

J. DAVID BRUNNER  
NOVEMBER 26, 1986  
PAGE 2

- 27.4 | ○ Avoidance areas be defined in the definition section, and areas within this definition, identified (General Boundaries) on a specific map. In any case, the conflict of definition between Map 6 and page 64 should be clarified.
- 27.5 | ○ That you identify the potential for a major transportation corridor in your RMP as set out in your BLM Organic Act Directive (OAD) 79-20 and its subsequent changes.

Your consideration and inclusion of our concerns and recommendations in your final RMP and EIS would be appreciated.

Sincerely,

*E. Dean Tisdale*  
E. DEAN TISDALE  
Director

EDT:CMR:sk

Richard A. Geier  
November 24, 1986  
Page 2

demonstrated by statistical sample that out of 73,626 noncompetitive and competitive leases issued for the states of Utah, Wyoming, New Mexico and Colorado, only 5,984 or 8.14 percent were actually drilled. This statistic demonstrates the impractical nature of attempting to complete environmental analysis before issuing leases since most leases will never be drilled thus wasting valuable agency time and efforts.

Another area of concern deals with Table 1 (page 49) listing the no occupancy time periods for wildlife habitat. While we recognize the need for some restrictions, a similar need exists for providing exceptions to no occupancy when the situation presents itself. Many times individual species may not be occupying critical range. If an operator desires to conduct operations in a given area, flexibility should be allowed to waive the restriction when justification can be given. We recommend that the restrictions presented on Table 1 contain a reference that modification to these restrictions for any period may be approved in writing by the authorized officer such as a Resource Area Manager.

In conclusion, we recommend that BLM revise its position relative to environmental documentation at the leasing stage and allow for flexibility in managing wildlife areas.

Thank you for considering our comments.

*Richard A. Geier*  
DRB/mgb

LTR718



Neil W. Allen  
Regional Environmental  
Safety and Utilization Manager

November 24, 1986

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

File: NWA-575-031

Cascade Draft Resource Management Plan  
and Draft Environmental Impact Statement

Amoco Production Company is a wholly owned subsidiary of Amoco Corporation, and is incorporated for the purpose of exploring for and developing oil and gas resources. The company is involved in the exploration of the federal mineral land base, and, as a result has great interest in the BLM planning process associated with public lands.

We support the 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 amount of constraints. However, there are some problems in the planning documents regarding the analysis mineral resources has received during the planning process.

28.1

One example of a concern can be found on Page 57 of the plan. Here the document 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 other resources. Does this mean that separate environmental analysis will be prepared on individual leases before they are issued? The Washington D.C. office of the BLM has on numerous occasions indicated that this process is very time consuming and costly. In a 1982 General Accounting Office report entitled "Are Leaseholders Adequately Exploring for Oil and Gas on Federal Lands?"

Amoco Production Company  
Denver Region  
1670 Broadway  
P.O. Box 800  
Denver, Colorado 80201  
303.630-4040



United States Department of the Interior

GEOLOGICAL SURVEY  
RESTON, VA. 22092

In Reply Refer To:  
WGS-Mat1 Stop 423

24

Memorandum

To: Cascade Area Manager, Bureau of Land Management,  
Boise, Idaho

From: Assistant Director for Engineering Geology

Subject: Review of draft Cascade Resource Management/Environmental  
statement for the Cascade Resource Area, Idaho

We have reviewed the statement as requested in your letter of August 21 included with the statement.

29.1

Page 4-88 of the draft statement indicates that 400 acres of Cascade Resource Area lands are to be sold for use as sanitary landfills: 80 acres in Ada County, 320 acres in Canyon County. This portion of the plan should be evaluated in more detail. Examination of map 2 and of maps of ground-water occurrence (e.g., Kinnison, P.T., 1955, A survey of the ground water of the State of Idaho: Idaho Bureau of Mines and Geology Pamphlet No. 103) suggest that the lands to be sold may be in ground-water recharge areas. The draft statement should indicate the location of the lands, discuss the geology and hydrology of the areas involved, assess the potential for impacts on ground water, and discuss mitigation possibilities.

*James F. Devine*  
James F. Devine

Copy to: District Chief, WRD, Boise, Idaho

30

November 25, 1986

Dick Geier  
Bureau of Land Management  
Cascade Resource Area  
3948 Development Ave.  
Boise, ID 83705

Dear Dick:

Reference our telephone conversation regarding the State-BLM land exchange program and your draft resource management plan.

You mentioned the Cascade District would not be able to do anything on land exchange until the resource management plan was approved. To avoid this delay in our land exchange program and to comply with the recently executed State/BLM Exchange Strategy Agreement, we suggest the State and BLM try to reach agreement on exchange for the Cascade District - which could then be incorporated into the Cascade Resource Management Plan.

30.1

I have attached a map showing the BLM lands the State is interested in acquiring and those lands the State is willing to dispose. It is a proposal - there may be State lands not identified the BLM may wish to acquire or lands shown in which you are not interested in exchanging. We did not list each subdivision and acreage. The total exchange acreage as shown on the map amounts to about 50,000 acres of each ownership.

The State/BLM exchange strategy agreement suggests that field offices develop exchange proposals and submit to headquarters no later than January 31. In order to meet this date, we suggest you review our proposal and lets' meet some time in December and see if we can jointly develop a proposal to be submitted by this January date.

Land exchange between our agencies has a past history of moving rather slowly. I see no reason we cannot work together to improve the process and get our exchange program completed in a relatively short time frame.

31

November 26, 1986

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

Dear Mr. Geier:

I am writing in regard to your proposed preferred alternative E which proposes a allowable cut of 1mm bd. foot.

We feel that the proposal is too low and would urge you to set a allowable sale volume of at least 2.9 mm bd. foot which is option D.

We feel that you have the acres of timber and growth to allow for the level of harvest which is needed to help support industries needs in this region. This level would not be a detriment to the other uses on BLM lands. Thank you.

Yours truly,

*Robert T. Coats*  
Robert T. Coats  
Forester

RTC/pm

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The Cascade District overlaps two State Supervisory Areas. For the most part, any questions on this proposal north of Township 10 North should be addressed to Bill Petzak, Area Supervisor, McCall, 634-7125. South of this Township line, questions should be addressed to me, 334-3488.

Dick, should you have any questions or if we can be of any assistance, feel free to contact Bill Petzak or myself.

Sincerely,

*Donald R. Stockton*  
DONALD R. STOCKTON  
Area Supervisor

DRS/slp

cc Bill Petzak  
Jay Biladeau, C.B.

32



INTERMOUNTAIN FOREST INDUSTRY ASSOCIATION

November 26, 1986

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

Dear Mr. Geier:

I appreciate the opportunity to review the draft Cascade Resource Management Plan and Environmental Impact Statement, and offer the following comments for your consideration.

In general, I found the plan's presentation of the resource management opportunities on the Cascade Resource Area to be concise, clear, and comprehensive. You are commended for an excellent job in this regard.

Since the members of the Intermountain Forest Industry Association are primarily engaged in the forest products industry, I will direct our comments to your management proposals for the timber resource. To put our remarks in perspective, I note that our association has been actively involved in development of Forest Service land management plans for the National Forests in southwestern Idaho. As an integral part of this effort, we have compiled timber supply and demand data for the southwestern Idaho market area. A summary of our analysis is enclosed for your consideration.

The southwestern Idaho timber market is characterized by several sources of timber supply, generally referenced as 1) Forest Service, 2) Private industrial, 3) Private non-industrial, and 4) Other public. Demand centers are the sawmills located in the numerous small communities of Boise, Gem, Adams and Valley counties. A critical examination of the timber supply and demand interactions in this market area indicates an alarming timber supply shortage. This situation is particularly exacerbated by the proposed management plans for the Boise and Payette National Forests.

Thus, we are most concerned that the proposed plan for the BLM's Cascade Resource Area does not provide for more active management of the available timber resource. Notably, the proposed plan does authorize timber management on 26,663 acres of the 31,895 acre commercial forest base. However, the rate of

32.1

harvest and intensity of management appears to be severely limited. The High Investment Management Alternative (Alternative D) authorizes timber management on fewer acres, but provides nearly three times the annual harvest as the proposed plan. Presumably, the acres assigned to timber management under Alternative D are the same acres assigned to timber management in the preferred Alternative D. Thus, we are puzzled by why the preferred alternative limits the Agency's flexibility to manage the timber resource on these lands in the same manner envisioned under Alternative D.

I am sure you are aware that the Secretary of Agriculture has recently asked the Forest Service to complete a timber supply and demand analysis for Idaho, including an assessment of the social and economic impact of proposed Forest Service plans on local dependent industries and communities. We believe that this study will substantiate the conclusions we have drawn from the Association's study of this situation as referenced above. Since the Forest Service study is expected to be released shortly, we would hope that the BLM will also consider the study results in the development of their plans and the selection of the final management proposal. Specifically, we suggest that the BLM plan for the Cascade Resource Area be modified to allow the opportunity to increase timber management levels on the 26,663 acres assigned to timber management. Although the timber resource inventory on the Cascade Resource Unit is admittedly quite small when compared to other inventories in the market area, we believe that it will be necessary to take full advantage of all management opportunities to avoid a major supply/demand imbalance in southwestern Idaho.

We sincerely appreciate this opportunity to comment and will be happy to meet with you as you consider preparing a final plan for the Cascade Resource Area, if it would be helpful to clarify our comments.

Sincerely,

James S. Riley  
James S. Riley  
Executive Vice President

November 27, 1986  
1914 North 20th  
Boise, Idaho 83702

Mr. Larry Woodard  
Associate State Director  
Bureau of Land Management  
Boise District  
3948 Development Avenue  
Boise, Idaho 83705

Re: Cascade Draft Resource Management Plan & DEIS

Dear Mr. Woodard:

Please enter these comments into the record on the BLM's proposed Cascade Draft Resource Management Plan and Draft Environmental Impact Statement (hereafter the "Plan") for the Boise District.

Preferred Alternative

I support Alternative C as a preferred alternative, principally because it will reduce grazing allotments and best protect important soil and watershed resources on the Cascade Resource Area. I do not agree with your rationale that Alternative E can increase grazing use 6% and still "meet the rangeland resource management objectives of maintaining or improving the soil, esthetic, wildlife, vegetation and watershed resources" (Plan, p.9).

While it is true that livestock production is part of the local economy, it is not the only component and the interests of these resource users are given unfair advantage in the Plan. I do not support continued gross public subsidy for vocal minority users and the simultaneous destruction of rangeland and watershed resources. Your Alternative E depends on livestock management and range improvements that in turn depend on federal funding year after year. Given the current trends in federal funding, there is no assurance you can or will carry out the improvements or that all of them will have the intended beneficial effects on range resources. The predicted increase in forage to support 6% more AUMs simply is not guaranteed. The range already is in terrible shape--the Plan itself shows only 35,123 acres as in either excellent or good condition while 406,644 acres are classified in fair or poor condition. Therefore the wisest course of management with our current funding climate is reduced grazing on the Cascade Resource Area.

Recreation

My particular concerns are with the recreational and rangeland resource mismanagement currently occurring on the Boise Front. I definitely support a 12,000 acre special management area on the Boise Front and urge improved management, including no transitory grazing, in the Hull's Gulch Nature Trail.

CASCADE RESOURCE MANAGEMENT PLAN COMMENTS

1408 Joyce Street  
Boise, Idaho 83706  
November 28, 1985

Dick Oster  
3948 Development Way  
Boise, Idaho 83705

Because of its concern for the protection and enhancement of the natural environment, I endorse Alternative C. It is especially important that Alternative C's increases in improved riparian and fisheries habitat be carried out. Also, we need to seek minimum stream flows. Areas of Critical Environmental Concern must be established for the long-billed curlew and for the Columbian sharp-tailed grouse. I support all six research natural areas. These areas should be closed to grazing, ORV activity, and mineral entry.

The BLM is to be applauded for recommending reductions in grazing the Crane Creek-Weiser River roadless area for Allotments 304 and 361. We must not let the fires of last summer be used as an excuse to increase grazing on BLM lands.

Unlike many of the BLM lands in Idaho, the Cascade District is readily accessible to much of our state's population. Recreation is therefore especially important for this area. I support the full 4500 acre Recreational River management along six miles of the North Fork and for eight miles of the Payette River. There is a need for a canoe launch site for the Middle Weiser River in the Midvale area. I urge you to acquire land for this purpose through trade or purchase. Likewise, Crane and Paddock reservoirs need to have land acquired and developed as campsites. We need "semi-primitive non-motorized" recreation in our high desert environment. The 7500-acre area between Crane Creek Reservoir and Weiser River should be designated as a Special Recreation Management Area, closed to motor vehicles, and have adequate deeded public access.

Finally, the Hull's Gulch Nature Trail, with its extensive public use, should serve as a shining example of good BLM recreational land management practices. A 500 foot corridor along it should be withdrawn from surface or subsurface right of ways, from mineral exploration or leasing, and from any domestic livestock grazing. For many people, this is the only close look at our desert lands; we want them to see the land at its unspoiled best.

Thank you for this opportunity to comment.

Sincerely,

Edwina Allen

Edwina Allen

33.1

Countless times I have seen ORV and motorcycle damage on and near Hull's Gulch. The disregard for a special area you have put much effort into is disgraceful; we must redouble efforts to continue this well-used recreational resource and teach the public about its specialness. This would include withdrawing it from mineral leasing and overhead and subsurface right of ways. The rest of the Boise Front needs similar attention to ORV and trail bike abuse. Runoff problems due to man-caused recreational erosion are increasing annually. Likewise, wildlife and plant abuse is abundant on the Boise Front and the BLM needs to take stronger action to channel the ORV users to appropriate and limited areas while restoring the rest of the front's soil waterholding capacity. Non-motorized recreation on the Boise Front is increasing and requires fuller support in the Plan.

Another area of special recreational concern are the Cascade Resource Area's river resources. You should establish a full 4500 acre Payette River Management Unit on the main and north forks of the Payette River. I would also like to see land exchange activities carried out for the Middle Weiser River to support increased boating use in the Midvale area. There is also a prime opportunity to build camp sites at Crane and Paddock Reservoirs. The plan should aggressively acquire lands, not just study the idea, to carry out such needed recreational improvements.

Riparian and Natural Areas

Minimum stream flows should be obtained by the BLM for Crane Creek below the reservoir. Alternative C's management objectives for fisheries and riparian habitat should be followed in the final Plan. I support your ACECs for the Columbian Sharp-Tailed Grouse Habitat Area, the Black Canyon Long-Billed Curlew Habitat Area and the Boise Front. In all three of these areas, severe restrictions on grazing and motorized activities must be implemented along with preventing future right of way grants to ensure the long term habitat in these special resource areas. The six Research Natural Areas need additional protection as well by eliminating grazing, ORV use and mineral entry on these units.

Fire Rehabilitation

34.1

I realize that the Plan was largely drafted before the 1986 fires destroyed rangeland and winter deer habitat in Willow Creek and Squaw Butte. Nonetheless, the final Plan should include sound range and habitat recovery steps and follow them with adequate monitoring for the next 20 years. Grazing definitely should be deferred for no less than two years on the burned range and reseeding should include a natural mix of forbes, sagebrush and fire resistant plants, not just crested wheatgrass. The soil needs immediate stabilization to prevent erosion and water quality problems. Upland game habitat and the winter mule deer habitat requires special attention and vigilance to bring the animal levels back just to the pre burn levels, let alone attain the increases the Plan had originally projected. Incorporating sound rehabilitation measures of the Emergency Fire Rehab Plan into the final Cascade RMP should be mandatory and should include explicit maps of what types

34.2

34.2 of seed will be planted and exactly where the seeding will occur.

Wilderness Area

I support final wilderness recommendation for Box Creek area studied in the Plan. Please be sure that this area is not omitted and that management practices in the coming months or years do not preclude or interfere with the roadless status of Box Creek. The remarks of Mr. Burford during his recent Boise visit about future BLM wilderness in Idaho were shocking and to say the least, inappropriate for the head of the agency which has the FLPMA congressional mandate to study rather than prejudicially speak out against wilderness.

I appreciate the opportunity to comment on the Cascade Plan and encourage significant changes in the Final Plan to adequately manage the public's resources in this portion of the Boise District.

Sincerely yours,

*Kay Hummel*  
Kay Hummel

cc: Honorable Cecil D. Andrus  
Congressman Larry Craig  
Senator James McClure

35.2

livestock grazing program. The final plan and EIS should describe the monitoring program in detail.

In addition, it appears that it would be more cost effective to approach range improvement through the technique of reducing AUMs rather than spending money on as yet undefined rehabilitation and monitoring efforts. The draft plan and the DEIS both should be redrafted to describe an alternative that proposes significant reductions in AUMs and compares the costs and benefits of doing so with those expected from monitoring and conducting rangeland improvement projects at public expense.

35.3

Riparian areas. The draft plan and DEIS give far too little consideration to the specifics of riparian habitat protection and improvement. The DEIS does not adequately explain which riparian areas are to be improved or how this is to be done. Nor is there an adequate explanation of the present locations of abused riparian areas. The EIS process demands that the public be given better information. Stream bank grazing activities should be eliminated.

Reseeding. The draft plan and the DEIS both fail to describe adequately the agency's reseeding plans in the Resource Area. However, it appears that most reseeding will be carried out for the benefit of livestock. You should specify more clearly the goals of your reseeding program. In my view, reseeding should be aimed primarily at restoring and improving wildlife habitat and restoring damaged watersheds while reducing the encroachment of annual grasses. Reseeding chiefly for cattle grazing, which appears to be your goal, likely does not fulfill your mandate to promote multiple use.

Off-road vehicles. The draft plan's proposal to allow ORV use in some of the research natural areas should be changed. ORV use is not acceptable in such areas unless specifically addressed and justified. Likewise, the draft plan and DEIS should describe each habitat containing rare, endangered or sensitive plants. It appears that the draft plan proposes to allow ORV use in some of these areas. If so, such use should be eliminated here as well. At the very least, the plan and EIS should describe whether such use is to be allowed, where it is to be allowed, and why.

Perhaps most fundamentally, the draft plan and DEIS should describe and justify an overall ORV program for the Resource Area which addresses the problems of erosion, damage to wildlife habitat, sensitive plant communities and recreation. In areas such as the Boise Front, ORV use should be significantly restricted or eliminated entirely. The DEIS should display an alternative prohibiting or near-total ORV use, except on

November 28, 1986

Mr. Larry L. Woodard  
Associate State Director  
Bureau of Land Management  
Boise District  
3948 Development Avenue  
Boise, ID 83705

RE: Draft RMP and DEIS for the  
Cascade Resource Area

Dear Mr. Woodard:

I have the following comments on the draft Cascade Resource Management Plan and the Draft Environmental Impact Statement:

35.1

Livestock grazing. The DEIS fails to display adequately the effects of the proposed increase in livestock grazing. The few sentences devoted to a description of these effects on pages 4-78 and 4-79 do not contain the information necessary for the public to make an informed judgment about what exactly is proposed in the livestock grazing program and what the effects of the program will be. The information on these subjects should be expanded to show, in specific terms, how much seeding will be involved in the program, how much land will be moved from one vegetative condition class to another, what type of "improvements" are projected and what their effects will be. Also, you should more clearly describe the present overall range condition and compare that with the expected overall condition that will result from your proposed program. Your goals for the range do not appear to comport with the requirements of federal law respecting the maintenance and improvement of the condition of the public rangelands.

Neither the draft RMP nor the DEIS contains an adequate description of the monitoring techniques that you may be considering. Maintaining a vigorous and realistic monitoring program, and the flexibility to change grazing practices when the monitoring uncovers problems, is critical to the entire

35.4

established roads, on the Boise Front and other areas which have been particularly abused or which are especially vulnerable.

The Boise Front. Neither the plan nor the DEIS adequately addresses the Boise Front, an area which has suffered some of the most glaring land abuses in the entire Resource Area. Large portions of the public lands on the Boise Front continue to decline in quality and contribute to increased erosion and the public costs that go along with it, including sedimentation of streams, loss of wildlife habitat and the spread of noxious weeds. The Resource Management Plan should include a more extensive program to revegetate and protect the Boise Front. Of particular importance is the need to restore year-round flows in those streams from the Boise Front which have been rendered intermittent by poor land management practices. While I applaud the efforts the BLM has undertaken in the Hull's Gulch area, these efforts should be extended. The agency should make a greater effort to educate the public about the Hull's Gulch restoration project and the importance of keeping ORVs out of the area.

Wild and scenic rivers. The draft plan and DEIS give no justification for merely recommending certain rivers for further study to determine whether they should be recommended as wild, scenic or recreational rivers. The draft plan is the study. The South Fork of the Payette River should be proposed to Congress for scenic or recreational status.

35.5

Wildlife habitat. The draft plan proposes that wildlife habitat will experience only a negligible improvement over the planning cycle. This approach does not appear to comport with your statutory duty to manage the public lands for multiple use or to improve the productivity of the public lands in the Resource Area for wildlife and related purposes. The draft plan and DEIS demonstrate an imbalance in favor of livestock grazing and against wildlife. The plan should be redrafted to place wildlife and other multiple uses on at least an equal footing with livestock grazing.

Fire rehabilitation. The draft plan and DEIS should be redrafted -- or a supplemental DEIS should be issued -- on the BLM's fire rehabilitation plan for the Squaw Butte region which burned last summer. The fires have significantly affected both the RMP's grazing and wildlife programs. The public should have an opportunity to comment on how the BLM intends to restore these areas, how you plan to keep livestock off reseeded areas for a proper period of time, what type of seed will be used in any follow-up seeding next year, and so forth.



**Research Natural Areas.** I applaud your proposed designation of research natural areas in the Resource Area. However, as pointed out above, they should be given more protection from ORV use and other activities that could destroy their value for such designation.

Very truly yours,

*Jeff Fereday*

Jeffrey C. Fereday

November 28, 1986

JCF:tg

Mr. Richard A. Geier  
Cascade Area Manager, BLM  
Boise District Office  
3948 Development Avenue  
Boise, ID 83705

Re: Draft Cascade Resource Management Plan/EIS

Dear Mr. Geier:

Idaho Department of Fish and Game personnel have reviewed the Cascade Draft Resource Management Plan and Draft Environmental Impact Statement. We offer the following recommendations, comments and questions for your consideration.

Comments are separated into two categories, general and specific. Similar concerns and questions from various parts of the documents are consolidated to aid you in developing your responses.

Specific Comments

- 37.1 1. Page 9 - 3rd and 5th Paragraphs - If there is "Limited Potential" to improve range conditions due to the reasons listed in Paragraph 3 and the intention is to shift intensive management to higher precipitation zones (Paragraph 5), what safeguards are planned to maintain condition class in these restricted areas of good range condition?
- 37.2 2. Page 47 - 4th Paragraph - What plant species are proposed to be seeded for wildlife? Are sources available for the "shrub, forb and grass seed mixture that are normally found in that type of ecological zone/type"?
- 37.3 3. Page 51 - Sage Grouse - What plant species are planned for seedings designed to improve sage grouse brooding ranges?

EQUAL OPPORTUNITY EMPLOYER



Boise Cascade

**Timber and Wood Products Group**

Forestry and Logging  
P.O. Box 652  
Cascade, Idaho 83611  
208/382-4888

November 26, 1986

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

Dear Richard:

I prefer Alternative 'D' (High Investment), as the best management approach on BLM Lands in the Cascade Resource Area. A higher level of timber management activity enhances many of the other multiple uses besides providing a return to the treasury.

The main reason I support a higher harvest level on BLM Lands is because of a major reduction in the USFS Cascade Ranger Dist. allowable cut to 8.0MMBF per year. The Cascade Ranger District historically has produced 15-20 MMBF per year and because of the withdrawal from the South Fork Salmon River timber activities, the void in volume has left the Cascade mill in a precarious position. Timber volume coming from BLM Lands in this area would be a welcome augmentation to what we are presently getting.

Many of the BLM Lands are adjacent to Boise Cascade lands which are already being managed intensively for timber production as well as the other multiple use activities.

Thank you for the opportunity to input.

Sincerely,

*Lynn House*

Lynn House  
Dist. Logging Mgr.

LH/bc



Mr. Richard Geier  
November 28, 1986  
Page 2

- 37.4 5. Pages 4-5, 4-23, 4-42, 4-60 and 4-80 - It is not possible to determine from the maps or information supplied, where the 1-2 miles of "unsurveyed perennial habitat" are located or why this valuable public land is proposed for transfer to private ownership.
- 37.5 6. Page 4-97 - Paragraph 5 - The Department would like to see a listing of which 17,524 acres of wildlife habitat would be modified to the extent that they are listed under Irreversible and Irretrievable Commitments of Resources.
- 37.6 7. Part 2 - Pages ii, iv, vi, vii and ix - The Department sees no reason why the entire 14 mile reach of the Payette River listed in Alternative C cannot be recommended for Wild and Scenic Recreation River Study in all of the proposed alternatives.
- 37.7 8. Page 33 - 1st Paragraph - Hungarian partridge is no longer the accepted name for this species -- Gray partridge is preferred.
- 37.7 9. Page 65 - 2nd Paragraph - It is unclear what "maximum opportunity for survival to occur" means.
- 37.8 10. Part 2 - Pages iii, iv, vi, vii and ix - It does not appear reasonable to expect recreation-related earnings and employment to be the same under all alternatives.
- 37.8 11. Page 2-45 - Wildlife Resource Objectives - An explanation of how 185,650 acres of sage grouse brooding and nesting habitat will be improved is needed. What plant species will be seeded to improve the 23,912 acres of wildlife habitat as planned?
- 37.9 12. Page 4-81 - Paragraph 4 - Wildlife concerns (hunter access, elk calving, etc.) should also be considered as reasons for post-logging road closures.
- 37.9 13. Page 4-87 - Paragraph 1 - We suggest that commercial varieties of crested wheat grass, etc. which have growth characteristics that are not detrimental to long-billed curlew be used in all seedings in the Black Canyon SRMA.

37



38

NOV 25 1986

Mr. Richard Geier  
November 28, 1986  
Page 3

- 37.10 14. We found no mention of the Idaho Ground Squirrel in these documents. We suggest that the final report by Eric Yensen on the Taxonomy, Distribution, and Population Status of the Idaho Ground Squirrel as prepared for the Nongame Species Program, Idaho Department of Fish and Game, 30 January 1985 be used to manage this species. Given its status as a Species of Special Concern, its needs should be addressed.
- 37.11 15. Page 3-12 - Aquatic Environment - Paragraph 3 - White sturgeon do exist in the free-flowing reaches of the Snake River above Brownlee Reservoir. This habitat is of unknown quality, but sturgeon are known to be present.
- 37.12 16. Page 3 - Several Issue Questions such as 1, 2, 5, 6, 7 and 9 do not appear to be answered or are not sufficiently answered in the plan. The RMP action contemplated section apparently is your approach to answering these questions. Can a realistic plan be developed at this stage without this information? This section is confusing as to what has been and what will be done.

General

- 37.13 1. The implementation of the grazing portion of the RMP and meeting the goals of the wildlife, fisheries and riparian plans are all dependent on monitoring. Based on your experience with past funding problems for monitoring, is it reasonable to expect that sufficient funding will be available for monitoring, and if not are alternative management plans developed that do not rely on monitoring?
- 2. How will the fires that burned during August of 1986 affect the plan? How will the necessary changes in the plan be made available for public review? Will management emphasis be changed from unburned to burned areas? Will wildlife and livestock monitoring be shifted to the burned areas? Will you be able to meet the wildlife habitat improvement goals and still rehabilitate the burned areas?

The recent fires open innumerable questions as to the Cascade Resource Management Plan and we suggest that the Final Environmental Impact Statement and Management Plan cover the changes in depth. The wildlife habitat losses were of such magnitude and importance that we strongly recommend that the Squaw Butte area be listed as an Area of Critical Environmental Concern.

37.14

REPLY TO  
ATTN OF M/S 443

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

Dear Mr. Geier:

The Environmental Protection Agency (EPA) has reviewed the draft Cascade Resource Management Plan/Environmental Impact Statement (RMP/EIS) prepared by your office. The RMP/EIS evaluates five alternatives for management of 487,466 acres of BLM-administered lands in the Cascade Resource Area of west-central Idaho. Our review was conducted in accordance with the National Environmental Policy Act, and our responsibilities under Section 309 of the Clean Air Act.

We have rated the draft RMP/EIS as E0-2 (Environmental Objections-Insufficient Information). An explanation of the EPA rating system for draft EISs is enclosed for your reference. This rating and a summary of our comments will be published in the Federal Register.

Our primary concern is the potential for impacts to occur to water quality and beneficial uses under the BLM-preferred Alternative E. A variety of water quality problems exist in portions of the Cascade Resource Area. In particular, significant sedimentation of instream habitat has occurred as a result of livestock grazing, forest practices, and ORV use. The draft EIS predicts a 2 percent further increase in the rate of erosion Area-wide under Alternative E. Although this may seem to be a small percentage, the draft EIS notes that over one-third of the streams recently surveyed (8 of 21) exhibited "excessive" sedimentation. Further increases will exacerbate cumulative effects in this area of highly intermingled ownership, and do not appear to be justifiable.

After careful consideration, we recommend redesignation of Alternative C as preferred in the Final EIS. Nonpoint source pollution, with subsequent degradation of water quality and beneficial uses, is the primary concern leading to this recommendation. Alternative C is the only alternative that would result in an overall reduction in erosion and instream sedimentation rates while also reducing other types of water quality problems.

In addition, we are interested that the monitoring plans to be developed will be clearly capable of detecting adverse impacts before they become significant. We have recently been discussing monitoring needs with the BLM Idaho State Office in this regard. Consistent with these discussions, we would appreciate the opportunity to review the draft monitoring plans as they are developed.

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Mr. Richard Geier  
November 28, 1986  
Page 4

- 37.15 3. We are extremely concerned with the proposal to exchange or sell 17,524 acres of land. Especially since 4,660 acres are listed as crucial elk habitat and 6,690 acres are listed as crucial mule deer winter range and an unknown number of acres supply habitat for other game and nongame species. What were the criteria for selecting these acres? Where are they located?

The Department views isolated BLM lands near Pickles Butte, Map Rock Road, Walters Ferry and elsewhere as important wildlife habitat because of the upland game winter habitat they provide. Their value as winter habitat for upland birds is much greater than their size would indicate.

Page 4-82 Wildlife-Elk and 4-83 Wildlife-Mule Deer - In both sections the statement is made that the exchange will be for lands of "equal or greater wildlife value". Since the locations of State and private lands to be exchanged are not delineated there is no basis for that statement. In addition, the management direction of the BLM and the State of Idaho Department of Lands is vastly different. While BLM lands are required to be managed under multiple use criteria, the direction for State lands is to manage its lands for the greatest return to the school fund. We suspect that the State lands being considered for exchange are State school sections currently within BLM lands and are being managed under multiple use criteria. We believe such an exchange of crucial wildlife habitat will be detrimental to wildlife populations and to the Department meeting its goals for wildlife management.

If this document is to be used as a "decision document" to decide the fate of the lands as listed on Map E Alternative E (Preferred), then we suggest that the RMP and EIS are deficient in listing the environmental effects of such exchanges or sales.

The Department is opposed to the transfer of crucial or critical wildlife habitats from public ownership.

Thank you for the opportunity to comment.

Sincerely,

*Stacy Gebhards*  
Stacy Gebhards  
Regional Supervisor  
Region 3/Boise

Our nonpoint source and monitoring concerns are discussed more specifically in the enclosed detailed comments. Other comments are also provided with the intent of assisting you in finalizing the RMP/EIS.

Thank you for the opportunity to review the draft RMP/EIS. Once you have had the chance to consider these comments, we will be contacting your staff to offer our assistance during the finalization process. In the meantime, if there are any questions, please contact Mr. Brian Ross of our EIS and Energy Review Section at (206) 442-8516 (FTS 399-8516).

Sincerely,

*Robert S. Burd*  
Robert S. Burd  
Director, Water Division

Enclosures

- cc: BLM (Idaho and Oregon/Washington State Directors)
- USFS (R-4, Payette NF, Boise NF)
- USFWS
- NMFS
- IDHW
- IDFG
- TWS
- SC
- IELC