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Cascade Resource Management

Re: SIS Letter
Dtd: Aug 21, 86

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17 Mesa Vista Drive
Boise, Idaho 83705
August 26, 1986

Mr. Richard A. Geier
Cascade Area Manager
Boise

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

Please note the change of address for the Oregon Council of Rock and Mineral Clubs Inc.....

Ronald L Stockhoff, President
Oregon Council of Rock & Mineral Clubs Inc.
1624 Manzanita
Klamath Falls, OR 97601

Dear Mr. Geier:

Mr. Harold Dunn, has retired from our organization as of June 1986. As we are currently under reorganization, and are short four officers until the coming elections in June 1987, I will cover the input for the Information Officer. Please be advised of the new Public Lands Advisory Committee (PLAC) formed by our Regional affiliation - Northwest Federation of Mineralogical Societies, which we are working with. They have the States of Montana, Washington, Oregon, Alaska, Idaho and the northern portion of Utah to administer. We would entertain that they be included in your mailing list;

Thanks for sending me a copy of the "Cascade Resource Management Plan". This document represents a great deal of time, effort and thoughtfulness. It is a bit more "Governmentese" than I would like to see but in the main tracks the various resources problem rather well.

Dick Rantz, Chairman
NFMIS Public Lands Advisory Committee
184 Sudden Valley
Bellingham, WA 98226

I do believe AVR's should be more restricted in where they can go and what they can do. They are very destructive as you know.

I feel ranchers grazing on public land should pay a higher grazing fee. I believe also you are acutely optimistic on range rehabilitation. Unless stock numbers are reduced I cannot see much chance of you accomplishing very much in range improvement.

Your general policy does not stress strongly enough the basic purpose and objective of Public Land Management, i.e., to "preserve and improve public lands" over and above any other objectives.

In your planning decisions - Non Issue/Management Concern Programs - Minerals, are of a concern in a non-commercial attitude. The hobby mining and access, to those considered non-commercial/lease minerals (e.g. Jasper, Agate, Godes, Crystals, Rhyolite, Feldspars, Fossils, Petrified Wood Etc..) are a very important consideration.

I hope in the future some way can be found to reduce the size and repetitive characteristics of these reports. They are just too long and complicated for most people to read, much less comment on.

The Oregon Council, is in the opinion that these rocks and minerals should be identified and controlled through existing regulations, i.e. Public Laws 167 and 94-579, U.S. Code 30, Sections 23, 28, 35, 36 and 1704, as well as 43 CFR, sections 3621, 3622 and 3800. The tenants found in 3622 should be applied to all hobby minerals, unless the operators are commercial, and then they should show proof of market, and leasing. By placing limitations on removal of rocks and minerals, it would stop hobby / recreational miners from wholesale manipulation of species.

Thank you and I should like to see the final when it comes out.

Sincerely,

George Bagglely
George Bagglely

The Oregon, Prineville, DMIS approaches these hobby/recreational miners as a lease/contract option. We would like to see Club Claims and individual hobby claims remain as non fee public use, with limits on removal of material. The Oregon Council, previously had its first input on this issue at the Ochoco National Forest - Crooked River National Grasslands SIS. It was a start and does not approach in as much detail as paragraph 2. But, if our hobby is to survive and leave some for the generations to follow - we must practice restraint and conservation.

Rockhounding brings tourism and recreational dollars into small communities, providing services to support the hobbyists in their pursuit. The concern of

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- Comment*
- 1) I comment you for your ACEC designations.
 - 2) Appendix E notes:

Advice:
Average license use is @66,000 and
Preference is @74,000 aums

*Range Condition shows over 40%
in poor condition.*

*The Proposal to increase aums
by 6% seems overly optimistic.
Reducing preference to below current
licensed use seems more likely
to produce improvement in range
condition, when accepted.*

*Mark Davis
1305 N 5th
Boise, Id.
83702*

many of our older citizens, is that lands closed to vehicular access, will deny them the pleasure of the National Forest and Public Lands. They are people because of diminished capabilities, from disease and age that cannot participate without use of motorized conveyance. Our feelings on this is a permit access for use of orv/atv transport of these persons, with limit of only use by them in a party. Assurances of material transport only - for the permit users. For use by certified disabled persons, this access should be free - for others it should be on a nominal payment basis. None - the - less it would give our disabled population recreational access to our Public Land.

The Council has also discussed the fact that payed users, have more say in the Public Land Issues, than what the non-paying public has had. It is felt that a reasonable fee system is not out of order. We also realize that surface management and resources are in the hands of the Forest Service and that the Bureau of Land Management has jurisdiction of the surface/sub-surface mineral management. The regulations found in 36 CFR and 43 CFR are sometimes conflicting and act in cross purposes. This makes it very hard for the hobby/recreational miners to stay knowledgeable of the rules. We would like to see one or the other agencies handle this issue - the resulting reduction of duplication would save some money in its management.

We support your preferred alternative Plan 2, with the addition of hobby/recreational rock and mineral criteria. Wholesale/commercial miners should have to acquire leases and comply with salable mineral regulations.

Respectfully
Ronald L Stockhoff
Ronald L Stockhoff, President
OC of R&MC Inc.

- 3) Visual ranking of headwaters of
The little Weiser River seems low.



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September 30, 1986

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

This format will provide needed detail and a more relevant method of comparison for alternatives with regard to mineral resources.

Thank you for the opportunity to comment on this document.

D'Arcy P. Banister
D'Arcy P. Banister

2 Enclosures

Dear Mr. Geier:

We recently reviewed the draft Cascade Resource Management Plan/ Environmental Impact Statement. Our concern is with the protection of archaeological and historic properties in the area. Our comments are as follows:

4.1 1. The document indicates that 17,524 acres will be transferred from federal ownership. Federal regulations require (36 CFR800) inventory and evaluation of archaeological and historic properties before transfer. Properties that are determined eligible for the National Register of Historic Places can be transferred out of federal ownership when proper protection measures are designed. Your statement on Page 56 indicating that the BLM will retain all eligible sites restricts your management options and probably should be modified.

2. We agree the eight sites proposed for nomination are eligible for the National Register and should be nominated.

4.2 3. The following areas in the Cascade Resource Area need Intensive Class III Inventories: all BLM lands along the upper end of Brownlee Reservoir; Crane Creek; all BLM lands in the Boise Basin.

All of these areas contain significant archaeological sites and all are being intensively collected or vandalized, if the reports and rumors are correct. Surveys in these areas should be done as soon as possible so we can determine which sites are significant and devise ways to protect them.

Thank you for the opportunity to comment.

Sincerely,
Thomas J. Green
THOMAS J. GREEN
Deputy State Historic
Preservation Officer

TJG:rm



United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

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October 2, 1986



U.S. Department of Transportation
Federal Aviation
Administration

6

Northwest Mountain Region
Colorado, Idaho, Montana,
Oregon, Utah, Washington,
Wyoming

17900 Pacific Highway South
C-60956
Seattle, Washington 98168

OCT 10 1986

Memorandum

To: Richard A. Geier, Cascade Area Manager--Boise District Office, Bureau of Land Management, Boise, Idaho

From: Supervisor--Minerals Involvement Section, Branch of Engineering Studies

Subject: Review of Draft Cascade Resource Management Plan and Environmental Impact Statement

A review of the subject document reveals a good analysis regarding the impact of preferred alternative management practices on mineral resources. All of the alternatives were analyzed with regard to their potential impact on the mineral resource base of the study area. Also, a good overview of the mineral base was given on pages 3-26 to 3-28. However, as not all Federal land has equal potential for mineral discovery, the statistics on page 31, 2-13, 2-15, and 2-61 are relatively meaningless. What is needed is an analysis of the various levels of mineral favorability with corresponding analysis of access limitations. It is necessary to develop the acreage charts to show total acres of each potential available and the percentage of each which will be affected under each alternative.

5.1

Example:

Potential Category*	Acreage	Alternative 1 % acres affected (by access category**)				Alternatives 2, 3, 4, etc.
		A	B	C	D	
I						
II						
III						
IV						
V						
Total of forest						

* Same as page J-10, appendices, Wallowa-Whitman National Forest DEIS (enclosed).

** Same as Beaverhead National Forest, Montana, Revised DEIS (enclosed).

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

Dear Mr. Geier:

We have reviewed your draft Cascade Resource Management Plan and Environmental Impact Statement and do not foresee any impact on aviation or its activities.

Thank you for the opportunity to comment on your proposal.

Sincerely,

Kenneth Thomasson
Kenneth Thomasson
Policy and Planning Officer



IDAHO PETROLEUM COUNCIL

Rocky Mountain Oil and Gas Association

ANDREW G. ANDERSON
EXECUTIVE DIRECTOR

Suite 614 416-618 Empire Building
205 W. 10th St.
Boise, Idaho 83702
Telephone 208-343-0456

MAIL ADDRESS
P.O. Box 547
Boise, Idaho 83701

October 14, 1986



IDAHO MUSEUM OF NATURAL HISTORY

Idaho State University
Campus Box 8096
Pocatello, Idaho 83209-0099

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Telephone (208) 236-3168

November 10, 1986

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

Dear Mr. Geier:

On behalf of the Idaho Petroleum Council, I would like to make the following points in commenting on the Cascade Resource Management Plan:

* We support the BLM's Preferred Alternative which would leave 94 percent of the Resource Area open to oil and gas leasing. It is important that access for energy and mineral activities be maintained with a minimum of constraints. However, there are some major flaws contained in the planning documents regarding the attention mineral resources have been afforded during the planning process.

7.1 On Page 57 of the Plan, you state that energy and mineral leasing is a discretionary action and that approval of an application for a lease is subject to an environmental analysis to determine whether any special stipulations are required to protect sensitive resources. You seem to be implying that separate environmental analyses will be prepared on individual leases as they are applied for by industry. It is our understanding that this approach is not in compliance with Bureau policy in Washington. Director Burford has testified on several occasions before Congress, on oil and gas leasing legislation, that this approach would be costly, time-consuming and impractical. The land management planning process should contain sufficient direction in order to make all leasing decisions within the Resource Area.

7.2 We believe that the minerals section of the plan should provide explicit direction as to how energy and mineral resources will be managed during the life of the plan. The Cascade RMP fails to provide specific information as to the location of significant potential existing in the RA for energy and mineral resources. Nor is there a map which provides information as to where you anticipate attaching special stipulations to leases. You should also provide information regarding the number of leases currently held in the RA as well as a discussion of any pending leases. This type of information is essential for companies when they are

ROCKY MOUNTAIN STATES - ENERGY RESOURCES FOR TODAY AND TOMORROW

ISU is An Equal Opportunity Employer

Mr. Geier

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trying to determine how their present or future operations may be affected by the proposed plan. Such information also provides the general public with an idea as to where these activities may take place and under what conditions.

* Even if more specific information is contained in the regional Oil and Gas Environmental Assessment, the planning documents should include, at minimum, the basic information required to evaluate how the plan impacts industry operations. We, therefore, encourage you to more fully integrate the Oil and Gas EA into the proposed planning documents.

7.3 We are concerned that the Cascade RMP may not provide adequate direction for the management of energy and mineral resources. For instance, we are concerned that there may be delays in the future when lease applications are filed because additional environmental documentation may be needed before an application is approved. It is possible that situations may arise where there is a conflict between surface and subsurface resources. You have stated that there are approximately 100,000 acres which have potential for oil and gas reserves. We are unsure as to whether you will consider the fact that in some cases energy and mineral resources may warrant priority consideration over surface resources in some situations.

7.4 In conclusion, we recommend you revise your final EIS to comply with the draft planning guidance for fluid minerals. For example, portions of 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. These guidelines should be identified in the plan with an explanation that they will be utilized when conflict resolutions are made.

Thank you for this opportunity to present our ideas on the Cascade Resource Management Plan.

Sincerely,

Andrew G. Anderson
ANDREW G. ANDERSON
Executive Director

AGA:jbt

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

Dear Mr. Geier:

The following comments and recommendations apply to the paleontologic resources sections of the "Cascade Draft Resource Management Plan and Draft Environmental Statement". They are based on the fact that the paleontologic resources of the area are essentially unknown.

1. Unfortunately, it is common practice throughout the United States for individuals and companies to not report, to destroy, and/or to bury paleontologic (and cultural) resources encountered during excavation activities. The primary reasons for this stem from fears that reporting of such resources will lead to work disruptions, excessive costs, and personnel layoffs. Such fears have been occasionally justified in the past, primarily with cultural resource finds. With this in mind, I recommend that all use permits which involve disturbance to soils, sediments, or rocks should include provisions which will encourage permittees to report paleontologic resources and which include major penalties (revocation of permit?) for knowingly destroying, reburial, or not reporting the discovery of such resources. For projects contracted out by the BLM, delays resulting from the reporting and evaluation of paleontologic materials could be treated as change orders so that they would not result in financial loss to the contractor or his employees.

2. For purposes of resource management, the primary points to be considered are that the paleontologic resources of the Cascade area are poorly known; that lack of documentation of paleontologic resources within any area cannot, in itself, be construed as evidence for a lack of such resources; that paleontologic resources are often undetectable in ground surveys; and that the only way to be certain of the presence or absence of scientifically significant paleontologic resources within any given area is intensive and expensive study. However, unlike cultural resources, the occurrence of paleontologic resources is constrained by mappable bodies of sediment or rock and the overall paleontologic potential of any given area can often be reasonably estimated from existing geologic maps and reference to pertinent literature. Thus, I recommend a management plan which I developed for private project EIR work in California.

Richard A. Geier

November 10, 1986

The first step is to develop a set of designations which describe the estimated probability that given rock units contain significant paleontologic resources. For example, granitic terrane would be designated as having no probability of containing fossils (but areas of sediment within granitic terrane would have a higher probability). Units such as the richly fossiliferous Hagerman beds would be ranked as almost certainly containing fossils, even in areas which have not yet been explored for fossils. These designations would then be applied to available geologic maps of the area and could be modified and refined as additional information becomes available. A separate designation would apply to areas of unknown geology.

Permit conditions and mitigation requirements would be tied to the probability designations. For example, permits for work in all areas having a map designation of no probability of encountering significant paleontologic resources would have only the minimum condition described in #1 above (reporting of encountered specimens). Permits applying to ground disturbance in areas with higher probabilities of encountering significant paleontologic resources would require additional measures. Permits for the most sensitive units may require preliminary field survey and monitoring by a qualified paleontologist.

In my opinion this approach will provide the maximum protection for fossils while minimizing costs to governmental agencies and to permittees. If you wish to explore this approach further, I will be pleased to provide assistance.

Sincerely,

William A. Kersten

William A. Kersten
Curator, Vertebrate Paleontology

WAA/ss

Nov. 12, 1986

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DICK GEIER, BLM
3446 DEERWALKER AVE
BOISE, ID 83705

I SUPPORT ALTERNATIVE C OF THE CASCADE
MANAGEMENT PLAN. I WOULD LIKE TO SEE WITH
MORE EMPHASIS ON WILDLIFE HABITAT IN BLM'S
MANAGEMENT.

Many riparian areas in the district are in
bad shape because of excessive grazing
pressure. I URGE YOU, AS PART OF THE
MANAGEMENT IN THIS DISTRICT, TO INVENTORY
RIPARIAN AREAS AND RECORD THEIR CURRENT CONDITION.
THIS INFORMATION WOULD PROVIDE A BASE TO
MEASURE FUTURE PROGRESS, OR LACK OF IT, IN
REHABILITATION OF RIPARIAN AREAS.

Rep. KEW ROBINSON
DISTRICT 19
1119 N. 12TH
BOISE ID 83702

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10.2 We have also identified two species, *Camassia cusickii* and *Primula cusickiana*, as category 3C plants and of some Federal concern even though they are no longer being considered for listing as threatened or endangered species. Should further research or changes in land use indicate significant decline in either of these taxa, they may be reevaluated for possible inclusion in category 1 or 2.

There are three other points that we wish to draw to your attention. First, we concur with the observation that reduced grazing enhances the growth and development of native plant species. Abuse of land by overgrazing results in the invasion of exotic species. This is usually followed by expenditures for noxious weed control, which could have been prevented if reasonable grazing practices had been used from the beginning.

Second, the BLM should recalculate the wildlife habitat allocation in the subject document and assess the numbers of acres of deer habitat that were destroyed by the fires this past summer. We understand that as much as 50 percent of the winter deer habitat may have been destroyed. An addition to the wildlife habitat allocation in consideration of habitat lost to fire is recommended.

10.3 Third, studies by the Walla Walla District of Corps of Engineers, the Idaho Department of Water Resources, and the College of Idaho under contract from the owner of Almaden Mine, have verified an elevated level of mercury in the Bear Creek watershed, a tributary to the Weiser River. Tailings from the Almaden mercury mine erode into Bear Creek. The mine area and Bear Creek watershed are administered by the BLM. We are concerned that migratory birds nesting in the wetland and riparian areas downstream from the tailings may be exposed to mercury poisoning. No studies have been done on possible mercury contamination of migratory birds using the watershed. The management plan and EIS should address this issue and propose mercury monitoring studies of migratory birds using the area.

John P. Wolflin
John P. Wolflin

cc: FWS, ES/BEC, Washington, D.C.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
BOISE FIELD OFFICE
4696 Overland Road, Room 576
Boise, Idaho 83705

November 14, 1986

TO: Richard A. Geier, Cascade Area Manager, Bureau of Land Management, Boise District, Boise, Idaho
FROM: John Wolflin, Field Supervisor, FWS, Boise Field Office, Boise, Idaho
SUBJECT: Draft Cascade Resource Management Plan/Environmental Impact Statement

We have reviewed the draft Cascade Resource Management Plan (Plan) and have limited our comments to federally listed candidate and endangered species.

General Comments

The document adequately addresses habitat requirements and maintenance for two federally listed species, the bald eagle and peregrine falcon. However, the document identifies only two candidate species, the Swainson's hawk and ferruginous hawk. Two other vertebrate species should be included in the document as candidate species, the Idaho ground squirrel and long-billed curlew (Federal Register, December 30, 1982, p. 58458).

Specific Comments

The plan provides excellent guidelines and habitat for managing the long-billed curlew. However, we could not find managements recommendations for the Idaho ground squirrel. We recommend that you contact Dr. Eric Yensen, College of Idaho, Caldwell, Idaho, for this information. As to comments and corrections on plant species, we reviewed the table found on page 3-8 of the draft Environmental Impact Statement. We recommend that the following table replace the one on page 3-8.

<i>Allium aaseae</i>	Category 1
<i>Astragalus milfordiae</i>	Category 2
<i>Haplopappus radiatus</i>	Category 2
<i>Carex aboriginum</i>	Category 2
<i>Camassia cusickii</i>	Category 3C
<i>Primula cusickiana</i>	Category 3C

We also found that *Primula cusickii* was identified in the report. We have no record of this species and assume it is *Primula cusickiana*.

Carex aboriginum is included in the report. It belongs as a Federal candidate species to category 2*. The 2* suggests the possible extinction of the taxa.

10.1

10.2



United States Department of the Interior

NATIONAL PARK SERVICE
Pacific Northwest Region
83 South King Street, Suite 212
Seattle, Washington 98104

IN REPLY REFER TO
L7619 (PHR-RE)
OES 86/35

NOV 14 1986

Memorandum

To: Cascade Area Manager, Bureau of Land Management, Boise, Idaho
From: Associate Regional Director, Recreation Resources and Professional Services, Pacific Northwest Region
Subject: Review of Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS)

Thank you for the opportunity to review and comment on the draft RMP and EIS. Our review has surfaced one concern regarding your recommendation that the South Fork Payette River be nominated for study as a recreational component of the Wild and Scenic Rivers System. It appears that the necessary studies have been completed to recommend to Congress that the river be designated as a component of the Wild and Scenic Rivers System. Your studies indicate that the river is both eligible and suitable and should be classified as recreational. We agree and believe that the requirements of the "Final Revised Guidelines for Eligibility, Classification and Management of River Areas," as published in the Federal Register, Vol. 47, No. 173, Tuesday, September 7, 1982, have been satisfied. Therefore, congressional designation should be recommended and no additional studies are necessary.

These comments are provided in accord with this Service's responsibility as custodian of the Nationwide River Inventory, which was prepared under authority of the Wild and Scenic Rivers Act. The South Fork Payette is included in the Inventory.

If you have any questions or wish to discuss this matter further, please contact Ron Hyra at FTS 399-5366.

Richard L. Winters
Richard L. Winters

11.1

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439 Styner Avenue
Moscow, Idaho 83843
November 14, 1986

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

Dear Mr. Geier:

It was a pleasure to review the Draft Resource Management Plan and Draft Environmental Impact Statement for the Cascade Resource Area. The report documents a tremendous amount of information and its synthesis and analysis. It is a great step forward in management of public lands of the Resource Area.

My particular interest is research natural areas. I have confined the following remarks to coverage and treatment of these areas.

We were pleased to see the inclusion of six proposed research natural areas in the Draft Plan and EIS. Roseley's and my letter to you of September 10, 1985 proposed designation of four of these areas and another, Summer Creek, was discussed in my letter to you of January 2, 1986. We strongly support designation of five of the six proposed RNA's. We do not support designation of Paraphyllus Rock as a research natural area, and we suggest that location and boundaries of two others, Summer Creek and Buckwheat Flat, could be improved. In addition, we suggest that rare plants should not be used as justification for Buckwheat Flats, Lost Basin Grassland, and Goodrich Creek. To our knowledge these areas do not contain rare plants. Following are comments concerning individual proposed RNA's.

Paraphyllus Rock

We do not believe that this area meets RNA criteria. Please see the 1977 publication, "A Directory of Research Natural Areas on Federal Lands of the United States of America", by the Federal Committee on Ecological Reserves. Pages 5-8 and 266-275 of that publication provide a good review of purposes, standards, and policy guidelines for research natural areas. Paraphyllus Rocks is a small area, badly disturbed by grazing, and with a ground cover of Medushead. Though it possibly contains squaw apple (we didn't find any squaw apple on a quick visit on September 18, 1986), we do not believe that this qualifies it for RNA designation.

12.1

Buckwheat Flats

The area shown on Map 4 was suggested by Roger Rosentretter prior to an examination of the general area by Robert Roseley and me on August 20, 1985. Using maps and notes supplied by Rosentretter, we located the Sage Creek area proposed as a RNA in our letter to you of September 10, 1985. We believe

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that the Sage Creek area is a better candidate RNA for the following reasons: (1) It contains greater diversity. Not only does the Sage Creek area contain undisturbed stands of *Eriogonum thymoides* but it also has slopes of bluebunch wheatgrass and areas of sagebrush and bitterbrush. (2) It probably is less subject to disturbance by livestock and man. Although the surrounding country is heavily grazed, the area we proposed receives little livestock use because of the steep slopes where the bluebunch wheatgrass occurs and a very rocky surface on the ridge where buckwheat is found. It is away from the highway and probably less subject to ORV and other human uses. (3) Although the proposed Sage Creek area is small (about 90 acres), it is larger than Buckwheat Flats and a bit closer to meeting RNA criteria.

12.2

Summer Creek

We suggest that you also reconsider the location and boundaries of this area. My letter of January 2, 1986 based on Elaine Hoover's recommendations, suggested an area that would include not only the two rare plants of Summer Creek but also vegetation types dominated by stiff sagebrush, mountain mahogany, bitterbrush, bluebunch wheatgrass, and Lomatium. We believe that plant diversity would be greater and that protection from livestock use would be easier.

12.3

Rare Plants in Proposed RNA's

We do not believe that occurrence of rare plants should be used as justification for the proposed Lost Basin Grassland, Goodrich Creek, or Buckwheat Flats (pages 12, 25, 2-9, 2-17, 2-26, 2-35, 2-44, 3-9, 4-5, 4-22, 4-41, 4-59, 4-79). To our knowledge none of these three areas contain rare plants. They do contain plant associations needed in a research natural area system to serve research and educational purposes and as baseline reference areas to determine effects of management practices in similar vegetation types.

12.4

We are pleased with your restrictions of activities in RNA's, and with the fire policy with respect to these areas. Exclusion of grazing, ORV use, timber cutting, powerline ROW's is necessary so that these areas will be representative of undisturbed conditions.

There are other plant communities and situations in the Cascade Resource Area that should be included in research natural areas. Needed are areas of *Xericensis* sagebrush, and mountain shrublands on the southeast slopes of the Hitt Mountains. We hope that we can cooperate with your people to find suitable areas that include these and other situations.

I appreciate the opportunity to review and comment on the Draft Plan and EIS.

Sincerely

Charles A. Wellner
Charles A. Wellner, Chairman
Idaho Natural Areas Coordinating Committee

-2-

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5210 N Black Cat Rd.
Meridian, ID 83442
November 17, 1986

Dirk Geier
BLM
3948 Development Dr.
Boise, ID 83705

Dear Sir:

I attended BLM's special meeting last night about the Cascade Resource management area plans. I don't think I know enough about the plan to really offer an opinion, but I trust that your group is doing all it can to walk the tightrope between special non-consumptive use and total closure. I only have a few thoughts.

1) It seems like these lands are being primarily maintained for livestock grazing. Do the ranchers pay fees for their grazing permits? Shouldn't they fund the monitoring programs which the management plans are based on?

2) I see a major global issue surfacing here in the elimination of native grasses. It seems like we have upset the delicate balance in the area with years of overgrazing. Now we have more frequent, larger range fires. Unless something is done to restore the balance, we'll be paying the price with charred areas, loss of wildlife habitat, firefighting bills and eventual destruction of the entire high desert grassland ecology. I hope these plans address the aims of the past and/or they can be modified.

Thank you for the opportunity to express my views.

Sincerely,

Paul Fodoran
Paul Fodoran

P.S. DO YOU HAVE INFORMATION ON VOLUNTEER BLM PROGRAMS?

14

JOHN R. SWANSON
P. O. Box 8524
Missoula, Mont. 59808
November 12, 1986

My name is John R. Swanson
3948 Development Avenue
Boise, Idaho 83705

I am a member of the Cascade Resource Area and I am interested in the management of the area. I am particularly interested in the management of the area and I am interested in the management of the area.

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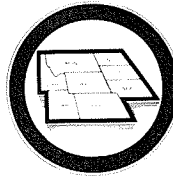


Forest Service

Intermountain Region 324 25th Street Ogden, UT 84401

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Reply to 1950 Date NOV 17 1986



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1860 Lincoln Street, Suite 404 - Denver, Colorado 80295 303/860-0099

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

Dear Mr. Brunner:

We have reviewed the Cascade Resource Management Plan for coordination concerns relative to management of the Boise National Forest.

Particular attention was given to proposed direction for lands immediately adjacent to National Forest lands. We found the direction to be consistent with what will be proposed in the Forest Land Management Plan. This includes the Bureau of Land Management's proposal for studying the South Fork Payette River from Garden Valley to Banks for Wild and Scenic River designation. Also, provisions for managing ORV travel are consistent with adjacent Forest direction.

We appreciate the opportunity to review the plan, and we look forward to working with the Bureau as we implement plans on the adjacent areas.

John P. Butt Director, Planning and Budget

November 19, 1986

Mr. Richard A. Geier Area Manager Cascade Resource Area Bureau of Land Management 3948 Development Avenue Boise, ID 83705

Dear Mr. Geier:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA) I am writing to offer our comments on the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Cascade Resource Area (RA). RMOGA is a trade association representing hundreds of members who account for more than 90% of the oil and gas exploration, production, and transportation activities in the Rocky Mountain West.

RMOGA supports the BLM's Preferred Alternative which proposes to make 94% of the Cascade RA available for oil and gas leasing. It is important that access for energy and mineral activities be maintained with minimum constraints, even in periods of low activity. We believe, however, that the treatment of minerals in the planning documents has some flaws which require correction or modification.

For example, on Page 57 of the RMP, the BLM states that energy and mineral leasing is a discretionary action and that approval of an application for a lease is subject to an environmental analysis to determine whether any special stipulations are required to protect sensitive resources. We believe this type of analysis should be included in the RMP; otherwise there would be no need to discuss minerals in the planning process. However, the BLM seems to be implying that separate environmental analyses will be prepared on individual leases as

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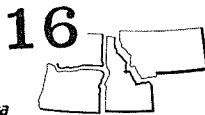
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Washington Oregon Idaho Montana



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November 19, 1986

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

page two

Richard Geier Cascade Area Manager BLM Boise District 3948 Development Ave. Boise, ID 83705

November 17, 1986

Dear Mr. Geier

The Cascade Area Resource Management Plan is to be commended for its recommendation of Wild & Scenic consideration for the Payette river and its South Fork. The draft plan and EIS err, however, in recommending further study for these river segments instead of recommending them to the President and Congress for designation. The Resource Management Planning process is the study on the eligibility and suitability of these rivers for Wild & Scenic designation.

I have attached correspondence in which the Regional Forester of Region Six of the Forest Service agrees that the Forest Planning process constitutes the Wild & Scenic study of rivers and the Forest Service will make recommendations for designation, rather than further study. Unless the BLM's planning process is somehow less capable or thorough than the Forest Service's, it should similarly be making recommendations for designation rather than further study.

Very Truly Yours,

Douglas A. North

Douglas A. North

they are applied for by industry. This approach is not in compliance with Bureau policy in Washington. Director Burford has testified on several occasions before Congress on oil and gas leasing legislation and has directly addressed this issue. It is our understanding that, according to Director Burford, the land management planning process should provide sufficient direction in order to make all leasing decisions within the Resource Area. We fully support this position.

We believe that the minerals section of the plan should provide explicit direction as to how energy and mineral resources will be managed during the life of the plan. The Cascade RMP fails to provide specific information as to the location of significant potential for energy and mineral resources. Nor is there a map which provides information as to where the BLM anticipates attaching special stipulations to leases. The BLM also failed to provide information regarding the number of leases currently held in the RA, as well as a discussion of any pending leases. This type of information is essential to companies in their efforts to determine how their present or future operations may be affected by the proposed plan. Such information also provides the general public with an idea as to where mineral activities may take place and under what conditions.

The BLM has indicated that an Oil and Gas Environmental Assessment (EA) on leasing was previously prepared which includes the Cascade Resource Area. Even if more specific information is contained in this EA, the planning documents should include the basic information and guidelines the BLM utilized in making planning decisions. We therefore encourage the BLM to more fully integrate the oil and gas leasing EA into the proposed planning documents if that document was the basis for the decisions contained in the proposed plan.

We are concerned that the Cascade RMP does not provide adequate direction for the management of energy and mineral resources. For instance, we are concerned that there may be future delays when lease applications are filed because additional environmental documentation may be needed before an application can be approved. It is possible that conflict situations may arise between surface and subsurface resources that the RMP has failed to address. Therefore, we recommend that the BLM revise the mineral portion of the plan to include a more in-depth analysis of the possible trade-offs involved between surface and subsurface resources. This analysis is important area-wide, but is of particular importance for the 100,000 acres identified by the BLM as having significant potential for oil and gas. During preparation of such an analysis, the BLM must recognize that in some situations energy and mineral resources may warrant priority consideration over surface resources. We believe these objectives can be met by utilizing the draft RMP Guidance for Fluid Minerals currently under BLM consideration.

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