmett should be an ACEC. 43 U.S.C. § 1702(a), and 43 U.S.C. § 1712(c)(3) are clearly applicable to this situation. An extensive wildlife population and habitat is at extreme risk. This is what the concept of the area of critical environmental concern was developed for. It should be used. Failure to do so would appear to be a failure to comply with the law and regulations.

- 4 -

methods are quite expensive. The horses compete for habitat that should be occupied by deer, elk, big horn sheep, antelope, etc.

I appreciate the opportunity to comment on the Cascade Resource Management Plan.

Sincerely,

John P. Kwader

Timber and Wood Products Group

Boise Cascade

Southern Idaho Region  
P.O. Box 156  
Horseshoe Bend, Idaho 83629  
208/793-2241

November 26, 1986

Richard A. Geier  
Cascade Area Manager  
Bureau of Land Management  
Boise District Office  
3948 Development Ave.  
Boise, Idaho 83705

Dear Mr. Geier:

Boise Cascade has reviewed the "Draft Resource Management Plan and Draft Environmental Impact Statement" for the Cascade Resource Management District and the following comments are our input into the planning process.

The timber sales level on the BLM, Cascade District, should be set at between 3 MMBF and 5 MMBF annually. This level is sustainable and is necessary to maintain current employment levels in small, dependent communities.

The reasons are as follows:

I. Concerning forest management alternatives and potential.

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A - The document considers five alternatives, managing a range of acres and intensities. Harvest levels range from .5 MMBF to 2.9 MMBF annually on lands between 20,026 acres and 26,686 acres. Our experience with timber types in the same area shows timber growth to be between 150/250 bd.ft./acre per year, on unmanaged stands, and 200/500 bd.ft./acres under intensive management. Assuming the worst case, 150 bd.ft./acre per year on 20,026 acres, the sustained yield harvest should be 3.0 MMBF.

200 bd.ft./acre per year average should be easily attainable. Assuming the 26,686 acres in the preferred alternative, this would allow a sustained yield of 5.3 MMBF annually. Considering growth potential of timbered acres, a harvest of 1 MMBF per year is considered too low.

B - You mention in the plan that selective harvest systems are preferred. Boise Cascade agrees with this philosophy for the following reasons;

1 - Selective harvest normally takes out larger, high risk trees. This reduces losses due to mortality, increases growth by leaving smaller, more thrifty trees, and is more economical for the purchasers. Larger trees cost less to harvest, reduces milling expense, and yield higher value products.

2 - Silvicultural systems which leave a continuous stand of timber depend on natural regeneration, saving the expense of planting.

3 - Selective cutting provides cover for game animals.

II. Concerning industries needs.

A - On page 16 of the "Draft Plan", it is stated that "the proposed annual harvest of 1 MMBF has been determined on the basis of demand for saw timber and the administrative capability to offer timber sales". This indicates a lack of demand for timber in the Southwest Idaho area. This is not the case. We view the timber supply as follows;

1 - Operators in the Southwest Idaho area (from Mountain Home on the Southeast to New Meadows on the Northwest) draw timber from a common raw material base. This limited source is made up of the Boise National Forest, the Payette National Forest, the BLM, the State of Idaho, and private landowners. The area of commercial timber land is fixed, distance prohibits operators from "reaching out" and expanding the operating base.

2 - The Payette National Forest has been operating on an allowable harvest of 74 MMBF. The Draft Plan for this forest indicates future harvest of 78 MMBF, including salvage.

3 - The Boise National Forest has been operating at a 92.6 MMBF allowable harvest level. Indications are that this level will be reduced to about 75 MMBF under the new plan.

4 - The State of Idaho sells 20 MMBF annually. This volume is expected to remain constant.

5 - Harvest of private lands was increased during the period from 1980 to 1985, primarily due to the less expensive stumpage from this source during a period of depressed lumber prices. Harvest levels from private sources will be reduced in the future.

The net result of the above listed facts is a reduction in available timber of 13 to 25 MMBF annually to operators in Southwest Idaho.

B - Timber manufacturers in the Southwest Idaho area are not currently operating at full capacity. To be efficient, a sawmill should operate on at least a two shift basis. Several facilities in this area are presently operating only one shift, primarily due to lack of raw materials.

C - To operate efficiently, a standing timber inventory equalling 2 1/2 to 3 years of production is needed. This allows time for road construction, contracting, etc. At Boise Cascade, the level of timber under contract has been going down steadily since 1975. There is no "backlog" of timber to make up for future sale shortages.

D - Reduction in production is not a straight line relationship with reduction in timber supply. When adequate timber is not available, a full shift is removed from a large mill, or a small mill goes out of business.

III. Concerning effects on employment.

A - The timber shortage which industry is facing will result in either a small mill going down, or a large mill reducing at least one shift. This equates to the loss of approximately 65 direct jobs.

B - Job loss would occur in a small, dependant community, such as Horseshoe Bend, Council, or New Meadows. These areas have little or no employment opportunity for displaced workers.

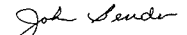
IV. Effects of community stability.

A - Mill facilities in Southwest Idaho are located in small communities. A reduction in timber availability would reduce \$1,475,000 in direct payroll in the town where a shutdown occurs. This, coupled with a reduction in taxes at all levels, would have serious adverse affects.

Thank you for considering our concerns and comments.

Sincerely,

BOISE CASCADE CORPORATION

  
John Bender  
Idaho Region Manager

Richard A. Geier  
Cascade Area Manager  
Bureau of Land Management  
Boise District Office  
3928 Development Avenue  
Boise, Idaho 83705

Dear Sir:

I attended the Cascade RMP Workshop on Nov. 12 and read through a copy of the plan, focusing primarily on the preferred alternative and Alternative C.

1. My opinion would favor Alternative C. This opinion is bolstered by the uncertainties surrounding adequate monitoring (because of insufficient funding) in the preferred alternative.

2. If sufficient funds and the mechanisms of monitoring are attainable, the preferred alternative appears to be an acceptable second choice.

3. The fire restoration efforts are encouraging, and I have little to add in comment on them.

4. I do want to go on record as being very strongly in support of the South Fork Payette recreational river recommendation; of the proposed ACEC's; and of the RNA's.

5. What I would like to concentrate on in more detail are the following two issues:

(a) The importance of good riparian management -- for wildlife, fish and people; overgrazed stream banks are disastrous for plants and animals -- probably one of the most obvious reasons many people think that there should be decreases in AUM's. At least major tributaries like Crane Creek deserve careful management. Along these lines, setting minimum flow criteria for streams like Crane Creek is also something that should be included in the final RMP.

(b) The issue of regulation of ORV's. I entirely support the closure of RNA's to ORV's and the limitations of ORV use in the ACEC's and other selected areas. However, I have extensively hiked in the Boise front and frequently encounter trail bikes in areas that are supposed to be closed; last spring I even met a trail bike on the Halls Gulch Trail. It is clearly true that a significant number of ORV operators neglect the simplest rules of erosion control -- the thrill of tracking the untracked is ultimately highly destructive to steep

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J. David Brunner  
Boise District Manager  
Bureau of Land Management  
3948 Development Ave.  
Boise, ID 83705

Dear Mr. Brunner:

The Idaho Wildlife Federation (IWF) appreciates the opportunity to comment on the Cascade Resource Management Plan and Environmental Impact Statement (Draft). Our organization views this land use plan an especially important one because of the destructive fires in the Resource Area. Protection and rehabilitation will dominate the management direction during the life of the land use plan, especially throughout the first five years of the plan. Because of these conditions the IWF recommends the Squaw Butte/Willow Ridge complex be designated an Area of Critical Environmental Concern (ACEC). The critical mule deer winter range, upland wildlife and riparian zones will require special management attention throughout the life of the plan.

The IWF recommends changing the RMP to reflect the altered range and wildlife conditions in the resource area. While we appreciate the confidence of your staff to carry out the management objectives of the proposed plan despite the obstacles, we believe the damage modified conditions that require a re-assessment of the management prescriptions proposed under all the alternatives. Without such reconsideration and adjustment the public is handicapped in evaluating the plan.

Significant inadequacies occur throughout the plan because it does not conform to the CEQ Regulations under NEPA. Federal Regulation, 40CFR 1508.7, defines "cumulative impact" as

the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

40CFR 1508.2r(a)(2) requires "(2) cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts . . . be discussed in the same impact statement."

Affiliated with the National Wildlife Federation

erosive slopes. Thus it is not just a matter of a conflict of uses -- although it is that, and a hiker-trail bike encounter interferes much more with the enjoyment of the hiker than it does the biker -- it is also a matter of a conflict of one use with the ecological integrity of the land used. It is analogous in a way to bird-hunting vs bird-watching; the former is more consumptive than the latter. Clearly ORV's are here to stay -- but just like with hunting, it needs to be regulated. Thus I would like to propose that the final RMP include some provision for monitoring of ORV use, particularly in the areas that are sensitive to erosion and in the areas where use is to be limited to trails only; and that the RMP include some criteria for when an area would become one of limited instead of unrestricted use or be closed altogether -- these criteria being ones that are before destruction to the extent seen in the Boise front.

I would like to further propose that a few selected smallish areas be set aside as entirely closed to ORV's to provide havens for wildlife and for hikers free of conflict with ORV's. The two proposals put forth by Sheldon Bluestein seem to be appropriate; the 7500 acres between Crane Creek and the Weiser River and the 8000 acres south of Rodson Pass. The total acres are not excessively large here; it can not be held to be discriminating to ORV'ers to designate an area outside an RNA as open to non-motorized recreation only, when the total number of unrestricted acres and available trails is so overwhelmingly large. It would seem to me that such an area is fully compatible with the principle of multiple use in that multiple use is a concept applied to a region -- like the Cascade area -- such that specific areas can have restricted uses.

A last thought along these lines would be to wonder if the Cascade Management Area could coordinate with the Boise National Forest to extend the Halls Gulch trail further in to the forest above its current ending.

6. Lastly, I would like to indicate that I would be willing to spend a Saturday come Spring working in the Boise front or another area that needs it helping replace signs and fences that have been knocked down or have fallen into disrepair. Alternatively, if there was some trail work that was taking place I would be willing to help out there too.

Sincerely yours,  
Rick Fisher  
1824 Ridgecliff Terrace  
Boise, Idaho 83702

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Cascade Draft RMP/EIS  
November 28, 1986  
Page 2

An example of the inadequacies is the discussion (or lack of discussion) of the cumulative effects of the fifteen (15) miles of stock watering pipeline (pg 24). Through experience we discovered pipelines usually result in the development of laterals and extensions. Because the plan extends through a twenty year period we feel it is reasonable to anticipate such actions during the life of the plan. The effect of pipelines on wildlife must be considered. We feel it is not a case of numbers but one of areas used by wildlife. While the proposed plan and DEIS are not the appropriate places for site specific analyses, they are however, the required place (40CFR 1501.2) to discuss the environmental impacts of the proposed actions.

Another example of where the proposed plan is deficient is the discussion of the land transfer, particularly the BLM/State of Idaho exchange. In the DEIS the potential environmental consequences are not discussed. The failure to explain the results of the proposed exchange is one more example of the inadequacies permeating the Draft RMP/DEIS.

The Federation approves of the establishment of an ACEC for Columbian sharp tail grouse and for the longbilled curlew.

Funding emerges as a major questionable ingredient of the plan. Much of the success of the plan hinges on carrying out the prescriptions stated in the RMP, but in Appendix F the familiar phrase "depending on the availability of funding and manpower" imposes a limitation on the ability of the Bureau to meet their commitments. The likelihood of reduced funding and manpower in the remainder of this decade and into the next decade is a likely constraint. However, the sentence to the environment if the Bureau is unable to implement an aggressive and effective monitoring plan is not discussed. We view this oversight as a serious flaw in the plan because monitoring constitutes a major step in determining management decisions.

The Idaho Wildlife Federation believes the Cascade Resource Management Plan and Environmental Impact Statement (Draft) seriously flawed, and we recommend that a rewrite is necessary to bring it in compliance with the requirements of NEPA and the federal regulations. Any rewrite must include the conditions and situations created by the past summer's fires.

Cordially,  
Russell W. Heughins  
Russell W. Heughins, Chairman  
Natural Resources Committee

11/22/86

Richard A. Liss  
Cascade Area Manager  
Bureau of Land Management  
Boise District Office  
3948 Development Avenue  
Boise, Idaho 83705

Dear Sir:

Concerning the Cascade Resource Plan/ Environmental Impact Statement, I took the preferred alternative E with some reservations. Removing the West Crane horse herd I believe is a very good idea as we are going into a more intensive management program on water development + grass seeding. Also, I think we are the only allotment to have been cut in Cascade Resource Area - 24% I believe. As for the Four Mile herd if it is retained, I would like to see them gathered more often so it is held closer to the proposed 20. I believe range would be better served if they were removed also.

On wildlife, I oppose a 22% increase in the Elk herd. Most areas that I know of already have too many and are causing a problem for private land owners. The increase in deer may not be as bad, but there seemed to be quite a few around

before the special harvest because of burned areas. I doubt that the increase in antelope would be any problem.

The off road vehicles could get to be a problem as their use increases. I have noticed this in my area.

On riparian habitat, I would not like to see much fencing if any. It could be real problem maintaining such fences.

On curlew habitat, I believe the range would be better served if seeded to some type of grass rather than go all to meadowland.

Sincerely,  
Wilson Branch

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The first concern is that the Resource Management Plan (RMP) does not acknowledge our future plans or needs for improving state and federal transportation routes within your resource area. For example, several Idaho Transportation Department studies have addressed the need to extend State Highway 16 between Emmett and Mesa through the Indian Valley area. Our department and consultants have coordinated with your agency on this project. The RMP, without reference, appears to eliminate this project from consideration. We have two alternative corridors, both of which apparently involve RMP identified "Avoidance Areas." The RMP states on page 43, under "Land Use Authorizations," that rights-of-way will be considered except where specifically identified in the RMP for avoidance. The second, and related, concern regards clarity of definition for the term "Avoidance Area." RMP map 6 supposedly identifies right-of-way avoidance areas, but differs considerably from those avoidance areas identified on page 64 under "Land Transfer and Utility Rows."

Our recommendation regarding the Draft RMP is that:

- o The Land use authorization section (page 43) be reworded to reflect that right-of-way will be considered in all cases; except those identified as sensitive areas should be avoided to the extent possible when practical and feasible alternatives exist to satisfy a demonstrated need.



November 26, 1986

BUREAU OF LAND MANAGEMENT,  
3948 Development Avenue  
Boise, ID 83705

Gentlemen,

The Idaho Outfitters and Guides Association supports Alternative C of the Cascade RMP.

In the area of recreation we support:

- 1) full 4500 acre recreational river management along six miles of the North Fork, and eight miles along the Main Payette
- 2) the exchange or purchase of land for a Middle Weiser River canoe/float launch site and take out site
- 3) development of a recreation parking area for a take out site for river recreationists on the Cabarton stretch of the Payette
- 4) wild and scenic status for the South Fork of the Payette
- 5) withdraw 500 foot corridor along Hull's Gulch Nature Trail from overhead, surface, or subsurface rights of way, from mineral location and leasing, and from any domestic grazing

We support ACEC's for the long-billed curlew and the Columbian sharp-tailed grouse.

Additionally, we are concerned that the plan adequately addresses the need for range rehabilitation north of Emmett in the burn area. Winter range for wildlife is critical for the herds.

Sincerely,

Grant Simonds  
Executive Director



JOHN V. EVANS  
GOVERNOR  
IDAHO TRANSPORTATION BOARD  
JOHN W. BINKLEY  
LOTO P. BARRON  
MARION DAVIDSON  
E. DEAN TISDALE



TRANSPORTATION DEPARTMENT

PO BOX 7129 BOISE, IDAHO 83707

November 26, 1986

Mr. J. David Brunner  
BLM District Manager  
3948 Development Ave.  
Boise, ID 83705

Dear Mr. Brunner,

The Idaho Transportation Department has two major concerns with the "Cascade Draft Resource Management Plan and Environmental Impact Statement." The concerns are related, and could severely limit our ability in the future to accomplish transportation objectives, including a major state goal of improving North/South travel.

The first concern is that the Resource Management Plan (RMP) does not acknowledge our future plans or needs for improving state and federal transportation routes within your resource area. For example, several Idaho Transportation Department studies have addressed the need to extend State Highway 16 between Emmett and Mesa through the Indian Valley area. Our department and consultants have coordinated with your agency on this project. The RMP, without reference, appears to eliminate this project from consideration. We have two alternative corridors, both of which apparently involve RMP identified "Avoidance Areas." The RMP states on page 43, under "Land Use Authorizations," that rights-of-way will be considered except where specifically identified in the RMP for avoidance. The second, and related, concern regards clarity of definition for the term "Avoidance Area." RMP map 6 supposedly identifies right-of-way avoidance areas, but differs considerably from those avoidance areas identified on page 64 under "Land Transfer and Utility Rows."

Our recommendation regarding the Draft RMP is that:

- o The Land use authorization section (page 43) be reworded to reflect that right-of-way will be considered in all cases; except those identified as sensitive areas should be avoided to the extent possible when practical and feasible alternatives exist to satisfy a demonstrated need.