

U.S. Environmental Protection Agency Detailed Comments:
Cascade Area Draft Resource Management Plan
Environmental Impact Statement, Idaho

EIS, pages 3-5,6

These detailed comments are divided into two parts. Comments specific to the draft EIS appear first, followed by RMP comments beginning on page 8.

Detailed Comments on the
Draft Environmental Impact Statement

- EIS, page 2-4 (Objectives/Actions Common to all Alternatives). The objectives listed for Watershed and for Riparian and Aquatic are appropriate. The general actions seem to be appropriate as well, with the exception that limiting ORV activity to existing designated roads and trails might at best prevent existing erosion problems from worsening. The draft EIS does not establish that existing erosion and instream sedimentation is acceptable. To the contrary, improvements appear to be necessary.
- 38.1**
- EIS, page 2-25 (Alternative C). Under this alternative, "(m)anagement would comply with the more stringent environmental protection standards." What standards does this refer to, specifically? The Resource Management Guidelines described beginning on page 38 of the draft RMP are said to be those which are applicable regardless of which alternative is selected. The more stringent standards should also appear in the documents.
- 38.2**
- 38.3** What management guidelines would apply to the Box Creek area under Outstanding Natural Area designation? What uses would be compatible and incompatible? What is the major objective of Outstanding Natural Area management?
- EIS, page 2-28 (Riparian and Aquatic Resources). Under Alternative C, present management would continue on 107 stream miles of riparian habitat and 57 miles of aquatic habitat, while 12 and 23 miles of these habitats, respectively, would receive direct improvement. This direction appears to be inconsistent with the EIS Summary (page v) which describes benefits to 140 and 142 miles of riparian and aquatic habitat (through AMP revisions) under this Alternative. Also, we are confused about the basis for determining the miles of improvements or other benefits. Why would AMP revisions and reduced grazing under Alternative C not be capable of benefitting more miles of habitat than
- 38.4**
- 38.5**

We agree with the statement that soil disturbing activities can be designed so that long term impacts can be reduced to environmentally acceptable levels. The key to achieving this is a clear definition of what "acceptable levels" are. For erosion, not only loss of productivity, but also instream values and impacts must be considered. Fish "species of special concern" occur throughout the Area. These are beneficial uses which should receive more than "usual" levels of management emphasis on protection of their habitat.

Of the streams surveyed (by ocular measurements), a large percentage have already experienced excessive sedimentation. Even if these streams have the ability (gradient and flow characteristics) to flush themselves of sediment, continuing impacts will result from continued erosion. Also, impacts due to sedimentation will be long term in the lower gradient areas that cannot regularly flush sediments, including the North Fork Payette and Welter Rivers. Even where erosion from BLM land is not the primary cause of these impacts (due to intermingled ownership), already-serious cumulative effects can be worsened. To the extent that additional erosion from BLM land is avoidable, it should not occur.

We were pleased to see that a management scheme which would significantly reduce erosion (Alternative C) was among the alternatives that could be implemented. We were further pleased to note that the local economies potentially affected by this management scheme represent less than one-half of one percent of the income and employment in this relatively populous area of the state. Clearly, the costs of adequately protecting water quality and beneficial uses in the Area are not excessive.

EIS, page 3-11

38.10

Please describe the "woody riparian survey method" - in particular the criteria for classification of conditions as poor, fair, good, excellent, or unsuitable.

EIS, page 3-12

(Aquatic/Fisheries Habitat). This section generally does a good job of outlining the resources in the Area, and some of the places where habitat degradation has occurred. It would be useful to expand the discussion somewhat to include the habitat requirements of the noted "species of special concern." This would serve to better highlight both the potential types of impacts that may occur and the sorts of mitigation that may be most effective.

- 38.5** Alternatives B and D, which each have more grazing? This is especially confusing given the predicted 30 percent Area-wide decrease in erosion rates under Alternative C.
- 38.6** How is "benefit" defined for the draft EIS? Finally, for the few miles predicted to experience decreases in riparian habitat value under any alternative (3 miles under Alternative C), why are no further measures proposed for mitigation? (E.g., fencing would appear to be economically feasible.)
- 38.7**
- EIS, page 2-53 (Areas of Critical Environmental Concern). The EIS does a good job of describing the resource values, causes for concern, and purpose relative to proposed ACECs. Regarding the Boise Front, the management guidelines described do not specify whether the proposed measures would result in a significant decrease in ORV-related erosion, or simply in maintenance of current erosion. It seems that continuing significant ORV use is expected. Element No. 6 under Management Emphasis (Installation of water control structures) may therefore be the key to reducing impacts from continuing erosion. The final document should therefore describe the measures BLM will employ to determine when structures are needed.
- 38.8**
- Also, given clear statements on pages 3-3 and 3-5 that ORV use is resulting in "very evident" and "serious" erosion problems, the final documents should describe the measures BLM will use to enforce ORV limitations (i.e., regarding use on only designated roads and trails). The likely effectiveness of enforcement should be evaluated, and possible changes in ORV management (if enforcement is not highly effective) should be described.
- EIS, page 3-5 (Air Quality). This section should describe existing air quality conditions in the area. It should also note that while some air quality deterioration can occur, standards and increments must still be met. Chapter 4 should then evaluate whether proposed burning in conjunction with activities on adjacent properties (including lands managed by the U.S. Forest Service) would contribute to significant air quality degradation. For suspended particulates, the allowable increase over baseline in Class II areas is 37 micrograms per cubic meter (twenty-four hour maximum). This degree of increase could not occur if baseline for the Cascade Resource Area is such that the 24 hour ambient standard of 150 micrograms per cubic meter would be exceeded. The attached Exhibit provides a suggested outline for evaluating potential air quality impacts. Our staff can provide assistance in carrying out such an analysis if this would be useful to you.
- 38.9**

- 38.11** What habitat conditions exist on BLM lands within the Payette River Watershed?
- EIS, page 4-1 It is stated that soils impacts would occur on both "limited" and "open" classifications of ORV use areas. However, page 4-40 states that in "limited" classification areas, only negligible sedimentation would result. Given numerous references throughout the EIS to significant erosion problems due to ORV use, we expect the former statement to be more correct. In any case, the apparently inconsistent statement on page 4-40 leads us to question whether erosion would be reduced as significantly as predicted under Alternative C. Our concern here is further heightened by the statement on page 4-39 that ORV use under Alternative C would result in the same impacts as under Alternative A (where 75% of the Area would be classified as "open" to ORVs). Please more fully describe the effective reductions in erosion expected to occur under "limited" use as compared to "open" use, and the method (including assumptions) used in estimating this. This will help us to better determine whether impact predictions and the Resource Management Guidelines (even for Alternative C) adequately reflect uncertainties inherent in the analyses.
- 38.12**
- EIS, page 4-39 The above comment also applies to impacts due to timber harvesting activities. We would expect reduced road construction and timber harvesting under Alternative C to result in reduced riparian area, fish habitat, and water quality impacts. Instead, this page states that impacts would be the same as described in Alternative A.
- 38.13**
- EIS, page 4-40 Predictions of overall riparian and aquatic impacts are based in large part on management practices that will be specified in new and revised AMPs. The final EIS should outline the types of measures that are likely to be specified in future AMPs so that we can determine whether the EIS appropriately evaluates impacts. Also, when would AMP revisions or preparation of new AMPs be initiated? We would appreciate the opportunity to review the draft AMPs and CRMPs for the Area.
- 38.14**
- EIS, page 4-43 Would special (more stringent) SOPs be utilized during road construction on high erosion hazard lands (under all alternatives)? If so, please describe them.
- 38.15**
- EIS, page 61-9 (Glossary). The use of the Stream Habitat Condition tag should be more fully described, either here or in the text. Specifically, what is the quality and
- 38.16**

38.16 comprehensiveness of the database on stream habitats over the Area? Are there only ocular estimates available for the six factors evaluated? How are the cutoffs between the ratings classifications defined?

EIS, page B-1

(Appendix B). The acreages for the various ORV use classifications under Alternative A appear to be incorrect. Elsewhere in the documents, the following acreages (and percentages of the Area) are given:

38.17

Open: 257,623 (53 percent)
Limited: 227,895 (47 percent)

EIS, page H-1

(Appendix H). This table appears to be inconsistent with Map 3-6 in terms of the ratings of existing habitat condition. On Map 3-6, the following ratings appear:

38.18

Harris Creek "Good"
Shafer Creek "Good"
Big Willow Creek "Good"
Little Welsler River "Good"
Manns Creek "Fair"
Dennett Creek "Fair" to "Good"
Rock Creek "Fair" to "Good"

(Also, specific areas of North Fork Payette River, Deer Creek, Little Pine Creek, and Grouse Creek that would experience improvement projects under some alternatives are not obvious on Map 3-6).

Which rating is correct for these areas? Also, how were areas chosen for improvement? (Some additional areas noted on Map 3-6 as being in "poor" condition are not proposed for improvement. Several other areas are also shown on Map 3-6 as being in worse condition than the areas proposed for improvements in this appendix.)

EIS, page P-1 to 3

(Appendix P: Monitoring and Evaluation Plan). An adequate monitoring program is the key to our ability to determine that undue degradation will not occur, and that adverse impacts will not persist, under any of the alternatives. We have recently been discussing monitoring program needs with BLM Idaho State Office personnel. From these meetings, we understand that additional guidance on water quality and riparian monitoring will soon be available from the State Office to the Districts. (We are reviewing a draft of the guidance now.) Also, a variety of BLM national level draft guidance relating to riparian area management and monitoring is currently under review

38.19

38.23

doing business and should appear as a non-optional part of Management Costs (for instance, in the Comparative Summary on page 2-61 of the EIS). This is a primary basis for our uneasiness over preparation of specific monitoring programs after Plan implementation. Significant adverse impacts may go undetected if the monitoring funds, allocated before needs are determined, are later found to be insufficient. Certainly, identified needs that are truly "special" may require additional funds. However, routine needs in highly erosive areas, such as the Cascade Area for example, need to be recognized and funded up front.

EIS, Maps

We noted some inconsistencies regarding the text and Map 3-6. Beyond this, we found that the maps included pertinent information and were of excellent quality. Public understanding would be enhanced if all other agencies that prepare land management plans produced this quality of maps.

38.20 and should be available in the near future. To the extent that these materials are available by the time the final RMP/EIS is prepared, they should be reflected.

We would appreciate the opportunity to review the draft monitoring plans as they are developed. We would also appreciate receiving a copy of the Record of Decision for the RMP ("Plan Decision Document").

Regarding the general monitoring program outline in Appendix P, its intent is appropriate. We have a few specific comments meant to help ensure that the intent is realized.

38.21

When will monitoring plans for the individual programs be developed? Obviously, monitoring should begin concurrent with RMP implementation. For example, it should not entirely wait for new AMPs to be developed.

38.22

The monitoring plans for the various programs should be coordinated where appropriate. For example, Range program monitoring should include collection of information necessary for the Fisheries and Watershed programs. [This would include information on water quality, bank stability, riparian condition (including stream shading), instream habitat condition (including sedimentation), etc.].

All monitoring plans should include a description of appropriate measures that could be taken if monitoring determines that objectives are not being met. Of course, clear statements of the objectives are necessary in order to design the monitoring to adequately address the objectives. These should include specific "triggers" for further management action (i.e., definitions of significance).

The description of Minimum Data Elements to be Monitored is too general for us to determine whether minimum monitoring standards will be sufficient in the Cascade Area. Given the extreme erosion potential on the majority of the Area's lands, and existing erosion-related water quality problems, we anticipate that more intensive monitoring will be necessary even for Alternative C.

38.23

Related to this, we are concerned with the statement that more intensive monitoring, if needed, would occur if funding is available. We believe that sufficient funds for monitoring (and mitigation) must be a firm commitment of any alternative. Such funds are part of the cost of

Detailed Comments on the Draft Resource Management Plan

As noted earlier, EPA supports redesignation of Alternative C for implementation on the Cascade Area. This would require substantially revising the draft RMP. Our comments on this document, which is based on Alternative E, are thus less extensive than on the draft EIS.

RMP, page 12

38.24

Under Soil and Water Quality, it is stated that "Standard operating procedures would be followed to ensure management proposals are in compliance with soil and water quality standards." The final documents should reflect the fact that while SOPs are a major tool for minimizing water quality impacts, their application does not automatically equate with standards compliance. Protection of beneficial uses is their goal. Beneficial uses themselves must therefore be regularly monitored so that the need for revisions to SOPs can be identified.

RMP, page 21

38.25

For "limited" use ORV areas, the general policy is "to fully protect and enhance sensitive and significant resources." It is unclear in the draft RMP and EIS the degree to which ORV use in "limited" areas will reduce impacts and be consistent with this guidance. Please refer to our comments on the EIS, pages 2-4, 2-53, and 4-1.

RMP, page 27

38.26

(Riparian and Aquatic Resources). Under Actions, the guideline to "adopt special measures to improve riparian and aquatic areas in all AMPs containing these areas" (emphasis added) is unclear. Does this refer to all riparian and aquatic habitats existing in all allotments having an AMP, or does it refer only to the 16 miles of riparian and 14 miles of aquatic habitats slated for improvement under "Objectives?"

RMP, pages 33, 34

38.27

Management guidelines for the Boise Front ACEC do not include stipulations on other soil disturbing activities such as livestock grazing. Why are no special restrictions/practices considered necessary for such uses in this fragile area?

RMP, page 45

38.28

It is stated that measures would be taken to protect the natural water storage and groundwater recharge functions of wetlands. This section should specifically include measures to preserve, protect or restore, other important functions of wetlands including for fish and wildlife habitat, water quality, nutrient cycling, etc. Wetlands,

like riparian areas, are critical resources which have experienced severe cumulative degradation. Wetland protection is one of EPA's top priorities nationally. We have developed a Mitigation Policy relating to wetlands in Region 10. This policy is enclosed for your reference.

RMP, page 53

38.29

This statement appears. "In those areas where fish/riparian values are identified as high priority, all other management practices will be designed to accommodate those priority needs." We agree with the sentiment of this statement. However, definitions of "high priority" and "acomodate" need to be provided. (For example, we believe sensitive beneficial uses such as habitat for designated fish "species of special concern" should qualify as high priority.) Also, how will the identification occur (e.g., in activity plans)?

Richard A. Geier
December 1, 1986
Page 2

39.4

Page 3-11 Riparian Habitat. Generally when condition is rated, one bases it against potential! While you stated that this did not occur on the woody riparian survey, by using the terms poor, fair, etc., one is led to believe that this has occurred. If it was just ungulate use inventoried, perhaps terms such as heavy use, moderate use, light use, etc., would be more appropriate. Also we are not certain what woody riparian survey method was used. Could you identify or did we just miss it in the Plan?

Sincerely,

Stanley N. Hobson
STANLEY N. HOBSON
State Conservationist



United States
Department of
Agriculture

Soil
Conservation
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Room 345, 304 North 8th Street
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December 1, 1986

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

Dear Mr. Geier:

Thank you for the opportunity to review and comment on the Draft Resource Management Plan and Draft Environmental Impact Statement for the Cascade Resource Area. Following are our comments:

Page 10, 3rd paragraph: ...perhaps you should not reduce grazing on the poor condition rangeland but pursue exercising more time control over the grazing, i.e. graze the annual ranges at periods to favor establishment and improvement of vigor on the perennial species, if that is your objective.

39.1

Page 11, Riparian/Aquatic Resources: Will the fenced areas along the stream be removed from livestock grazing? How does this affect management of adjacent land? If livestock are fenced out, has the maintenance liabilities/responsibilities, time and cost been evaluated? Could time-controlled grazing, water development, etc., reduce the need for fencing and the resultant high maintenance cost which goes along with the fencing of streams?

39.2

Page 24, Actions - Activity Plans. Mention is made of 7 AMPs/CRMPs to be reviewed and updated, and 12 AMPs will be prepared. Is there a possibility for some/all of the 12 plans to use the CRMP as the AMP and perhaps avoid duplication of effort?

39.3

Page 36-37. Statement is made that the 61,000 acres as an ACEC have generally been modified over the years, changing it from its potential natural vegetation to one of exotic species. Also, the statement is made that the long-billed curlew population and distribution is or has declined. Where was these birds' habitat prior to manipulation of the vegetation? Have we perhaps, through management, caused the decline because the birds are now coming to an area not truly a habitat favorable to the distribution and population of the species? Perhaps we are maintaining a habitat for the species which, if a full life cycle of the bird was fully evaluated, the habitat in Idaho should not be maintained? Have you fully evaluated this?

Little Land & Livestock Co.

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December 1, 1986

Mr. Richard A. Geier
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Dear Dick,

I have a variety of concerns and questions about the draft RMP. I will address the concerns by referring to the page number and the subject area.

Page 9: Stock Driveways: I would like to know which driveways will be closed.

Grazing Levels: 6% increase proposed. Little Cattle Company has expended substantial resources in improving range land and if not rewarded with licensed carrying capacity the incentive to improve the range is eliminated.

40.1

Land treatment: Our restoration system has shown a marked improvement in range trend (ie: annuals to native perennials) this trend is evident on most of our allotment. What is "ecological site change"?

Page 11: I feel that curlew habitat maintenance should be accomplished through an economic analysis. (ie: if \$1.00 spent outside curlew management area yields more habitat than \$1.50 inside the curlew management area then that should be the direction.)

40.2

Page 12: I would like a map of areas identified for sale and/or trade.

Page 14: Little Cattle Company designated a specific area for ORV activity, Little Gem Cycle Park, part of our agreement with the ORV and BLM people was that the rest of our allotment would be closed to ORV activity. According to the RMP that is not the case. Why?

40.3

What are the "area's of special designation" in the Little Gem Cycle Park and why?

Page 21: I have no problem with protecting curlew habitat, but I doubt that the area is of "critical" concern. Critical meaning that action is absolutely necessary. Obviously curlews are not rare and endangered.

Also the banning of utility ROW seems like a very large impact for minimal habitat disruption.

Page 25: The statement of "reducing livestock preferences in allotments in poor and fair condition" does not bode well for the management practices of the BLM. Good range management is predicated on range TREND and not range condition. I wonder if a good manager removes livestock from poor range in an upward trend or does he remove livestock from good range in a downward trend?

5-47



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is an agency of the
Department of Agriculture

40.4 Page 26: Why can't we put salt and water on the ridgelines in Sand Hollow? A practice encouraged by the BLM for years. Where are the 6 miles of fence to be located? Why no utility ROW's allowed?

40.5 Page 37: The description of the curlew area have several inaccuracies. 1. perennial have been reduced, not eliminated. 2. horse enthusiasts don't use area heavily. 3. upland bird hunters seldom use area.

It almost impossible to put in stock water pipelines any time other than spring due to the hardness of the ground. To put in a mile of water line in the spring disrupts only a minor amount of soil and usually takes only 1 day.

If we are forced to put in the pipeline in the fall a back hoe rather than a trencher is necessary and much more soil disruption, time and cost is involved.

40.6 Page 44: Under "soils", do shrubs help stabilize soils or are shrubs for wildlife rather than soil?

Page 48: To allow an entire year for Fish & Game comment before land disposal and vegetative manipulation can be implemented, is a cumbersome restriction which severely limits a range managers ability to effectively manage the land.

Page 49: I would like a map of all areas listed on page 49 which restrict construction. It virtually eliminates many of the multiple use's of a large part of the Cascade Resource Area.

40.7 Page 50: What is a 60/40 ration of forage area to ground cover?

Page 51: What areas have had wintering populations of sage grouse in the past 10 years.

Page 52: Define: de-watering, riparian area and riparian zone. If stock driveways are eliminated from riparian areas it will stop economical grazing of livestock therefore implementing single use rather than multiple use.

Page 53: Define practical application of: --providing water for livestock away from reservoirs (and who pays for). --utilizing manual for management and protection of western stream eco-system.

Page 55: What is the necessity for 2 years of rest after a fire? --How can BLM delegate 8100 Funds for wildlife and watershed projects.

Page 60: "Economic Considerations". Cost effectiveness should be determined by "generally accepted economic principles" and not by any method deemed appropriate.

I am concerned that weed control and livestock management be subject to benefit/cost analysis yet wildlife recreation and fire management not be subjected to the same analysis.

Dick, I would be very appreciative if your staff would keep me informed as changes in the RMP evolve, since my livelihood is dependent on future management of the Cascade Resource Area.

Sincerely,

Brad Little
Brad Little

The Nature Conservancy

November 4, 1986

Mr. Richard A. Geier
Cascade Area Manager
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3940 Development Avenue
Boise, Idaho 83705

Dear Mr. Geier:

Thank you for the opportunity to review the Draft Resource Management Plan and EIS for the Cascade Resource Area. The Nature Conservancy's goal is the preservation of a full array of biotic diversity and it is toward this that the following comments are directed. More specifically, I am commenting on how the plan addresses two major areas: rare plant taxa and Research Natural Areas.

Research_Natural_Areas - A Memorandum of Understanding between The Nature Conservancy and your State Office was finalized in April, 1986. The MOU enumerates common interests and provides for cooperation between our two organizations in several areas including protection of biologically significant areas via ACEC and/or RNA designations. In addition, the Conservancy cooperated with the Idaho Natural Areas Coordinating Committee and BLM in recommending five of the six RNA's proposed in the RMP.

The Nature Conservancy supports the designation of five of the RNA's proposed in the plan (the exception, *Peraphyllum* Rock, is discussed below). Proposed protection measures for these valuable areas also appears adequate. These small areas will go a long way toward completion of a statewide RNA system that will include much of Idaho's biotic diversity. There are, however, problems with three of the proposed areas:

41.1 **1. *Peraphyllum* Rock RNA** This area does not meet RNA criteria agreed upon by the Federal Committee on Ecological Reserves. Please refer to the Committee's 1977 report *A Directory of Research Natural Areas on Federal Lands of the United States of America* for RNA purposes and management guidelines. *Peraphyllum* Rock, while possibly containing a rare plant, is not representative of an ecosystem with minimal human influence, having had a long history of domestic livestock grazing.



Nature Conservancy, 1100 North 34th Street, Arlington, Virginia 22209

Cascade RMP Comments
Page 2

41.2 **2. *Buckwheat* Flat RNA** Boundaries for Buckwheat Flat in Map 4 do not coincide with those proposed by us in 1985. Please refer to the letter from C.A. Wellner and myself, dated September 10, 1985, for our proposed boundaries. While containing good stands of *Eriogonum* types, your area is small and relatively indefensible, being close to much activity centered around Midvale Summit, including a rock crusher, gravel pit, rifle range, etc. The area we propose includes good examples of both *Eriogonum* types plus a steep canyon side with remnant bunchgrass communities in good condition. This area would also make a more defensible unit and, although cattle graze the periphery, it is away from much of the human disturbance and would be easier to manage.

41.3 **3. *Summer* Creek** Boundaries of the proposed Summer Creek RNA also need to be reassessed in light of the criteria set forth in the 1977 Directory. Please refer to a letter from C.A. Wellner, dated November 10, 1985, concerning boundaries and further attributes of the Summer Creek/Sheep Peak area.

Additionally, there are other communities found on the Cascade Resource Area that are currently missing from any proposed or established RNA. Foremost among them is an area that contains *Artemisia tridentata* ssp. *vasquezana* form "*xericusis*" habitat types. This form of mountain big sagebrush is endemic to the Cascade Resource Area and may prove valuable in rehabilitating the large areas burned by wildfire last summer.

Rare Plant Taxa - For this information I rely on the Idaho Natural Heritage Program. The Heritage Program is a comprehensive biological inventory undertaken in a cooperative way between The Nature Conservancy and Idaho Department of Fish and Game. The resulting data base serves as a clearinghouse for information on rare species and ecosystems in the state of Idaho that is continuously being updated and refined, making it ideally suited for Resource Area planning.

Treatment of rare plants in the RMP and EIS is good. The strong protection measures for rare plants and the incorporation of management needs for candidate and sensitive plants in all activity plans is commendable. Incorporation of the following suggestions, however, would greatly enhance the rare plant portion of the RMP and EIS.

41.4 **1.** The isolated tract of BLM land near Council that contains Idaho's only known population of *Ceanothus prostratus* should be included on the list of rare plant sites requiring special attention. A monitoring program should also be established to study the effects of livestock grazing on the *Ceanothus*.

- 41.5 2. A plant that is a concern of many botanists in Idaho, is *Allium aasaagii*. The BLM needs to fully address how they intend to manage those areas on which *A. aasaagii* is known to occur in order to prevent this species from being listed as Threatened by the USFWS due to the documented and continuing impacts of mining, ORV's, housing development, mass-transplant experiments, etc. Mass-transplant cultivation of *A. aasaagii* is an unproven conservation measure for rare onions and may jeopardize the survival of large numbers of plants. Additionally, this action may be outside the intent of The Endangered Species Act, that is, it is a recovery action taking place prior to official listing and Recovery Plan development. Furthermore, the transplant gardens would be considered experimental populations and would not fulfill the BLM's obligation toward recovery if *A. aasaagii* is listed as Threatened. Consultation with USFWS on these experiments is imperative.

A more prudent and effective course of action for the conservation of this rare plant would be to conduct intensive surveys of BLM tracts within the onion's known range in conjunction with the Heritage Program. Steve Caicco of the Heritage Program has spent two years on a thorough search of adjacent private, state, and municipal lands. Following this survey, and in cooperation with the USFWS, Heritage Program, and The Nature Conservancy, a conservation plan should be drawn up for the species that would entail rigorous protection of the best *Allium aasaagii* populations as preserves. When the survival of this plant appears secure in these preserves and Federal listing unnecessary, experiments involving the movement of entire populations to prevent loss from mining would be a worthwhile endeavor.

Following are specific comments on the EIS and RMP:

EIS-Description of Alternatives

- 41.6 All five alternatives have as an objective under Vegetative Resources to "protect and manage 12 specific sites containing candidate and sensitive plants" (except in Alternative D, page 2-35, where only 11 are considered). The list includes six RNA's, three of which, Goodrich Creek, Buckwheat Flats, and Lost Basin Grassland, contain no known populations of BLM listed plants.

EIS-affected Environment (pages 3-8 to 3-10)

- 41.7 A. *Allium aasaagii* is incorrectly identified as a Category 2 candidate on page 3-8, paragraph one and list at bottom of page. It is a Category 1 candidate.

- 41.11 4) Three times on page 3-8 and once on page 3-10, *Astragalus mulfordiae* is spelled incorrectly. Over the past couple of years, there has been widespread confusion as to the correct spelling of "mulfordiae." M.E. Jones published the name without the "i" in 1913, prior to formalization of the International Code of Botanical Nomenclature. According to the code, this is an orthographic error that can be (and was) changed in later treatments of the taxon. All commemorative specific epithets used as nouns include an "i". If it is used to commemorate a female, as in *Astragalus mulfordiae*, "ae" is added.

EIS-Environmental Consequences

As mentioned above, each alternative includes the designation of certain RNA's to protect candidate and sensitive species that do not contain any.

RMP-Rationale for Preferred Alternative

Page 12 - It is good to see that allowances are made for new knowledge of rare plant distributions and that the BLM will protect new populations that are identified through site evaluations and other inventories. This indicates a long-term commitment to rare plant conservation that is rarely seen in land management plans.

You again incorrectly mention the designation of six RNA's to protect known candidate and BLM sensitive species.

RMP-Preferred Alternative

- 41.12 Page 25 - The 12 sites do not all contain candidate and sensitive species.

RMP-Support Requirements

Page 63 - We strongly agree with the need for the highest level of wildfire suppression on RNA's to protect these significant resources.

RMP-Map 4

- 41.13 Summer Creek is not identified as a RNA.

RMP-Map 5

Goodrich Creek and Buckwheat Flat RNA's are not closed to ORV use, as recommended on page 26.

- 41.7 B. In the third paragraph, page 3-8, *Carex aboriginum* is listed as a sensitive species. It is a Category 2 candidate.

C. On page 3-9, the following four areas are incorrectly identified as having known populations of candidate and sensitive species:

- 41.8 1) Halls Gulch Nature Trail - According to Heritage Program survey information for *Allium aasaagii* on the Boise Front, the lower limit of the proposed Halls Gulch Nature Trail is higher than any known occurrence of the species. If the onion occurs along the trail, it needs to be documented.
- 41.9 2) Lost Basin Grassland RNA - contains no known populations of plants listed on page 3-8. It does, however, contain *Allium kolmei* var. *elatyrhyllum*, a plant considered sensitive by the Rare and Endangered Plants Technical Committee ("Redbook Committee") and tracked by the Heritage Program data base.
- 3) Goodrich Creek RNA - likewise, contains no known populations of BLM listed plants.
- 4) Buckwheat Flat RNA - also does not contain any listed plants, but does contain a population of *Allium kolmei* var. *elatyrhyllum*.

- 41.10 It appears that certain RNA's are being erroneously justified as rare plant sites. They are equally valuable without rare plants and are justified for a myriad of other reasons. See the 1977 federal report on RNA's cited above.

D. Spelling errors:

- 41.11 1) Page 3-8, paragraph three, the spelling of the specific epithet of *Mimulus rinzusii* is incorrect.
- 2) Page 3-10, heading for last paragraph, *Peraphyllum* is spelled incorrectly.
- 3) Page 3-8, list of common names, both Mulford and Cusick are proper names and should begin with upper case letters.

- 41.13 RMP-Map 7
The proposed vegetative treatment in allotment 179 lies within the proposed Rebecca Sand Hill RNA. This would be inconsistent with RNA designation.

If you have any questions concerning these comments please feel free to contact me. Thanks again for the opportunity to comment on the Draft RMP and EIS and I look forward to working with the Cascade Resource Area in the future.

Sincerely,

Bob Moseley

Bob Moseley
Idaho Public Lands Coordinator

CC: Roger Rosentreter, ISO
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COMMITTEE FOR IDAHO'S
HIGH DESERT
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Dick Geier
Cascade Resource Area Manager
BLM Boise District

Dear Dick,

Thanks for the opportunity to comment on your Cascade R.M.P. We really have a chance to do good things in this area and make it a multiple use showcase.

We strongly endorse Alternative C, which emphasizes the "protection and enhancement of the natural environment", with some modifications. Given the poor baseline data you have available on the Resource Area's vegetation, and the continuing lack of funds for effective monitoring, this alternative offers a usable, conservative management strategy.

Many of our proposed modifications concern recreation. We recognize that some of these concerns were not fully expressed in the issues identification stage of the planning process. You stated at our meeting that none of our newly voiced concerns could have any impact on the R.M.P., and that you would disregard them as stated. Given the flaws in the Plan, this left us very disheartened.

We will therefore attempt to shape them into the relevant issues as presented in the Draft R.M.P.--Payette River Corridor Management Issue, Land Tenure Adjustment Issue, and your Rangeland Resource Management Issue; as well as your Access Management Concern, your Off-Road Vehicles Management Concern, your Fire Management Management Concern, and your Special Designations Management Concern. Further, we request your willingness to consider new issues/concerns/policy requirements as stated on page 6 of the draft (Identification of Future Issues).

We support full 4500 acre Recreational River management along 6 miles of North Fork, and 8 miles of main Payette River. These are world-class kayaking and floating rivers, with heavy public use. They deserve and need protection and management. We urge that you review your statutory and regulatory position, and pursue full recommendations, not just urge further study for these rivers.

We urge that you broaden your limited issue of Payette River management to consider the Middle Weiser River's recreational potential, which your plan seems to ignore. Use land tenure adjustment here as a creative management tool to purchase or acquire through exchange canoe/float launch sites, especially in Midvale area. This also applies to your Access management concern--the public needs access to these lands.

The Crane Creek and Paddock Reservoir areas desperately need developed recreation sites. This brings together three issues and concerns in the plan, and one major problem we see with the R.M.P. as written. You ignored the problems at these sites

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because your failed to consider the potential for using an aggressive land transfer or purchase program (Land Tenure Adjustments Issue) to acquire title to lands at the reservoirs suitable for campgrounds. Building campgrounds, and banning camping outside the campsites, is a good way to reduce wildfire hazards (Fire Management Concern). Also, the public is in danger of being denied access (Access Concern) to these reservoirs because of the private land surrounding them.

The major problem we see with the plan is its incredible bias in favor of ORVs (Off-Road Vehicle Management Concern) and against any other form of recreation. The current SCORP calls for numerous campsites to be built in these counties. Why can't the Cascade Resource Area help? The public expresses an increasing interest in hiking in the desert, in an environment resembling Recreational Opportunity Spectrum's Primitive and Semi-Primitive Non-Motorized categories. Why can't the Cascade Resource Area help? Too much attention is paid to motorcycles, and not enough to developed and undeveloped recreation needs. This desperately needs to be changed in the final plan.

With these concerns in mind, we support placing a larger portion of the Resource Area into the closed to Off-Road Vehicles category (page 6). Our proposed closed areas definitely merit Special Recreation Management Areas status. We recommend: 1) a 7500-acre area between Crane Creek Reservoir and the Weiser River, an area which needs deeded public access; and 2) an 8000-acre area south of Dodson Pass (Sheep and Hog Creek drainages), which needs access from Dodson Pass. Please regard these comments as relative to your Special Designations management concern, as well as your ORV concern. We regard these areas as meeting all FLPMA definitions as Wilderness Study Areas. We're not sure why BLM never inventoried them as such, but we see such potential in them to justify placing them in our Idaho BLM Wilderness Proposal.

The Hulls Gulch Nature Trail, one of BLM's premiere nature trails, needs additional protection. This could be accomplished by withdrawing a full 500 foot corridor along Hull's Gulch Nature Trail from overhead, surface or subsurface right of ways, from mineral location and leasing, and from any domestic grazing, even transitory. Please consider these comments under your Special Designations management concern.

One of the RMP's best features is its provision for Natural Areas. We support Areas of Critical Environmental Concern (ACEC's) for long-billed curlew, and Columbian sharp-tailed grouse. We also support the six Research Natural Areas, an request additional protection through withdrawal from mineral entry, elimination of grazing, and closure to ORVs.

We feel more could be done for riparian areas in the Resource Area. We support Alternative C's increases in improved riparian and fisheries habitat. We additionally support improvement in Crane Creek below Crane Creek Reservoir to Good or excellent condition, and request that the BLM seek minimum stream flows

On grazing, we support Alternative C's reductions in grazing in the Crane Creek-Weiser River roadless area for Allotments 304 and 361; given present conditions in these allotments, there

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seems good cause for reductions. We oppose increased grazing pressure on BLM lands to make up for fire losses on BLM and private lands.

Last, we wish to make one point perfectly clear. We support high populations of wildlife--game and non-game. Whatever course fire rehabilitation takes, we urge you to decide the tough decisions in favor of deer, elk, antelope, upland birds, and non-game species. This nation has a surplus of beef and a shortage of wildlife.

Thanks again for the opportunity to comment. I hope you are willing to take our suggestions and put them to use to improve this plan.

Sheldon Bluestein
Sheldon Bluestein
Secretary