Chapter 5

Consultation, Coordination, Consistency, and Comments and Responses

Introduction.

The Bureau of Land Management coordinated with Federally recognized tribes, representatives of various agencies, businesses, and organizations, and members of the general public throughout the planning process for the Challis RMP. ***Chapter 5*** provides details of those efforts in the following chapter sections: (a) consultation; (b) coordination (c) consistency efforts and determinations; (d) agencies, organizations, and persons who will be sent a copy of the Proposed RMP/Final EIS, and (e) comment letters and responses. Further information on tribal and public involvement during preparation of the Challis RMP is documented in the **Planning Record** (available for review at the Salmon Field Office, Highway 93 South, Salmon, Idaho).

Consultation.

Consultation with the Shoshone-Bannock Tribes:

The sovereign status of Indian tribes and special provisions of law set Native Americans apart from all other U.S. populations and define a special level of Federal agency responsibility to consult tribes on a government-to-government basis. The BLM has the responsibility to identify and consider how its plans, projects, programs, or activities may potentially impact Native American interests, including Indian trust resources and cultural resources.

The lands presently managed by the Challis Resource Area were transferred to the United States government by the Shoshone-Bannock Tribes through the signing of the *Treaty with the Eastern Band Shoshoni and Bannock* ("Fort Bridger Treaty") in 1868. Through treaty language, the Shoshone-Bannock tribal members retain legal rights to hunt, fish, and gather natural resources ("to obtain wild food") on public lands within the Challis Resource Area (Article 4 of the *Treaty with the Eastern Band Shoshoni and Bannock, 1868*; as clarified in *State v. Tinno* (1972)). Representatives of the Shoshone-Bannock Tribes were consulted during development of the Challis RMP to ensure that the Tribes' treaty rights and traditional cultural values are protected.

Consultation with the National Marine Fisheries Service and U.S. Fish and Wildlife Service:

In the spring of 1997 the BLM received concurrence on the Biological Assessment (BA) for the Challis Draft RMP - Preferred Alternative from the National Marine Fisheries Service (NMFS) and the U.S. Fish and Wildlife Service. In 1998 the BLM re-initiated consultation with these agencies and prepared a Biological Assessment for the Challis Proposed RMP because (a) several species had been listed as threatened since the agencies concurred with the BA for the Draft RMP, and (b) the Proposed RMP was somewhat different from the Draft RMP - Preferred Alternative. The BLM has received concurrence from the NMFS and the U.S. Fish and Wildlife Service on the BA for the Proposed RMP.

Coordination.

Tribal and public participation efforts which were implemented prior to publication of the Challis Draft RMP/EIS are described in the Draft RMP/EIS on pages 335-341. The following paragraphs summarize the tribal and public participation from publication of the Draft RMP/EIS until publication of the Proposed RMP/Final EIS.

In August 1996 the Challis Draft RMP/EIS was distributed to those individuals and representatives of Indian tribes, the media, government agencies, businesses, and special interest organizations who have, in the past, expressed an interest in land use planning in the Challis Resource Area. A "Notice of Availability" of the Draft RMP/EIS was published in the *Federal Register* by the BLM on Friday, August 2, 1996 and by the Environmental Protection Agency on Friday, August 9, 1996. Open-house style meetings were held at the BLM's Challis Field Station in Challis, Idaho on October 1 and 2, 1996 to discuss the Draft RMP/EIS and receive comments.

The original 90-day public comment period for the Draft RMP/EIS was scheduled to end on Thursday, November 21, 1996. However, based on requests by members of the public, the comment period was extended by 46 days to Monday, January 6, 1997. Notice of that extension was published by the BLM in the Friday, November 1, 1996 edition of the *Federal Register.* In addition, a general mailing explaining the comment period extension was sent to all persons and agencies who had received a copy of the Draft RMP/EIS. Finally, the amended comment period deadline was announced through the local media.

The BLM reviewed the written comments on the Challis Draft RMP/EIS which were submitted, and prepared responses to those letters. Photo-reduced copies of the original comment letters and the BLM's responses are shown beginning on page 457.

Involvement of the Challis Experimental Stewardship Program (ESP):

The Challis Experimental Stewardship Program (ESP) was authorized under Section 12 of the Public Rangeland Improvement Act of 1978 (PRIA) (43 USC 1908) to "...develop and implement, on an experimental basis on selected areas of the public rangelands which are representative of the broad spectrum of range conditions, trends, and forage values, a program which provides incentives to, or rewards for, the holders of grazing permits and leases whose stewardship results in an improvement of the range condition of lands under permit or lease. Such a program shall explore innovative grazing management policies and systems which might provide incentives to improve range conditions." The Challis ESP, as well as other organizations and individuals interested in management of the public resources, including, but not limited to, rangelands, were invited to participate in the development of the Challis RMP. Briefings and updates concerning development of the RMP were a routine agenda item for meetings of the Challis ESP Group.

Consistency Efforts and Determinations.

The BLM has reviewed the Challis Proposed RMP and believes the Plan is consistent with the officially approved or adopted resource-related plans, policies, and programs of other Federal agencies, State and local governments, and Indian tribes.

Agencies, Organizations, and Persons to Whom a Copy of the Challis Proposed RMP/Final EIS Will Be Sent.

Shown below is a partial list of the tribes, agencies, organizations, and persons who will be sent a copy of the Challis Proposed RMP/Final EIS.

Federal Agencies

U.S. Fish and Wildlife Service
National Marine Fisheries Service
National Park Service
Minerals Management Service
U.S. Geological Survey
U.S. Air Force
U.S. Army Corps of Engineers
U.S. Department of Energy
Environmental Protection Agency
Advisory Council on Historic Preservation
USDI Office of Environmental Policy
USDI Office of Communications
USDI Natural Resources Library
Director, Bureau of Land Management
Bureau of Reclamation
U.S. Forest Service

Native American Tribes:

Northwestern Band of the Shoshoni
The Shoshone-Bannock Tribes

State and Local Government:

Custer County Extension Agent
Lemhi County Extension Agent
Challis Chamber of Commerce
Mackay Public Library
Salmon City Mayor
Butte Soil & Water Conservation District
Lemhi Soil & Water Conservation District
ID Department of Water Resources
ID Department of Lands
ID Department of Health and Welfare
Idaho State Library
Idaho State Historical Society, SHPO
ID Department of Fish & Game
ID Department of Lands
ID Department of Agriculture
ID Department of Transportation
Office of the Governor, Idaho
Natural Resource Conservation Service

Congressional and Legislative Offices:

Larry Craig, U.S. Senator
Mike Crapo, U.S. Congressman
Dirk Kempthorne, U.S. Senator
Lenore Hardy Barrett, State Representative

Businesses, Media, Interest Groups, Other Organizations, Livestock and Recreation Permittees, and Individuals:

In addition to the specific businesses, interest groups, media contacts, other organizations, and livestock and recreation permittees listed below, more than 100 individuals will be sent a copy of the Challis PRMP/FEIS.

Horse Creek Outfitters
C&S River, Inc.
Outlaw Outfitters
4-4 Outfitters
Bill Mason Outfitters
L-B Fishing & Guide Service
Sawtooth Guide Service
White Cloud Outfitters
Hatch Livestock
Chamberlain Ranch
Prairie Basin Ranches
Moen Family Ranch
Circle PI Ranch
Bar G Farms
Aslett Ranches
Whitworth Ranches, Inc.
Sulphur Creek Livestock Co.
Dickey Livestock
Bar 13 LTD
Spur Cattle
Rena Ranch
Piva Brothers
Winter Camp Cattle Co.
D & L
Parsons Creek, Inc.
Idaho State University
Boulder-White Clouds Council, Inc.
Challis Creek Cattle Co.
Utah Power & Light
Alliance for the Wild Rockies
University of Idaho
Animal Welfare Institute
The Nature Conservancy
Churndasher Ranch
Greystone
Minerals Exploration Coalition
Thompson Creek Mining Co.
Mountain Springs Ranch
O'Neal Ranches
Chester Plumbing
Challis Messenger
Broebeck Phleger & Harrison
Natural Resource Defense Council
Idaho Conservation League
National Wildlife Federation
The Wilderness Society
Idaho Watersheds Project

Comment Letters and Responses.

Written comment letters on the Draft RMP/EIS were reviewed by the Challis Resource Area - BLM Planning Team (see *Table 1-1: List of Preparers*, pp. 15-16) according to criteria described in BLM Manual H-1790-1 (National Environmental Policy Act Handbook) on pages V-11 and V-12. This BLM Manual guidance is based upon implementing regulations set forth in 40 CFR 1502.19, 1503.3, 1503.4, and 1506.6. (Also see Department of Interior Manual 516 DM 4.17.) Comments were considered to be one or more of the following general types:

(a) *Comments on inaccuracies and discrepancies* - which generally identified inaccuracies or discrepancies in factual information, data, or analysis.

(b) *Comments on the adequacy of the analysis* - which expressed a professional disagreement with the conclusions or adequacy of the analysis.

(c) *Comments which identify new impacts, alternatives, or mitigation measures* which were not addressed in the Draft RMP/EIS.

(d) *Comments which disagree with determinations regarding the significance and/or severity of impacts.*

(e) *Comments which express the commentor's personal preference or opinion* on the proposal.

The following pages contain photo-reduced copies of the original comment letters on the Challis Draft RMP/EIS and the BLM's responses to those comments. Personal information (such as names, addresses, telephone numbers, and fax numbers) has been opaqued from comment letters submitted by individual respondents, in order to protect those individuals' privacy interests, while still making comments available to the public. This information is withheld in accordance with BLM guidance interpreting Exemption 6 of the Freedom of Information Act.

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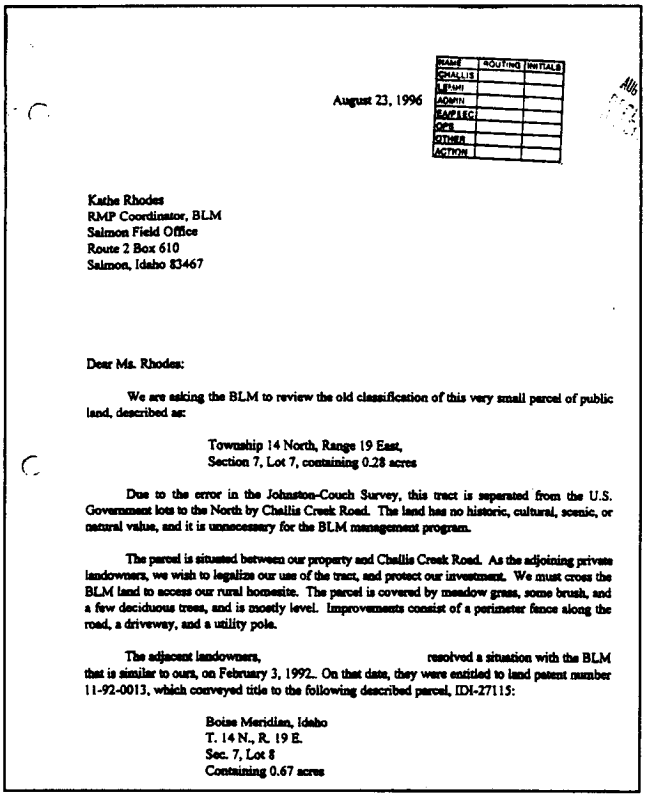
Comment Letters and Responses

Letter No. 1



August 23, 1996

NAME	ROUTING	INITIALS
CHALLIS		
LEWIS		
ADMIN		
EA/PLEC		
OPS		
OTHER		
ACTION		

Kathe Rhodes
RMP Coordinator, BLM
Salmon Field Office
Route 2 Box 610
Salmon, Idaho 83467

Dear Ms. Rhodes:

We are asking the BLM to review the old classification of this very small parcel of public land, described as:

Township 14 North, Range 19 East,
Section 7, Lot 7, containing 0.28 acres

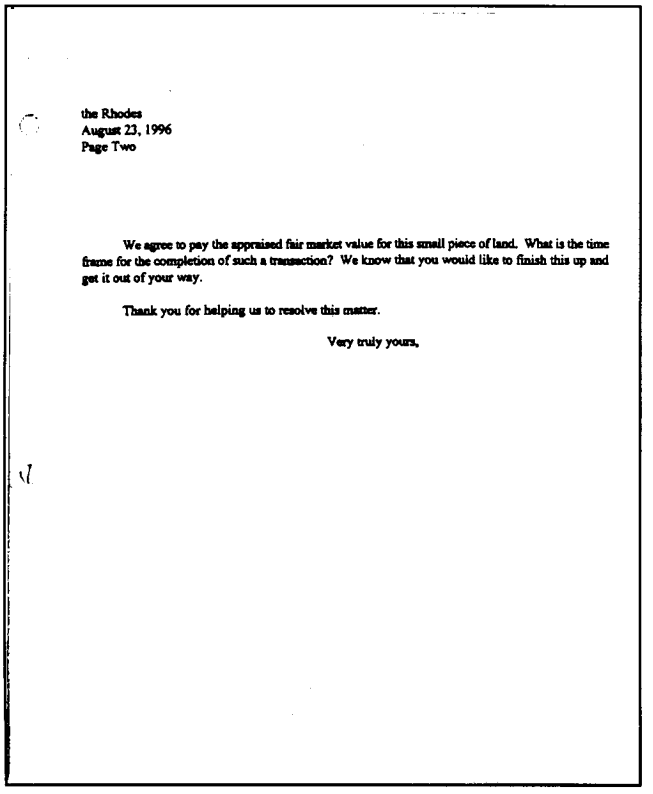
Due to the error in the Johnston-Couch Survey, this tract is separated from the U.S. Government lots to the North by Challis Creek Road. The land has no historic, cultural, scenic, or natural value, and it is unnecessary for the BLM management program.

The parcel is situated between our property and Challis Creek Road. As the adjoining private landowners, we wish to legalize our use of the tract, and protect our investment. We must cross the BLM land to access our rural homesite. The parcel is covered by meadow grass, some brush, and a few deciduous trees, and is mostly level. Improvements consist of a perimeter fence along the road, a driveway, and a utility pole.

The adjacent landowners, resolved a situation with the BLM that is similar to ours, on February 3, 1992. On that date, they were entitled to land patent number 11-92-0013, which conveyed title to the following described parcel, IDI-27115:

Boise Meridian, Idaho
T. 14 N., R. 19 E.
Sec. 7, Lot 8
Containing 0.67 acres

Letter No. 1 *continued*



the Rhodes
August 23, 1996
Page Two

We agree to pay the appraised fair market value for this small piece of land. What is the time frame for the completion of such a transaction? We know that you would like to finish this up and get it out of your way.

Thank you for helping us to resolve this matter.

Very truly yours,

BLM Response to Letter No. 1

1-1: The BLM public lands you are interested in acquiring (T14N, R19E, Section 7, Lot 7) were proposed for consideration as a sale tract under Alternatives 2 and 3 of the Draft RMP (see Attachment 17, p. 499). This sale tract has been listed in the Proposed RMP for potential disposal (see PRMP, Attachment 17).

Letter No. 2

To: Kathe Rhodes

From:

Subject: Resource Management Plan

Our property was established by a 1916 survey of section 25. Then in 1963, according to a new survey, our property lines were off apx. 1 1/5 acres on which our home and well were established. Reference:(T.8N., R.20 E., section 25.)
A land sale of .97 acres was made in 1995. Reference: 2710 IDI-30625. Lot 1, T. 8N., R. 20 E., section 25.

1 I would like to propose a land trade for the apx. 1/2 acre left. Reference: (T:8N., R.20E., section 25: SWSWSWNWSE).
I am willing to trade River Front Property, valued apx. $11,000 to $15,000 an acre. Reference:(T.8N., R.20E., section 25: NWSWSE).
The public would benefit from this trade inasmuch as there is sportmans' access, several species of mature trees, natural grasses, willows, and flowers. Deer, Elk, Moose, and a Black Bear have personally been seen on or near this riparian habitat. Fishing is at a premium for Rainbow, Brook, and Whitefish. The Otter is present also.
There are several campsites to the East for about 3 miles along the river that are used frequently.
May I present three proposals:

2 ____First: I would like to trade my 1/8 of an acre of river front for the apx. 1/2 acre of Dry Land Grazing. I would have to have apx. 6 more acres to the North and East of Lot 1 that would make it an aliquot part trade based on $11,000, if that is the price we settle on for river front value. Reference:(T.8N., R.20E., section 25: SWSWSWNWSE).
____Second: I would like to trade 10 acres, apx., of River Front Property. Reference:(T8N., R.20E., section 25: NWSWSE), for an aliquot part of Dry Land Grazing in section 35, in section 2 and 3 of T7N. R.20E. I am interested in this arid Dry Land Grazing parcel for the improvements that would benefit the Wildlife and Public. The BLM cannot manage this parcel because it is only accessible over a private bridge and through a locked gate. I have the intention of removing the Sage Brush and planting with good productive arid grasses and trees. Elk and Deer could forage on this land as a benefit to the Upland Game Herds.

3 ____Third: If the BLM is not interested in a land trade, I would like to sell the ten acres, apx., of River Front to the BLM. I would rather have the BLM manage the recreational, wildlife and fisheries that are available on my place, than to sell it to someone that may destroy it forever with houses and lots on that beautiful river.
My Land descriptions are not totally accurate and my acreage numbers are not exact. They all have been given in apx. numbers and locations so we can have a point of reference to negotiate from.
A general description of the Dry Land Grazing Parcel I am interested in trading for is all acreage West of section 36 in section 35 and section 2 and 3 of T.7N, R.20E., about a quarter

Letter No. 2 *continued*

mile South of the Big Lost River in an equivalent value to the value of the River Front Property as an aliquot part trade. Land values today are $200 for Dry Land Grazing Lands and $11,000 to $15,000 for River Front.
Another general description is a trade for apx. 8.5 acres in section 25 North and East of where my trailer sits.
Here is my best try to give you apx. readings:
_____T.8N.,R.20E.,section 35 Boise Meridian. E1/2 NE1/4 SE1/4: S1/2 NW1/4 NE1/4 SE1/4: SW1/4 NE1/4 SE1/4: NE1/8 SW1/4 SE1/4: W1/2 SE1/4 SE1/4: S1/2 SW1/4 SW1/4 SE1/4.
_____T.7N.,R.20E.,Section 2. W1/2 NW1/4: NE1/4 NW1/4
_____T.7N.,R.20E.,Section 3.NE1/4 SE1/4: W1/2 SE1/4: SE1/4 NE1/4: SE1/4 SW1/4.

I would appreciate hearing from you to know what procedures need to be gone through in order to put this land trade and or sale in motion.

Sincerely,

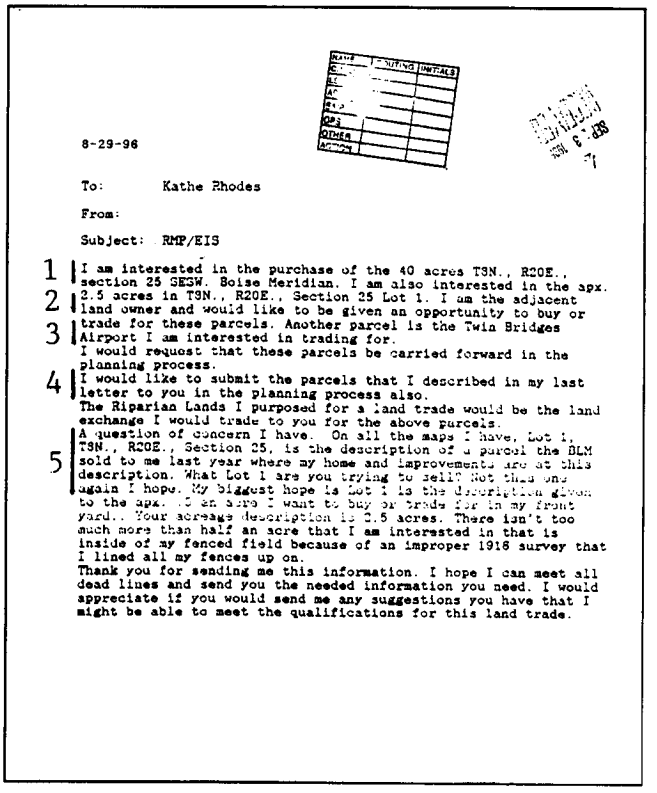
BLM Response to Letter No. 2

2-1: The BLM considered your proposal to exchange your river front property (T8N, R20E, Section 25, NWSWSE) for the 0.5 acres of public lands located adjacent to your private land (T8N, R20E, Sec. 25, SWSWSWNWSE). The BLM has decided to retain this 0.5 acres as a management area in the Proposed RMP because (1) this parcel does not meet the FLPMA criteria for disposal by sale and (2) a land exchange involving this small amount of acreage would not be cost-effective.

2-2: The public lands you would like to acquire through exchange (T7N, R20E, Sections 2 and 3, and T8N, R20E, Section 35) are not identified for disposal in the Proposed RMP. Please note that T7N, R20E, Section 2 is National Forest land and cannot be considered for disposal by the BLM. The public lands you reference in T7N, R20E, Section 3 and T8N, R20E, Section 35 are part of a grazing allotment and would continue to be managed by the BLM for multiple uses, as described in the PRMP.

2-3: Your offer is noted.

Letter No. 3



8-29-96

To: Kathe Rhodes

From:

Subject: RMP/EIS

1 I am interested in the purchase of the 40 acres T9N., R20E., section 25 SESW. Boise Meridian. I am also interested in the apx.
2 2.5 acres in T9N., R20E., Section 25 Lot 1. I am the adjacent land owner and would like to be given an opportunity to buy or
3 trade for these parcels. Another parcel is the Twin Bridges Airport I am interested in trading for.
I would request that these parcels be carried forward in the planning process.
4 I would like to submit the parcels that I described in my last letter to you in the planning process also.
The Riparian Lands I purposed for a land trade would be the land exchange I would trade to you for the above parcels.
A question of concern I have. On all the maps I have, Lot 1, T9N., R20E., Section 25, is the description of a parcel the BLM
5 sold to me last year where my home and improvements are at this description. What Lot 1 are you trying to sell? Not this one again I hope. My biggest hope is Lot 1 is the description given to the apx. .5 an acre I want to buy or trade for in my front yard.. Your acreage description is 2.5 acres. There isn't too much more than half an acre that I am interested in that is inside of my fenced field because of an improper 1916 survey that I lined all my fences up on.
Thank you for sending me this information. I hope I can meet all dead lines and send you the needed information you need. I would appreciate if you would send me any suggestions you have that I might be able to meet the qualifications for this land trade.

BLM Response to Letter No. 3

3-1: You express interest in a purchase or land exchange for 40 acres of public land located along the Big Lost River in T8N, R20E, Sec. 25, SESW. This parcel is identified in the Proposed RMP as an area available for disposal through exchange (see adjustment areas on Map A: Adjustment/Management Areas). It is not identified as a sale tract in Attachment 17, because it does not meet the FLPMA Section 203 criteria for disposal through sale.

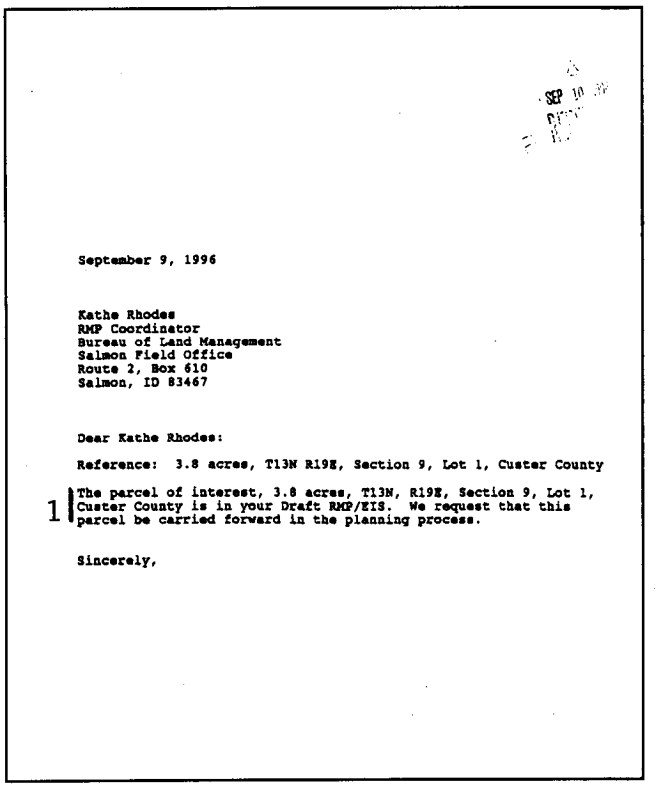
3-2: You express interest in purchasing or exchanging lands for about 2.5 acres in T8N, R20E, Section 25, Lot 1. As you mention later in your letter, you purchased .97 acres of this tract in 1995 (see response 3-5). The remaining acreage (approximately 0.5 acres) has not been identified for disposal in the Proposed RMP (please see response 2-1).

3-3: You express interest in acquiring the Twin Bridges Airport through exchange or purchase. The airport is currently under a 20-year Airport Lease with the Department of Aeronautics (until the year 2014). The BLM plans to continue authorizing the lease to the Department of Aeronautics for the purpose intended, which is as a public airstrip for emergencies and backcountry flights. The decision in the proposed RMP (Land Tenure and Access, Goal 2, #10) has been revised to clarify the BLM's intent to sell or exchange these public lands only to the State of Idaho.

3-4: Please see the responses to Letter 2.

3-5: The parcel listed in the Draft RMP, Attachment 17 (p. 399) as T8N, R20E, Section 25, Lot 1, included the .97-acre parcel sold to you in 1995. The Draft RMP was ready for press when you purchased the parcel, so the BLM decided to make the correction in the Proposed RMP. The public lands you purchased are not identified for disposal in the Proposed RMP.

Letter No. 4



September 9, 1996

Kathe Rhodes
RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

Dear Kathe Rhodes:

Reference: 3.8 acres, T13N R19E, Section 9, Lot 1, Custer County

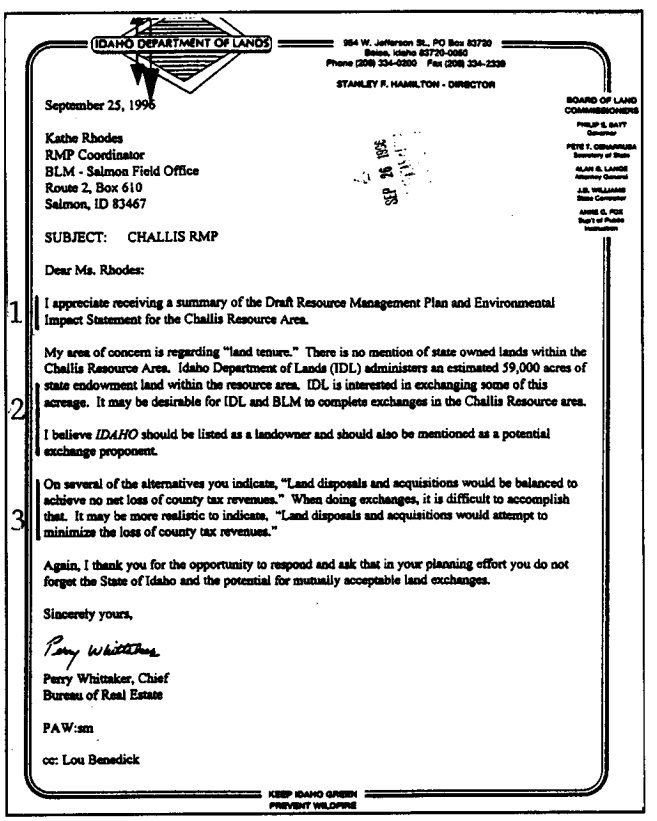
1 The parcel of interest, 3.8 acres, T13N, R19E, Section 9, Lot 1, Custer County is in your Draft RMP/EIS. We request that this parcel be carried forward in the planning process.

Sincerely,

BLM Response to Letter No. 4

4-1: The BLM public lands you are interested in acquiring (T13N, R19E, Section 9, Lot 1) were proposed for consideration as a sale tract under Alternatives 2 and 3 of the Draft RMP (see Attachment 17, p. 499). This sale tract has been listed in the Proposed RMP for potential disposal (see PRMP, Attachment 17).

Letter No. 5



IDAHO DEPARTMENT OF LANDS

954 W. Jefferson St., PO Box 83720
Boise, Idaho 83720-0050
Phone (208) 334-0200 Fax (208) 334-2339

STANLEY F. HAMILTON - DIRECTOR

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September 25, 1996

Kathe Rhodes
RMP Coordinator
BLM - Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

SUBJECT: CHALLIS RMP

Dear Ms. Rhodes:

1 I appreciate receiving a summary of the Draft Resource Management Plan and Environmental Impact Statement for the Challis Resource Area.

My area of concern is regarding "land tenure." There is no mention of state owned lands within the Challis Resource Area. Idaho Department of Lands (IDL) administers an estimated 59,000 acres of
2 state endowment land within the resource area. IDL is interested in exchanging some of this acreage. It may be desirable for IDL and BLM to complete exchanges in the Challis Resource area.

I believe *IDAHO* should be listed as a landowner and should also be mentioned as a potential exchange proponent.

On several of the alternatives you indicate, "Land disposals and acquisitions would be balanced to achieve no net loss of county tax revenues." When doing exchanges, it is difficult to accomplish
3 that. It may be more realistic to indicate, "Land disposals and acquisitions would attempt to minimize the loss of county tax revenues."

Again, I thank you for the opportunity to respond and ask that in your planning effort you do not forget the State of Idaho and the potential for mutually acceptable land exchanges.

Sincerely yours,

Perry Whittaker

Perry Whittaker, Chief
Bureau of Real Estate

PAW:sm

cc: Lou Benedick

KEEP IDAHO GREEN
PREVENT WILDFIRE

BLM Response to Letter No. 5

5-1: The Draft RMP lists the State of Idaho as an owner of lands within the Challis Resource Area boundary (see DRMP, p. 91, paragraph 3; p. 92, Table 3-6; and Map G: Land Ownership).

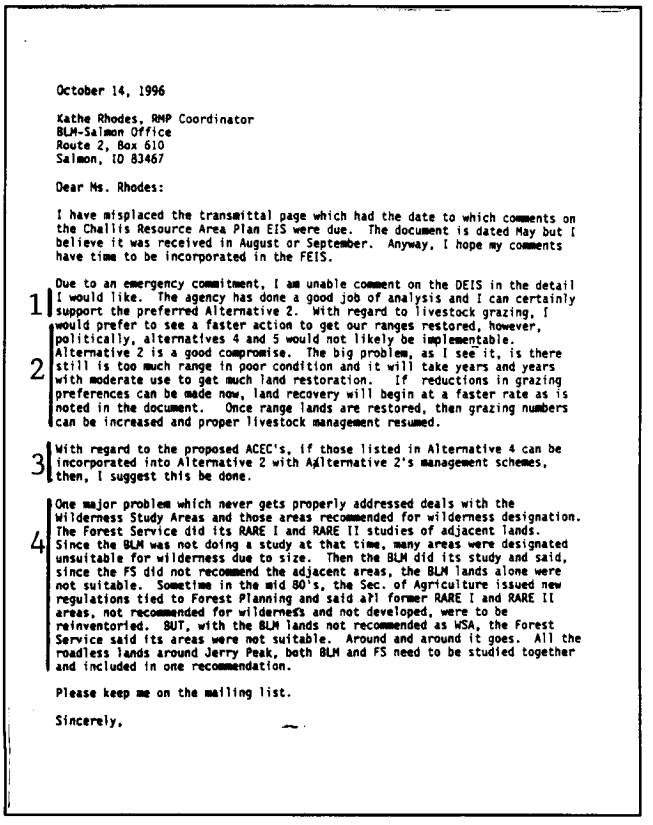
5-2: The Draft RMP mentions the State of Idaho as a potential exchange proponent (see DRMP, Management Concern: Land Tenure, Goal 1, #6 (p. 386) and #13 (p. 388); Goal 2, #8 and 9 (p. 389); and Map A: Adjustment/Management Areas). Land Tenure, Goal 2, #8 (DRMP, p. 389) specifically identifies approximately 36,915 acres for exchange only with the State of Idaho. Those acres are in addition to others identified for disposal with any proponent, as displayed on Map A. The Proposed RMP continues to make 37,035 acres available for exchange only with the State of Idaho (see PRMP, Land Tenure and Access, Goal 1, #6 and 13, and Goal 2, #7 and 8). In addition, the Proposed RMP revises a land tenure decision from the Draft RMP, Alternative 2, in order to clarify that two airport sites are available for sale or exchange only to the State of Idaho (see PRMP, Land Tenure and Access, Goal 2, #9).

5-3: The action you refer to (Land Tenure, Goal 2, #1, Alternatives 2, 4, and 5, p. 388a/b) has been revised in the Proposed RMP to reads as follows: "Offer sufficient public

BLM Response to Letter No. 5 *continued*

lands for sale or exchange to mitigate loss of tax revenue to Custer or Lemhi counties that may occur as a result of BLM acquisitions of private land needed to meet important public resource objectives." The BLM does not mean to imply that private tax revenue gains and losses would balance in every lands action. The BLM believes this revised wording indicates the BLM will *attempt* to balance disposals and acquisitions so as to mitigate loss of county tax revenues. It is, of course possible that the public lands offered for sale or exchange will not be purchased and therefore not produce private property tax revenue to the counties. It is also possible that more public lands will be disposed of than acquired over the life of the RMP, which could result in greater net private property tax revenue to the counties.

Letter No. 6



October 14, 1996

Kathe Rhodes, RMP Coordinator
BLM-Salmon Office
Route 2, Box 610
Salmon, ID 83467

Dear Ms. Rhodes:

I have misplaced the transmittal page which had the date to which comments on the Challis Resource Area Plan EIS were due. The document is dated May but I believe it was received in August or September. Anyway, I hope my comments have time to be incorporated in the FEIS.

1 Due to an emergency commitment, I am unable comment on the DEIS in the detail I would like. The agency has done a good job of analysis and I can certainly support the preferred Alternative 2. With regard to livestock grazing, I would prefer to see a faster action to get our ranges restored, however, politically, alternatives 4 and 5 would not likely be implementable. Alternative 2 is a good compromise. The big problem, as I see it, is there
2 still is too much range in poor condition and it will take years and years with moderate use to get much land restoration. If reductions in grazing preferences can be made now, land recovery will begin at a faster rate as is noted in the document. Once range lands are restored, then grazing numbers can be increased and proper livestock management resumed.

3 With regard to the proposed ACEC's, if those listed in Alternative 4 can be incorporated into Alternative 2 with Alternative 2's management schemes, then, I suggest this be done.

4 One major problem which never gets properly addressed deals with the Wilderness Study Areas and those areas recommended for wilderness designation. The Forest Service did its RARE I and RARE II studies of adjacent lands. Since the BLM was not doing a study at that time, many areas were designated unsuitable for wilderness due to size. Then the BLM did its study and said, since the FS did not recommend the adjacent areas, the BLM lands alone were not suitable. Sometime in the mid 80's, the Sec. of Agriculture issued new regulations tied to Forest Planning and said all former RARE I and RARE II areas, not recommended for wilderness and not developed, were to be reinventoried. BUT, with the BLM lands not recommended as WSA, the Forest Service said its areas were not suitable. Around and around it goes. All the roadless lands around Jerry Peak, both BLM and FS need to be studied together and included in one recommendation.

Please keep me on the mailing list.

Sincerely,

BLM Response to Letter No. 6

6-1: We have noted that you support Alternative 2.

6-2: We recognize that Alternatives 4 and 5 may result in more rapid improvement of resource conditions. The BLM determined that two primary options existed to manage livestock grazing and improve resource conditions. A reduction in livestock AUMs was one option, as described in Alternatives 4 and 5. The other option was to use management "triggers" to move livestock when a level of riparian use, upland utilization, or other resource use criterion was reached. The BLM chose (in the Preferred Alternative) specific resource use criteria or management triggers (*e.g.,* stubble-heights, utilization levels) to achieve RMP goals, since experience has shown that reductions in livestock grazing are not always effective in avoiding overuse of the forage resource. The impact analysis indicates that acceptable rates and levels of resource improvement would occur with the resource use criteria prescribed under the Preferred Alternative, without the requirement for immediate, across-the-board reductions in livestock AUMs called for under Alternatives 4 and 5.

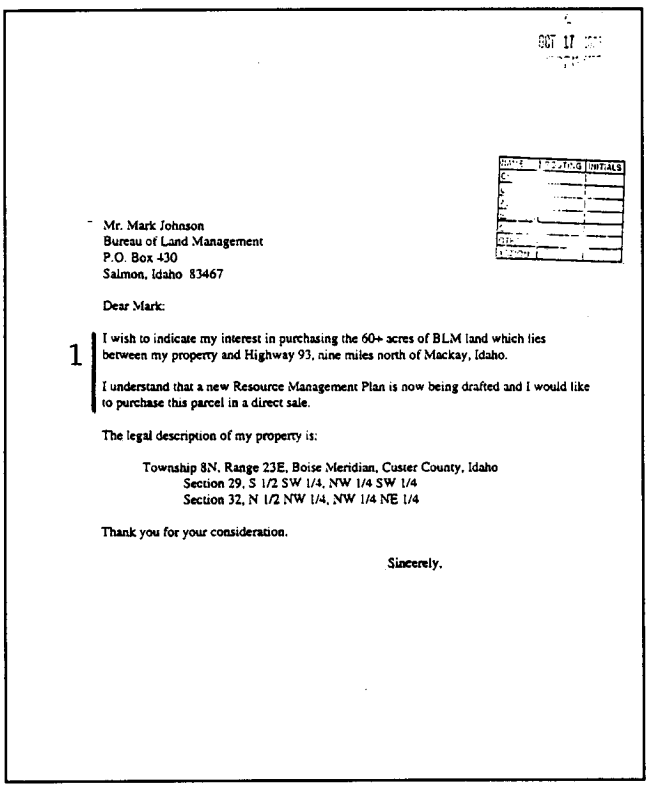
6-3: Your preference for Alternative 4 ACEC designations is noted. The BLM considered designation of both the Carlson Hills portion of the Donkey Hills ACEC and the Road Creek Watershed ACEC, but decided not to include these areas as ACECs in the Proposed RMP.

BLM Response to Letter No. 6 *continued*

6-4: Your suggestions are noted. However, the Federal Land Policy and Management Act of 1976, (FLPMA), Section 603(c) directed the Secretary of the Interior to report to the President on the wilderness suitability of lands managed by the Bureau of Land Management (BLM) by October 21, 1991. The Borah Peak, Goldburg, and Little Boulder Creek WSAs were studied under Section 202 of FLPMA, which authorized the wilderness study of roadless areas less than 5,000 acres in size, but contiguous to larger roadless areas.

The BLM's wilderness recommendations have been forwarded by the President to Congress. Only Congress can designate a wilderness or release from interim management areas that were placed under wilderness study by Congressional authority. Until Congress acts on these recommendations, Section 603(c) further directs the BLM to continue to manage these WSAs in a manner that will not "impair the suitability of such areas for preservation as wilderness." Until designation or release, the BLM will manage these areas as directed in "Interim Management Policy And Guidelines For Land Under Wilderness Review" (BLM, 1995). If Congress acts and some of the WSAs in the Challis Resource Area are released from wilderness review, those public lands would be managed according to the Proposed RMP decisions listed under WSAs - Management if Released from Wilderness Review.

Letter No. 7



OCT 17

Mr. Mark Johnson
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Mark:

1 I wish to indicate my interest in purchasing the 60+ acres of BLM land which lies between my property and Highway 93, nine miles north of Mackay, Idaho.

I understand that a new Resource Management Plan is now being drafted and I would like to purchase this parcel in a direct sale.

The legal description of my property is:

Township 8N, Range 23E, Boise Meridian, Custer County, Idaho
Section 29, S 1/2 SW 1/4, NW 1/4 SW 1/4
Section 32, N 1/2 NW 1/4, NW 1/4 NE 1/4

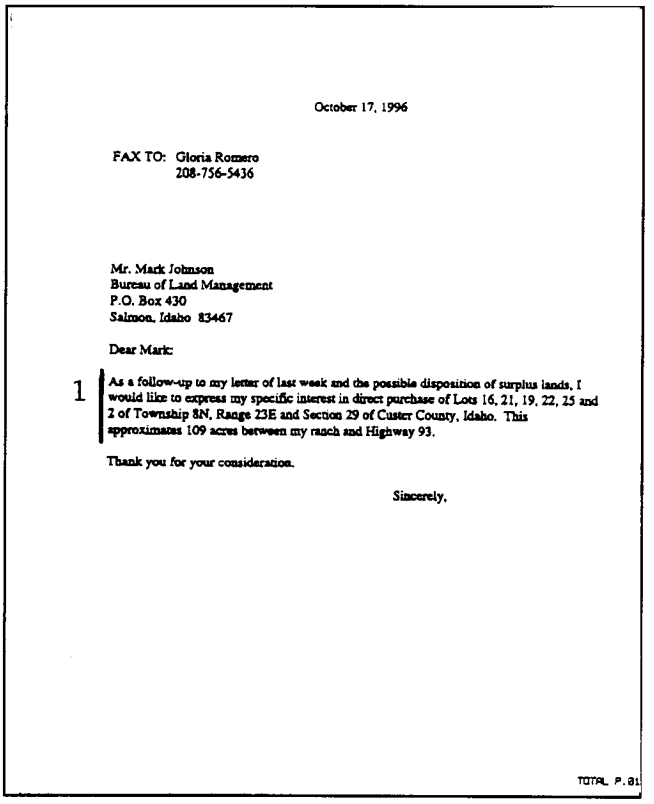
Thank you for your consideration.

Sincerely.

BLM Response to Letter No. 7

7:1: Please see the response to letter 8. (**Note:** In Letter 8 Mr. provides a more exact legal description of the public lands he would like to purchase.)

Letter No. 8



October 17, 1996

FAX TO: Gloria Romero
208-756-5436

Mr. Mark Johnson
Bureau of Land Management
P.O. Box 430
Salmon, Idaho 83467

Dear Mark:

1 As a follow-up to my letter of last week and the possible disposition of surplus lands, I would like to express my specific interest in direct purchase of Lots 16, 21, 19, 22, 25 and 2 of Township 8N, Range 23E and Section 29 of Custer County, Idaho. This approximates 109 acres between my ranch and Highway 93.

Thank you for your consideration.

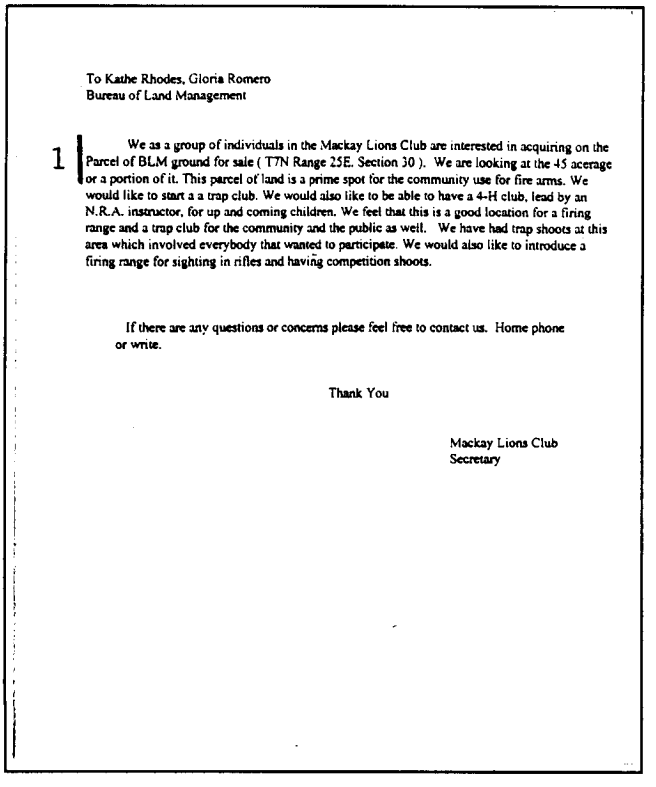
Sincerely,

TOTAL P.01

BLM Response to Letter No. 8

8-1: The Proposed RMP lists the public lands specified in your letter (T8N, R23E, Sec. 29, lots 16, 21, 19, 22, 25, and 2; approximately 109 acres) as tracts which can be considered for sale under the authority of FLPMA, Section 203(a)(1) (see PRMP, Attachment 17).

Letter No. 9



To Kathe Rhodes, Gloria Romero
Bureau of Land Management

1 We as a group of individuals in the Mackay Lions Club are interested in acquiring on the Parcel of BLM ground for sale (T7N Range 25E. Section 30). We are looking at the 45 acerage or a portion of it. This parcel of land is a prime spot for the community use for fire arms. We would like to start a a trap club. We would also like to be able to have a 4-H club, lead by an N.R.A. instructor, for up and coming children. We feel that this is a good location for a firing range and a trap club for the community and the public as well. We have had trap shoots at this area which involved everybody that wanted to participate. We would also like to introduce a firing range for sighting in rifles and having competition shoots.

If there are any questions or concerns please feel free to contact us. Home phone or write.

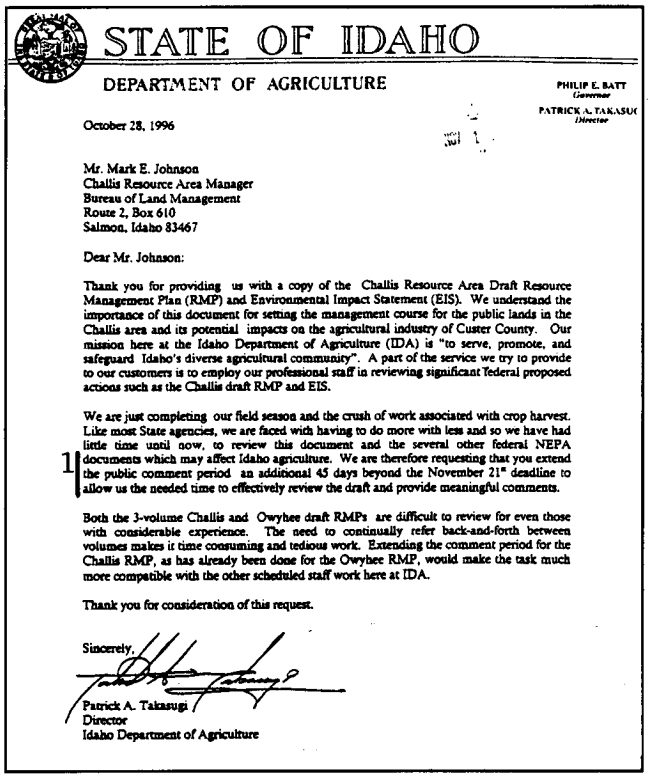
Thank You

Mackay Lions Club
Secretary

BLM Response to Letter No. 9

9-1: Approximately 50 acres in Lots 1 and 2 of the BLM lands you requested (*i.e.*, T7N, R25E, Section 30) have been included in the Proposed RMP for potential sale or exchange (see Attachment 17 and the adjustment areas identified on Map A: Adjustment/Management Areas).

Letter No. 10



STATE OF IDAHO

DEPARTMENT OF AGRICULTURE

PHILIP E. BATT
Governor

PATRICK A. TAKASUGI
Director

October 28, 1996

Mr. Mark E. Johnson
Challis Resource Area Manager
Bureau of Land Management
Route 2, Box 610
Salmon, Idaho 83467

Dear Mr. Johnson:

Thank you for providing us with a copy of the Challis Resource Area Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS). We understand the importance of this document for setting the management course for the public lands in the Challis area and its potential impacts on the agricultural industry of Custer County. Our mission here at the Idaho Department of Agriculture (IDA) is "to serve, promote, and safeguard Idaho's diverse agricultural community". A part of the service we try to provide to our customers is to employ our professional staff in reviewing significant federal proposed actions such as the Challis draft RMP and EIS.

We are just completing our field season and the crush of work associated with crop harvest. Like most State agencies, we are faced with having to do more with less and so we have had little time until now, to review this document and the several other federal NEPA documents which may affect Idaho agriculture. We are therefore requesting that you extend the public comment period an additional 45 days beyond the November 21st deadline to allow us the needed time to effectively review the draft and provide meaningful comments. 1

Both the 3-volume Challis and Owyhee draft RMPs are difficult to review for even those with considerable experience. The need to continually refer back-and-forth between volumes makes it time consuming and tedious work. Extending the comment period for the Challis RMP, as has already been done for the Owyhee RMP, would make the task much more compatible with the other scheduled staff work here at IDA.

Thank you for consideration of this request.

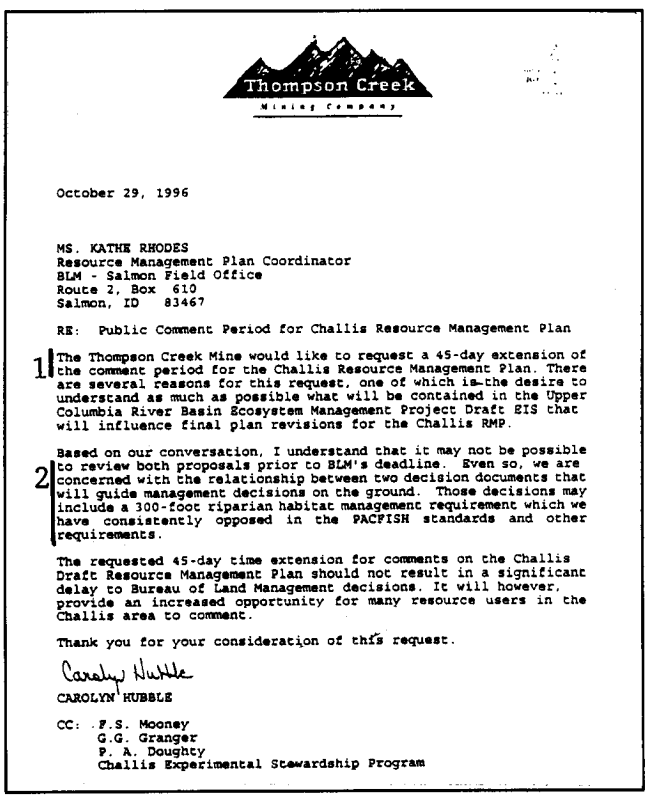
Sincerely,

Patrick A. Takasugi
Director
Idaho Department of Agriculture

BLM Response to Letter No. 10

10-1: The BLM extended the comment period by 46 days (to January 6, 1997), to provide the public with additional time to review the Challis Draft RMP/EIS and provide comments. The BLM notified the public of the comment period extension through a notice in the *Federal Register*, announcements in the local media, and a letter sent to all persons/agencies who had received a copy of the Draft RMP/EIS.

Letter No. 11



Thompson Creek
Mining Company

October 29, 1996

MS. KATHE RHODES
Resource Management Plan Coordinator
BLM - Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

RE: Public Comment Period for Challis Resource Management Plan

The Thompson Creek Mine would like to request a 45-day extension of the comment period for the Challis Resource Management Plan. There are several reasons for this request, one of which is the desire to understand as much as possible what will be contained in the Upper Columbia River Basin Ecosystem Management Project Draft EIS that will influence final plan revisions for the Challis RMP. 1

Based on our conversation, I understand that it may not be possible to review both proposals prior to BLM's deadline. Even so, we are concerned with the relationship between two decision documents that will guide management decisions on the ground. Those decisions may include a 300-foot riparian habitat management requirement which we have consistently opposed in the PACFISH standards and other requirements. 2

The requested 45-day time extension for comments on the Challis Draft Resource Management Plan should not result in a significant delay to Bureau of Land Management decisions. It will however, provide an increased opportunity for many resource users in the Challis area to comment.

Thank you for your consideration of this request.

Carolyn Hubble
CAROLYN HUBBLE

CC: F.S. Mooney
G.G. Granger
P. A. Doughty
Challis Experimental Stewardship Program

BLM Response to Letter No. 11

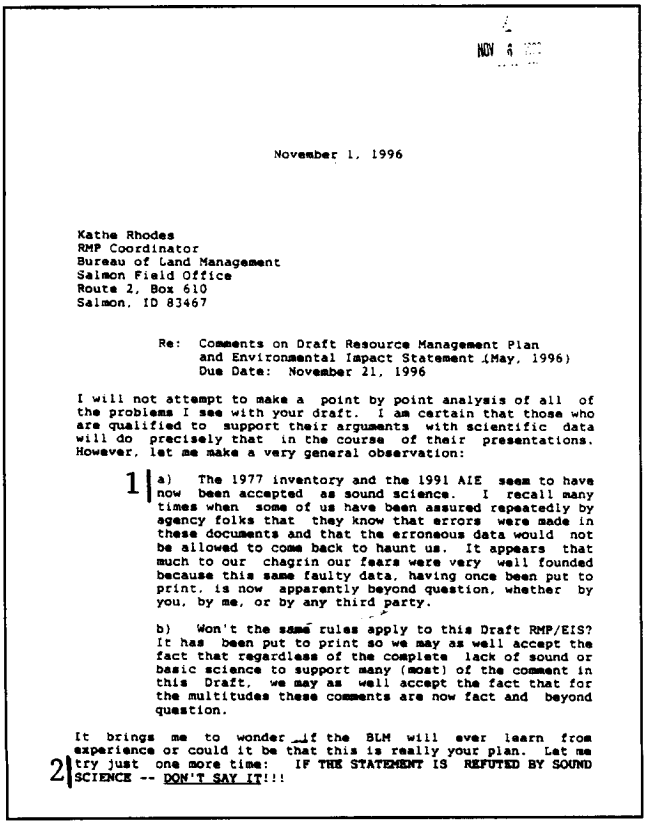
11-1: Please see the response to Letter 10.

11-2: The proposed riparian habitat width for perennial fish-bearing streams or perennial portions of intermittent fish-bearing streams in the majority of the Challis Resource Area is the 100-year floodplain (non-forested rangeland systems) (see PRMP, Attachment 4). The 300-foot slope distance riparian habitat width you oppose would only apply in forested systems. The BLM estimates that less than 2% of riparian areas in the Challis RA are within timber types (conifers) and only about 5 to 10 percent of riparian areas are within forested areas (including conifer, aspen, and cottonwood types). The BLM recognizes that "PACFISH" is an interim management strategy. The various standards and management decisions which are described in the Draft RMP - Preferred Alternative and included in the Proposed RMP were selected because they are expected to achieve the desired resource improvement and maintenance goals for the Challis Resource Area, including goals for aquatic and riparian habitats.

Future management direction to replace "PACFISH" should be contained in the Upper Columbia River Basin Ecosystem Management Project (Project). Once the Record of Decision for the Project is signed, all BLM Resource Management Plans and Management Framework Plans will automatically

be amended to be consistent with the Project. Standards contained in the Project which are different from, or more stringent than, standards contained in the Challis Proposed RMP will automatically be incorporated in the RMP. If the Challis Proposed RMP contains decisions which conflict with the Project, the RMP will be revised to be consistent. Decisions and standards in the RMP which are consistent with the Project could be implemented without revision, once the Record of Decision for the Challis approved RMP is signed.

Letter No. 12



NOV 6

November 1, 1996

Kathe Rhodes
RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

Re: Comments on Draft Resource Management Plan
and Environmental Impact Statement (May, 1996)
Due Date: November 21, 1996

I will not attempt to make a point by point analysis of all of the problems I see with your draft. I am certain that those who are qualified to support their arguments with scientific data will do precisely that in the course of their presentations. However, let me make a very general observation:

1 a) The 1977 inventory and the 1991 AIE seem to have now been accepted as sound science. I recall many times when some of us have been assured repeatedly by agency folks that they know that errors were made in these documents and that the erroneous data would not be allowed to come back to haunt us. It appears that much to our chagrin our fears were very well founded because this same faulty data, having once been put to print, is now apparently beyond question, whether by you, by me, or by any third party.

b) Won't the same rules apply to this Draft RMP/EIS? It has been put to print so we may as well accept the fact that regardless of the complete lack of sound or basic science to support many (most) of the comment in this Draft, we may as well accept the fact that for the multitudes these comments are now fact and beyond question.

It brings me to wonder if the BLM will ever learn from experience or could it be that this is really your plan. Let me
2 try just one more time: IF THE STATEMENT IS REFUTED BY SOUND SCIENCE -- DON'T SAY IT!!!

BLM Response to Letter No. 12

12-1: The 1991 San Felipe Allotment Analysis, Interpretation and Evaluation (AIE) is not a topic that was discussed or meant to be addressed in the Challis Draft RMP. We can only assume that you are using it as an example to emphasize your concern about the resource data that were used as a basis for development of the RMP, in addition to your reference to the 1977 Challis Rangeland Inventory.

The 1977 inventory was described in the Draft RMP-Affected Environment (Chapter 3) because planning guidance requires description of "the environment of the area(s) to be affected...by the alternatives under consideration" (36 CFR 1502.15). For some portions of the Challis Resource Area, the 1977 inventory is the only range condition information available. However, the 1977 Rangeland Inventory was ***not*** used as a primary source of information to develop the goals, objectives, and management actions proposed in the Challis RMP. RMP decisions are designed to improve the condition of areas that are currently in less than satisfactory condition, and maintain the condition of areas which are in satisfactory condition. Specific areas may or may not be the same areas identified in the 1977 inventory. To develop the goals, objectives, and management actions for the RMP alternatives, the RMP team reviewed the BLM's direction for managing resources on public lands and data from many sources, including recent ecological site inventories, the 1977 inventory, nested

Kathe Rhodes, RMP Coordinator
November 1, 1996
Page 2

I would be glad to list examples by page number but it would cover so much space I won't bother. Also, I am satisfied that and others will grant you that service in a very professional and scholarly way.

Given past history, any further time spent on analysis of the issues would be wasted.

Submitted by.

frequency trend studies, upland and riparian permanent photo point studies, and utilization pattern mapping studies.

12-2: The BLM regrets that you did not provide specifics to clarify your comment "If the statement is refuted by sound science -- don't say it!!!" Not knowing your meaning of "statements" or in which section of the Draft RMP these "statements" were made makes responding to this comment difficult. Very often "sound science" refutes "sound science" and it is the reader who must interpret how sound, meaningful and appropriate the science is. The Draft RMP cited over 250 references, approximately 80-85% of which were technical scientific journals. These references were used by the interdisciplinary team in the development of the RMP alternatives, description of the affected environment, and analysis of environmental consequences. The content of the Challis Draft RMP/EIS was also based on the professional judgment of resource specialists, extensive internal review, and external (State Office) BLM review. In sum, the BLM believes sound science was used throughout the RMP development process and, as a result, the product of that planning process (the Draft RMP/EIS) is itself "sound science."

November 14, 1996
Kathe Rhodes, Resource Management Plan Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

RE: Challis Draft RMP/EIS

Dear Ms. Rhodes,

My wife and I have enjoyed the spectacular beauty of the Pahsimeroi, Lost River, Little Lost and Birch Creek valleys for over 20 years. For the past 9 years we have owned land in the upper Big Lost, land that we purchased because of the unique aesthetic values then prevalent in this area. These values included solitude, minimal noise and light pollution, spectacular scenery, an intact but declining fishery, and fair populations of sage grouse, antelope, deer and elk. It has long been our goal to make our home in the Big Lost valley, so it was with great interest that we studied the Challis Draft RMP/EIS.

1 In our opinion, over-grazing by livestock is the biggest single problem on the Challis RA. The reduction of native grasses and forbs due to intense grazing on public land has contributed greatly to the severe decline in antelope and sage grouse populations. These two species are symbolic of a healthy high desert. Their alarming decline is a warning that the ecosystem is in serious trouble.

2 Healthy riparian areas are the very life blood of high desert valleys. Many wildlife species use these areas. Sage grouse broods depend upon the succulent vegetation and insect life found there. Cattle trample the vegetation along stream banks as well as the seeps and springs in the smaller gullies and canyons, contributing to the overall loss of sage grouse brood rearing habitat. The decline of sage grouse in the Challis RA is of great concern to us.

3 Fisheries, water quality and biodiversity are also negatively impacted by cattle. Fish and other aquatic creatures need water to survive. The diversion of water for irrigation, particularly in drought years, has reduced stream flows to the point where fish survival is very poor. High, cold streams like the Big Lost, Pahsimeroi and Little

4 Lost Rivers do not grow fish quickly. In addition to the regulation of sportsmen, management of these fisheries must include restrictions on grazing and the conservative use of irrigation water.

13-1: The BLM's analysis of existing information on antelope and sage grouse does not suggest that the ecosystem is in serious trouble or that current population levels are due to the effects of livestock grazing. Antelope and sage grouse populations fluctuate in response to many factors; hunting, predation, and weather may be some of the most significant factors affecting populations of these species.

Data on antelope and sage grouse populations have been gathered, and hunter surveys have been conducted, by the Idaho Department of Fish and Game (IDFG) in the Challis region, and statewide in Idaho, for more than 40 years. Anecdotal reports of population numbers go back to the 1920s. Discussions with IDFG personnel and review of anecdotal reports suggest that high sage grouse populations were historically present in the Challis RA during periods when livestock grazing more than likely exceeded the levels that exist today. Yoakum (1978) reported that antelope populations in the U.S. and Canada increased 1,500 percent between 1924 and 1976; control of hunting and transplanting were identified as the primary factors. This increase occurred in spite of livestock use levels that were likely much higher than levels of use that exist today.

13-2: The Proposed RMP (PRMP) makes a commitment to provide sufficient forage and habitat to support wildlife populations (see PRMP, Wildlife Habitat, Goals 1 and 2).

Letter No. 13 *continued*

5 The projected economic impacts of the various alternatives seem acceptable to us. Alternative 5, which would restore rangeland health and natural values the fastest, (benefiting everyone in the long run) projects only a 2% economic decline for the Big Lost subregion, which is currently experiencing a land boom. Newcomers are not buying land at $2,000-$3,000 per acre in order to raise cattle. They are buying land because of the intrinsic natural beauty of the area. Simultaneously, ranchers are plowing up more and more private ground, thus rendering the remaining BLM desert lands even more valuable to wildlife.

The Pahsimeroi valley subregion, one of the most beautiful places in Idaho, might experience a 6-7% economic decline if Alternative 5 is implemented. This seems a small price to pay for living in such grand country, especially if the Challis RMP rapidly restores the public range to its former health. We (and many other taxpayers) would without hesitation take a 7% cut in our economic situation to enjoy living in such a place!

We believe it is unrealistic to assume that the extractive, commodity based philosophy of public land management will continue unabated into the next century. Grazing pressure will have to be reduced and fees increased as the public demands a greater say in the management of lands once used more or less exclusively by the livestock industry.

In conclusion, we think that a reduction in grazing and the protection of watersheds would most rapidly improve and

6 sustain the condition of resources in the Challis RA. We urge you to adopt Alternative 5 in your RMP.

Respectfully yours,

BLM Response to Letter No. 13 *continued*

Livestock grazing management decisions (see PRMP, Livestock Grazing, Goals 1 and 2) are designed to improve upland range sites and riparian areas. Riparian use standards (PRMP, Riparian Areas, Goal 1, #4-7) would improve riparian wildlife habitats for sage grouse and other riparian-dependent wildlife species. Decisions listed under Floodplain/Wetland Areas, Goal 2, #1 and 2, and Attachment 8: Design Specifications - Rangeland Improvement, #4 would reduce livestock trampling and associated effects on springs and seeps.

13-3: Proposed RMP decisions on livestock grazing management are expected to improve water quality and fisheries. Biodiversity would be maintained. Livestock grazing impacts to biodiversity for each alternative are described in the DRMP on p. 191, #6; livestock grazing impacts to fisheries and aquatic habitats are listed on p. 213 (general discussion) and pp. 214-217, #2-6, 9, and 12; and livestock grazing impacts to water quality are shown on p. 291 (general discussion) and pp. 292-294, #2-11.

13-4: The BLM does not have the authority to impose fishing regulations; hunting and fishing regulations are developed and implemented by the State. Water rights and use of water for irrigation are also state-regulated. The BLM recognizes valid existing water rights, but may, under certain circumstances, have authority to specify the design and operation of diversion facilities (see PRMP, Floodplain/Wetland Areas, Goal 2, #4).

The BLM believes the decisions contained in the Proposed RMP will improve fisheries habitat and associated riparian areas. Riparian Areas, Goal 1 calls for restoring and maintaining riparian areas so that at least 90% of riparian areas along fish-bearing streams are in proper functioning condition by 2010. Management decisions listed under Riparian Areas, Goal 1 provide for (a) monitoring livestock impacts in riparian areas by measuring stubble height and bank disturbance, and (b) adjusting livestock use and allotment management plans to restore or maintain riparian areas and aquatic habitat in proper functioning condition.

13-5: Your preference of Alternative 5 is noted. The Proposed RMP incorporates portions of Alternative 5 to more rapidly improve and sustain resource conditions. Specifically, the PRMP limits off-highway vehicle use to existing roads, vehicle ways, and trails Resource Area-wide.

Letter No. 14

December 12, 1996

Kathe Rhodes, RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

Re: Support for Alternative 4 to the Challis Draft Resource Management Plan (RMP)/ Environmental Impact Statement (EIS)

Dear Kathe,

I am a member of the Upper Columbia-Salmon/Clearwater Resource Advisory Council and would like to offer the following comments regarding the Challis draft RMP/EIS.

1a The reason that I am in favor of Alternative 4 is twofold. First, according to page 545 of Volume 3 of the RMP, it states that only 25 (40%) of the grazing allotments are in the maintain category which means that the range condition and trend is satisfactory, 7 (11%) are in the custodial category where opportunities do not exist for positive economic return from public investments, and 30 (48%) are in the improve category which means that range condition and trend is unsatisfactory. Allotments in the custodial category should be removed from the grazing inventory altogether. Second, according to page 101 of Volume 1 of the RMP, only 21.4% of the riparian habitat is functional. **These two figures show that 79.6% of the riparian areas need improvement and at least 48% of the uplands need improvement. Alternatives 1, 2 and 3 all continue to allow the current grazing allocations of 51,069 AUM's to remain the same.** If the intent is to "sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations" (BLM's mission statement) then a reduced volume of AUM's is needed in order for the land to heal and repair itself in order to become sustainable. The fact that 95% of the BLM-administered public lands in the Challis RMP is currently allocated for livestock grazing (page 96 of Volume 1) reflects the overused condition of the land as stated above.

1b

1c

I urge you to support Alternative 4 because it reduces the grazing allocations from 51,069 AUM's to 20,679 AUM's while still allowing 87% of the land in the RMP to be utilized for livestock grazing. Reducing the AUM's is the only way to allow the land to recover from overgrazing in the past.

3 The proposed Alternative 2 lacks the following guidelines that are contained in Alternative 4 that would enable restoration of the land:

Range Management

2 1. Reduce existing grazing preference to 20,679 AUM's, based on allocating 50% of forage to watershed and plant maintenance, 25% to big game, and 4.4% to wild horses.

Letter No. 14 *continued*

3 2. No use on upland sites during the critical boot to flowering season of use.

3. Design grazing practices to be consistent with attainment of riparian and aquatic habitat standards in all perennial and intermittent streams. Locate new and existing livestock handling and management facilities and livestock training, bedding, watering, salting, loading and other handling efforts outside riparian areas in all perennial and intermittent streams where attainment of riparian and aquatic habitat standards cannot otherwise be achieved.

4. Grazing privileges that are lost, retired, relinquished, canceled, or have base property sold for subdivision would have attached AUM's held for watershed protection and wildlife habitat. Vacant allotments would remain unallocated to livestock grazing to improve range condition and to help protect watershed condition and wildlife habitat.

5. Prescribed burns or seedings would be done only to restore native plant communities, increase visual diversity, and improve wildlife habitat not just to promote a variety of resource objectives.

6. Vegetation treatment projects would only be considered when necessary to restore potential natural plant community composition, improve wildlife habitat, improve visual quality, reclaim disturbed areas, or to protect archaeological values.

7. One-half of the available forage resource (25% of allocated forage) would be allocated to provide forage and cover for wildlife, and to improve habitat quality to support wildlife populations.

Wildlife Habitat Management

1. One-half of the available forage resource (25% of allocated forage) would be allocated to provide forage and cover for wildlife, and to improve habitat quality to support wildlife populations.

2. Where conflicts between livestock and big game populations for available forage and habitat are identified, conflicts would be resolved to maintain existing big game populations.

4 3. Use only corrective control in response to actual livestock losses as the only type of Animal Damage Control work authorized on BLM lands. Note: The routine prophylactic killing of tens of thousands of coyotes is a travesty.

4. Commercial timber on the Willow Creek Summit elk winter range would be withdrawn from harvest.

5. Reintroduction of native wildlife would take precedence if competing land uses exist.

BLM Response to Letter No. 14

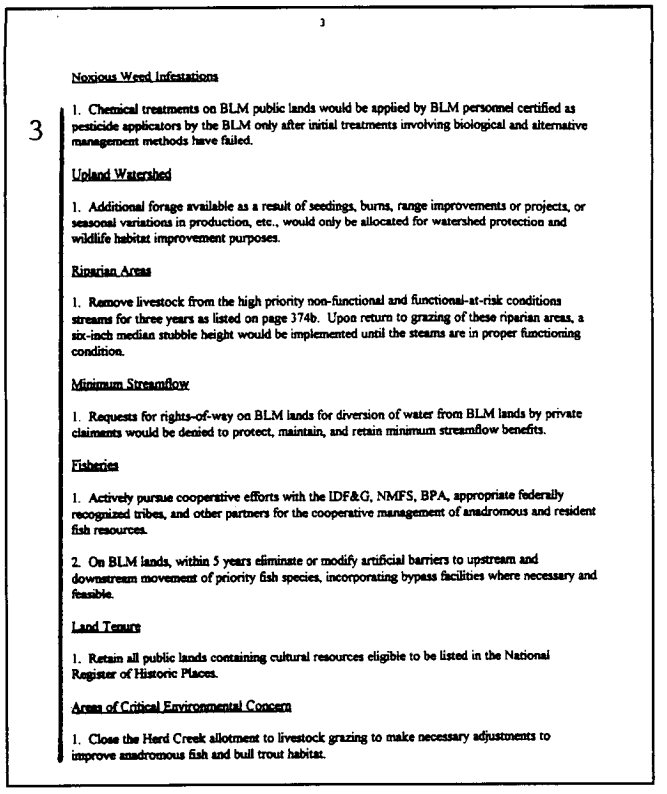
14-1: (a) Your preference for Alternative 4 is noted.

(b) Allotment categorization is one tool used to prioritize allotments for future management. Please note that the criteria for allotment categorization, as stated in the Glossary, include much more than just allotment condition. Placing an allotment into the "improve" category may be the result of potential opportunities, rather than an indication of major problems. Removing "custodial" allotments from the "grazing inventory" *(i.e.,* removing them from livestock grazing) would serve no useful purpose. Please note that areas within the Challis Resource Area that have been determined to be unsuitable for livestock grazing have been closed to livestock grazing (see PRMP, Livestock Grazing, Goal 1, #3).

(c) As the BLM debated possible livestock grazing management options for improving rangeland conditions (including riparian and upland conditions), two potential alternatives emerged. One method for improving rangeland conditions (proposed in Alternatives 4 and 5) was through reductions in livestock use (either reducing the numbers of livestock on an allotment, or reducing the amount of time that the livestock spend on the allotment). The other option (Proposed in Alternatives 2 and 3) was to define management "triggers" to move livestock when a level of plant utilization, bank shearing, or other criteria was reached. The BLM chose (in the Proposed RMP) management triggers to achieve RMP goals since experience has shown that reductions in livestock grazing, by themselves, are not effective in reducing livestock use in riparian zones. Livestock tend to concentrate in riparian zones regardless of the number of livestock that are present in a pasture. Even a few livestock, if left in a riparian zone for any length of time, can result in stubble heights below those necessary to assure proper functioning riparian condition. Across-the-board reductions of AUMs are not considered necessary for many allotments and would not be warranted based on existing knowledge.

14-2: A reduced number of AUMs is not the only way to achieve healthy, diverse, and productive public lands. The BLM feels that the combination of management actions contained in the Proposed RMP would have more beneficial impacts on the land than imposing large "up-front" reductions in livestock grazing preference that may or may not achieve the desired result. These Proposed RMP actions *(e.g.,* stubble height and bank shearing criteria for riparian areas, and cover requirements for uplands) will provide the BLM with the tools for effective livestock grazing management, and ensure that high value resources are protected.

14-3: Your suggestions for incorporating portions of Alternative 4 into the Preferred Alternative were considered. The Proposed RMP adopts the intent of the Alternative 4



3

Noxious Weed Infestations

3 1. Chemical treatments on BLM public lands would be applied by BLM personnel certified as pesticide applicators by the BLM only after initial treatments involving biological and alternative management methods have failed.

Upland Watershed

1. Additional forage available as a result of seedings, burns, range improvements or projects, or seasonal variations in production, etc., would only be allocated for watershed protection and wildlife habitat improvement purposes.

Riparian Areas

1. Remove livestock from the high priority non-functional and functional-at-risk conditions streams for three years as listed on page 374b. Upon return to grazing of these riparian areas, a six-inch median stubble height would be implemented until the steams are in proper functioning condition.

Minimum Streamflow

1. Requests for rights-of-way on BLM lands for diversion of water from BLM lands by private claimants would be denied to protect, maintain, and retain minimum streamflow benefits.

Fisheries

1. Actively pursue cooperative efforts with the IDF&G, NMFS, BPA, appropriate federally recognized tribes, and other partners for the cooperative management of anadromous and resident fish resources.

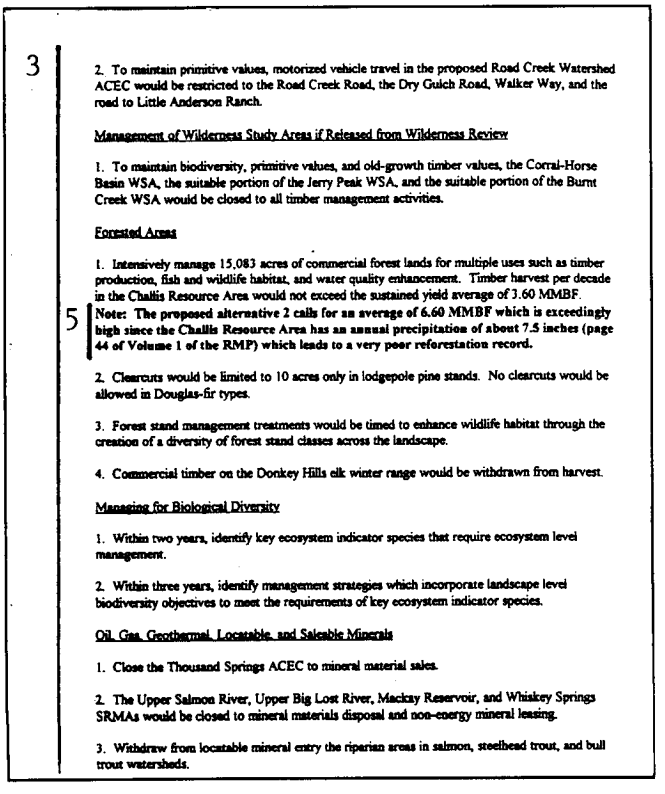
2. On BLM lands, within 5 years eliminate or modify artificial barriers to upstream and downstream movement of priority fish species, incorporating bypass facilities where necessary and feasible.

Land Tenure

1. Retain all public lands containing cultural resources eligible to be listed in the National Register of Historic Places.

Areas of Critical Environmental Concern

1. Close the Herd Creek allotment to livestock grazing to make necessary adjustments to improve anadromous fish and bull trout habitat.



3 2. To maintain primitive values, motorized vehicle travel in the proposed Road Creek Watershed ACEC would be restricted to the Road Creek Road, the Dry Gulch Road, Walker Way, and the road to Little Anderson Ranch.

Management of Wilderness Study Areas if Released from Wilderness Review

1. To maintain biodiversity, primitive values, and old-growth timber values, the Corral-Horse Basin WSA, the suitable portion of the Jerry Peak WSA, and the suitable portion of the Burnt Creek WSA would be closed to all timber management activities.

Forested Areas

1. Intensively manage 15,083 acres of commercial forest lands for multiple uses such as timber production, fish and wildlife habitat, and water quality enhancement. Timber harvest per decade in the Challis Resource Area would not exceed the sustained yield average of 3.60 MMBF.

5 **Note: The proposed alternative 2 calls for an average of 6.60 MMBF which is exceedingly high since the Challis Resource Area has an annual precipitation of about 7.5 inches (page 44 of Volume 1 of the RMP) which leads to a very poor reforestation record.**

2. Clearcuts would be limited to 10 acres only in lodgepole pine stands. No clearcuts would be allowed in Douglas-fir types.

3. Forest stand management treatments would be timed to enhance wildlife habitat through the creation of a diversity of forest stand classes across the landscape.

4. Commercial timber on the Donkey Hills elk winter range would be withdrawn from harvest.

Managing for Biological Diversity

1. Within two years, identify key ecosystem indicator species that require ecosystem level management.

2. Within three years, identify management strategies which incorporate landscape level biodiversity objectives to meet the requirements of key ecosystem indicator species.

Oil, Gas, Geothermal, Locatable, and Saleable Minerals

1. Close the Thousand Springs ACEC to mineral material sales.

2. The Upper Salmon River, Upper Big Lost River, Mackay Reservoir, and Whiskey Springs SRMAs would be closed to mineral materials disposal and non-energy mineral leasing.

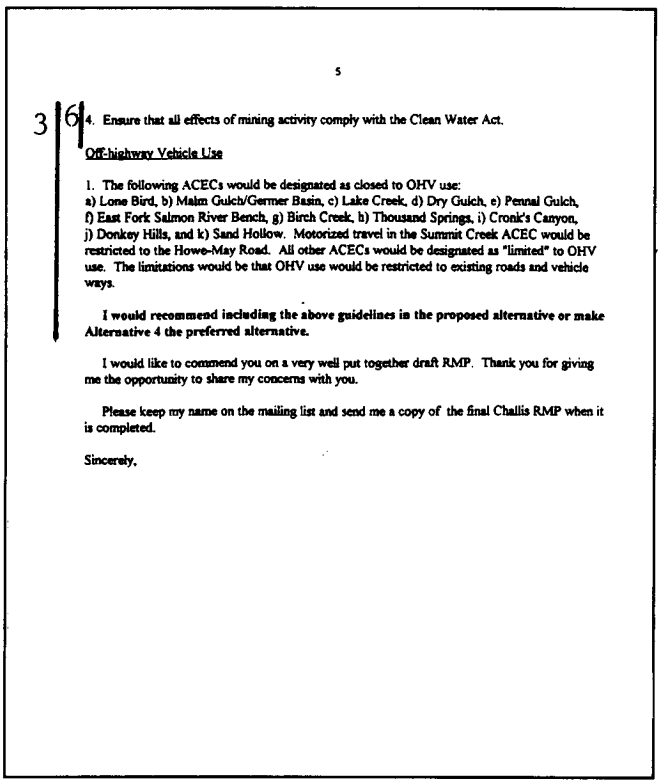
3. Withdraw from locatable mineral entry the riparian areas in salmon, steelhead trout, and bull trout watersheds.

decisions listed in your letter as Range Management #3 and ACECs #2.

14-4: Animal Damage Control (ADC) actions on BLM lands in the Challis RA were recently analyzed in the *Environmental Assessment: Predator Damage Management in Northern and Central Idaho* (USDA-APHIS-ADC September 1996). The Proposed RMP would continue the ADC program as outlined in this EA. Because livestock losses are documented annually from coyote predation, and wolves have recently been reintroduced into the Central Idaho Recovery Area, the BLM has determined that the environmentally responsible ADC program conducted by the Animal and Plant Health Inspection Service should be continued on public lands in the Challis RA.

14-5: The sustained yield figure for Alternative 2 (6.60 MMBF per decade) is based on the site productivity of the acres of suitable commercial timberlands which are available for harvest *(i.e.,* not withdrawn) under this alternative. This harvest level is considered sustainable and is the *maximum* allowed under this alternative. The low annual precipitation figure that you cite applies to lower elevation, non-timbered sites in the Resource Area. Higher elevation, cooler, timbered sites within the Resource Area receive greater precipitation.

14-6: Draft RMP decisions pertaining to water quality are the same for Alternatives 2 and 4 (see pp. 380a/b).



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3 6 4. Ensure that all effects of mining activity comply with the Clean Water Act.

Off-highway Vehicle Use

1. The following ACECs would be designated as closed to OHV use: a) Lone Bird, b) Malm Gulch/Germer Basin, c) Lake Creek, d) Dry Gulch, e) Pennal Gulch, f) East Fork Salmon River Bench, g) Birch Creek, h) Thousand Springs, i) Cronk's Canyon, j) Donkey Hills, and k) Sand Hollow. Motorized travel in the Summit Creek ACEC would be restricted to the Howe-May Road. All other ACECs would be designated as "limited" to OHV use. The limitations would be that OHV use would be restricted to existing roads and vehicle ways.

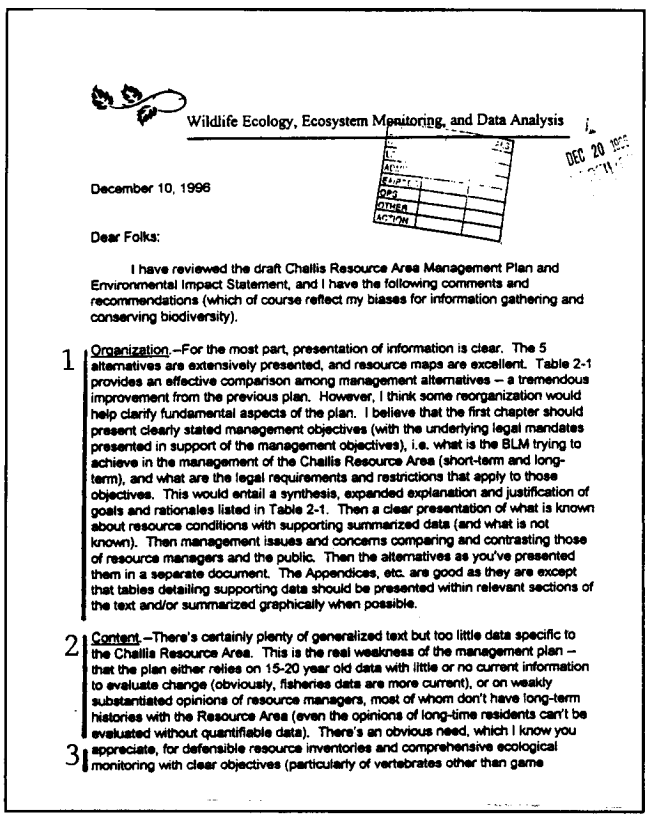
I would recommend including the above guidelines in the proposed alternative or make Alternative 4 the preferred alternative.

I would like to commend you on a very well put together draft RMP. Thank you for giving me the opportunity to share my concerns with you.

Please keep my name on the mailing list and send me a copy of the final Challis RMP when it is completed.

Sincerely,

Letter No. 15



Wildlife Ecology, Ecosystem Monitoring, and Data Analysis

DEC 20 19

December 10, 1996

Dear Folks:

I have reviewed the draft Challis Resource Area Management Plan and Environmental Impact Statement, and I have the following comments and recommendations (which of course reflect my biases for information gathering and conserving biodiversity).

1 Organization.--For the most part, presentation of information is clear. The 5 alternatives are extensively presented, and resource maps are excellent. Table 2-1 provides an effective comparison among management alternatives -- a tremendous improvement from the previous plan. However, I think some reorganization would help clarify fundamental aspects of the plan. I believe that the first chapter should present clearly stated management objectives (with the underlying legal mandates presented in support of the management objectives), i.e. what is the BLM trying to achieve in the management of the Challis Resource Area (short-term and long-term), and what are the legal requirements and restrictions that apply to those objectives. This would entail a synthesis, expanded explanation and justification of goals and rationales listed in Table 2-1. Then a clear presentation of what is known about resource conditions with supporting summarized data (and what is not known). Then management issues and concerns comparing and contrasting those of resource managers and the public. Then the alternatives as you've presented them in a separate document. The Appendices, etc. are good as they are except that tables detailing supporting data should be presented within relevant sections of the text and/or summarized graphically when possible.

2 Content.--There's certainly plenty of generalized text but too little data specific to the Challis Resource Area. This is the real weakness of the management plan -- that the plan either relies on 15-20 year old data with little or no current information to evaluate change (obviously, fisheries data are more current), or on weakly substantiated opinions of resource managers, most of whom don't have long-term histories with the Resource Area (even the opinions of long-time residents can't be evaluated without quantifiable data). There's an obvious need, which I know you

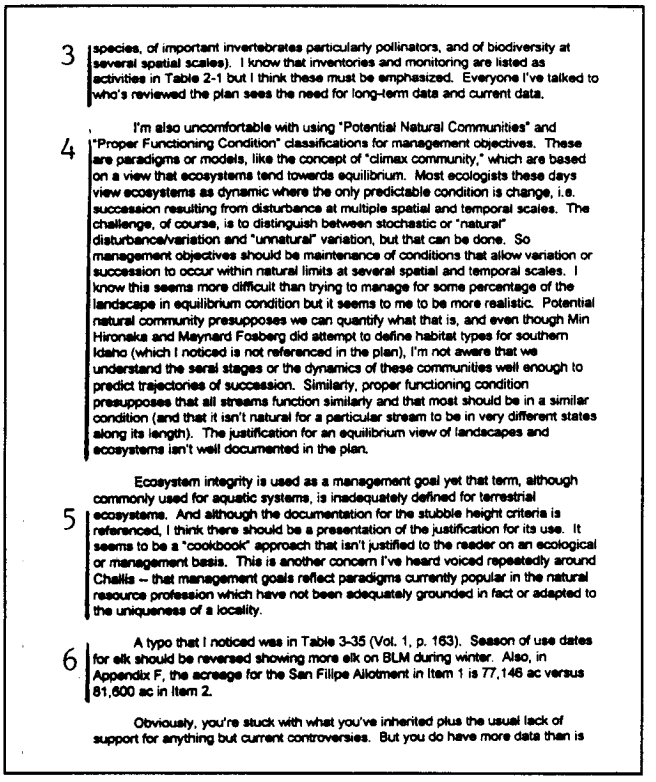
3 appreciate, for defensible resource inventories and comprehensive ecological monitoring with clear objectives (particularly of vertebrates other than game

BLM Response to Letter No. 15

15-1: Your request to reorganize the document is well taken. Using the format you suggest would make a document that clearly and rationally presents goals, where we are now, and possible ways (alternatives) of achieving the goals. At this point in the RMP process, however, the Draft RMP/EIS has already been issued and will not be re-published. The Proposed RMP should be a much easier document for the public to use because it presents only the proposed plan, without alternatives. A major reorganization of the RMP/EIS format at this point might cause confusion and frustration on the reader's part.

15-2: During development of the Challis DRMP, which spanned a five year period, several allotments within the Challis Planning Unit of the Challis Resource Area had upland range inventories completed on them. These upland range inventories were conducted to address resource concerns within those allotments. Once completed, it takes considerable time to analyze the data and reduce it to a form where it can be summarized and presented. As of the time of the release of the Draft RMP, the table presenting a summary of upland range condition by allotment (*Appendix F: Livestock Grazing. Item 2: Range Condition Summary by Allotment*) could only be updated to reflect the results of the 1994 range inventory affecting the Mountain Springs (San Felipe), Warm Springs, and Thousand Springs allotments. Since that time, the information from the

Letter No. 15 *continued*



3 species, of important invertebrates particularly pollinators, and of biodiversity at several spatial scales). I know that inventories and monitoring are listed as activities in Table 2-1 but I think these must be emphasized. Everyone I've talked to who's reviewed the plan sees the need for long-term data and current data.

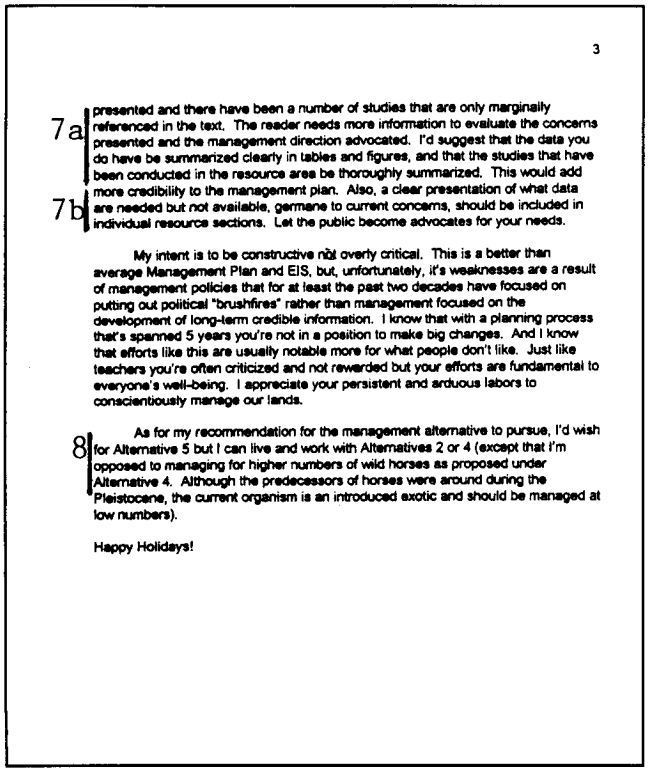
4 I'm also uncomfortable with using "Potential Natural Communities" and "Proper Functioning Condition" classifications for management objectives. These are paradigms or models, like the concept of "climax community," which are based on a view that ecosystems tend towards equilibrium. Most ecologists these days view ecosystems as dynamic where the only predictable condition is change, i.e. succession resulting from disturbance at multiple spatial and temporal scales. The challenge, of course, is to distinguish between stochastic or "natural" disturbance/variation and "unnatural" variation, but that can be done. So management objectives should be maintenance of conditions that allow variation or succession to occur within natural limits at several spatial and temporal scales. I know this seems more difficult than trying to manage for some percentage of the landscape in equilibrium condition but it seems to me to be more realistic. Potential natural community presupposes we can quantify what that is, and even though Min Hironaka and Maynard Fosberg did attempt to define habitat types for southern Idaho (which I noticed is not referenced in the plan), I'm not aware that we understand the seral stages or the dynamics of these communities well enough to predict trajectories of succession. Similarly, proper functioning condition presupposes that all streams function similarly and that most should be in a similar condition (and that it isn't natural for a particular stream to be in very different states along its length). The justification for an equilibrium view of landscapes and ecosystems isn't well documented in the plan.

5 Ecosystem integrity is used as a management goal yet that term, although commonly used for aquatic systems, is inadequately defined for terrestrial ecosystems. And although the documentation for the stubble height criteria is referenced, I think there should be a presentation of the justification for its use. It seems to be a "cookbook" approach that isn't justified to the reader on an ecological or management basis. This is another concern I've heard voiced repeatedly around Challis -- that management goals reflect paradigms currently popular in the natural resource profession which have not been adequately grounded in fact or adapted to the uniqueness of a locality.

6 A typo that I noticed was in Table 3-35 (Vol. 1, p. 163). Season of use dates for elk should be reversed showing more elk on BLM during winter. Also, in Appendix F, the acreage for the San Filipe Allotment in Item 1 is 77,146 ac versus 81,600 ac in Item 2.

Obviously, you're stuck with what you've inherited plus the usual lack of support for anything but current controversies. But you do have more data than is

Letter No. 15 *continued*



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7a presented and there have been a number of studies that are only marginally referenced in the text. The reader needs more information to evaluate the concerns presented and the management direction advocated. I'd suggest that the data you do have be summarized clearly in tables and figures, and that the studies that have been conducted in the resource area be thoroughly summarized. This would add more credibility to the management plan. Also, a clear presentation of what data

7b are needed but not available, germane to current concerns, should be included in individual resource sections. Let the public become advocates for your needs.

My intent is to be constructive not overly critical. This is a better than average Management Plan and EIS, but, unfortunately, it's weaknesses are a result of management policies that for at least the past two decades have focused on putting out political "brushfires" rather than management focused on the development of long-term credible information. I know that with a planning process that's spanned 5 years you're not in a position to make big changes. And I know that efforts like this are usually notable more for what people don't like. Just like teachers you're often criticized and not rewarded but your efforts are fundamental to everyone's well-being. I appreciate your persistent and arduous labors to conscientiously manage our lands.

8 As for my recommendation for the management alternative to pursue, I'd wish for Alternative 5 but I can live and work with Alternatives 2 or 4 (except that I'm opposed to managing for higher numbers of wild horses as proposed under Alternative 4. Although the predecessors of horses were around during the Pleistocene, the current organism is an introduced exotic and should be managed at low numbers).

Happy Holidays!

BLM Response to Letter No. 15 *continued*

1995 upland range inventory of the Herd Creek and Warm Springs allotments has become available. Analysis of these data shows a generally favorable trend on the upland portions of those allotments. This favorable trend is mostly the result of implementing intensive grazing systems and a number of new range improvement projects.

The 1994 and 1995 updated inventories covered a total of about 163,275 acres, or about 20.6% of the Challis Resource Area acreage. These data suggest that similar improvement may have occurred on other allotments **within the Challis Planning Unit** because similar actions (intensive grazing systems, range improvement developments, etc.) were also implemented on those allotments. This general trend of improving upland range conditions may not have taken place on other allotments within the Resource Area (allotments in the Ellis-Pahsimeroi and Mackay Planning Units), because similar grazing systems and range improvements were not implemented on all of them. New inventories have also not been completed on these allotments, and the current status of their upland range condition is unknown.

When the RMP process was started, the BLM was aware that most of the existing vegetative inventories were dated, and that the quality of the data was questioned by some people. Please see the Draft RMP discussion on page 100, which describes some of the factors influencing the validity of existing vegetative inventories. For these reasons, the BLM relied heavily on the professional judgement of the Challis Resource Area staff (some of whom have 15 years or more experience within the Resource Area) during development of the resource goals and objectives outlined in the PRMP.

The Proposed RMP/Final EIS incorporates up-to-date information specific to the Challis Resource Area (for example, riparian habitat condition and trend, water quality, special status species listings, fish species distribution).

15-3: We agree that there is a need for updated inventories and for this reason the PRMP proposes *many* actions to gather new information and update current information (please see the response to 15-7(b).) The very fact that these inventory and monitoring decisions are listed in the PRMP gives them "emphasis."

15-4: We agree that there is currently an on-going debate over the proper model to use in describing vegetative succession. Unfortunately, there is little agreement or consensus among range scientists on one specific model to replace the old straight-line model proposed by Clements (1916) and others. In the absence of universal acceptance of a BLM alternative model of succession, we opted to go with the existing succession-retrogression model described by Dyksterhuis (1949) that has been institutionalized by

BLM, Soil Conservation Service, and Forest Service policy for many years. Throughout the RMP, however, are management decisions that provide the BLM with flexibility to address resource management issues related to vegetative succession. The BLM currently uses the concept of Potential Natural Community as used in the Soil Conservation Service (now Natural Resources Conservation Service) site guides. In our case, they are based on the local Custer-Lemhi soil survey.

15-5: The Challis Resource Area staff has had a great deal of practical, on-the-ground experience in the use of stubble height criteria as part of a package of knowledgeable and reasonable actions designed to improve riparian habitat. Riparian habitat improvement has been measured on numerous streams within the East Fork Salmon River drainage since initial baseline studies were established in 1993. Specific streams where stubble heights have been used include Road Creek, Bear Creek, Mosquito Creek, and Horse Basin Creek within the Mountain Springs (San Felipe) Allotment, and Herd Creek and Lake Creek within the Herd Creek Allotment. Quantitative studies indicate an upward trend towards expanding hydric plant communities, improved woody age structure and increased streambank stability. Improvements in these parameters directly relate to obtaining properly functioning riparian, aquatic and hydrologic conditions. This improvement can be attributed to applying a package of knowledgeable and reasonable practices which include changes in grazing management regarding season of use (timing) and days of use (intensity), and the application of stubble height and woody use standards. These management actions follow procedures similar to those described by Hall and Bryant, 1995 and Clary and Webster, 1989 and parallel those management decisions described in the PRMP under Riparian Areas, Goal 1, #4-6.

The applied knowledgeable and reasonable practices stated above are not the only recognized means to obtain improved riparian conditions. Other tools and applications integrated into riparian management which have also contributed to the improvement of riparian communities include periodic season-long rest, temporary fencing, and intensive herding. The Proposed RMP allows for other combinations of knowledgeable and reasonable practices, as long as they meet the criteria shown under Riparian Areas, Goal 1, #4.

15-6: Table 3-35 has been corrected in the PRMP/FEIS.

Appendix F, Item 2 acreage data for the Mountain Springs (San Felipe), Warm Springs, and Thousand Springs allotments were updated based on the 1994 range inventory of those allotments (see Draft RMP/EIS, p. 547, footnote 3). The PRMP also updates these acreage data in Appendix F, Item 1, so the two appendix items are consistent.

BLM Response to Letter No. 15 *continued*

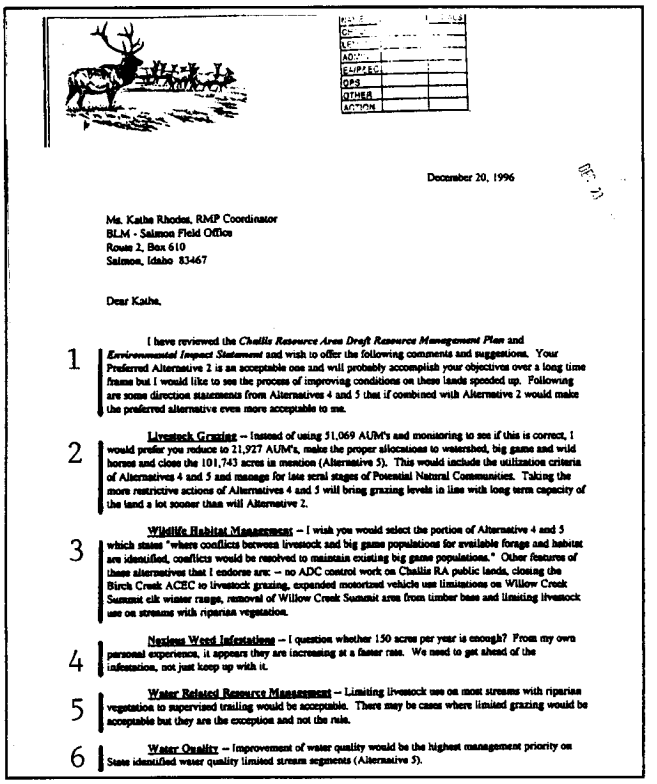
15-7: (a) The Affected Environment section of the Proposed RMP updates the Draft RMP information pertaining to water quality, rangeland condition and trend, fisheries habitat, and riparian function by summarizing additional data available since the Draft RMP/EIS was begun (approximately 1991).

The BLM considered your suggestion to provide a thorough summarization of all the upland, riparian and aquatic monitoring data; however such a summary would take volumes to present and, since monitoring is an ongoing endeavor, the summary would never be complete. The BLM feels the Affected Environment descriptions and Appendices provide a reasonable summary of resource information. A new appendix in the Proposed RMP, Appendix L, Item 1, lists the majority of studies, inventories, surveys, and other research activities pertinent to the Challis Resource Area which can be reviewed upon request at the Salmon BLM Office.

(b) To address information shortcomings, the PRMP carries forward numerous decisions from the Draft RMP Alternative 2 which emphasize gathering new information and updating current information. For example, please see the following PRMP decisions: Biological Diversity, Goal 1, #3; Cultural Resources, Goal 1, #1, 10, 13 and Goal 3, #2; Fisheries, Goal 1, #3, 12, 16; Forest Resources, Goal 1, #2; Hazardous Materials Management, Goal 1, #4; Paleontological Resources, Goal 1, #1; Recreation Opportunities and Visitor Use, Goal 3, #2 and Goal 5, #1; Riparian Areas, Goal 1, #9 and Goal 2, #1-3; Special Status Species, Goal 1, #1-5; Transportation, Goal 1, #8; Water Quality, Goal 1, #1; and Wildlife Habitat, Goal 2, #1.

15-8: Your preference for Alternative 5 is noted, as well as your willingness to live and work with Alternatives 2 or 4. Please note that wild horse numbers in the PRMP reflect Alternative 2 that you were in favor of, rather than the numbers in Alternative 4.

Letter No. 16



December 20, 1996

Ms. Kathe Rhodes, RMP Coordinator
BLM - Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

Dear Kathe,

1 I have reviewed the *Challis Resource Area Draft Resource Management Plan* and *Environmental Impact Statement* and wish to offer the following comments and suggestions. Your Preferred Alternative 2 is an acceptable one and will probably accomplish your objectives over a long time frame but I would like to see the process of improving conditions on these lands speeded up. Following are some direction statements from Alternatives 4 and 5 that if combined with Alternative 2 would make the preferred alternative even more acceptable to me.

2 Livestock Grazing -- Instead of using 51,069 AUM's and monitoring to see if this is correct, I would prefer you reduce to 21,927 AUM's, make the proper allocations to watershed, big game and wild horses and close the 101,743 acres in question (Alternative 5). This would include the utilization criteria of Alternatives 4 and 5 and manage for late seral stages of Potential Natural Communities. Taking the more restrictive actions of Alternatives 4 and 5 will bring grazing levels in line with long term capacity of the land a lot sooner than will Alternative 2.

3 Wildlife Habitat Management -- I wish you would select the portion of Alternative 4 and 5 which states "where conflicts between livestock and big game populations for available forage and habitat are identified, conflicts would be resolved to maintain existing big game populations." Other features of these alternatives that I endorse are: -- no ADC control work on Challis RA public lands, closing the Birch Creek ACEC to livestock grazing, expanded motorized vehicle use limitations on Willow Creek Summit elk winter range, removal of Willow Creek Summit area from timber base and limiting livestock use on streams with riparian vegetation.

4 Noxious Weed Infestations -- I question whether 150 acres per year is enough? From my own personal experience, it appears they are increasing at a faster rate. We need to get ahead of the infestation, not just keep up with it.

5 Water Related Resource Management -- Limiting livestock use on most streams with riparian vegetation to supervised trailing would be acceptable. There may be cases where limited grazing would be acceptable but they are the exception and not the rule.

6 Water Quality -- Improvement of water quality would be the highest management priority on State identified water quality limited stream segments (Alternative 5).

Letter No. 16 *continued*

7 Minimum Streamflow -- Include Alternative 5 statement -- "Request for rights-of-way on BLM lands for diversion of water from BLM lands by private claimants would be denied to protect, maintain and retain minimum streamflow benefits."

8 Fisheries -- Include from Alternatives 4 and 5, "...improve 100% of nonfunctional and functional-at-risk aquatic and riparian habitats." Also include "Actively pursue cooperative efforts with the IDFG, NMFS, USFS and BPA,..." and "On BLM public lands, within 5 years eliminate or modify artificial barriers..."

9 Areas of Critical Environmental Concern -- Retain all existing ACEC'S and designate all the proposed areas (Pennal Gulch, Herd Creek Watershed, Sand Hollow, Donkey Hills and Carlson Hills, Birch Creek, Lone Bird and Road Creek Watershed) using the most restrictive management prescriptions of Alternatives 4 and 5.

10 Forested Areas -- Intensive timber management should be limited to 15,021 acres as per Alternative 5 and commercial timber on the Donkey Hills elk winter range and Lone Pine Peak should be withdrawn from harvest.

11 Off-highway Vehicle Use -- All of the ACEC's designated as "closed" to OHV use under Alternative 5 should be included.

I strongly urge you to combine these desirable features from Alternatives 4 and 5 with Preferred Alternative 2 and develop it for your final Preferred Alternative.

12 In my review, I failed to find a mention of the Salmon or Challis National Forest Management Plan in your list of Other Agencies' Plans. Is this an oversight?

Even though I don't completely agree with your decision, I compliment the BLM for writing such an exhaustive and easy to read document. It is quite evident that it was produced by a very dedicated group of well-trained natural resource management professionals who understand what is happening on the ground. Keep up the good work.

Sincerely,

BLM Response to Letter No. 16

16-1: We acknowledge your preference for incorporating some aspects of Alternatives 4 and 5 into Alternative 2.

16-2: Your preferences are noted. Please see response 6-2.

16-3: (a) Your preference is noted.

(b) Your preference is noted. Please see response 14-4.

(c) Your preference is noted.

(d) The Proposed RMP maintains a seasonal limitation on motorized vehicle use on the Willow Creek Summit elk winter range, but does not apply to the expanded acreage described in Alternatives 4 and 5. OHV use on the 9,200-acre area identified in Alternatives 4 and 5 would be limited to existing roads and vehicle ways, yearlong. The expansion area identified in Alternatives 4 and 5 encompasses the peripheral winter range around the core of the Willow Creek Summit winter range. The BLM believes that the motorized vehicle use limitations outlined above would be adequate to protect the wintering elk herd using this area.

(e) The PRMP would permit harvest of commercial timber on the Willow Creek Summit elk winter ranges only if harvest can be managed to protect elk habitat quality (see PRMP, Forest Resources, Goal 1, #19).

(f) Your preference is noted.

16-4: As of December 1997, ninety-six (96) weed-infested sites comprising approximately 180 acres had been located and inventoried in the Challis Resource Area. Planned inventories in future years may expand inventory of known sites. The planned treatment of 150 acres per year is expected to adequately control further expansion of weed populations on public lands in the RA. The PRMP does not preclude treatment of more acres, if necessary.

16-5: Your preference is noted.

16-6: Your preference is noted. The PRMP identifies water quality improvement as a priority throughout the Resource Area (see PRMP, Water Quality, Goal 1).

16-7: This decision has been rewritten to more accurately reflect BLM policy on the development and use of water resources on public lands. The Proposed RMP revises the decisions listed under Management Concern: Minimum Streamflow, Goal 1, #1, 2, and 3 (DRMP, p. 381a) and Management Concern: Floodplain/Wetland Areas, Goal 2, #3 and 4 (DRMP, p. 379a) so they are consistent with current water rights law and policy. To address fisheries and other resource concerns, the Proposed RMP retains language

BLM Response to Letter No. 16 *continued*

regarding acquisition of minimum streamflows and stipulations on rights-of-way for irrigation diversions.

16-8: Your preferences are noted.

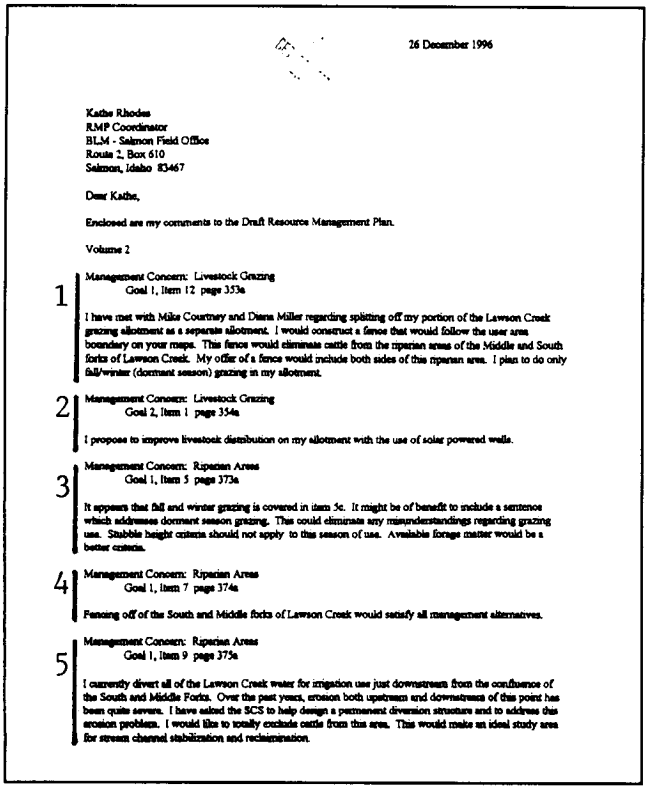
16-9: Your preferences are noted.

16-10: Your preferences are noted.

16-11: Your preference is noted.

16-12: The *Land and Resource Management Plan for the Salmon National Forest* (1988) and the *Land and Resource Management Plan for the Challis National Forest* (1989) were used during preparation of the Challis Draft RMP. Reference to these documents has been listed in the "Corrections to the Draft RMP/EIS" section of the PRMP/FEIS.

Letter No. 17



26 December 1996

Kathe Rhodes
RMP Coordinator
BLM - Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

Dear Kathe,

Enclosed are my comments to the Draft Resource Management Plan.

Volume 2

1 Management Concern: Livestock Grazing
Goal 1, Item 12 page 353a

I have met with Mike Courtney and Diana Miller regarding splitting off my portion of the Lawson Creek grazing allotment as a separate allotment. I would construct a fence that would follow the user area boundary on your maps. This fence would eliminate cattle from the riparian areas of the Middle and South forks of Lawson Creek. My offer of a fence would include both sides of this riparian area. I plan to do only fall/winter (dormant season) grazing in my allotment.

2 Management Concern: Livestock Grazing
Goal 2, Item 1 page 354a

I propose to improve livestock distribution on my allotment with the use of solar powered wells.

3 Management Concern: Riparian Areas
Goal 1, Item 5 page 373a

It appears that fall and winter grazing is covered in item 5e. It might be of benefit to include a sentence which addresses dormant season grazing. This could eliminate any misunderstandings regarding grazing use. Stubble height criteria should not apply to this season of use. Available forage matter would be a better criteria.

4 Management Concern: Riparian Areas
Goal 1, Item 7 page 374a

Fencing off of the South and Middle forks of Lawson Creek would satisfy all management alternatives.

5 Management Concern: Riparian Areas
Goal 1, Item 9 page 375a

I currently divert all of the Lawson Creek water for irrigation use just downstream from the confluence of the South and Middle Forks. Over the past years, erosion both upstream and downstream of this point has been quite severe. I have asked the SCS to help design a permanent diversion structure and to address this erosion problem. I would like to totally exclude cattle from this area. This would make an ideal study area for stream channel stabilization and reclamation.

BLM Response to Letter No. 17

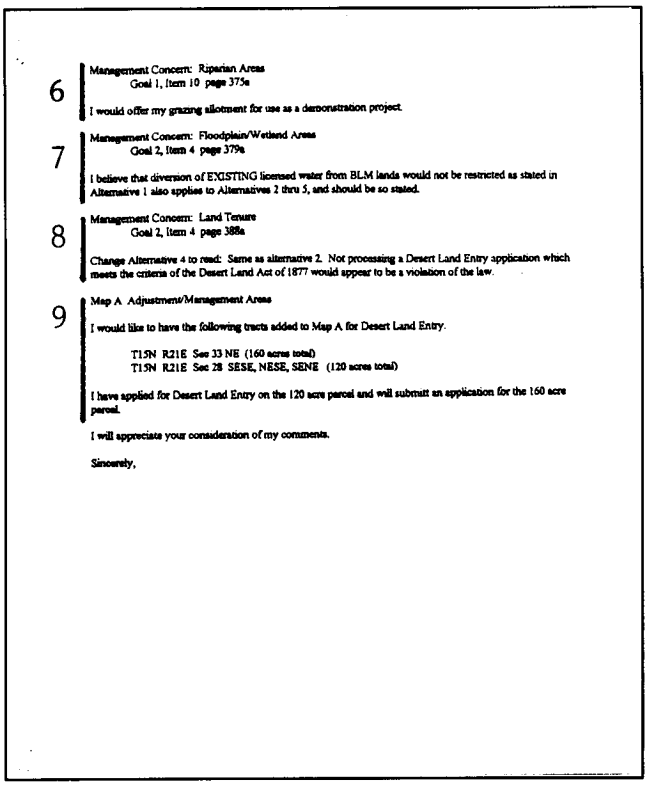
17-1: The proposal you suggest would be allowed under the PRMP (see Livestock Grazing, Goal 1, #12).

17-2: Construction of new range improvement projects would be allowed in the PRMP (see Livestock Grazing, Goal 2). Any site-specific impacts from your proposal would have to be analyzed in an environmental assessment.

17-3: Your suggestions are noted. Riparian area stubble height criteria (see PRMP, Riparian Areas, Goal 1, #5) would apply to dormant season grazing. A four-to-six inch stubble height is necessary in the spring to allow riparian zones to properly trap sediments that can be used to build streambanks, raise watertables, and promote the growth of riparian-dependent vegetation. Note that the PRMP has procedures to allow other knowledgeable and reasonable practices in lieu of stubble height (see Riparian Areas, Goal 1, #4).

17-4: Fencing off the riparian zones would likely promote riparian recovery at a more rapid rate than other management options involving controlled grazing.

17-5: Your proposal to exclude cattle from the erosion area would be compatible with the Proposed RMP. Decisions about how to best manage this area would be made by a



6 Management Concern: Riparian Areas
Goal 1, Item 10 page 375a

I would offer my grazing allotment for use as a demonstration project.

7 Management Concern: Floodplain/Wetland Areas
Goal 2, Item 4 page 379a

I believe that diversion of EXISTING licensed water from BLM lands would not be restricted as stated in Alternative 1 also applies to Alternatives 2 thru 5, and should be so stated.

8 Management Concern: Land Tenure
Goal 2, Item 4 page 388a

Change Alternative 4 to read: Same as alternative 2. Not processing a Desert Land Entry application which meets the criteria of the Desert Land Act of 1877 would appear to be a violation of the law.

9 Map A Adjustment/Management Areas

I would like to have the following tracts added to Map A for Desert Land Entry.

T15N R21E Sec 33 NE (160 acres total)
T15N R21E Sec 28 SESE, NESE, SENE (120 acres total)

I have applied for Desert Land Entry on the 120 acre parcel and will submitt an application for the 160 acre parcel.

I will appreciate your consideration of my comments.

Sincerely,

BLM interdisciplinary team, with public input, and with final approval by the BLM authorized officer.

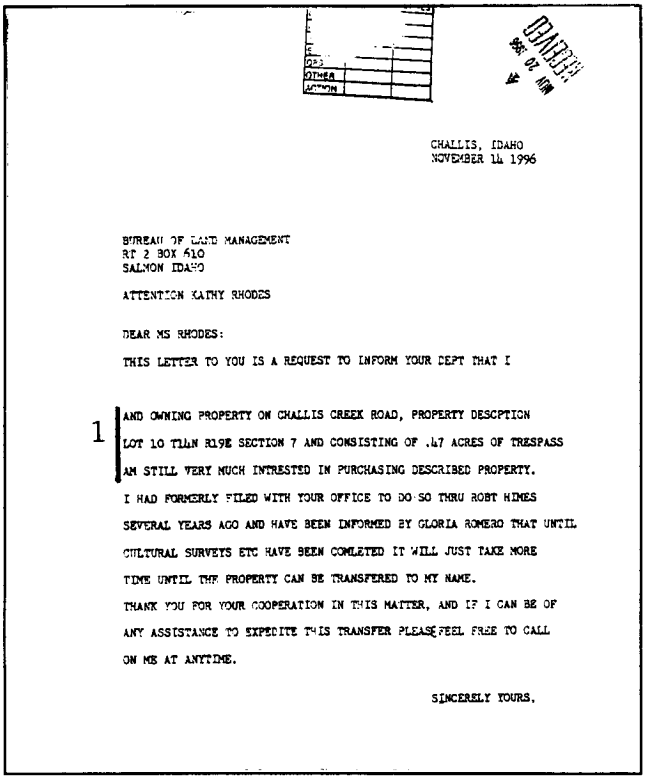
17-6 Your proposal to offer your allotment for a demonstration project on a perennial watershed would be compatible with the Proposed RMP, and is appreciated.

17-7: Please see response 16-7.

17-8: Language from Alternative 4 of the Draft RMP decision you are concerned about (Management Concern: Land Tenure, Goal 2, #4, Alternative 4) was not carried forth into the Proposed RMP. However, please note that land use plans, such as this RMP, *can* be used to constrain applications for DLEs. The Challis Resource Area's existing land use plans (Challis Management Framework Plan (MFP), Ellis-Pahsimeroi MFP, Mackay MFP) currently contain constraints on DLE applications. DLE applications received prior to signing of the Record of Decision for the Challis RMP/EIS will be processed consistent with the land use plan provisions in place at the time the application was received.

17-9: The DLE application for the 120-acre tract noted in your comment letter was rejected by the Challis Resource Area for Desert Land Entry (DLE) on July 30, 1997, because the soils fail to meet *existing* Land Use Plan (Ellis-Pahsimeroi MFP) criteria for DLEs, and the proposal failed to meet the economic farm requirements of 43 CFR 2520.0-8(d). The 160-acre tract also fails to meet these soils criteria, so it would be rejected under the existing criteria of the MFP, as well as those criteria that are carried forth into the PRMP (see PRMP, Land Tenure, Goal 2, #4). Because these tracts do not meet Desert Land Entry criteria or other BLM criteria for disposal, they have not been added to the general Adjustment Areas on Map A.

Letter No. 19



CHALLIS, IDAHO
NOVEMBER 14 1996

BUREAU OF LAND MANAGEMENT
RT 2 BOX 610
SALMON IDAHO

ATTENTION KATHY RHODES

DEAR MS RHODES:

THIS LETTER TO YOU IS A REQUEST TO INFORM YOUR DEPT THAT I

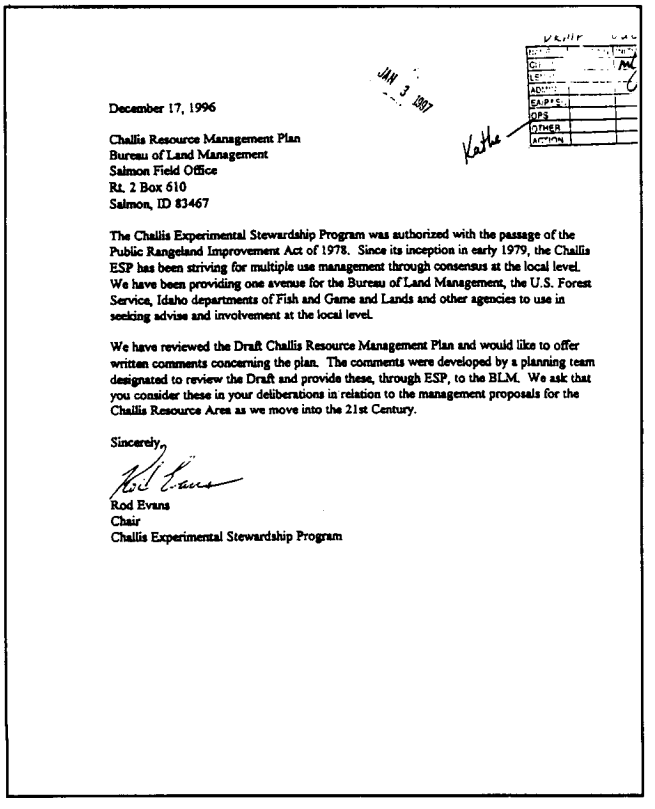
1 AMD OWNING PROPERTY ON CHALLIS CREEK ROAD, PROPERTY DESCPTION
LOT 10 T14N R19E SECTION 7 AND CONSISTING OF .47 ACRES OF TRESPASS
AM STILL VERY MUCH INTRESTED IN PURCHASING DESCRIBED PROPERTY.
I HAD FORMERLY FILED WITH YOUR OFFICE TO DO SO THRU ROBT HIMES
SEVERAL YEARS AGO AND HAVE BEEN INFORMED BY GLORIA ROMERO THAT UNTIL
CULTURAL SURVEYS ETC HAVE BEEN COMLETED IT WILL JUST TAKE MORE
TIME UNTIL THE PROPERTY CAN BE TRANSFERED TO MY NAME.
THANK YOU FOR YOUR COOPERATION IN THIS MATTER, AND IF I CAN BE OF
ANY ASSISTANCE TO EXPEDITE THIS TRANSFER PLEASE FEEL FREE TO CALL
ON ME AT ANYTIME.

SINCERELY YOURS.

BLM Response to Letter No. 19

19-1: The BLM public lands you are interested in acquiring (T14N, R19E, Section 7, Lot 10) were proposed for consideration as a sale tract under Alternatives 2 and 3 of the Draft RMP (see Attachment 17, p. 499). This sale tract has been listed in the Proposed RMP for potential disposal (see PRMP, Attachment 17).

Letter No. 20



December 17, 1996

Challis Resource Management Plan
Bureau of Land Management
Salmon Field Office
Rt. 2 Box 610
Salmon, ID 83467

The Challis Experimental Stewardship Program was authorized with the passage of the Public Rangeland Improvement Act of 1978. Since its inception in early 1979, the Challis ESP has been striving for multiple use management through consensus at the local level. We have been providing one avenue for the Bureau of Land Management, the U.S. Forest Service, Idaho departments of Fish and Game and Lands and other agencies to use in seeking advise and involvement at the local level.

We have reviewed the Draft Challis Resource Management Plan and would like to offer written comments concerning the plan. The comments were developed by a planning team designated to review the Draft and provide these, through ESP, to the BLM. We ask that you consider these in your deliberations in relation to the management proposals for the Challis Resource Area as we move into the 21st Century.

Sincerely,

Rod Evans
Chair
Challis Experimental Stewardship Program

BLM Response to Letter No. 20

20-1: (a) Please see response 15-2, paragraphs 1 and 2; response 15-7(a), paragraph 1; and response 15-7(b). Because some of the inventories contained in the Proposed RMP were not specified in prior planning documents (Alternative 1), the management decisions and actions proposed in the Challis PRMP are required to even **begin** the process of gathering this information. Other inventory actions are carried forward from the Management Framework Plans, with modification, because they are considered to be valid, but have not been completed to date.

(b) Monitoring of resource conditions and trends in relation to current management indicates that "where we (currently) are" is not the direction "we want to go." The BLM's analysis of the effectiveness of past rangeland management actions indicated that past management has produced little change in resource conditions (see DRMP, "Rangeland Monitoring," p. 101). The Draft RMP therefore proposed four alternative management schemes for achieving the stated goals. The goal statements described in Volume 2 of the DRMP *(i.e.,* "where we want to go") were not developed from an analysis of current rangeland conditions. Rather, referenced goal statements were derived from the sources indicated in the rationale statement which accompanies each

Challis Experimental Stewardship Group
Comments on the Draft Challis Resource Management Plan

We found the report to be generally well-written and in many cases, based upon peer-reviewed research reports. We do feel that there are numerous points of potential debate spread throughout the document. These points of debate relate primarily to 2 or 3 major issues that are contained in or are underlying the planning document. These issues center upon the lack of inventory and monitoring information on which this decision is based and the potential for highly prescriptive short-term management at the sacrifice of long-term range and resource conditions. These issues and how they are dealt with are central to the longer-term management of the resource area.

1 Based upon our review of the RMP, there appears to be a general lack of information within the planning documents on condition and trend. This is not only true for rangelands, but also encompasses cultural resources, genetic diversity, biological diversity (or biodiversity), plant communities and a number of other critical factors. We find it incredible that information (including tables, maps and other citations within the Draft RMP) used in this RMP is based upon inventory and classification information developed as long ago as the 1977 Challis EIS. We believe it is extremely difficult (if not impossible) to decide where you are going (management plan) without having any idea of where you are (inventory). At the very least field inventories and/or range condition and trend studies should have been done by field staff to compare with earlier information to determine the results of past management, as well as set the stage for future direction. It does not appear from this document that this was done. How can you determine the successes or failures of past management without knowing the condition and trend of these resources in relation to those management alternatives used in the past? In other words, there is a cause and effect relationship in terms of natural resources (particularly rangelands) and you are missing the effect on the landscape by not doing the inventory.

For example, consider the following quotes, references and citations contained in the Draft RMP:
Biological Diversity, p. 52: "To date, the biological diversity of the Challis RA has not been formally inventoried, assessed or analyzed"
p. 53: "Virtually nothing is known about levels or distribution of genetic diversity in the RA."
p. 54: "Data on biodiversity are currently limited to inventories of vertebrate and vascular plant species and classification of vascular plant communities."
Plant Communities: p. 55: "The distribution of common plant communities is relatively well known in the RA. Table 3-21... and Table 3-22 ... list the principle plant communities that have been described for the RA."
Riparian/Wetland Vegetation, p. 131: "A riparian vegetation type classification has not been completed for central Idaho, but the areas covered by the above documents surround the Resource Area."

1 **Cultural Resources**, p. 57: "A Class I inventory has not been completed for the Challis Resource Area. An estimated 74,600 acres (9.5%) of the Challis Resource Area has been inventoried for cultural resources at a Class II level using a variety of methods. Approximately 12,500 acres (1.5%) of the Challis Resource Area have been intensively inventoried at a Class III level."
Vegetation (pp. 128-145 and Maps H and I) Range Condition and Trend (p.55 and pp.99-101): Most of these sections refer to information developed during the Grazing EIS period (1977-1983) and do not appear to have been updated. In addition, some very strong disclaimers must be put into the text concerning the fact that the Affected Environment information is extremely dated and of little use, unless updated through some sampling procedures. The paragraph on page 100 is a good start, but more is needed. The

2 Challis ESP Group urges you to put the highest priority on updating this information through sampling of critical areas and eventually progressing through most of the vegetation types in the resource area. We would urge you to put this at the utmost priority level, at the sacrifice of "studies" and monitoring efforts that result in no data. Many of these latter items appear to be aimed at the highly prescriptive management issues

3 such as utilization and stubble height. We would also encourage you to develop long term goals in terms of resource conditions (streambank stability, vegetation successional stages, etc.) and do away with the highly prescriptive items included in the document. To include items such as a "minimum of 4 (or 6) inch median of stubble height" in your alternatives implies that those are goals of management. The goals of your management should be based upon the desired condition of the basic resource that you are managing (eg. soil, water, vegetation). Remaining stubble height is but one of the ways that we have of

4 looking at our progress toward the real goals of resource improvement. If condition and trend, cover, actual use, photographs and other techniques listed on page 101 have in fact been gathered and used, then those data and results of the analyses should be presented here. That is the only way of determining if we are improving or degrading resource conditions over time. Most of these changes in resource conditions can be tied directly to on-the-ground management.

5 Statements concerning condition and trend also appear to contain erroneous and biased information. For example, "Early, mid, and late seral communities typically result from the effects of disturbance events such as fire, timber blowdown, insect infestation, or past and present land uses."(p. 55) Succession is a process that takes place with or without disturbance. Movement from early seral to mid seral communities may have nothing to do with "disturbance events", but is rather a case of annuals or short-lived perennial species being replaced in the community by perennials. There are obviously many factors that influence succession, many of which are not related to disturbances. Disturbance can in fact play a major role in moving down the successional ladder (ie. moving from late seral to early seral), but the conditions themselves do not "typically result from ...disturbance."

6 **Rangeland Monitoring**, p 101: Reference is made to trend studies and the lack of movement to upward trend. The concluding statement says, "These data seem to indicate that current management has not met existing land use plan objectives to *improve* range condition in the RA. Three reasons may account for the lack of improvement: (a) grazing

goal, including national initiatives, Bureau policies, and regulations.

20-2: The BLM will continue to monitor upland plant communities using nested frequency and permanent photo plots according to Idaho's Minimum Monitoring Standards (see PRMP, Livestock Grazing, Goal 1, #6) on the prioritized allotments listed in Livestock Grazing, Goal 1, #2, and expanding to other allotments as needed. Part of the monitoring process may include an upland inventory; however, upland inventories must be specific to individual management units. In addition, part of the monitoring process will include monitoring of use standards and (or) habitat conditions that may be applied to specific streams or upland habitats (*e.g.*, see Riparian Areas, Goal 1, #3; and Fisheries, Goal 1, #3). Sampling only the plant communities within critical areas would not provide information on resource conditions unique to a management unit or specific streams within that unit.

20-3: RMP goals are stated in terms of resource conditions, where appropriate (for example, see Proposed RMP: Livestock Grazing, Goal 1; Wildlife Habitat, Goals 2 and 3; Noxious Weed Infestations, Goal 3; Rangeland Vegetation Treatment Projects, Goal 1; and Upland Watershed, Goal 1). The various alternatives described a range of management decisions (such as stubble height criteria) which would be implemented to achieve these goals.

20-4: The "Rangeland Monitoring" discussion on page 101 accurately summarizes the analysis of 120 nested frequency study site data and photo plots. This analysis included climate, actual use, and utilization data, where available. Detailed descriptions of these data are available for review in the Challis Resource Area Office in Salmon, Idaho.

20-5: Much of the discussion on Biological Diversity (DRMP, pp. 52-56) is excerpted from the 1991 Keystone Center Report - *Biological Diversity on Federal Lands*. Plant succession is indeed a continuing, dynamic, natural process; however, the rate of succession and the particular path of plant succession are greatly influenced by the severity and frequency of natural and induced disturbances along with the composition of the present plant community. If a particular ecological site is not at "potential natural community" (PNC) seral stage, then it likely has undergone some sort of natural or induced disturbance that altered the site's plant community. This concept recognizes that PNC is dependent upon natural disturbances (fire, insects, climatic extremes) in order to remain dynamic and resilient within its historical range of variability. These disturbances can alter a site's plant community in the short term; but, as

6 systems may not have been fully implemented as plannned, (b) overstocking, and (c) seasons of use that are incompatible with improving the vigor of desired species." It is very important to realize that there is one other critical reason for not reaching the land use plan objective--that being that the objectives may not have been realistic or obtainable given the physical and financial limitations that we are currently facing. Many of these objectives were developed in the late 1970's and early 1980's under entirely different conditions than we are now facing. For example, under many situations, it may not be physically possible, nor financially feasible to move from Late Seral to PNC. Is the blanket objective of "improving range condition" still valid? Perhaps maintaining range condition would have been a more realistic goal. Perhaps this is another

7 opportunity for Challis ESP involvement in evaluating objectives from past land use plans, given the current lack of funding for range improvements, personnel and the shadow of endangered species. Also consider that you may not have conducted the studies or

8 accumulated the data to provide answers to this critical resource condition. Clarification should be made concerning the 76 studies cited in this section. As it sits now, there is substantial room for debate about the quality of this information and the interpretation of it. For example, the seventy-six (76) studies that were inconclusive may have shown no statistical significance between the 2 observation points, which may indicate no change in the plant communities, or static trend. From this interpretation, only 2.5 percent of your studies (3 out of 120 total studies) are showing a downward trend. Rather than concentrating on the minor negative aspect of the 3 sites with downward trend, why not say that we are maintaining or improving range conditions over 97.5 percent of the time?

9 If range conditions are as deteriorating as the Draft RMP implies, why do we see record numbers of elk and antelope, wild horse herds continuing to increase (with the need for gathering every other year), recreational use of the public lands increasing and livestock numbers maintaining to declining slightly over the past 20 years? With all of these demands on the resource that is declining in condition, one would expect that range conditions would continue to suffer, which would in turn cause the wildlife, wild horses and others dependent upon the habitat, to eventually decline.

10 The same point could be made earlier on that same page (p. 101) in the interpretation of the Riparian-Wetland Area Functional Conditions and the interpretation listed on p. 104. The statement is made that "Challis RA staff indicate riparian zones throughout the Resource Area are well below functioning condition." This is contrary to the data presented on page 101. Our interpretation is that 76.7 percent of the acreages in riparian zones are functioning. Only about 17 percent are not functioning. The further statement

11 "In many parts of the Resource Area, the riparian resource is sustaining severe damage that will take years of intensive management to rectify." appears to be subject to debate. Observations by the Challis ESP group support view that change in these areas influenced by water can be rather rapid and that "intensive management" may be only the institution of a grazing system or the building of a management fence.

Economy and Society

12 The general thrust of this section appears to be preparation of the local economy for the shift to more service-oriented functions associated with tourism and retirees. This should be done with open eyes and the realization that shifts from basic industries such as agriculture, timber and mining to services will result in significant changes in the local economy. From your economic models, what can you say about the numbers of retirees or river rafters or some other service-oriented sector employees that would be needed to replace the lost income and employment from reducing grazing by 25 percent in the resource area? It would seem these trade-offs should be detailed and considered in the formulation of management alternatives.

13 p. 67 Cattle cycles usually last 8 to 12 years, with 10 years being the average duration of the cycle (peak to peak) over the past 100+ years.

14 p. 69. "If profitability declines enough, expenditures for goods and services related to raising beef cattle may decline, ..." How much is enough? Cattle prices have declined over 35 percent over the last 3 years, has the expenditures for goods and services related to raising beef cattle declined also?

Wild Horses

15 Statement p. 159: "This has resulted in wild horse numbers varying from about 185 to 253 animals between gatherings, as the herd normally increases at a rate of about 17% per year." This ignores the fact that there were no gatherings on the Challis Wild Horse Herd from the late-1970's to the early-1980's, due primarily to an injunction in Federal Court. During that period of time, the horse herd increased to nearly 700 head (in 1979). Even as late as 1986, there were still about 300 head of horses on the unit. One of the factors that resulted in the removal of the injunction and the reinstituting of gathering, was the efforts of the Challis Experimental Stewardship Program. Testimony was provided by Fish and Game personnel relative to the damage done by the horse herd, particularly to antelope fawning areas. Permittees also presented testimony to the court relating to the fact that management plans were on hold until horse numbers were controlled, as well as the fact that range improvement projects (burns, seedings, fencing) were in jeopardy as long as horses were allowed to increase unchecked.

16 Very prescriptive recommendations made in relation to management are doomed to fail. We have seen this develop over a period of years in relation to riparian grazing utilization standards and more recently, stubble height. The agencies and ranching community have some very definite trust and credibility problems that must be addressed in order to improve or maintain resource conditions, with the presence of livestock grazing. Highly prescriptive actions such as these will only widen the gaps that now exist in terms of trust and credibility, thus hindering the development of site-specific management objectives and plans and ultimately implementation.

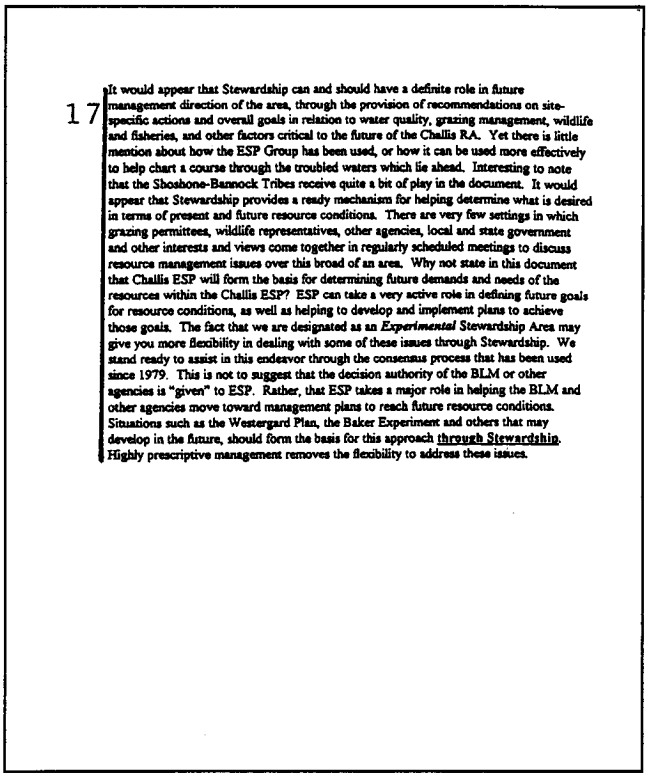
long as the site has maintained its site potential (through soil structure, fertility, water holding capacity, nutrient and energy cycles, etc.) the native plants will progress up the seral scale towards PNC. During this process other disturbances may occur which dictate the site's historical range of variability. Disturbances can direct a site beyond its historical range of variability towards a completely different vegetation path. This new pathway may be short or long term and may even become irreversible. This concept is described in "state-and-transition models" by Westoby et al. (1989) and others.

In order to clarify the RMP's discussion of succession processes, the Proposed RMP contains a revised definition of PNC and adds a definition of ecological site.

20-6: The BLM believes the goals of improving rangeland conditions and obtaining functioning riparian conditions where these conditions are not being realized are valid, regardless of the vintage of land use plan providing the direction. Your reference to move from Late Seral to PNC appears to be a mis-interpretation of Management Concern: Livestock Grazing, Goal #1 (DRMP, p. 350). The goal states that 40% of the uplands within the Resource Area should be Late Seral to PNC, meaning within the range of these high seral states. These goals are also realistic and obtainable, as indicated by the improvement in upland conditions in the Mountain Springs (San Felipe) Allotment and the favorable trends in the Herd Creek and Warm Springs allotments (see response 15-2). Riparian and aquatic conditions have also improved in Road and Herd creeks and their tributaries; data indicate an upward trend towards expanding hydric plant communities, improved woody age structure and increased streambank stability, leading to functional riparian systems. These positive results were obtained by modifying grazing management actions and applying use standards, while still providing for significant livestock grazing.

20-7: ESP's involvement in evaluating the RMP's proposals and goals has been welcomed throughout the RMP planning process, and will continue to be sought during RMP implementation following selection of the approved plan.

20-8: The trend analysis performed in 1992 indicated 76 of the 120 sites were inconclusive **due to insufficient data**, not because of a lack of statistical significance between data sets (which would indicate a static trend). Since 1992, an additional 25 nested frequency plots have been read showing the following results: seven (7) upward trend, nine (9) downward trend and nine (9) static trend. These new data generally indicate a lack of improvement when viewed throughout the Resource Area; however specific allotments (or management areas within an allotment) may be improving. The BLM will continue to monitor the uplands so that eventually there is sufficient data to determine trend



17 It would appear that Stewardship can and should have a definite role in future management direction of the area, through the provision of recommendations on site-specific actions and overall goals in relation to water quality, grazing management, wildlife and fisheries, and other factors critical to the future of the Challis RA. Yet there is little mention about how the ESP Group has been used, or how it can be used more effectively to help chart a course through the troubled waters which lie ahead. Interesting to note that the Shoshone-Bannock Tribes receive quite a bit of play in the document. It would appear that Stewardship provides a ready mechanism for helping determine what is desired in terms of present and future resource conditions. There are very few settings in which grazing permittees, wildlife representatives, other agencies, local and state government and other interests and views come together in regularly scheduled meetings to discuss resource management issues over this broad of an area. Why not state in this document that Challis ESP will form the basis for determining future demands and needs of the resources within the Challis ESP? ESP can take a very active role in defining future goals for resource conditions, as well as helping to develop and implement plans to achieve those goals. The fact that we are designated as an *Experimental* Stewardship Area may give you more flexibility in dealing with some of these issues through Stewardship. We stand ready to assist in this endeavor through the consensus process that has been used since 1979. This is not to suggest that the decision authority of the BLM or other agencies is "given" to ESP. Rather, that ESP takes a major role in helping the BLM and other agencies move toward management plans to reach future resource conditions. Situations such as the Westergard Plan, the Baker Experiment and others that may develop in the future, should form the basis for this approach through Stewardship. Highly prescriptive management removes the flexibility to address these issues.

throughout the Resource Area. Monitoring will focus on the allotments listed in the PRMP under Livestock Grazing Goal 1, #2.

20-9: The BLM disagrees with your interpretation that deteriorating conditions prevail throughout the Resource Area. Page 101 of the DRMP indicates improving or static upland conditions do exist. You are correct in referencing an increase in some big game numbers (specifically elk) and wild horse numbers. However, elk and wild horses are very adaptable and these species' population trends do not necessarily reflect the overall trend in habitat health. Many other indicators suggest that other resources may be in less than satisfactory condition in many locations throughout the Resource Area (aquatic habitat, water quality, sage grouse habitat, bighorn sheep habitat, etc). The BLM believes the analysis of impacts contained in the DRMP, Chapter 4 - Environmental Consequences adequately captures the adverse effects of competing and conflicting uses under Existing Management (Alternative 1). An increase in recreational activity is being realized throughout the West with the renewed interest in the nation's public lands and the increase in regional population, and not necessarily because of improved resource conditions or actions resulting from the RMP (see DRMP, p. 257, "Introduction" and "Summary of Effects," #2).

20-10: The statement in the Draft RMP, p. 104, you are concerned about has been revised in the Proposed RMP. You are correct in viewing "functional-at-risk" as "functional" because, by definition, it is. However, streams that are at-risk are lacking or cannot sustain some important attributes of properly functioning systems. Attributes such as channel type, downcutting and lateral cutting, poor vegetation, or unhealthy watersheds make the stream system susceptible to degradation during periodic high flow events. The RMP's goal is to obtain and maintain the full range of attributes characteristic of a properly functioning system (see PRMP, Livestock Grazing, Goal 1 and Riparian Areas, Goal 1).

20-11: The BLM believes the potential to improve riparian condition to properly functioning is still present, although the time frames to obtain success may be quite variable. Some stream reaches may indeed take several years to heal, even with intensive management. The original functionality assessment was made in 1993/1994 through contract inventory and staff review. The latest (1996) annual report to Congress indicated 35.5% properly functioning, 55.9% functional-at-risk and only 8.6% in a non-functional condition. A great deal of this improvement has been obtained on tributaries to the East Fork Salmon River specifically Road, Horse Basin, Mosquito, Bear, Herd and Lake Creeks) in a relatively short time frame through improved management strategies and the application of grazing standards. Other stream reaches within the

Resource Area may have to undergo further stream alteration in order to obtain balance with the hydrology and land form and then build from a new starting point. These situations will take several years to improve through use of very conservative management strategies. The consideration and application of physical structures to assist these management strategies are certainly valid on a case-by-case basis, and are not precluded by the PRMP.

20-12: The discussion of the two-county economy describes current characteristics of the local economy (employment, income, earnings), as well as economic trends during the past 20 to 25 years. The data compiled during the University of Idaho's study of the two counties indicates what ESP terms "basic industries" (grazing, mining, timber) comprise about 60% of employment and earnings for the area, while business associated with visitors to the area and retirees accounts for about 28% of employment and 20% of earnings (see DRMP, pp. 504 and 506). Both Custer and Lemhi counties have experienced consistent growth in the service sector since 1969, a trend which began prior to development of the Challis RMP (DRMP, p. 69) and is expected to continue regardless of BLM management. The quantitative analysis of impacts to the regional economy indicates that the slight effects which are expected to occur as a result of RMP actions are not significant (see DRMP, p. 205a, Alternative 2); *i.e.,* RMP actions are **not** expected to either cause "shifts from basic industries such as agriculture, timber and mining to services" or "result in significant changes in the local economy."

The estimated number of jobs "lost" in the two-county region as a result of expected grazing reductions under Alternative 2 would be approximately 13 jobs, or only .3% of regional employment (DRMP, Table 4-2, p. 210b). You cannot make a direct equivalency of jobs-lost-in-one-industry to jobs-gained-in-another-industry, for each industry has different economic patterns, income ranges, and purchasing patterns. Actual occurrence of service sector jobs is not a trade off or substitution for basic industry jobs, but a change in purchasing patterns or needs requirements. The "trade-offs" of impacts to the various economic sectors **were** considered in the development of RMP alternatives; please note that the analysis of impacts described on pp. 204-212 of the Draft RMP discloses a range of impacts among the alternatives.

20-13: A recent article in *Idaho Outlook* ("Beef Battles Back" May 1997) supports the BLM's discussion of the cyclical nature of cattle prices (DRMP, p. 67). The BLM recognizes that other data sources may describe cattle cycles with slightly different average durations.

20-14: The economic analysis for the Challis Draft RMP used the Custer-Lemhi Economic Model, which is a linear model. The model assumes that if a given reduction in livestock

numbers occurs, a commensurate reduction in the costs of goods and services to raise those livestock also occurs. For example, if an operator reduces his or her herd from 100 head to 80 head, the operator would have reduced costs per animal for feed, vaccinations, and the like. However, some costs to raise the livestock herd may remain the same, even if the herd size is reduced - *e.g.,* the cost of the pickup truck and trailer needed to transport stock or the cost of the mower and baler needed to harvest a hayfield. For this reason the BLM stated that expenditures for goods and services MAY decline.

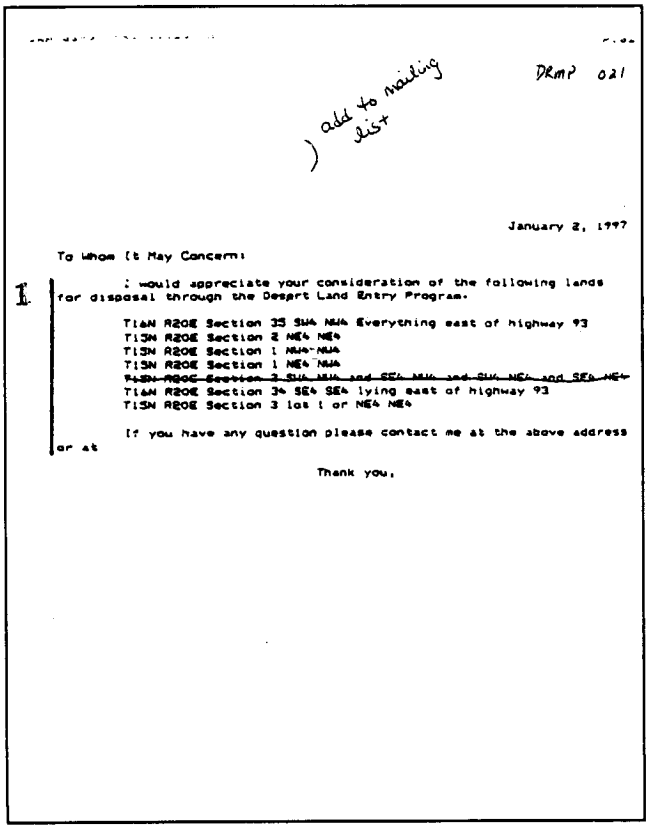
20-15: The Wild Horse and Burro affected environment section (DRMP, pp. 158-161) did not discuss **in detail** how the appropriate management level for the Challis wild horse herd was decided. However, the Draft RMP did state that equilibrium with other resource uses and winter forage requirements were the primary factors for the Challis herd. The interest, input and efforts of the ESP in reaching a satisfactory conclusion to the injunction (which defined the wild horse management level) are noted in the Introduction section of the 1989 Herd Management Area Plan Update. This document is incorporated in the Draft RMP by reference (see DRMP, p. 158).

20-16: It is very important to improve areas that are currently in less than satisfactory condition as quickly as possible, while considering ongoing social, economic, biological, and physical uses, needs, and constraints. Immediate changes in management are necessary to abate any ongoing impacts that may become irreversible if left unattended. The Proposed RMP clearly defines management actions that are likely to yield rapid response in areas most in need of improvement, while not eliminating commodity-based uses of the public lands. Since 1993, very positive results have been achieved using this approach on many upland habitats (see response 20-1) and riparian areas (see response 20-11). Other knowledgeable and reasonable practices (see PRMP, Livestock Grazing, Goal 1, #7 and Riparian Areas, Goal 1, #4) will be considered as a viable means of reaching the stated goals, providing these practices have been effective in past applications and can meet interdisciplinary team and environmental analysis (EA) review. Once the upland or riparian habitat has responded favorably and has become resilient and sustainable, then other management schemes, if meeting the knowledgeable and reasonable criteria, can be entertained with relative certainty of maintaining these productive habitats while providing additional flexibility to the public lands user. The BLM regrets you perceive that the RMP's management decisions encourage "distrust and credibility problems"; the BLM anticipates improved relationships with public land users as a result of the improved resource conditions that will occur from implementing RMP actions.

Response to Letter No. 20 *continued*

20-17: As stated in response 20-7, ESP's involvement and assistance are welcome. ESP involvement was actively pursued during the planning process for the Draft RMP; the RMP was an agenda item at regularly scheduled ESP meetings (see DRMP, pp. 335-338). Stewardship's role in providing recommendations, and ESP's assistance in developing and implementing specific plans to achieve defined objectives and goals, are certainly recognized and appreciated. The BLM agrees ESP's role in the management of the public lands within the Challis Resource Area can and should be utilized further in the future. ESP is encouraged to submit innovative proposals, to participate in the public involvement process and project planning, and to provide input and comments on environmental assessments. The BLM welcomes ESP's assistance and recommendations in developing resource objectives at the activity plan level (*e.g.*, grazing allotments, herd management areas), along with providing valuable information for future watershed assessment efforts.

Letter No. 21



DRMP 021

add to mailing list

January 2, 1997

To Whom It May Concern:

1 I would appreciate your consideration of the following lands for disposal through the Desert Land Entry Program.

T16N R20E Section 35 SW4 NW4 Everything east of highway 93
T15N R20E Section 2 NE4 NE4
T15N R20E Section 1 NW4 NW4
T15N R20E Section 1 NE4 NW4
~~T15N R20E Section 3 SW4 NW4 and SE4 NW4 and SW4 NE4 and SE4 NE4~~
T16N R20E Section 34 SE4 SE4 lying east of highway 93
T15N R20E Section 3 lot 1 or NE4 NE4

If you have any question please contact me at the above address or at

Thank you,

BLM Response to Letter No. 21

21-1: The BLM considered your request that certain public lands be made available for disposal through Desert Land Entry.

The following parcels were added to the Proposed RMP as adjustment areas on Map A: Adjustment/Management Areas to indicate they would be available for potential disposal through exchange or DLE:

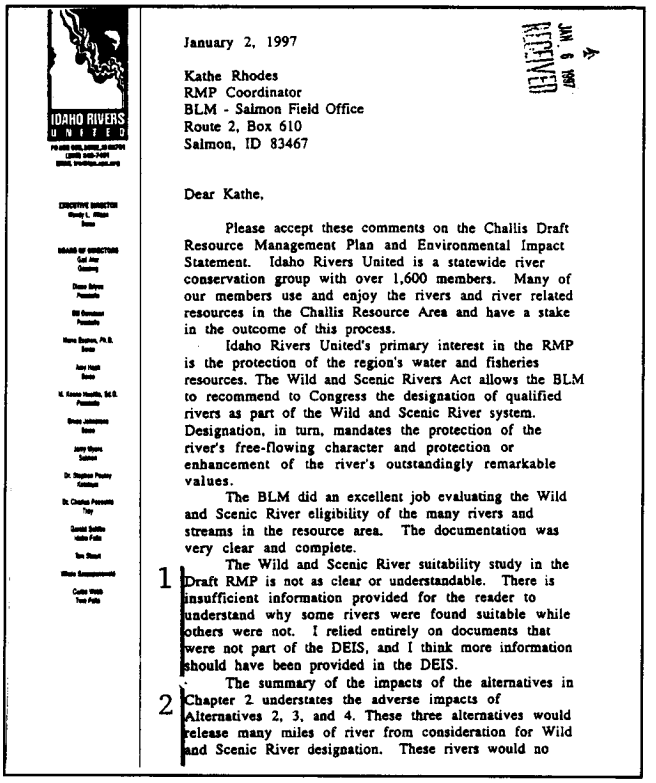
T16N, R20E, Sec. 35, SW4NW4 everything east of Highway 93
T15N, R20E, Sec. 2 NE4NE4
T15N, R20E, Sec. 1 NW4NW4
T15N, R20E, Sec. 1 NE4NW4

The following two parcels were not included in the Proposed RMP as adjustment areas because they do not meet the soils or slope criteria for Desert Land Entry (see PRMP, Land Tenure and Access, Goal 2, #4):

T16N, R20E, Sec. 34, SE4SE4 lying east of Highway 93
T15N, R20E, Sec. 3, lot 1 or NE4NE4.

In addition, the BLM wishes to retain these parcels because of resource concerns: these public lands are visible from an eligible Wild and Scenic River segment; are within the corridor for Visual Resource Management Class II, which emphasizes retention of existing visual quality; are in close proximity to a BLM campground; and contain pristine vegetation communities and other important resource values.

Letter No. 22



IDAHO RIVERS UNITED

RECEIVED JAN 6 1997

January 2, 1997

Kathe Rhodes
RMP Coordinator
BLM - Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

Dear Kathe,

Please accept these comments on the Challis Draft Resource Management Plan and Environmental Impact Statement. Idaho Rivers United is a statewide river conservation group with over 1,600 members. Many of our members use and enjoy the rivers and river related resources in the Challis Resource Area and have a stake in the outcome of this process.

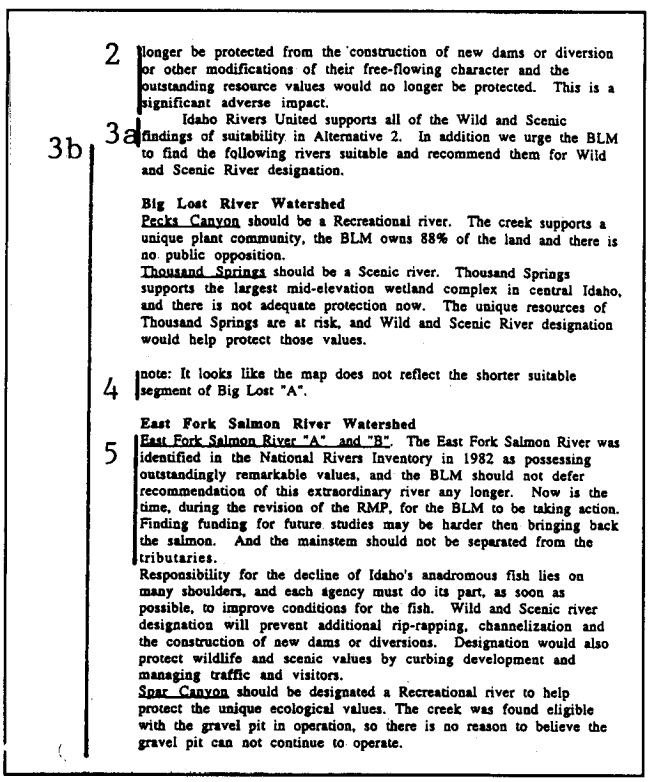
Idaho Rivers United's primary interest in the RMP is the protection of the region's water and fisheries resources. The Wild and Scenic Rivers Act allows the BLM to recommend to Congress the designation of qualified rivers as part of the Wild and Scenic River system. Designation, in turn, mandates the protection of the river's free-flowing character and protection or enhancement of the river's outstandingly remarkable values.

The BLM did an excellent job evaluating the Wild and Scenic River eligibility of the many rivers and streams in the resource area. The documentation was very clear and complete.

1 The Wild and Scenic River suitability study in the Draft RMP is not as clear or understandable. There is insufficient information provided for the reader to understand why some rivers were found suitable while others were not. I relied entirely on documents that were not part of the DEIS, and I think more information should have been provided in the DEIS.

2 The summary of the impacts of the alternatives in Chapter 2 understates the adverse impacts of Alternatives 2, 3, and 4. These three alternatives would release many miles of river from consideration for Wild and Scenic River designation. These rivers would no

Letter No. 22 *continued*



2 longer be protected from the construction of new dams or diversion or other modifications of their free-flowing character and the outstanding resource values would no longer be protected. This is a significant adverse impact.

3a Idaho Rivers United supports all of the Wild and Scenic findings of suitability in Alternative 2. In addition we urge the BLM 3b to find the following rivers suitable and recommend them for Wild and Scenic River designation.

Big Lost River Watershed

Pecks Canyon should be a Recreational river. The creek supports a unique plant community, the BLM owns 88% of the land and there is no public opposition.

Thousand Springs should be a Scenic river. Thousand Springs supports the largest mid-elevation wetland complex in central Idaho, and there is not adequate protection now. The unique resources of Thousand Springs are at risk, and Wild and Scenic River designation would help protect those values.

4 note: It looks like the map does not reflect the shorter suitable segment of Big Lost "A".

East Fork Salmon River Watershed

5 East Fork Salmon River "A" and "B". The East Fork Salmon River was identified in the National Rivers Inventory in 1982 as possessing outstandingly remarkable values, and the BLM should not defer recommendation of this extraordinary river any longer. Now is the time, during the revision of the RMP, for the BLM to be taking action. Finding funding for future studies may be harder then bringing back the salmon. And the mainstem should not be separated from the tributaries.

Responsibility for the decline of Idaho's anadromous fish lies on many shoulders, and each agency must do its part, as soon as possible, to improve conditions for the fish. Wild and Scenic river designation will prevent additional rip-rapping, channelization and the construction of new dams or diversions. Designation would also protect wildlife and scenic values by curbing development and managing traffic and visitors.

Spar Canyon should be designated a Recreational river to help protect the unique ecological values. The creek was found eligible with the gravel pit in operation, so there is no reason to believe the gravel pit can not continue to operate.

BLM Response to Letter No. 22

22-1: The background information used to arrive at the suitability findings presented in the Draft RMP is part of the Planning Record for the Challis RMP. This information is available upon request to anyone. In response to your suggestion, a more detailed explanation of the suitability process has been included in the Proposed RMP (see Attachment 18: Wild and Scenic Rivers Study).

22-2: The BLM disagrees that significant adverse impacts would occur to the OR values of the segments found unsuitable (see DRMP, p. 332a, #1, Alternative 2). Decisions throughout the RMP which would maintain or improve resource conditions would also maintain or improve many of the OR values. In addition, laws such as the Endangered Species Act, Archaeological Resources Protection Act, and the Historic Preservation Act would provide protection for many of the OR values.

The BLM agrees that free flowing character may not be protected on the river segments found unsuitable. However, the risk of hydropower development is believed to be low for 36 segments, moderate for 5 segments, and high for only 1 segment. Note that the W&SR Act provides for inclusion of rivers which are appropriate for a national system of rivers, and does not require that all eligible rivers be protected beyond completion of a suitability study.

22-3: (a) The BLM has noted your support for the suitability findings of Alternative 2. The Proposed RMP adopts the suitability findings of Alternative 2 with one change; river segment East Fork "B" (EF-01b) was incorrectly described as "Eligibility determination will be deferred" in the Draft RMP. In fact, this segment is eligible, with a suitability finding deferred until a coordinated river study (see response 22-5).

(b) Your preferences for additional suitability findings are noted. However, after reviewing your recommendations, the BLM has decided not to include any additional river segments in the PRMP beyond those which were included in Alternative 2 of the DRMP.

The BLM understands the charge of the W&SR Act to be to determine which, if any, river segments within the planning area would be suitable for inclusion in a national rivers system. Many factors were considered in making that determination, including such things as the length of the segment, outstandingly remarkable (OR) values present within the river corridor, floatability, flow status, importance to the suitability of other segments, water development potential, the BLM's ability to manage the segment as a designated river, other opportunities to manage the OR values present, commitment of other involved land owners in sharing administration of the segment, identified support of or opposition to designation, consistency with other approved plans, and estimated

3b Road Creek "A", Bear Creek, Horse Basin and Sand Hollow. Road Creek and Bear Creek support cutthroat trout and Horse Creek contributes flow to Road Creek. Sand Hollow has unique ecological values.
Little Boulder Creek, Big Boulder Creek, and Big Lake Creek should be found suitable because they support salmon, steelhead, bull trout and cutthroat. These creeks are fishery goldmines and are obviously part of a healthy East Fork Salmon River system. The omission of these creeks from Alternative 2 is completely unjustified and makes no sense whatsoever!

6 Marco Creek should be a "Wild" river. While the protected river corridor is not sufficient to protect the bighorn sheep, protection of the wild river corridor is a critical factor. The sheep would be adversely impacted if development was allowed in the river corridor.

7 Note: Fisheries, wildlife and recreation should be added to OR values
8 of Lake Creek. Recreation should be added to OR values of Little Boulder Creek. Geologic should be added to OR values of Spar Canyon.

9

3b **Little Lost River Watershed**
Dry Creek and Long Lost. It's illogical to recommend Dry Creek and not Long Lost as suggested in Alternatives 2 and 4. BLM team's notes point this out.

10 Summit Creek should be found suitable because of its unusual wetland system, it's threatened and endangered plant community and its high recreational value. The creek is threatened by hydropower development and Wild and Scenic river protection is the best defense against dams and diversions. No justification or explanation is offered to support Alternative B's finding of non suitable.

Main Salmon River Watershed

5 Main Salmon River, Cow Creek, Thompson Creek, Squaw Creek, and Bayhorse Creek. Further study should not be deferred for the same reasons put forth for the East Fork Salmon. These rivers support steelhead, salmon, bulltrout and are extraordinarily precious. Continuing to defer recommendation for inclusion in the Wild and Scenic Rivers system is like not getting your kids immunized or putting off getting a car seat - it's unjustifiable. The data is there, the public process is underway, and the need is great. As Nike says, "Just do it."

11 The threat to Thompson and Squaw Creek is exceptionally high because of operations of the Thompson Creek mine. The BLM must

3b 11 work with the Forest Service to ensure that the most effective method of preventing acid mine drainage is chosen in the supplemental EIS for the project.
McKim Creek should be found suitable because it supports bull trout, cutthroat and steelhead. It doesn't matter if there is a low amount of public land - Wild and Scenic designation will stop water resource development on private land next to the river.
Pennal Gulch should be found suitable because of its unique perennial riparian vegetation. Wild and Scenic designation should be adequate to protect riparian values.

12 Leaton Gulch spring should be protected and the draft EIS does not explain whether Wild and Scenic designation will accomplish this or if other mechanisms are in place to protect these cultural sites.
Malm Gulch should be found suitable because it is one of the most biologically diverse locations in Idaho. It's unclear if the corridor width will encompass all of the plant community, but the stream is obviously a critical component of the ecosystem.
Morgan Creek should be found suitable to protect it from water development and because it supports steelhead, chinook, bull trout and cutthroat trout. The creek was found eligible with the existing rip-rap site and the rotating grazing system and there is little reason to think these activities could not continue if the creek is designated. The purpose of Wild and Scenic designation is to protect existing values, not return the river to a more natural state.

13 West Fork Morgan Creek should also be found suitable. It's part of the Morgan Creek system. No justification was presented to support the finding of non suitable.

Note: There is insufficient data to evaluate Spud Creek.

Pashimeroi River Watershed
Donkey Creek should be found suitable because it supports cutthroat trout.
Goldburg Creek should be found suitable because it supports bull trout and cutthroat.
Burnt Creek should be found suitable because it supports bull trout.

5 Pahsimeroi River "A" and Mahogany Creek should be found suitable. The BLM should not defer further study for the reasons stated above for the Main Salmon and East Fork Salmon. These rivers both support bull trout, one of Idaho's troubled species. The state is making a special effort to protect known stocks of bull trout and the BLM should do its part by providing these rivers with the best protection available.

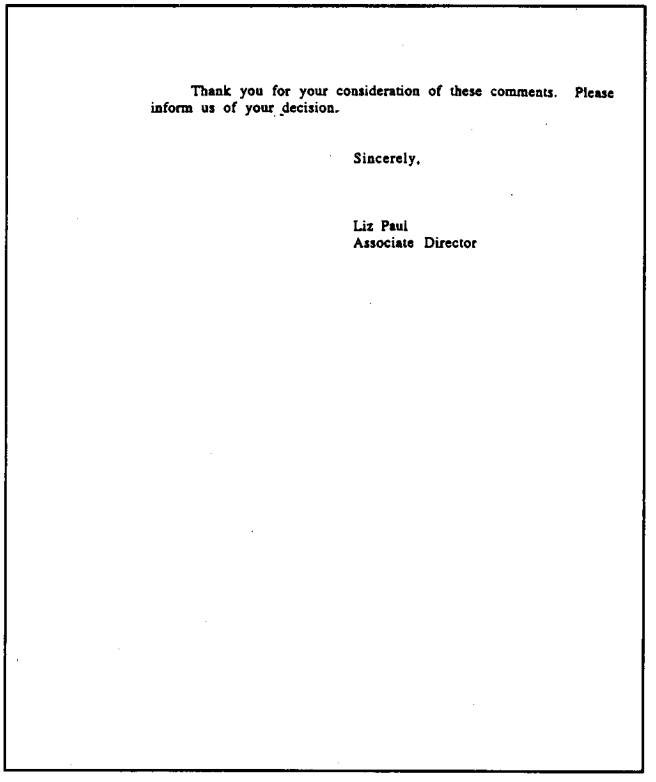
potential costs of administering the segment, if designated. In addition to considering the qualities of the river segment and its corridor, the BLM recognized that determining a river suitable for management as part of a national rivers system is an issue of allocation. For example, there may be rivers that have numerous OR values present within the river corridor, but because of other issues such as current or proposed uses in or near the corridor, the BLM may have chosen not to allocate that river for management as a national wild, scenic, or recreational river. In those cases the rivers were found unsuitable. Although the free-flowing character of the river, the presence and importance of OR values, and the protection that would be afforded under the W&SR Act were given heavy consideration, they were not viewed as circumstances that would require a finding of "suitable" on any given river segment.

22-4: Map K: Wild and Scenic River Suitability Findings - Alternative 2 accurately reflects the BL-17 Big Lost River "A" suitability proposal of the shortened segment. However, the segment was incorrectly labeled as "recreational" rather than "scenic." This error has been corrected in the PRMP. Map M in the DRMP properly reflects the Alternative 4 proposal.

22-5: In response to your comments about coordinated study and/or deferring study to a later date, the BLM offers the following explanation.

Section 5 of the W&SR Act states its intent for coordinated river study when it addresses the rivers designated in the Act for potential addition to the national rivers system. It states, "The study of any of said rivers shall be pursued in as close cooperation with appropriate agencies of the affected State and its political subdivisions as possible, shall be carried on jointly with such agencies if request for such joint study is made by the State, and shall include a determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the national wild and scenic river system."

In 1991, the Idaho - BLM State Director entered into a Memorandum of Understanding (MOU) with the Governor, State of Idaho, and Regional Foresters of the Northern and Intermountain Regions of the Forest Service. The purpose of the MOU is to "formalize a cooperative relationship for conducting river planning efforts and Wild and Scenic Rivers Studies of Idaho's rivers; among the State of Idaho, the Forest Service, and the Bureau of Land Management. It affirms commitments to: prioritize Federal Wild and Scenic Rivers Studies and coordinate Federal studies with State planning activities; shares data and planning resources between State and Federal water resource planning agencies; and coordinates public education and information outreach programs." Further, in 1992 the



Thank you for your consideration of these comments. Please inform us of your decision.

Sincerely,

Liz Paul
Associate Director

affected Forest Supervisors, BLM District Manager, and Idaho Department of Water Resources representative entered into a Study Agreement whose purpose "is to coordinate river basin planning activities in the Upper Salmon River Basin consistent with the MOU dated February 14, 1991 between the signatory agencies. This will include definition of the study area, designation of agency roles, timing and funding for the planning process, collection and sharing of data, and implementing procedures." Three of the rivers included in the study agreement are the Pahsimeroi River, the East Fork Salmon River, and the Main Salmon River. As a result of these agreements, the Challis PRMP deferred completion of the suitability study for these rivers to a coordinated study effort.

In addition to the Main Salmon, East Fork Salmon, and Pahsimeroi rivers, the Challis DRMP and PRMP deferred suitability finding on nine other segments (see DRMP, p. 174, and PRMP, Wild and Scenic Rivers) which are closely linked to and should be studied with the three main deferred rivers, would be suitable only as part of a system, or are logical extensions of river segments administered by the Forest Service or Upper Snake River District - BLM. To study a portion of a river identified solely on the basis of management responsibility would not present a complete picture of the suitability of the entire river reach.

22-6: River Segment EF-28, Marco Creek was included in the suitability study in error. Marco Creek is not free flowing and is therefore ineligible for WSR study (Challis Resource Area National Wild and Scenic Rivers Eligibility Report, BLM 1993, p. 19).

22-7: The BLM determined that Lake Creek has a fisheries OR value because chinook salmon occupied habitat occurs below the lake. However, recreational and wildlife values within the WSR corridor are not considered to be outstandingly remarkable. Even though Lake Creek has an additional OR value, the BLM did not find the segment suitable for inclusion in a nationwide system of WSR.

22-8: The BLM considered your request, and determined that no outstandingly remarkable recreational values are present within the WSR corridor for Big Boulder Creek.

22-9: The BLM considered your request and determined that, since no new information has been added, there are still no geologic OR values present in the Spar Canyon segment.

22-10: River segment LL-01, Summit Creek is not "nonsuitable" [unsuitable] under "Alternative B" [Alternative 2], as you state; a suitability study of this segment has been deferred until a coordinated study with the Upper Snake River District - BLM. Until suitability is determined, this BLM

BLM Response to Letter No. 22 *continued*

segment will be managed to "maintain the level of development that resulted in its classification, to ensure non-degradation of its OR values, and to protect free-flowing characteristics" (PRMP, Wild and Scenic Rivers).

22-11: Your comment is noted. The BLM is a cooperating agency (with the USFS) on the proposed action to develop a Supplemental Plan of Operations for the Thompson Creek Mine in order to address acid mine drainage concerns.

22-12: The Leaton Gulch spring would be protected under the cultural resource laws mentioned in response 22-2.

22-13: Please note that the BLM did find the West Fork of Morgan Creek (MS-67) suitable (Recreational classification), but only as part of a system including USFS lands (PRMP, Wild and Scenic Rivers).

Letter No. 24

96-065-BLM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

JAN 02, 1997

Reply To
Attn Of: ECO-088

Kathe Rhodes
RMP Coordinator, Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

Re: Challis Resource Area Draft Resource Management Plan and Environmental Impact Statement

Dear Ms. Rhodes:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the above referenced draft Environmental Impact Statement (draft EIS). The draft EIS analyzes five alternative land use plans to address issues regarding resource management on BLM lands in the Challis Resource Area, located in Custer and Lemhi counties, Idaho.

1 Based on our review, we have rated the draft EIS EC-2 (Environmental Concerns – Insufficient Information). Our concerns are primarily based on water quality impacts from grazing activities. We strongly support alternatives that involve placing additional efforts on allowing degraded riparian areas to return to their natural conditions. Detailed comments on these points are attached.

This rating and a summary of our comments will be published in the *Federal Register*. A copy of our rating system is enclosed. Thank you for the opportunity to review this draft EIS. Please contact John Bregar at (206) 553-1984 if you have any questions about our comments.

Sincerely,

for Richard B. Parkin, Manager
Geographic Implementation Unit

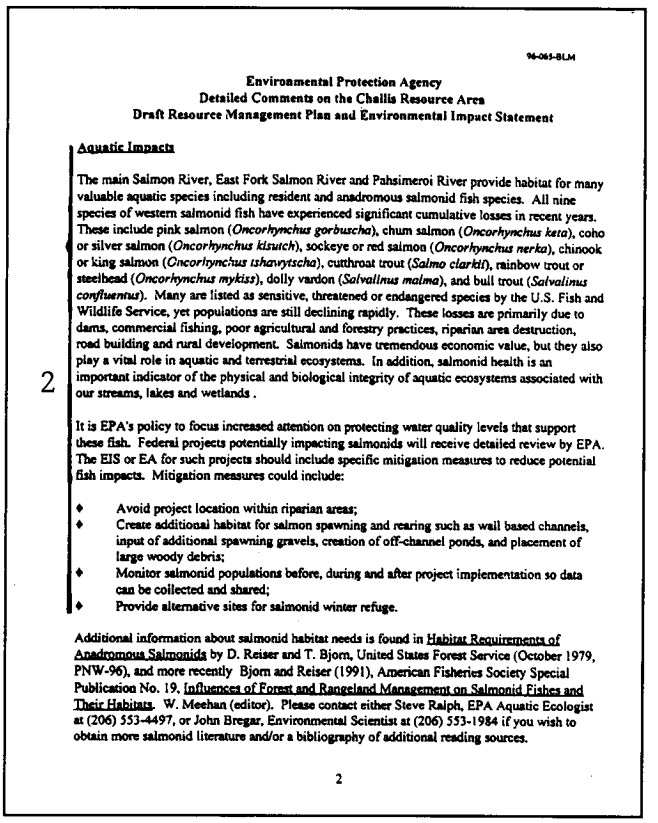
Printed on Recycled Paper

BLM Response to Letter No. 24

24-1: Several Draft RMP alternatives emphasize restoration of degraded riparian areas (see DRMP, Volume 2, Alternatives 2 through 5). The alternatives differ in the rate of restoration and the means through which restoration would be achieved. The Proposed RMP (PRMP) revises the Preferred Alternative (Alternative 2) in response to public comments. However, the PRMP retains an emphasis on restoring degraded riparian areas to their natural condition.

The PRMP's approach to maintaining good water quality and restoring degraded water quality in the Challis Resource Area is two-fold. First, the PRMP includes decisions which address water quality impacts from all non-point sources, including grazing. Second, the PRMP includes decisions to inventory and monitor resources and to manage resources and activities in order to restore uplands, riparian areas, and aquatic habitats; these actions have direct and indirect beneficial impacts to water quality, which are documented in Chapter 4.

24-2: The PRMP contains many specific actions to provide good quality aquatic habitat for resident and anadromous salmonid fish species, including several special status fish species. The U.S. Fish and Wildlife Service and National Marine Fisheries Service have reviewed our Biological Assessment of the Proposed RMP and given us concurrence on the BLM's determinations of "may affect, but not likely to adversely affect" for listed fish species. The BLM's revisions of Alternative 2 in preparation of the PRMP



96-065-BLM

Environmental Protection Agency
Detailed Comments on the Challis Resource Area
Draft Resource Management Plan and Environmental Impact Statement

Aquatic Impacts

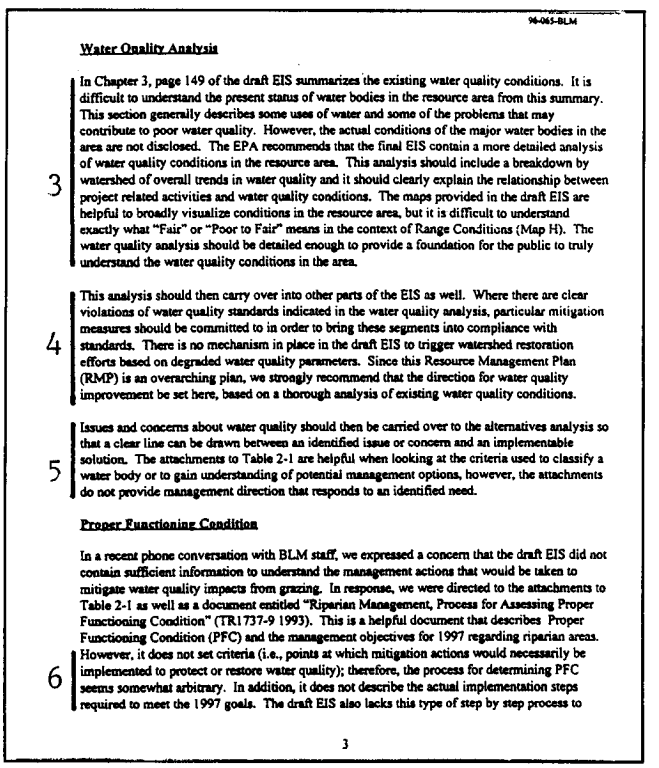
The main Salmon River, East Fork Salmon River and Pahsimeroi River provide habitat for many valuable aquatic species including resident and anadromous salmonid fish species. All nine species of western salmonid fish have experienced significant cumulative losses in recent years. These include pink salmon (*Oncorhynchus gorbuscha*), chum salmon (*Oncorhynchus keta*), coho or silver salmon (*Oncorhynchus kisutch*), sockeye or red salmon (*Oncorhynchus nerka*), chinook or king salmon (*Oncorhynchus tshawytscha*), cutthroat trout (*Salmo clarkii*), rainbow trout or steelhead (*Oncorhynchus mykiss*), dolly vardon (*Salvalinus malma*), and bull trout (*Salvalinus confluentus*). Many are listed as sensitive, threatened or endangered species by the U.S. Fish and Wildlife Service, yet populations are still declining rapidly. These losses are primarily due to dams, commercial fishing, poor agricultural and forestry practices, riparian area destruction, road building and rural development. Salmonids have tremendous economic value, but they also play a vital role in aquatic and terrestrial ecosystems. In addition, salmonid health is an important indicator of the physical and biological integrity of aquatic ecosystems associated with our streams, lakes and wetlands. 2

It is EPA's policy to focus increased attention on protecting water quality levels that support these fish. Federal projects potentially impacting salmonids will receive detailed review by EPA. The EIS or EA for such projects should include specific mitigation measures to reduce potential fish impacts. Mitigation measures could include:

- Avoid project location within riparian areas;
- Create additional habitat for salmon spawning and rearing such as wall based channels, input of additional spawning gravels, creation of off-channel ponds, and placement of large woody debris;
- Monitor salmonid populations before, during and after project implementation so data can be collected and shared;
- Provide alternative sites for salmonid winter refuge.

Additional information about salmonid habitat needs is found in Habitat Requirements of Anadromous Salmonids by D. Reiser and T. Bjorn, United States Forest Service (October 1979, PNW-96), and more recently Bjorn and Reiser (1991), American Fisheries Society Special Publication No. 19, Influences of Forest and Rangeland Management on Salmonid Fishes and Their Habitats. W. Meehan (editor). Please contact either Steve Ralph, EPA Aquatic Ecologist at (206) 553-4497, or John Bregar, Environmental Scientist at (206) 553-1984 if you wish to obtain more salmonid literature and/or a bibliography of additional reading sources.

2



96-065-BLM

Water Quality Analysis

In Chapter 3, page 149 of the draft EIS summarizes the existing water quality conditions. It is difficult to understand the present status of water bodies in the resource area from this summary. This section generally describes some uses of water and some of the problems that may contribute to poor water quality. However, the actual conditions of the major water bodies in the area are not disclosed. The EPA recommends that the final EIS contain a more detailed analysis of water quality conditions in the resource area. This analysis should include a breakdown by watershed of overall trends in water quality and it should clearly explain the relationship between project related activities and water quality conditions. The maps provided in the draft EIS are helpful to broadly visualize conditions in the resource area, but it is difficult to understand exactly what "Fair" or "Poor to Fair" means in the context of Range Conditions (Map H). The water quality analysis should be detailed enough to provide a foundation for the public to truly understand the water quality conditions in the area. 3

This analysis should then carry over into other parts of the EIS as well. Where there are clear violations of water quality standards indicated in the water quality analysis, particular mitigation measures should be committed to in order to bring these segments into compliance with standards. There is no mechanism in place in the draft EIS to trigger watershed restoration efforts based on degraded water quality parameters. Since this Resource Management Plan (RMP) is an overarching plan, we strongly recommend that the direction for water quality improvement be set here, based on a thorough analysis of existing water quality conditions. 4

Issues and concerns about water quality should then be carried over to the alternatives analysis so that a clear line can be drawn between an identified issue or concern and an implementable solution. The attachments to Table 2-1 are helpful when looking at the criteria used to classify a water body or to gain understanding of potential management options, however, the attachments do not provide management direction that responds to an identified need. 5

Proper Functioning Condition

In a recent phone conversation with BLM staff, we expressed a concern that the draft EIS did not contain sufficient information to understand the management actions that would be taken to mitigate water quality impacts from grazing. In response, we were directed to the attachments to Table 2-1 as well as a document entitled "Riparian Management, Process for Assessing Proper Functioning Condition" (TR1737-9 1993). This is a helpful document that describes Proper Functioning Condition (PFC) and the management objectives for 1997 regarding riparian areas. However, it does not set criteria (i.e., points at which mitigation actions would necessarily be implemented to protect or restore water quality); therefore, the process for determining PFC seems somewhat arbitrary. In addition, it does not describe the actual implementation steps required to meet the 1997 goals. The draft EIS also lacks this type of step by step process to 6

3

clarify and strengthen many BLM management decisions which focus on riparian and aquatic habitat condition.

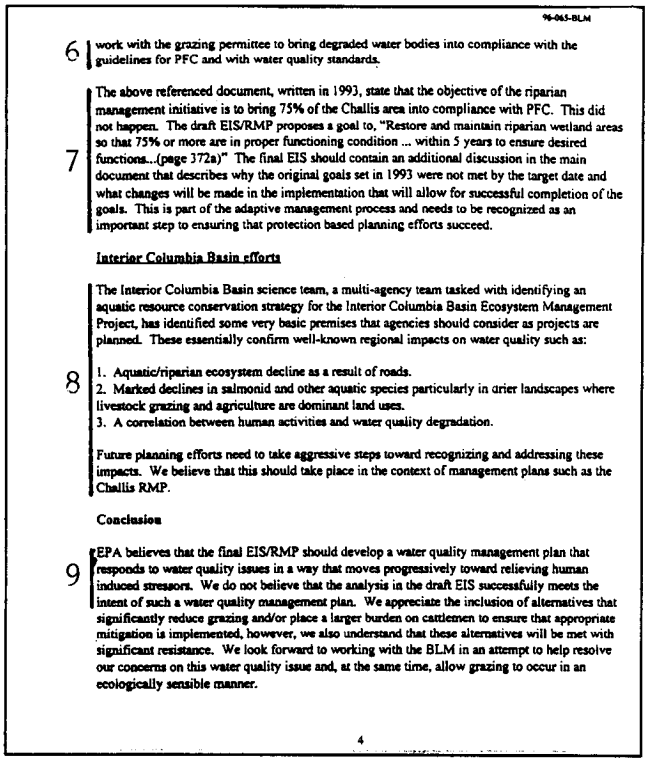
The following paragraphs document the BLM's responses to EPA's suggestions regarding actions to reduce potential fish impacts.

(1) *Avoid project location in riparian areas*: The PRMP sets standards for grazing management and riparian and aquatic habitat condition, and provides other management direction which would prevent adverse impacts to riparian areas and/or restore degraded riparian areas. The following are examples of management decisions in the PRMP which avoid and/or limit impacts in riparian areas: Fire Management, Goal 1, #5 and 6; Fisheries, Goal 1, #4; Floodplain/Wetland Areas, Goal 1, #2 and 3; Forested Areas, Goal 1, #15-17, 21; Hazardous Materials Management , Goal 1, #1, 2, and 5; Land Tenure, Goal 3, #1 and 4; Livestock Grazing, Goal 1, #8, 9, and 11; Minerals, Goal 1, #6, Goal 2, #6, and Goal 3 , #5; Off-highway Vehicle Use, Goal 1, #1; Recreation Opportunities, Goal 1, #3; Riparian Areas, Goal 1, #4-7, and 12; Transportation, Goal 1, #6-9; Upland Watershed, Goal 1, #1, 2, and 10; Water Quality, Goal 1, #5-7; Wild Horse and Burro Management, Goal 1, #7; Wildlife Habitat Management, Goal 1, #4 and Goal 2, #3; Attachment 5: Standard Operating Procedures - "General" #1-4; Attachment 8: Design Specifications for Forest Management (Roads), #2, Minerals, #1, and Rangeland Improvement, #2 and 5.

The analysis of environmental consequences (see PRMP, Chapter 4) indicates the decisions listed above would be effective in reducing potential impacts to riparian areas and fisheries habitat. Since 1993, similar riparian area grazing management has been implemented on some Challis Resource Area allotments within anadromous fish habitat, with noticeable improvement in riparian habitat condition (see response 15-5, paragraph 1).

(2) *Create additional spawning and rearing habitat for salmon*: The PRMP provides direction for maintaining or improving existing habitats (see Fisheries, Goal 1, #3, 4, 7, 9, 10, 13, and 14). Although the PRMP does not outline a specific plan for creating new habitat, it encourages cooperative efforts to manage fisheries habitat (see Fisheries, Goal 1, #6); these cooperative efforts could include activities such as those suggested by EPA.

(3) *Monitor salmonid populations before, during, and after project implementation so data can be collected and shared*: Please be aware that it is the BLM's role to manage fisheries habitats, but it is the State of Idaho's responsibility to manage fisheries populations, including conducting population monitoring. The BLM collects and shares data with other agencies on fisheries habitat



98-065-BLM

6 work with the grazing permittee to bring degraded water bodies into compliance with the guidelines for PFC and with water quality standards.

7 The above referenced document, written in 1993, state that the objective of the riparian management initiative is to bring 75% of the Challis area into compliance with PFC. This did not happen. The draft EIS/RMP proposes a goal to, "Restore and maintain riparian wetland areas so that 75% or more are in proper functioning condition ... within 5 years to ensure desired functions...(page 372a)" The final EIS should contain an additional discussion in the main document that describes why the original goals set in 1993 were not met by the target date and what changes will be made in the implementation that will allow for successful completion of the goals. This is part of the adaptive management process and needs to be recognized as an important step to ensuring that protection based planning efforts succeed.

Interior Columbia Basin efforts

8 The Interior Columbia Basin science team, a multi-agency team tasked with identifying an aquatic resource conservation strategy for the Interior Columbia Basin Ecosystem Management Project, has identified some very basic premises that agencies should consider as projects are planned. These essentially confirm well-known regional impacts on water quality such as:

1. Aquatic/riparian ecosystem decline as a result of roads.
2. Marked declines in salmonid and other aquatic species particularly in drier landscapes where livestock grazing and agriculture are dominant land uses.
3. A correlation between human activities and water quality degradation.

Future planning efforts need to take aggressive steps toward recognizing and addressing these impacts. We believe that this should take place in the context of management plans such as the Challis RMP.

Conclusion

9 EPA believes that the final EIS/RMP should develop a water quality management plan that responds to water quality issues in a way that moves progressively toward relieving human induced stressors. We do not believe that the analysis in the draft EIS successfully meets the intent of such a water quality management plan. We appreciate the inclusion of alternatives that significantly reduce grazing and/or place a larger burden on cattlemen to ensure that appropriate mitigation is implemented, however, we also understand that these alternatives will be met with significant resistance. We look forward to working with the BLM in an attempt to help resolve our concerns on this water quality issue and, at the same time, allow grazing to occur in an ecologically sensible manner.

4

with other agencies on fisheries habitat condition, species distribution (presence/absence within a stream) and water quality factors. This kind of inventory and monitoring would continue to be provided for in the PRMP (see Fisheries, Goal 1, #3, 12, 16; and Water Quality, Goal 1, #1 and 3). The PRMP provides for project-specific actions to reduce impacts to special status fish species (see Attachment 5: General SOP #4); these actions could include monitoring, if necessary. Attachment 12 also contains provision for monitoring (step #14) to ensure beneficial uses (including fisheries habitat) are being protected.

(4) *Provide alternative salmonid winter refuge sites*: There is no evidence to suggest that winter refuge is a limiting factor for fish in the Challis Resource Area. Therefore, the BLM feels there is no need to provide alternative sites for salmonid winter refuge.

24-3: As EPA suggested, the PRMP adds a discussion of water quality condition and trend by watershed (see Chapter 3 - Water Resources, "Summary of Surface Water Quality, By Principal Drainage Basin). The DRMP analysis of environmental consequences describes "...the relationship between project related activities and water quality conditions..." for each alternative (see DRMP, Chapter 4 - Water Resources). Because the PRMP emphasizes restoration of degraded riparian and aquatic habitats throughout the Resource Area, water quality in all of the watersheds described in the PRMP, Chapter 3 - Water Resources would be expected to improve (see PRMP, Chapter 4 - Water Resources).

24-4: The PRMP contains actions to initiate restoration of degraded stream segments and manage all authorized actions so that good water quality is maintained (see Water Quality, Goal 1; Attachment 3; and Attachment 12). Priority for restoring segments with degraded water quality parameters would be defined in the Implementation Plan for the approved RMP. (Current BLM direction for priority is to focus on functional-at-risk riparian areas with downward trend.) The PRMP also contains standards and decisions which would produce indirect benefits to water quality and prevent water quality degradation from occurring (see response 24-2 (1) above).

24-5: The Draft RMP/EIS identifies water quality as a management concern (Chapter 2), describes implementable solutions (Table 2-1 in Volume 2), and documents the analysis of impacts from the alternatives (Chapter 4). The analysis for Alternative 2 (preferred alternative) indicates "management actions would improve water quality condition and trend" Resource Area-wide (DRMP, p. 291, #1). The specific discussion of water quality impacts for each alternative is stated in the DRMP on pp. 291a-302a, #1-3, 5, 6, 8, 13, 15, 17-18, 21-23, 29-33.

The introduction to Chapter 4 has been expanded in the Proposed RMP/Final EIS to clarify that issues are identified in Chapter 2, management decisions to address the issues and concerns are listed in the Proposed RMP, and the analysis of impacts from those decisions is described in Chapter 4. In addition, where appropriate, the reader is referred from the Chapter 4 analysis to the relevant management decisions from the PRMP.

24-6: (a) If the RMP were to use "criteria...points at which mitigation actions would necessarily be implemented to protect or restore water quality," the BLM would have to wait for there to be a water quality problem before it could be addressed. Instead, the RMP includes resource condition objectives, management actions, and resource allocations which collectively maintain existing good water quality and improve degraded water quality. PRMP decisions address water quality both directly (see Water Quality, Goal 1) and indirectly, by managing upland, riparian and aquatic habitats (for example, see Upland Watershed, Goal 1, #1-3, 8-11; Riparian Areas, Goal 1; and Fisheries, Goal 1, #4).

(b) The PRMP's plan to achieve proper functioning condition is shown under Management Concern:, Riparian Areas, Goal 1; the definition of proper functioning condition is provided in Attachment 1. Please note that proper functioning condition results in good water quality. The RMP's decisions to achieve proper functioning riparian condition are complemented by many other decisions which would directly or indirectly reduce livestock grazing impacts to water quality (for example, see response 24-2 (1) above).

(c) The specific terms and conditions of individual grazing permits would continue to be established under the discretion of the authorized officer, in accordance with 43 CFR 4130.3. Any terms or conditions of grazing permits would be consistent with and/or implement the decisions in the approved Challis RMP. BLM grazing regulations provide administrative remedies for failure to meet the terms and conditions of grazing permits.

24-7: EPA's comments and suggestions are noted. Management actions to achieve the goals for riparian condition stated in Riparian-Wetland Initiative for the 1990's (BLM 1991) were implemented on some portions of the Challis Resource Area beginning in approximately 1993. These actions to manage and improve riparian habitat and water quality are very similar to management proposed in the PRMP. From 1993 to present, measurable riparian habitat improvement has occurred on the portions of the RA where this management has been implemented. This success on portions of the Resource Area indicates similar improvements can be expected throughout the Resource Area when the RMP is implemented. Thus, the BLM believes the five-year timeframe (from the date the Record of Decision for the

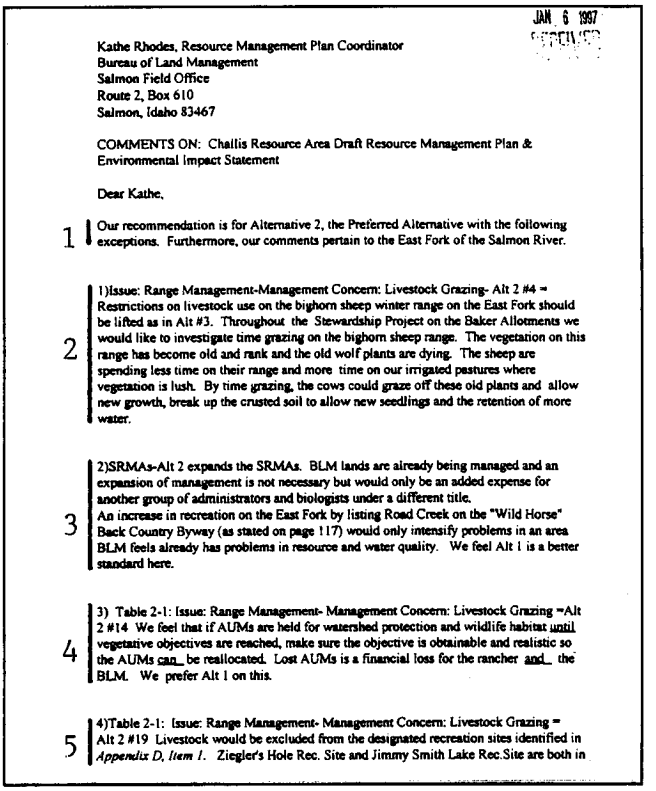
approved RMP is signed) to achieve 75% of riparian areas in proper functioning condition is realistic.

24-8: The BLM considered whether regional impacts to water quality such as the ones EPA lists currently have an impact in the Challis Resource Area.

The PRMP contains management to minimize water quality impacts from road construction and maintenance, livestock grazing, and other human activities within the Resource Area (e.g., mineral development, OHV use, recreation, timber harvest). The BLM analyzed the impacts to water quality from PRMP actions and actions on adjacent USFS, private, and State lands, and determined that water quality would improve Resource Area-wide under proposed management. The BLM also believes the RMP responds to regional trends which affect water quality in the local planning area. For example, (a) the PRMP contains OHV use and road construction/maintenance/closure decisions which reduce the proliferation of roads (OHV Use, Goal 1 and Transportation, Goal 1), and (b) the PRMP provides direction to remove barriers to anadromous fish migration (Fisheries, Goal 1, #9).

24-9: As noted in the above responses, the PRMP contains interdisciplinary management to address water quality issues, including impacts resulting from numerous types of "human induced stressors" (*e.g.*, livestock grazing, mineral development, OHV use, road construction, timber harvest). The analysis of impacts indicates PRMP management would effectively minimize adverse impacts to water quality and restore degraded water quality. For these reasons the BLM does not believe an additional "water quality management plan" is necessary to include in the PRMP.

Letter No. 25



JAN 6 1997

Kathe Rhodes, Resource Management Plan Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

COMMENTS ON: Challis Resource Area Draft Resource Management Plan & Environmental Impact Statement

Dear Kathe,

1 Our recommendation is for Alternative 2, the Preferred Alternative with the following exceptions. Furthermore, our comments pertain to the East Fork of the Salmon River.

2 1)Issue: Range Management-Management Concern: Livestock Grazing- Alt 2 #4 = Restrictions on livestock use on the bighorn sheep winter range on the East Fork should be lifted as in Alt #3. Throughout the Stewardship Project on the Baker Allotments we would like to investigate time grazing on the bighorn sheep range. The vegetation on this range has become old and rank and the old wolf plants are dying. The sheep are spending less time on their range and more time on our irrigated pastures where vegetation is lush. By time grazing, the cows could graze off these old plants and allow new growth, break up the crusted soil to allow new seedlings and the retention of more water.

3 2)SRMAs-Alt 2 expands the SRMAs. BLM lands are already being managed and an expansion of management is not necessary but would only be an added expense for another group of administrators and biologists under a different title.
An increase in recreation on the East Fork by listing Road Creek on the "Wild Horse" Back Country Byway (as stated on page 117) would only intensify problems in an area BLM feels already has problems in resource and water quality. We feel Alt 1 is a better standard here.

4 3) Table 2-1: Issue: Range Management- Management Concern: Livestock Grazing =Alt 2 #14 We feel that if AUMs are held for watershed protection and wildlife habitat until vegetative objectives are reached, make sure the objective is obtainable and realistic so the AUMs can be reallocated. Lost AUMs is a financial loss for the rancher and the BLM. We prefer Alt 1 on this.

5 4)Table 2-1: Issue: Range Management- Management Concern: Livestock Grazing = Alt 2 #19 Livestock would be excluded from the designated recreation sites identified in *Appendix D, Item 1.* Ziegler's Hole Rec. Site and Jimmy Smith Lake Rec.Site are both in

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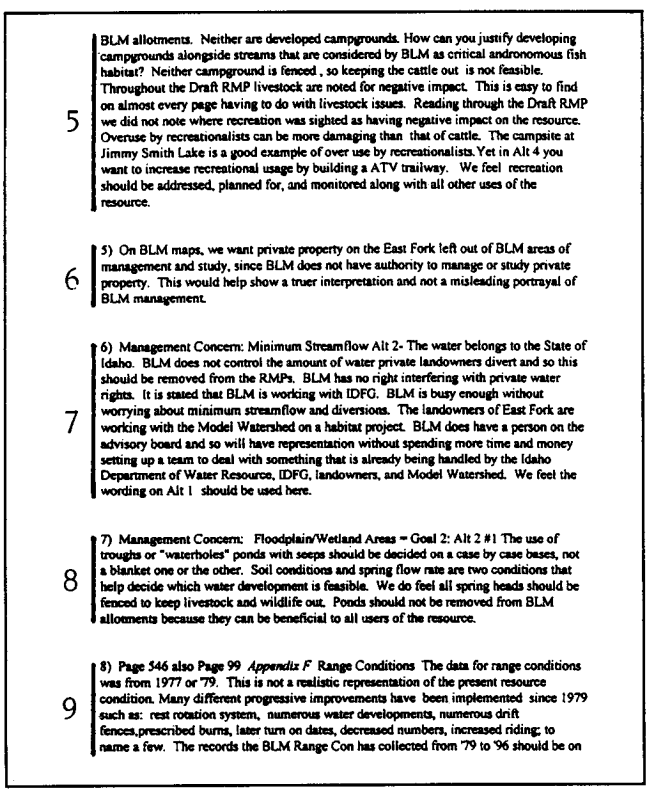


5 BLM allotments. Neither are developed campgrounds. How can you justify developing campgrounds alongside streams that are considered by BLM as critical andronomous fish habitat? Neither campground is fenced , so keeping the cattle out is not feasible. Throughout the Draft RMP livestock are noted for negative impact. This is easy to find on almost every page having to do with livestock issues. Reading through the Draft RMP we did not note where recreation was sighted as having negative impact on the resource. Overuse by recreationalists can be more damaging than that of cattle. The campsite at Jimmy Smith Lake is a good example of over use by recreationalists.Yet in Alt 4 you want to increase recreational usage by building a ATV trailway. We feel recreation should be addressed, planned for, and monitored along with all other uses of the resource.

6 5) On BLM maps, we want private property on the East Fork left out of BLM areas of management and study, since BLM does not have authority to manage or study private property. This would help show a truer interpretation and not a misleading portrayal of BLM management.

7 6) Management Concern: Minimum Streamflow Alt 2- The water belongs to the State of Idaho. BLM does not control the amount of water private landowners divert and so this should be removed from the RMPs. BLM has no right interfering with private water rights. It is stated that BLM is working with IDFG. BLM is busy enough without worrying about minimum streamflow and diversions. The landowners of East Fork are working with the Model Watershed on a habitat project. BLM does have a person on the advisory board and so will have representation without spending more time and money setting up a team to deal with something that is already being handled by the Idaho Department of Water Resource, IDFG, landowners, and Model Watershed. We feel the wording on Alt 1 should be used here.

8 7) Management Concern: Floodplain/Wetland Areas = Goal 2: Alt 2 #1 The use of troughs or "waterholes" ponds with seeps should be decided on a case by case bases, not a blanket one or the other. Soil conditions and spring flow rate are two conditions that help decide which water development is feasible. We do feel all spring heads should be fenced to keep livestock and wildlife out. Ponds should not be removed from BLM allotments because they can be beneficial to all users of the resource.

9 8) Page 546 also Page 99 *Appendix F* Range Conditions The data for range conditions was from 1977 or '79. This is not a realistic representation of the present resource condition. Many different progressive improvements have been implemented since 1979 such as: rest rotation system, numerous water developments, numerous drift fences,prescribed burns, later turn on dates, decreased numbers, increased riding; to name a few. The records the BLM Range Con has collected from '79 to '96 should be on

BLM Response to Letter No. 25

25-1: Your preference for Alternative 2, with exceptions, is noted. The BLM's responses to the exceptions you recommend are stated in responses 25-2 through 25-12 below.

25-2: In response to your comment and after consultation with the Idaho Department of Fish and Game, the BLM revised the decision you are concerned about (Livestock Grazing, Goal 1, #4, Alternative 2; DRMP, p. 351a) and the decisions listed under Wildlife Habitat Management, Goal 2, #6, 7, and 8, Alternative 2 (DRMP, p. 358a). The BLM believes the wording in the Proposed RMP clarifies the BLM's intent, which is to protect critical bighorn sheep and elk winter ranges and allow land uses which do not have substantial adverse effects on those winter ranges (see PRMP, Wildlife Habitat, Goal 1, #6).

25-3: Your concerns about the expansion of SRMAs and the nomination of the Road Creek road as a potential addition to the BLM's Back Country Byway program have been noted.

25-4: Your preference for Alternative 1 is noted. Realistic and attainable vegetative objectives would be developed as appropriate during activity planning (e.g., AMP development or revision).

25-5: Adverse effects of recreational activities are a concern to the BLM. The recreation management decisions described in the PRMP are intended to help alleviate recreation caused impacts to resources (see PRMP, Recreation Opportunities and Visitor Use). Please note that the beneficial and adverse impacts of recreation management to other resources were discussed for all alternatives in the DRMP - Chapter 4 (e.g., pp. 201-202, #14 and 15; p. 208, #5; p. 219, #23; pp. 240-241, #28-29, 33; p. 272, #20; p. 283, #26; p. 286, #46; p. 297, #22; and p. 317, #64.)

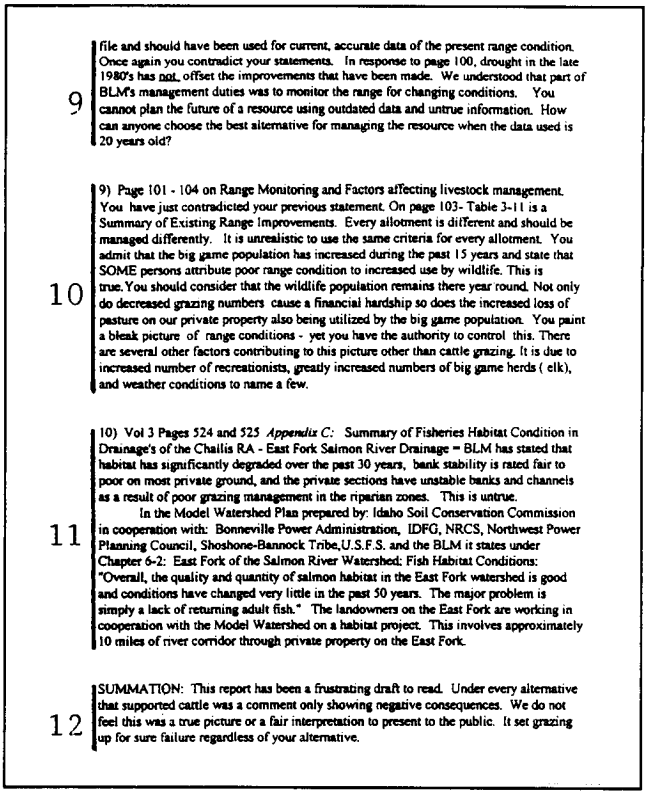
25-6: A text note has been added to all PRMP maps where public/private/State ownership is not fully depicted, explaining that land ownership status is shown on Map E and proposed management only applies to BLM lands.

25-7: Your preference for Alternative 1 is noted. Please see response 16-7.

25-8: Your opinions are noted.

25-9: At the time of the release of the Draft RMP, the table presenting a summary of upland range condition by allotment (Appendix F, Item 2) could only be updated to reflect the results of the 1994 range inventory affecting the Mountain Springs (San Felipe), Warm Springs, and Thousand Springs allotments within the Challis Planning Unit. Information from the rest of the 1994 and 1995 upland range inventories in the Challis Resource Area was not available until after the Draft RMP was released.

Letter No. 25 *continued*



file and should have been used for current, accurate data of the present range condition. Once again you contradict your statements. In response to page 100, drought in the late 1980's has not offset the improvements that have been made. We understood that part of
9 BLM's management duties was to monitor the range for changing conditions. You cannot plan the future of a resource using outdated data and untrue information. How can anyone choose the best alternative for managing the resource when the data used is 20 years old?

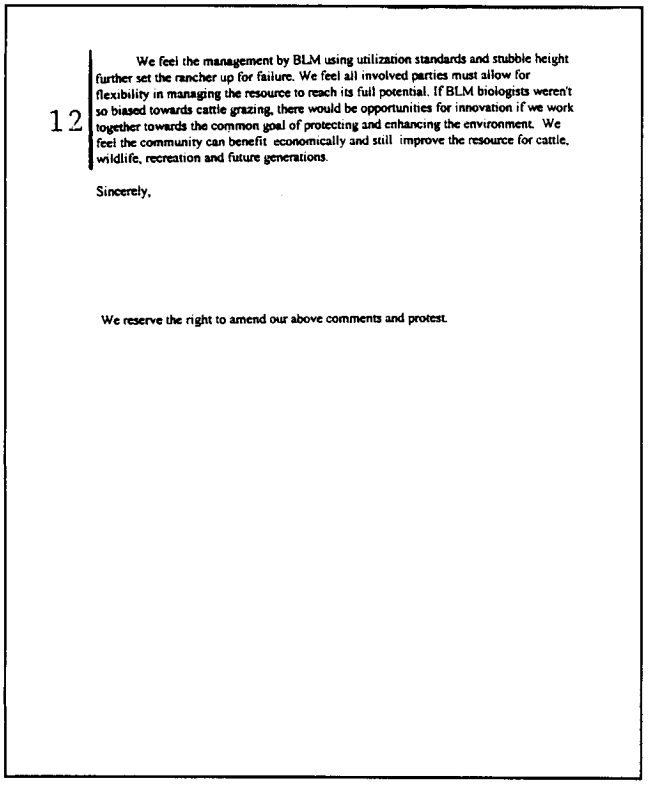
9) Page 101 - 104 on Range Monitoring and Factors affecting livestock management. You have just contradicted your previous statement. On page 103- Table 3-11 is a Summary of Existing Range Improvements. Every allotment is different and should be managed differently. It is unrealistic to use the same criteria for every allotment. You admit that the big game population has increased during the past 15 years and state that SOME persons attribute poor range condition to increased use by wildlife. This is
10 true. You should consider that the wildlife population remains there year round. Not only do decreased grazing numbers cause a financial hardship so does the increased loss of pasture on our private property also being utilized by the big game population. You paint a bleak picture of range conditions - yet you have the authority to control this. There are several other factors contributing to this picture other than cattle grazing. It is due to increased number of recreationists, greatly increased numbers of big game herds (elk), and weather conditions to name a few.

10) Vol 3 Pages 524 and 525 *Appendix C:* Summary of Fisheries Habitat Condition in Drainage's of the Challis RA - East Fork Salmon River Drainage = BLM has stated that habitat has significantly degraded over the past 30 years, bank stability is rated fair to poor on most private ground, and the private sections have unstable banks and channels as a result of poor grazing management in the riparian zones. This is untrue.

In the Model Watershed Plan prepared by: Idaho Soil Conservation Commission
11 in cooperation with: Bonneville Power Administration, IDFG, NRCS, Northwest Power Planning Council, Shoshone-Bannock Tribe, U.S.F.S. and the BLM it states under Chapter 6-2: East Fork of the Salmon River Watershed: Fish Habitat Conditions: "Overall, the quality and quantity of salmon habitat in the East Fork watershed is good and conditions have changed very little in the past 50 years. The major problem is simply a lack of returning adult fish." The landowners on the East Fork are working in cooperation with the Model Watershed on a habitat project. This involves approximately 10 miles of river corridor through private property on the East Fork.

SUMMATION: This report has been a frustrating draft to read. Under every alternative
12 that supported cattle was a comment only showing negative consequences. We do not feel this was a true picture or a fair interpretation to present to the public. It set grazing up for sure failure regardless of your alternative.

Letter No. 25 *continued*



We feel the management by BLM using utilization standards and stubble height
12 further set the rancher up for failure. We feel all involved parties must allow for flexibility in managing the resource to reach its full potential. If BLM biologists weren't so biased towards cattle grazing, there would be opportunities for innovation if we work together towards the common goal of protecting and enhancing the environment. We feel the community can benefit economically and still improve the resource for cattle, wildlife, recreation and future generations.

Sincerely,

We reserve the right to amend our above comments and protest.

BLM Response to Letter No. 25 *continued*

Recent analysis of these data suggests that improvement may have occurred on other allotments within the Challis Planning Unit because similar actions (intensive grazing systems, range improvement developments, etc.) were also implemented on those allotments. However, this general trend of improved upland range conditions may not have taken place on other allotments within the RA (especially those within the Ellis-Pahsimeroi and Mackay Planning Units), because similar grazing systems and range improvements were not implemented on many of them.

New inventories are proposed in the Challis RMP to update or complete condition and trend information for the various resources in the Challis Resource Area. As explained on page 100 of the DRMP, rangeland inventories to determine ecological seral stage are very expensive and typically take several years to complete on a Resource Area of this size. The effectiveness of past rangeland management actions was evaluated through an analysis of 120 upland trend studies, which included nested frequency and permanent photo plots. This analysis indicated that past management produced little or no change in resource conditions (see Rangeland Monitoring, DRMP, p 101). The Proposed RMP proposes that livestock grazing management changes (e.g., application of use standards, seasons of use, stocking levels) will be determined through monitoring and evaluation of those areas currently in a less than satisfactory condition (see PRMP, Livestock Grazing, Goal 1, #2 and 6).

Drought and other climate-related impacts have had an effect on the amount and extent of resource improvement on some allotments. The BLM agrees that those allotments that went through intensive management adjustments including decreased numbers, later on-dates, rest rotation, and new water and fence developments have come through the drought years in better condition than those that had few or none of the above-mentioned changes.

One overall goal of the Challis RMP is to improve range condition where it is presently unsatisfactory. In areas where range conditions are currently satisfactory, this goal may already have been achieved. There are, however, sites in the RA where conditions are unsatisfactory.

25-10: The discussion on pages 101-104 is meant to suggest several possible reasons why land use plan goals were not met. The BLM agrees that there are a number of other factors contributing to range conditions other than livestock grazing, such as major storm events, recreational activities, off-highway vehicle use, and wildlife numbers. However, livestock grazing is the one activity occurring throughout 97.2% of the Resource Area that has the most direct impact on range condition. For example, the IDFG (see Comment Letter Number 32) estimates that big game

populations take approximately 8 percent of the forage consumed by grazing animals in the Challis RA, while livestock consume approximately 92 percent. When compared with livestock use, other factors such as recreation and off-highway vehicle use have very minor impacts on range condition. The PRMP has been revised to acknowledge climate as a factor influencing rangeland condition and trend (see PRMP, Chapter 3, Livestock Grazing). Please see Chapter 4, Vegetation for a discussion of the expected impacts other actions would have on vegetation.

25-11: The fisheries habitat assessment for the East Fork of the Salmon River provided in the Challis DRMP, Appendix C, is very similar to the habitat assessment in the Model Watershed Plan (November 1995). The Challis DRMP, Appendix C, pp. 524-525, states that bank stability ranges from fair to good, with an overall good rating, that cobble embeddedness averages 33% or less, and that the East Fork of the Salmon River is still considered important spawning habitat for chinook salmon. This assessment is essentially the same as discussed in the Model Watershed Plan, Chapter 6, which states that the East Fork from mouth to Herd Creek has good bank stability, but needs improvement in streamside vegetative cover and spawning/incubation areas (page 6-5), and the East Fork from Herd Creek to Germania Creek has approximately 70% bank stability (which would be equivalent to a fair to good rating), that improvement is needed in streamside vegetative cover and bank stability (especially on private land), and spawning/incubation areas are limited by fines in the gravel, which are greater than 20%.

25-12: Like mineral development, livestock grazing is a type of use that does not produce direct beneficial impacts to other resources and programs, such as soils, water, and vegetation. However, the BLM does acknowledge the beneficial impacts of livestock grazing to the local economy (see PRMP, Chapter 3, Economy and Society). The PRMP attempts to balance multiple renewable and non-renewable "consumptive" uses (grazing, minerals, timber harvest) with maintenance or improvement of the basic resources which sustain renewable consumptive uses (vegetation, soils, water). Livestock grazing can be managed to allow continued use of the grazing resource without damaging other resources or precluding other uses (such as recreation). Flexibility and innovation in livestock grazing management are provided for in the PRMP through the potential application of knowledgeable and reasonable practices (see PRMP, Livestock Grazing, Goal 1, #7 and Riparian Areas, Goal 1, #4).

Letter No. 26

January 3, 1997

Ms. Kathe Rhodes
RMP Coordinator
Salmon Field Office
Bureau of Land Management
Route 2, Box 610
Salmon, Idaho 83467

Dear Kathe:

Happy New Year! I have (finally) gotten time to read the Challis Draft Resource Management Plan and EIS, and would like to compliment you on a job well done. The document, for the most part, is thorough and well prepared. I would not expect that you would receive many adverse comments to the document.

1 Of the alternatives presented, I agree that Alternative 2 should be the preferred alternative. I believe that the balance desired is achieved, although there will be a reduction in some present services; it appears that the reduction is necessary to improve range health and future services.

With that introduction and statement of support, I would like to point out some minor concerns and editorial comments:

2 1. P. 35, Alternative 3, Wild and Scenic Rivers, is it 5 or 6 segments?

3 2. P. 60. I am surprised at the length and detail of the discussion on the Fort Hall Reservation, since it is so far from the Challis Resource Area. I understand that the Tribe can use the resources of the area, and that some discussion of the Tribe characteristics has relevance, but it seemed that it was excessive for the RMP. I would not edit it for the final, however, since it does not hurt anything, other than change the focus of the document, for a few pages, many miles to the south.

4 3. P. 76. In the section Factors Affecting Fisheries Habitat and Production, the discussion should have been more oriented to the less scientific reader. At a minimum, substrate embeddedness should have been defined in the Glossary. For the less scientific reader, "gravels (0).25 to 2.5 inches (in diameter,

Letter No. 26 *continued*

4 spaced?) with velocities (of the water?) ranging from 0.5 to 2 feet/second." The abbreviated language may be confusing to some.

5 4. P. 79. "Sensitive Species:" I believe that the BLM Policy, since it is not readily available to most readers, should be provided, either stated here or provided elsewhere.

6 5. P. 81. Table 3-4. Is this the way forest land is classified? Everything is a problem, either being on fragile soils, problem reforestation sites, non-commercial species, non-suitable, etc. I would believe, based on this classification, that there should be no timber harvest allowed on the Resource Area, but all alternatives allow it.

7 6. P. 86. I think there should be some explanation why the harvest of timber is less than 50% of the sustained yield cut. I recognize that some WSA lands have been removed from harvest, but only 6200 acres of 31,000. Is there no demand for timber? If the timber is all on the problem sites, the sustained yield cut should be reduced to recognize the difficulties.

8 7. P. 95. Power Site Reservation or Classification. I believe that there should be an explanation of who does the reviews and the fact that this is not within the control (authority) of the BLM.

9 8. P. 147. Second line: dominant should be dominate.

10 9. P. 151. It should be clarified, in the second paragraph, whether or not these are Federal water rights filings.

11 10. P. 227a and b. Point 1, Alternatives 2 and 3. Based on the discussion in the text, I think a more positive statement about the positive effects of prescribed fire should be made. The same is true for point 3, alternative 2, P 228a.

12 11. P. 238a. Point 18, Alternative 2. I believe that this is a requirement under all alternatives, including Alternative 1, and should be so stated.

13 12. P. 557. I do not have a copy of the Idaho rules at home, so cannot check the entries in the Table, but I am concerned about the language in the introductory paragraph. "Listed beneficial use classifications were either identified by the BLM...." The Use Classifications are set by the Idaho Legislature on the recommendation by the DEQ. If there are uses identified, other than those designated by the State, they should be removed. If there is a need to identify those uses which exist, but are not designated, I would recommend that they be identified differently in the table or in another table.

BLM Response to Letter No. 26

26-1: Your preference for Alternative 2 is noted.

26-2: Under Alternative 3, five segments are found eligible and an eligibility determination is deferred on one additional segment, for a total of 6 segments. Please note that an eligibility determination on East Fork Salmon River "B" (EF-01b) was made in the PRMP (see PRMP, Wild and Scenic Rivers).

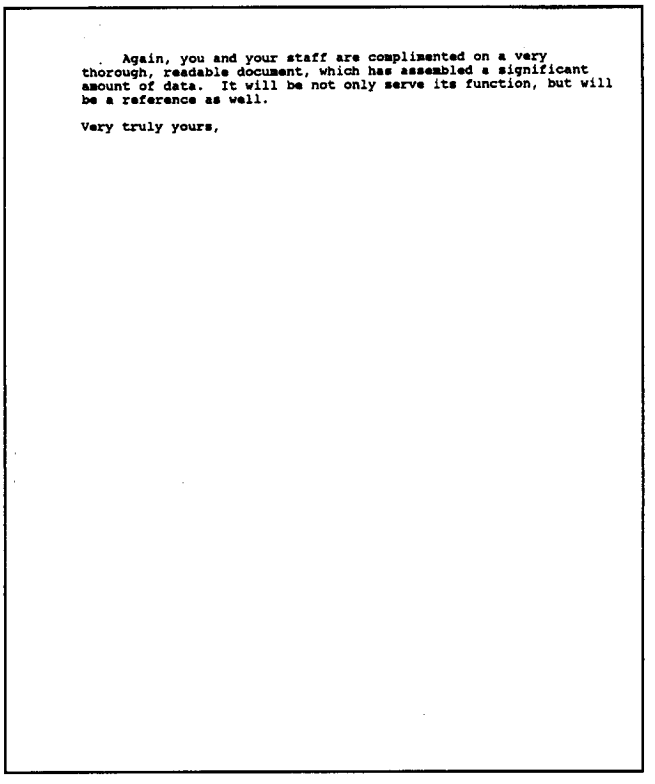
26-3: Information about the Fort Hall Indian Reservation was included at the request of the Shoshone-Bannock tribes to inform readers that the Tribes have made historic use of, and have a current social-economic interest in, the Challis Resource Area. The description of the Reservation was prepared to parallel the level of detail given in the description of the Lemhi County-Custer County area. This discussion of the affected environment was an essential first step in completing an analysis of impacts to tribal treaty rights and the Reservation economy and society.

26-4: Substrate embeddedness was not defined in the glossary; however, cobble embeddedness, which is essentially the same as substrate embeddedness, was defined. A cross-reference for substrate embeddedness has been added to the Glossary for the PRMP/FEIS.

The sentence you describe on page 76 should have been written as follows: "Spawning habitat for resident trout consists of gravels .25 to 2.5 inches in diameter, with water velocities ranging from 0.5 to 2 cubic feet per second." The PRMP includes this correction.

26-5: The current BLM policy on sensitive species as reflected in BLM manual section 6840 (Release 6-116; 9/16/88) is that the BLM shall carry out management, consistent with the principles of multiple use, for the conservation of sensitive species and their habitats, and shall ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these species as threatened or endangered. Reference to manual section 6840 is noted in the DRMP on pages 74, 129, and 162. Copies of this policy would be available to readers upon request.

26-6: The Timber Production Capability Classification system is used for all BLM forested land in Idaho, and is outlined at length in a supplement to BLM Manual Section 5251 (Release No. 5-10; 8/15/90). Some terms in the classification system (e.g., non-commercial species) indicate the site should be managed as woodland rather than commercial forest land. Other terms in the classification system (e.g., "problem reforestation site") point out various management considerations which should be taken into account when managing lands already classified as commercial forest lands. The Timber Production Capability Classification system's "problem site" classification was designed to alert forest managers to



Again, you and your staff are complimented on a very thorough, readable document, which has assembled a significant amount of data. It will be not only serve its function, but will be a reference as well.

Very truly yours,

potential difficulties in timber management so that such issues could be identified at the activity planning stage, rather than at or after project implementation. This would ensure that measures could be incorporated into projects that would eliminate or minimize such problems. For example, a site with the "Heat and Drought"' classification would use drought resistant lodgepole pine planting stock as opposed to Douglas-fir, and harvesting would seek to maximize shade patterns during the hottest period of the day.

26-7: (a) Although there is a demand for timber in the Challis RA, the sustained yield level estimate discussed on DRMP page 86 is higher than actual timber harvest for several reasons. First, forest products are not to be removed from Wilderness Study Areas (WSAs) currently under interim management guidelines (approximately 6,209 acres of commercial forest land) (Interim Management Policy for Lands Under Wilderness Review (7/5/95); p. 43). However, forest lands in the WSAs were included in the sustained yield level for Alternative 1 (existing management). Not harvesting in WSAs and moving the same harvest level to the remaining commercial forest land in the Challis RA would result in timber harvest significantly above the sustainable level on the non-WSA commercial forest land. To correct this problem, the sustained yield average described for Alternative 2 (and in the PRMP) removes forest lands in existing WSAs from the commercial timber base. Second, the sustained yield estimate for Alternative 1 is believed to be high because of the way it was calculated. All of Eastern Idaho BLM land was aggregated for the cut calculation, and most of the land designated as commercial forest land was higher in productivity than the Challis RA's forest lands. As a result, an elevated cutting level was likely projected on the Challis RA. For this reason the Challis RMP proposes to conduct an intensive forest inventory within 10 years. Third, conflicting resource values and issues may reduce the amount of commercial forest lands which can be made available for timber harvest in a given year. And fourth, until recently (1996) the Salmon Field Office's forest resources staff needed to spend most of their time on reforestation efforts in previously harvested sites which had inadequate regeneration.

(b) Problem site classifications ideally are reflected in the long term sustained yield harvest level. However, given the current situation discussed above regarding WSAs and harvest level calculation methods, problem reforestation and fragile site classifications may not be accurately reflected in the sustained yield level for Alternative 1. This is yet another reason for a conservative approach to timber harvest in the Challis RA until intensive inventories are completed.

26-8: Under section 204 (a) of the Federal Land Policy and Management Act of 1976, the Secretary of the Interior is

authorized to make, modify, extend, or revoke withdrawals. Field offices of the BLM analyze withdrawal proposals and make review recommendations to the Secretary. Clarification of the review process for power site classification and reservation withdrawals has been added to the PRMP/FEIS.

26-9: This typographical error has been corrected in the PRMP/FEIS.

26-10: The text has been clarified in the PRMP/FEIS to specify that these water rights claims have been filed by the BLM. All water sources on public land administered by the BLM were claimed under a state law basis (i.e., permit and license for beneficial use). In addition, all springs and waterholes on public land were reserved under Federal law by Public Water Reserve #107, dated 1926. Under the water right filing procedures defined by the Snake River Basin Adjudication (SRBA Court), water rights on springs and waterholes were filed having dual basis (i.e., being claimed both under State law as well as under Federal law).

26-11: The BLM feels the positive effects of prescribed fire are described adequately on p. 228, #3 and p. 232, #17. Many other factors besides fire can affect short and long term forest health and productivity (drought; disease/insect cycles; prescribed thinning, including timber harvest; historic vs. recent succession patterns *(i.e.,* fire suppression has altered site composition)). The positive effects of prescribed fire are not stated as an absolute "will occur" because many site-specific/event-specific factors will determine the nature of impacts from a given fire.

26-12: The analysis on p. 238, #18 refers to a management decision shown on pp. 380a/b (Management Concern: Water Quality, Goal 1, #2). In this decision the DRMP states that State approved BMPs for water quality must be followed under all alternatives. The different analysis shown under Alternative 1 reflects the fact that in the past (existing management), State approved BMPs were not available for many activities. Under Alternatives 2-5, State approved BMPs would be met or exceeded for all BLM authorized actions.

26-13 You are correct that the BLM cannot designate beneficial uses. The table on page 557 clearly differentiates between streams where the Idaho Department of Health and Welfare, Department of Environmental Quality has designated a beneficial use (labeled "D, S/T, P, U"), and those streams where the BLM has made a tentative identification of a beneficial use (labeled "x"). The BLM used the protocols in Idaho Department of Health & Welfare, Division of Environmental Quality, 1991, "Protocols for Conducting Use Attainability Assessments for Determining Beneficial Uses to be Designated on Idaho Stream Segments," *Water Quality Monitoring Protocols*, Report Number 7 to identify

BLM Response to Letter No. 26 *continued*

beneficial uses for stream segments. The BLM will continue to use these as water quality standards until such time as DEQ is able to assess all streams in the Resource Area for beneficial uses.

Letter No. 27

STATE OF IDAHO

(original) of fax

DEPARTMENT OF AGRICULTURE

PHILIP E. BATT
Governor

PATRICK A. TAKASUGI
Director

January 6, 1997

Ms. Kathy Rhodes, RMP Coordinator
Challis Resource Area
Salmon Field Office
Bureau of Land Management
Route 2, Box 610
Salmon, ID 83467

Dear Ms. Rhodes:

Attached are our comments to the May 1996 Challis Resource Area Draft Resource Management Plan and Environmental Impact Statement. We trust that our comments will be useful in preparing the final RMP. We appreciate the extra review time you provided in extending the comment period.

Sincerely

Patrick A. Takasugi
Director
Idaho Department of Agriculture

PAT:pc
encl.

BLM Response to Letter No. 27

27-1: The BLM agrees that the Challis Experimental Stewardship Program (ESP) has played a valuable role in management of the public rangeland in the Stewardship area. The BLM disagrees, however, that it is "imperative" to elaborate further on that program in a narrative discussion in the Proposed RMP/Final EIS (PRMP/FEIS). ESP's involvement was summarized in the DRMP in Chapter 5 - Consultation, Coordination, and Consistency (p. 341). The successes and/or failures of ESP proposals (as well as all other management strategies) applied to the public lands in the Challis Resource Area are reflected in the present condition of the rangeland resources. The Experimental Stewardship Program Report of December 1984, and subsequent reports further elaborate on the results of ESP. The BLM continues to support all opportunities, including partnerships with ESP, to improve the range condition of lands under grazing permits within the planning area.

27-2: (a) Please see response 15-2.

(b) The BLM recognizes all the various components involved in determining rangeland health, and does not base assessments of range condition solely on livestock utilization data.

Letter No. 27 *continued*

The Idaho Department of Agriculture offers the following comments regarding the May 1996 Challis Resource Area Draft RMP and EIS:

General

1. We were greatly surprised and disappointed that the draft hardly mentioned the Challis Experimental Stewardship Program (the only mention we could find was on page 341). It seems clear that the BLM would like to forget about the ESP program. Why? There is no single program in the Challis area that has impacted federal land management as much as Stewardship and the BLM has allocated significant human and fiscal resources to it's support since 1979. Salmon BLM District Managers have chaired the Steering Committee. BLM managers at all levels have voiced support for it and praised it's accomplishments both in improving communication and trust and in affecting positive change on the land. It is a great disservice to both the BLM and to the people of the Challis area to ignore the effort that has gone into this program. 1

If this document is to have any credibility at all it is imperative that a fair discussion of the ESP program, including its' successes and failures, be incorporated in the final. To imply as you have on page 341 that the Challis ESP is just a club or organization such as the Chamber of Commerce to which the BLM provided background information is outrageous. Finally, this is an opportunity for the BLM to dispel any doubts about how it views Stewardship and declare whether it will continue to support the ESP program in the future.

2. We are also concerned about the liberal use of supposition and the lack of factual data in discussing the present condition of rangeland resources in the Challis Resource Area. We realize that BLM human for resources have been taxed in the intervening years between the Challis Grazing EIS and this document. Rangeland condition and trend monitoring is a time consuming activity and there is rarely sufficient data to make clear determinations. Why don't you simply admit that you have insufficient hard data to support your perceptions of declining conditions? In fact, as you know, recent information collected by the San Felipe ranch indicate quite the opposite. Furthermore, if BLM's perception of declining range condition is based only on utilization data, fairly recognize in the document that utilization is a surrogate, perhaps the most subjective of all the monitoring techniques, and only one of several to be used in combination in deterring rangeland health. 2.a 2.b

3. In presenting and discussing the various alternatives, it is implied that each is exclusive of the other. Accelerating the development of AMPs and *effective* management strategies could be employed with the existing "level of use and resource protection" So could an effective weed management program, improved riparian management, wider use of prescribed fire, etc. It is obvious that the BLM line, consistent with the current national policy, is that reductions in stocking levels is the cure-all. This has never resolved management problems in the past, so why should we believe that it would do so now? 3

Letter No. 27 *continued*

3 If BLM can obtain the resources to advance management capability as purposed under alternative # 2, why can it not obtain those same resources to make the needed improvements without major reductions in grazing and the demise of many ranchers as well as the communities which depend on their economic well-being?

4. The RMP Team would do well to reconsider the resource condition goals based on ecological status. This is a concept which is dying because of the increasing evidence that the Clementsian theory of linear succession is invalid. We recommend that the team review the "Livestock Grazing" section (Chapter 2- Affected Environment) of the Upper Columbia River Basin draft EIS. This presents a fair and impartial discussion of the weaknesses of current successional theories and the need to look to emerging ones. 4

SPECIFIC COMMENTS

Volume 1

Page 8: 2nd sentence use "vegetation" not "vegetative". (There are many instances throughout the document where "vegetative" is used erroneously instead of "vegetation"). Also, "...primarily comprised of bluebunch wheatgrass/big sagebrush or Douglas fir" is hardly useful information. Either drop or at least differentiate between forested and non-forested communities. 5

Page 15: "BLM Policies and Initiatives"

You cite the document "The State of the Public Rangelands 1990, The Range of Our Vision (1990). This document was disavowed by new BLM Director Baca in 1994. After all, it stated that public rangelands were in the best condition in the last 100 years...a statement not supportive of Baca's Range Reform ideas. 6

Page 16: You should add to the list of MOU's, the April 1989 MOU between the Idaho Department of Agriculture and the Idaho State Director BLM for "...consultation, cooperation, and coordination..." in using the Section 8 process in Idaho to resolve conflicts between permittees and the BLM in matters related to AMP's. 7

Page 33: Vegetation What evidence is provided that "current allocations would not be sufficient for plant maintenance needs"? Even if there was evidence that plant maintenance needs were not being met, how is that related to "allocation" or stocking rate? Vegetation changes or maintenance is related equally **timing, intensity and duration of use** not to "allocation". 8

BLM Response to Letter No. 27 *continued*

27-3: The Draft RMP alternatives are purposely designed to look different from each other; a Draft RMP presents a range of alternative Resource Management Plans. Please note that Alternative 2 and the Proposed RMP carry forward many actions which are valid existing management and were listed as decisions under Alternative 1. The Proposed RMP was developed in response to public comment and is based upon Alternative 2, yet incorporates some aspects of Alternatives 1, 3, 4, and 5. Alternative 2 does not propose major reductions in grazing. The estimated 25% reduction in average annual livestock use stated in the analysis of impacts (DRMP, p. 235a) depends on permittees' actions to improve livestock management and is not an absolute AUM reduction. This estimated reduction in actual use is the BLM's analysis of impacts to the livestock grazing program, assuming RMP actions to achieve needed improvements in resource conditions are implemented, and permittees make no substantial adjustments in their livestock management. These potential reductions (mainly in time on public lands) could be offset by permittee actions to manage livestock (e.g., riding, salting, fencing).

27-4: The BLM agrees there is an on-going debate over the proper model to use in describing vegetative succession. Unfortunately, disagreement continues as to which specific model should replace the old straight-line model proposed by Clements (1916) and others. In the absence of universal acceptance of an alternative model of succession, the Challis Resource Area is using the succession-retrogression model described by Dyksterhuis (1949), as it has been BLM, Soil Conservation Service (now the Natural Resources Conservation Service), and Forest Service policy to do so for many years. The BLM currently uses the concept of Potential Natural Community as described in the Soil Conservation Service (Natural Resources Conservation Service) site guides. Potential Natural Community for the Challis Resource Area is based on the local Custer-Lemhi soil survey (referred to in the DRMP, p. 119). Throughout the PRMP, however, are instances where an interdisciplinary team can vary from the goals and objectives shown in various decisions, provided there is a sound ecological basis for the variance.

27-5: This portion of the Summary has been revised in the PRMP/FEIS.

27-6: The BLM believes this is a valid and reasonable document to list as one of the existing BLM Policies and Initiatives used during preparation of the Challis RMP. The policy was not formally changed or abandoned by Director Baca or subsequent BLM Directors.

27-7: Omission of the April 1989 MOU between the Idaho Dept. of Agriculture and the Idaho State Director- BLM was an oversight; reference to the MOU has been listed in the PRMP/FEIS as a correction to the Draft RMP.

Letter No. 27 *continued*

9 There is also good evidence that the "potential for noxious weeds to invade and spread" can only be reduced by an effective weed management program. Why should that be different irrespective of the alternative?

10 **Page 36:** Again you raise the contention that "forage allocation" is the deciding factor in vegetation vigor, health etc. when it is only one factor in managing vegetation (see comment from page 33).

11 **Page 97:** (1st full paragraph, last sentence) You imply that the current practice "...livestock must be off during the summer months (when hay is being produced) in order to have a viable, year-around livestock operation" is the only one possible. Not so. Considering current economic conditions, there may be good reason to reexamine the cost of traditional haying practices with a look toward use of standing hay crops.

12 (Last paragraph, last sentence: Correct as follows: "In order to address these concerns, most of the AMP's for the 40 allotments would be revised under...".

13a **Page 101 & 102:** If the facts are as BLM implies ("These data seem to indicate that current management has not met existing land use plan objective to *improve* range condition in the Resource Area") why not simply state that grazing management changes (timing, intensity, and duration) will be adjusted as necessary instead of "fishing"?

13b To imply that there is a "true" capacity defies our understanding of the dynamic nature of ecosystems. There are simply too many variables to assume that there is a magic number. This statement is extremely naive and foolish.

14 **Page 103:** Do not use the term "reinvasion" when describing increased shrub cover or density. The term reinvasion implies that shrubs are alien when they are natives and always a significant component of sagebrush/grass communities. Furthermore, to imply that because sagebrush and other native shrub species continue to increase after prescribed fire treatment, the treatment is "questionable" is certainly an over-generalization and should be deleted. Also, there is no evidence that a post treatment rest of "2 or 3 growing seasons" is required. In fact, carefully timed use in the years immediately following the treatment can be beneficial.

15 **Page 104:** Either use the term "ecological status" or "range condition" but not "ecological range condition" This only confuses readers and is not consistent with the excepted terms nor your own glossary.

16 The subject of range "suitability" for grazing has always been controversial because of its subjectivity. If you intend to apply suitability in future management, please define the term and how it will be applied. It is not defined in the glossary nor in any detail in the text.

Letter No. 27 *continued*

17 "Noxious weed continue to spread within the Resource Area, in spite of a control program undertaken by Custer County under agreement with the BLM". This is true of every county in Idaho and in most of the West. How do you intend to reverse this trend on the public lands? That fact that noxious weeds continue to spread has nothing to do with the agreement per se but with how the agreement is carried out and what resources are made available.

18 **Page 129:** Vegetation management practices, in order of priorities: 1) preventive 2) non-use chemical where feasible, 3) herbicides after considering everything else. Considering the safety of modern chemical and the ineffectiveness of current weed management, we believe there is good reason to consider much more emphasis on instant action with the best known method. Harm to the environment is likely to be much less with the use of herbicides than with the spreading weeds.

19 **Page 144:** (1st full paragraph) "Poisonous plants, while posing a threat to livestock, are not designated as noxious weeds." This sentence should be revised to read " Most poisonous plants or most native poisonous plants..." Poison hemlock is poisonous to livestock and is on the list.

20 **Page 145:** Table 3-29, the Idaho noxious weed list is inaccurate. The Resource Area should request an updated list, along with the law and rules, from the Custer County weed supervisor.

21 **Page 152:** The statement "Coliform levels at BLM sites below private land are nearly always higher than at BLM sites above private land." is puzzling. What are you implying—that the coliform comes from private land? If so, does the same thing apply to private land below BLM Land (which is very common)?

22 **Page 180:** The idea that you would even mention methane production from livestock in an air quality analysis on rangelands in the Challis area is ludicrous.

23 **Page 187:** "Livestock grazing management decisions may reduce adverse effects on special status anadromous and resident fish populations and fish habitat." Does this simply relate to stocking reductions? If so, say so. Otherwise, elaborate.

24 **Page 191a:** "Grazing use is expected to be lighter in riparian areas and adjacent upland sites.....Many plant communities maintained in early seral stages by livestock grazing under alternative 1 may advance to mid-seral stage under Alternative 2." Again, broad sweeping statements used to fill up space. There is no detail given to determine whether such statements are justified.

25 **Page 205a:** In # 2, Alternative 2, an estimated 25% reduction in AUMs is planned (12,658 AUMs), resulting in a "negligible" decrease on the regional level. This could be true, but the impact on some individual communities would be much worse, and even

BLM Response to Letter No. 27 *continued*

27-8: The absence of appropriate plant composition, age structure, and vigor on many upland sites within the Challis Resource Area indicates that plant maintenance needs are not being met under existing management. Review of current allocation levels indicates that the ratio of existing consumptive use is not properly balanced to provide for plant maintenance and watershed protection. (The Management Framework Plans indicate that 50% residual forage is essential for watershed protection and plant maintenance needs.) This current imbalance among plant use allocations may have led to some range sites and riparian systems within the Resource Area exhibiting a static or downward trend. The DRMP analyzes the effects of vegetative allocations in Chapter 4, pages 191a (#6); 278a (#1 and 2); and 279a (#5, 6 and 7). In Chapter 3, forage allocation and rangeland condition and trend are discussed on pages 99 and 100.

The BLM agrees that the factors affecting plant maintenance are related to the timing, duration, and intensity of grazing use. However, plant maintenance is only one component of the residual plants' overall benefits to the water and energy cycles. Litter, cover, microbiotic crust, and other components enhance the watershed's ability to resist erosion, allowing sites to retain water available for plant growth. Static to downward trends on range sites indicate to land managers that some components essential to rangeland health are either not present, and/or that those components which are present are not functioning to their potential. The PRMP proposes a variety of utilization and residual herbaceous material requirements to provide for not only plant maintenance, but also watershed health (increased cover) and riparian function (increased hydric species).

27-9: The potential for noxious weeds to invade and spread does not vary by "action" alternative; Alternatives 2 through 5 propose an effective weed management program. Existing management (Alternative 1) is not effective.

27-10: Please see response 27-8 above.

27-11: The PRMP/FEIS contains revised wording of the sentence mentioned in your comment.

27-12: The PRMP/FEIS contains clarified wording of the sentence you are concerned about.

27-13: (a) The "action" alternatives (Alternatives 2 through 5) all propose changes in livestock grazing management in order to improve resource conditions. These management decisions are described in Volume 2 - Description of Alternatives, rather than in the Affected Environment. The analysis of impacts for Alternative 1 provides details to support the BLM's statement that current grazing management has not met land use plan objectives to

25 more so on individuals. This is in addition to anticipated increases in livestock management costs (page 206a, alternative 2, 1st paragraph).

26 Page 236a: #3- Again, the polly-anna notion that reducing stocking rates will be the driving force is improving forage quality. After 50 years of reductions, we ought to consider something else.

Volume 2:

Page 363a: Good noxious weed goals and strategies. We are pleased to see that a weed-free hay requirement for commercial stock or wildlife is planned.

27 Page 364a: "Sensitive areas would be treated initially with non-chemical alternatives." Why not just get in and eradicate the weed with the best method available whether it be chemical or non-chemical. If anything less than the best method is used, there is a greater risk of the infestation escaping.

Volume 3:

28 Page 546: The San Felipe allotment appears to be in very good condition, compared to the other allotments. Could this be the case for most of the other allotments if an updated inventory were carried out?

improve range condition (see DRMP, pp. 278-280, #1-12 and p. 281, #16-18).

(b) Alternative 2 does not propose a "true" capacity, but rather ties stocking levels to resource condition objectives for various resources: aquatic habitat, riparian condition, residual cover and food for wildlife species, etc.

27-14: Portions of the paragraph you commented on have been revised in the PRMP/FEIS in response to your comments.

27-15: The PRMP/FEIS has been revised in response to your comments.

27-16: No PRMP decisions identify or require the use of suitability criteria. A definition of "suitable ranges" has been added to the Glossary for the PRMP/FEIS.

27-17: The PRMP proposes an integrated weed control program which is expected to be effective through the efforts of all partners named in existing and future cooperative agreements (see PRMP, Noxious Weed Infestations).

27-18: (a) The Challis Draft RMP incorporates the FEIS Vegetative Treatment on BLM Lands in 13 Western States by reference (DRMP, p. 129), and must adhere to its priorities and Standard Operating Procedures.

(b) The Draft RMP action alternatives (Alternatives 2 through 5) and the PRMP propose integrated pest management, and allow for chemical control; the RMP contains this flexibility to use a mix of weed control strategies in order to minimize adverse environmental impacts and maximize the effectiveness of noxious weeds treatments.

27-19: The sentence you are concerned about has been revised in the PRMP/FEIS.

27-20: The noxious weed list depicted in Table 3-29 has been updated in the PRMP/FEIS.

27-21: Generally, the combination of pasture irrigation and livestock along streams and rivers on private land result in higher coliform levels downstream. Livestock on privately owned lands are often concentrated in pastures adjacent to streams, and irrigation runoff from the pastures delivers fecal matter into streams, increasing fecal coliform counts downstream. This happens regardless of where BLM land is located. Fecal coliform levels in streams flowing through and downstream of public land are generally lower than coliform levels downstream of private land. Livestock and wildlife on public lands are normally dispersed over a larger area, often farther away from rivers and streams, with no irrigation runoff to increase input of fecal matter to streams.

27-22: This topic was discussed briefly in the Draft RMP to address concerns from readers who may envision a "feedlot" environment and might view methane production as an air quality issue.

27-23: This analysis point purposely says "livestock grazing management decisions" (*i..e.*, plural) because it summarizes impacts from many management decisions listed under Management Concern: Livestock Grazing (see DRMP, Volume 2). Although livestock grazing management within the Herd Creek and Road Creek watersheds could include stocking rate reductions in some cases, the management decisions and analysis do not state or imply that stocking rate reductions are the BLM's preferred grazing management option.

27-24: This analysis is based on impacts from all the Draft RMP decisions shown under Management Concern: Livestock Grazing (pp. 350-355) and Management Concern: Upland Watershed (pp. 367-368).

27-25: The following information is in response to your comment that "the impact on some individual communities would be much worse" than the impacts to the regional economy. Table 4-2 (DRMP p. 211) displays the estimated quantitative impacts to the agriculture sector, by county, for Alternative 2. Because the economic model estimated only 11 jobs decrease would occur in Custer County, the cell size is too small to analyze for each of the 4 subregions in that county. However, the BLM can estimate a "worst case" impact to the subregion most dependent on agriculture: If, hypothetically, the subregion most dependent on agriculture in Custer County (*i.e.*, the Pahsimeroi subregion, where 84% of subregion's employment and 96% of earnings are in the agriculture sector - see Appendix B, Items 2 and 4) lost ALL of those 11 jobs, this would be a 16% decrease in employment (11 of 68 jobs) and a 9% decrease in earnings ($255,000 divided by $2,823,000). Under this hypothetical situation, the economic impacts to the Pahsimeroi subregion would be greater than the impacts to the regional economy. However, it is highly unlikely all economic impacts would be in one subregion, since the regional economy is interconnected among subregions.

27-26: Please note that the Draft RMP proposes to establish proper stocking levels in the context of revised grazing management, and not as an isolated action. Proper stocking rates and changes in livestock grazing management would both contribute to improved vegetation composition and vigor and improved forage quality.

27-27: (a) Your support for the noxious weed goals and strategy are noted. (b) Chemical eradication of target weed species is not always appropriate because these areas are sensitive. In many cases, chemicals cannot be used in these areas because of legal label restrictions.

27-28: Please see response 15-2, paragraph 2.

Letter No. 28

January 2, 1997

Ms. Kathe Rhodes
RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2 Box 610
Salmon, Idaho 83467

Dear Ms. Rhodes:

The Challis Draft RMP provides an inappropriately bleak, assessment of resource conditions and will further provoke the already contentious fight over resource use in the Challis area. In numerous instances the RMP exaggerates resource problems or assumes resource problems without a factual basis and suggests management actions based on inappropriate assumptions of cause and effect. The Draft RMP, rather than being an objective assessment and analysis of reasonable management actions, verges on promoting the environmental agenda and extending the Bureaus' authority well beyond public lands.

The following are some specifics which illustrate the lack of objectivity in the Draft RMP:

1 Page 52 - The table on Road Creek proposed ACEC twice states that riparian conditions are poor. In fact Road Creek riparian conditions are good and this statement is incorrect and misleading. This is not an objective description of current condition on Road Creek. Refer to EOY monitoring reports prepared by the BLM on San Felipe Allotment 95 and 96.

Letter No. 28 *continued*

-2-

2 Page 76 & 77 - Fisheries habitat and factors affecting fisheries habitat and production: This entire discussion claims poor anadromous and resident fish production is the result of poor fisheries habitat and irrigation diversions. This is an exaggeration of habitat problems and lack of recognition of fish passage problems through the many dams on the lower Snake and Columbia River systems. This biased discussion leads the reader to believe land use is the main cause of Salmon and Steelhead population declines. This same biased message is found on page 6 and again in the second paragraph of page 526 (volume 3). These biased assessments appear to be an attempt by the RMP authors to justify unreasonable and unnecessary restrictions on public land use and to extend BLM control beyond beyond public lands to regulate private water rights and irrigation diversions. The discussion on page 536 of volume 3 goes far beyond the Bureaus' legal authority and reflects an environmental agenda that is radical and destructive of the local communities. Furthermore it is not justifiable by the biologic conditions of resources as they currently exist.

3 Page 101 & 102 - This discussion of range condition and trend is atrocious. The statement that "current management has not met existing land use plan objectives to improving range condition.." is a shakey conclusion based on flawed assumptions and inadequate data. How can it be logically concluded that current management is inappropriate when the trend data was analyzed in 1992 after nearly a decade of severe drought. Even at that only three trend data sets of 120 studies showed a downward trend. What kind of a rationale could justify this conclusion? The impact of prolonged drought on range trend or condition is not even mentioned in the discussion on page 101 (last paragraph) or on page 99 (next to last paragraph).

On page 101 and 102 there is a lengthy analysis of why land use plan objectives have not been met. Again only livestock grazing aspects are considered. Yet one of the most obvious possibilities would be to at least consider that the objectives are flawed and/or unattainable. Those objectives were based on the 1977 ESI Inventory which supposedly showed most public lands in the Challis Resource Area to be in poor or fair condition. However, this was a flawed document which was challenged by the range science community and the Society for Range Management virtually from the date of issue. The methodology used in the 1977 inventory was later discredited and there is good reason to believe this 1977 assessment was inappropriately disparaging of range condition. The land use plan objective to improve range condition was based on the 1977 results.

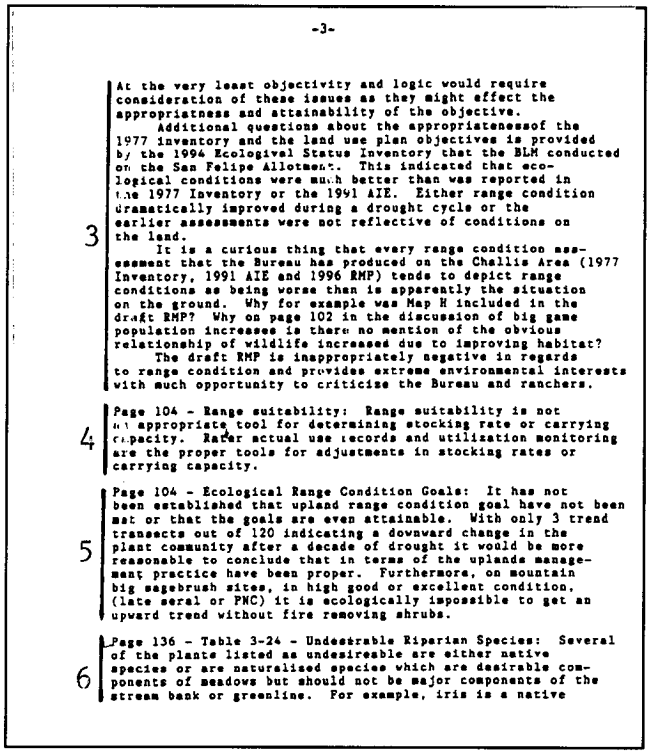
BLM Response to Letter No. 28

28-1: Table 3-2 on page 52 reflected a subjective assessment of conditions on the ground as they existed at the time the Draft RMP was started in approximately 1991. The BLM acknowledges conditions have improved along Road Creek since that time; the PRMP has been revised to reflect this fact. Because the Road Creek watershed was not designated as an ACEC in the PRMP, the portion of the document describing Relevance and Importance within this watershed has been deleted. For your information, ongoing riparian functional condition assessments were last displayed in the 1997 riparian report for the Challis Resource Area, which listed the following riparian conditions for Road Creek: 35% in proper functioning condition and 65% functional at-risk, with an upward trend.

28-2: (a) The Affected Environment describes the condition of affected resources within the planning area, which in this case encompasses the Challis Resource Area. Although actions on public lands within the Challis RA may impact downstream waters, BLM cannot manage migration and adult habitat for anadromous species once they leave the public lands for waters in the Columbia River system and the ocean. BLM does indicate that factors beyond the Challis RA limit anadromous fish survival (see DRMP, p. 77, paragraph 2). That is why interagency and Northwest regional cooperation which addresses multiple factors in anadromous fish survival is necessary. The Challis Draft RMP Affected Environment must, however, describe resource conditions and uses relevant to fisheries habitat conditions of waters within RA boundaries. The Affected Environment describes conditions on non-public lands to provide a context for a cumulative effects analysis. The DRMP presentation on irrigation diversions in Appendix C: Fisheries, Item 8, page 536; the Appendix Table C-3 listing Irrigation Diversion Structures on Public Lands (p. 537); and Appendix C, Item 4, pages 520 and 521 which describes fisheries habitat condition along privately-owned as well as BLM-administered segments, are all included in the document to provide sufficient background to analyze cumulative effects.

(b) Irrigation diversions, both unscreened and screened, are a major limiting factor for fisheries management, for the reasons stated on page 536. Table C-3 on page 537 lists forty-three unscreened diversions that result in either a reduced flow, or a dry stream channel on public lands. The BLM recognizes that Snake and Columbia river dams increase mortality rates of migrating anadromous fish; however, data show substantial mortality of outmigrating steelhead and chinook smolts occurs before they reach the uppermost dam, Lower Granite. The National Marine Fisheries Service and Idaho Department of Fish and Game estimate that only 21% of spring/summer chinook released from the Sawtooth Fish Hatchery and 37% of spring/summer chinook released from the Pahsimeroi Fish Hatchery reach Lower Granite Dam (NMFS, 1997). The

Letter No. 28 *continued*



-3-

At the very least objectivity and logic would require consideration of these issues as they might effect the appropriatness and attainability of the objective.

Additional questions about the appropriatenessof the 1977 inventory and the land use plan objectives is provided by the 1994 Ecological Status Inventory that the BLM conducted on the San Felipe Allotment. This indicated that ecological conditions were much better than was reported in the 1977 Inventory or the 1991 AIE. Either range condition dramatically improved during a drought cycle or the earlier assessments were not reflective of conditions on the land.

3 It is a curious thing that every range condition assessment that the Bureau has produced on the Challis Area (1977 Inventory, 1991 AIE and 1996 RMP) tends to depict range conditions as being worse than is apparently the situation on the ground. Why for example was Map H included in the draft RMP? Why on page 102 in the discussion of big game population increases is there no mention of the obvious relationship of wildlife increased due to improving habitat?

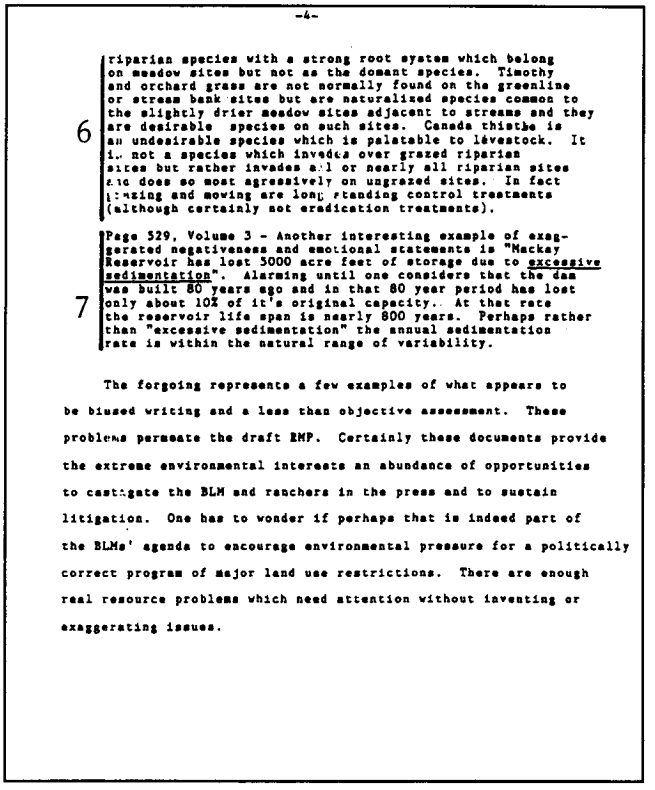
The draft RMP is inappropriately negative in regards to range condition and provides extreme environmental interests with much opportunity to criticize the Bureau and ranchers.

4 Page 104 - Range suitability: Range suitability is not an appropriate tool for determining stocking rate or carrying capacity. Rather actual use records and utilization monitoring are the proper tools for adjustments in stocking rates or carrying capacity.

5 Page 104 - Ecological Range Condition Goals: It has not been established that upland range condition goal have not been met or that the goals are even attainable. With only 3 trend transects out of 120 indicating a downward change in the plant community after a decade of drought it would be more reasonable to conclude that in terms of the uplands management practice have been proper. Furthermore, on mountain big sagebrush sites, in high good or excellent condition, (late seral or PNC) it is ecologically impossible to get an upward trend without fire removing shrubs.

6 Page 136 - Table 3-24 - Undesirable Riparian Species: Several of the plants listed as undesireable are either native species or are naturalized species which are desirable components of meadows but should not be major components of the stream bank or greenline. For example, iris is a native

Letter No. 28 *continued*



-4-

6 riparian species with a strong root system which belong on meadow sites but not as the domant species. Timothy and orchard grass are not normally found on the greenline or stream bank sites but are naturalized species common to the slightly drier meadow sites adjacent to streams and they are desirable species on such sites. Canada thistle is an undesirable species which is palatable to livestock. It is not a species which invades over grazed riparian sites but rather invades all or nearly all riparian sites and does so most agressively on ungrazed sites. In fact grazing and mowing are long standing control treatments (although certainly not eradication treatments).

7 Page 529, Volume 3 - Another interesting example of exaggerated negativeness and emotional statements is "Mackay Reservoir has lost 5000 acre feet of storage due to excessive sedimentation". Alarming until one considers that the dam was built 80 years ago and in that 80 year period has lost only about 10% of it's original capacity. At that rate the reservoir life span is nearly 800 years. Perhaps rather than "excessive sedimentation" the annual sedimentation rate is within the natural range of variability.

The forgoing represents a few examples of what appears to be biased writing and a less than objective assessment. These problems permeate the draft RMP. Certainly these documents provide the extreme environmental interests an abundance of opportunities to castigate the BLM and ranchers in the press and to sustain litigation. One has to wonder if perhaps that is indeed part of the BLMs' agenda to encourage environmental pressure for a politically correct program of major land use restrictions. There are enough real resource problems which need attention without inventing or exaggerating issues.

BLM Response to Letter No. 28 *continued*

BLM is an active member of the Model Watershed Program, as are several landowners, state agencies, and other federal agencies. This group has collaborated on several projects designed to restore and enhance both native and anadromous fish habitat, mostly through diversion redesign, consolidation, and screening.

28-3: (a) The section describing Rangeland Monitoring and Evaluation has been revised in the PRMP to incorporate more current information. Inventories and monitoring are proposed in the PRMP to update or complete condition and trend information for the various resources in the Challis Resource Area. Please also see response 15-2.

(b) The BLM agrees that drought and other climate-related impacts should also have been listed as a reason for lack of resource improvement. Chapter 3 has been revised in the PRMP to acknowledge climate as an important factor in resource condition and trend.

(c) The objective of the RMP is to improve range condition where it is presently unsatisfactory. The PRMP proposes that livestock grazing management changes (e.g., application of use standards, seasons of use, stocking levels) will be determined through monitoring and evaluation of those areas currently in less than satisfactory condition (see PRMP, Livestock Grazing, Goal 1, #2 and 6).

28-4: The BLM agrees that range suitability alone is not an appropriate tool for determining stocking rate or carrying capacity. BLM's preferred method to monitor and adjust stocking rates is through utilization pattern mapping, along with implementation of utilization standards for key livestock forage species. PRMP decisions under Livestock Grazing, Goal 1, #2, 6, 7 specify that levels of livestock use will be determined for various allotments based upon monitoring.

28-5: Livestock Grazing, Goal #1 states that 40% of uplands within the Resource Area should be Late Seral to PNC, meaning within the range of these high seral states. Livestock Grazing, Goal 1, #10 allows an interdisciplinary team the flexibility to determine if some other Desired Plant Community would better meet the goals of rangeland health. The BLM believes the RMP's goal for rangeland condition is realistic and obtainable, as indicated by recent improvement in upland conditions in the Mountain Springs (San Felipe) Allotment and favorable trends in the Herd Creek and Warm Springs allotments. These positive results were obtained by modifying livestock management actions and applying use standards, while still providing for significant livestock grazing.

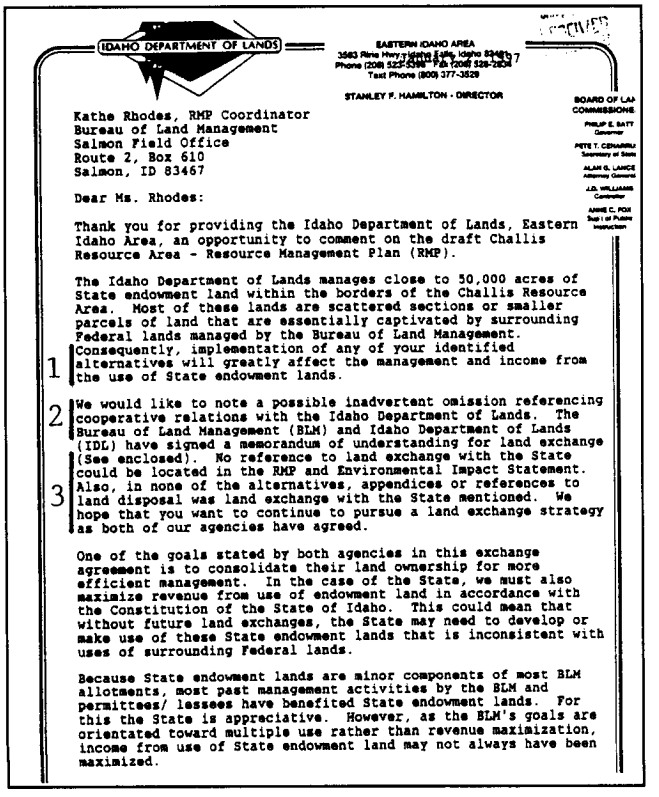
28-6: Undesirable characteristics of some riparian species, as depicted in Table 3-24, are discussed in the last paragraph on page 131: "Other common riparian species are classified

BLM Response to Letter No. 28 *continued*

as 'undesirable' because they are indicators of reduced functioning or they replace species with high functional values." In contrast, desirable riparian species are those with extensive root systems that typically comprise the majority of the hydric plant species found adjacent to the stream zone in highly functional systems. These species are the most resilient to water flow and hold streambanks together during peak flows. Those species on the list of undesirable riparian species do not have the same beneficial characteristics; many are introduced species, and the intent of Table 3-24 was to list plants with characteristics that are less than desirable for **riparian** health and function.

28-7: BLM agrees that the term "excessive" as it relates to the sedimentation rate of Mackay Reservoir is not appropriate. As you point out, the annual sedimentation rate for this reservoir appears to be within the natural range of variability. The paragraph has been dropped from the PRMP.

Letter No. 29



IDAHO DEPARTMENT OF LANDS

EASTERN IDAHO AREA

STANLEY F. HAMILTON - DIRECTOR

BOARD OF LAND COMMISSIONERS

Kathe Rhodes, RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

Dear Ms. Rhodes:

Thank you for providing the Idaho Department of Lands, Eastern Idaho Area, an opportunity to comment on the draft Challis Resource Area - Resource Management Plan (RMP).

The Idaho Department of Lands manages close to 50,000 acres of State endowment land within the borders of the Challis Resource Area. Most of these lands are scattered sections or smaller parcels of land that are essentially captivated by surrounding Federal lands managed by the Bureau of Land Management. Consequently, implementation of any of your identified alternatives will greatly affect the management and income from the use of State endowment lands. 1

We would like to note a possible inadvertent omission referencing cooperative relations with the Idaho Department of Lands. The Bureau of Land Management (BLM) and Idaho Department of Lands (IDL) have signed a memorandum of understanding for land exchange (See enclosed). No reference to land exchange with the State could be located in the RMP and Environmental Impact Statement. Also, in none of the alternatives, appendices or references to land disposal was land exchange with the State mentioned. We hope that you want to continue to pursue a land exchange strategy as both of our agencies have agreed. 2 3

One of the goals stated by both agencies in this exchange agreement is to consolidate their land ownership for more efficient management. In the case of the State, we must also maximize revenue from use of endowment land in accordance with the Constitution of the State of Idaho. This could mean that without future land exchanges, the State may need to develop or make use of these State endowment lands that is inconsistent with uses of surrounding Federal lands.

Because State endowment lands are minor components of most BLM allotments, most past management activities by the BLM and permittees/ lessees have benefited State endowment lands. For this the State is appreciative. However, as the BLM's goals are orientated toward multiple use rather than revenue maximization, income from use of State endowment land may not always have been maximized.

BLM Response to Letter No. 29

29-1: Under the PRMP, livestock grazing on State lands within the Challis RA boundaries should be able to continue.

29-2: The MOU you mention was inadvertently omitted from Table 1-1 in the Draft RMP. Reference to the MOU has been included in the Proposed RMP/Final EIS in the section titled "Corrections to the Draft RMP/EIS."

29-3: Please see response 5-2.

29-4: Your preference of alternatives is noted. Please notice, however, that in addition to Alternative 1, Alternatives 2 and 3 also propose maintaining very near current AUM levels, at least for the short term and possibly longer. All five alternatives described in the Challis Draft RMP would make public lands available for exchange with the State of Idaho (see Challis Draft RMP/EIS, Volume 2, pp. 389a/b, #8). The Challis Proposed RMP would make approximately 36,915 acres of public lands available for exchange with the State of Idaho (see PRMP, Land Tenure and Access, Goal 2, #7).

29-5: The list of agencies noted in the Draft RMP/EIS on p. 335, paragraph 2, sentence 2 only refers to agencies which are "consulted periodically to supplement BLM data and information" and is not all inclusive ("such as..."). The third sentence in paragraph 2, p. 335 refers

Letter No. 29 *continued*

Kathe Rhodes
January 2, 1997
Page 2

Since most income generated from use of State endowment lands in the Challis Resource Area comes from grazing, although mineral extraction and timber harvesting play some role, planned grazing management is very important to the IDL. Management Plan Alternative 1 seems to be the only alternative which likely maintains current AUM's. Therefore, the IDL Eastern Idaho Area would tend to favor Alternative 1. However, with an active land exchange program, Alternatives 2 or 3 could become acceptable. 4

In Chapter 5, in the second paragraph which begins "Consultation and coordination ---", no mention is made of either the IDL or the Challis Experimental Stewardship Program (CESP). Both the IDL and the BLM are active participants in the CESP. Neither could we find reference to the Federal legislation authorizing the CESP which involves many acres of public land as well as State endowment land. It is our understanding that many of the forty (40) Allotment Management Plans (AMPS) currently in place on the Challis Resource Area were developed in close cooperation with the Challis Experimental Stewardship Steering Group (CESSG). It is also our understanding that a holistic approach to revising at least one and possibly more AMPs in the near future is being planned with cooperation from all interested parties including both our agencies, the permittee/lessees, other Federal agencies, state agencies, and environmental groups. 5

We believe that through coordination and cooperation in groups such as the CESSG, our mutually beneficial goals can be achieved. We therefore recommend that reference to cooperation with the IDL, CESSG and the favorable opportunity for land exchange with the State be added to all alternatives. 6

To conclude, we have these few specific comments:

1. On page 7 - Vol.1 under "Land Tenure and Access" there is no mention of intermingled State endowment lands which are generally Sections 16 or 36. Neither is mention made of future land exchange with the State. 7

2. We respectfully disagree with your conclusion that there will be more negative impacts under Alternatives 1 and 3 if true holistic approaches are undertaken. On page 235a under summary of effects, we believe that with a holistic approach, range conditions could improve and provide more and better forage. Range improvement projects and management intensity might of necessity increase over the short term. However, Aum's should also increase. 8

3. We believe the likelihood of reaching your RMP goals could be as short as 10-15 years. 9

Letter No. 29 *continued*

Kathe Rhodes
January 2, 1997
Page 3

We hope these comments about the draft RMP relating to mandatory revenue maximization and quality resource management for the State endowments will be helpful to you.

If there are any questions, please call me at 208-523-5398.

Sincerely,

James Mackley

James Mackley - SRM

c: Jay Biladeau - AD, LM & R

BLM Response to Letter No. 29 *continued*

to the BLM's formal agreements with other agencies, as listed in Table 1-1. Omission of the IDL/BLM Memorandum of Understanding has been noted (see response 29-2 above).

The Challis Experimental Stewardship Program (ESP) is specifically discussed on p. 341 of the Draft RMP/EIS. This discussion includes a reference to the Public Rangelands Improvement Act which authorizes the Challis ESP. The Challis Experimental Stewardship Steering Group (CESSG) is a sub-unit of the Challis ESP and may be considered to be included in any discussion of the Challis ESP.

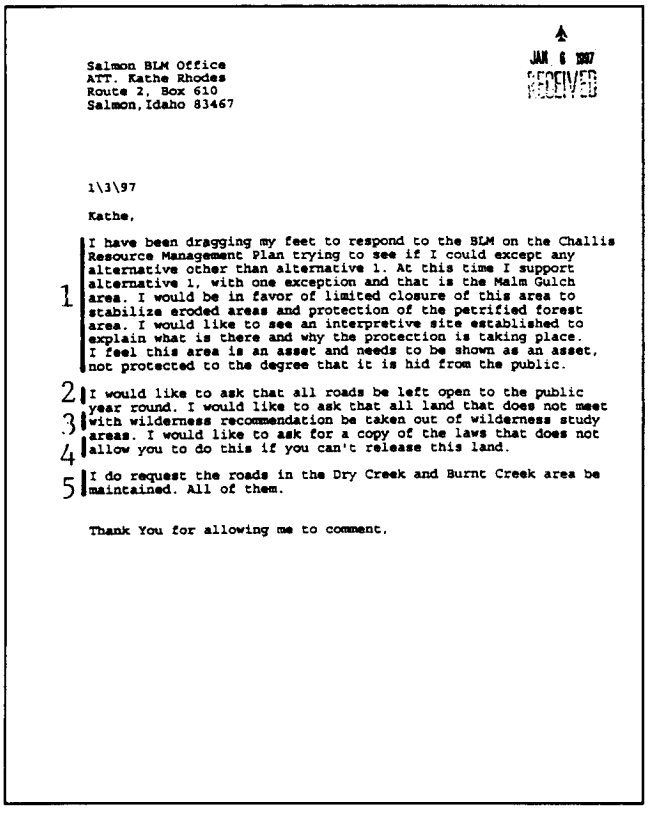
29-6: The Challis PRMP includes only one plan and does not restate alternative plans. References to IDL, CESP, and land exchange opportunities with the State are included in the PRMP as discussed in responses 29-2, 29-3, and 29-5 above.

29-7: The "Affected Environment" summary of the PRMP has been corrected to add a reference to intermingled State lands under the discussion of "Land Tenure and Access." Please note that an expanded discussion of State lands within the Challis Resource Area's boundaries was provided in the Draft RMP/EIS on p. 91, paragraph 3, and p. 92, Table 3-6. "Future land exchange with the State" was discussed in the Draft RMP/EIS in Volume 2, pp. 389a/b #8 (all five alternatives). This proposed management would be inappropriate to include in the summary of affected environment (existing condition) on p. 7.

29-8: The summary of impacts you refer to does not say that there will be negative impacts from Alternative 1 or 3. It states that the likelihood of reaching RMP range condition goals would be very slight under Alternative 1, and that the goals would take many years to achieve. Holistic approaches could be used in some instances to improve range conditions; however, under any alternative, the BLM does not expect that holistic approaches would be adopted widely enough to make a significant difference in the amount of range achieving RMP goals Resource Area-wide. Based on the analysis of impacts, the BLM still believes that the rate of improvement expected under Alternative 1 or 3 would not be as rapid as under any other alternative.

29-9: The BLM does not estimate a timeframe for overall completion of all goals in the RMP since most goals involve ongoing implementation (e.g., Cultural Resources, Goal 1). In addition, the time needed to achieve Proposed RMP goals which do set specific timeframes and/or imply a standard to be achieved (e.g., Riparian Areas, Goal 1) may be influenced by factors such as the date that a Record of Decision is signed, and staffing, budget, or program priorities identified by Congress, the Department of Interior, BLM Headquarters, or the BLM - Idaho State Office.

Letter No. 30



Salmon BLM Office
ATT. Kathe Rhodes
Route 2, Box 610
Salmon, Idaho 83467

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Kathe,

1 I have been dragging my feet to respond to the BLM on the Challis Resource Management Plan trying to see if I could except any alternative other than alternative 1. At this time I support alternative 1, with one exception and that is the Malm Gulch area. I would be in favor of limited closure of this area to stabilize eroded areas and protection of the petrified forest area. I would like to see an interpretive site established to explain what is there and why the protection is taking place. I feel this area is an asset and needs to be shown as an asset, not protected to the degree that it is hid from the public.

2 I would like to ask that all roads be left open to the public year round. I would like to ask that all land that does not meet
3 with wilderness recommendation be taken out of wilderness study areas. I would like to ask for a copy of the laws that does not
4 allow you to do this if you can't release this land.

5 I do request the roads in the Dry Creek and Burnt Creek area be maintained. All of them.

Thank You for allowing me to comment.

BLM Response to Letter No. 30

30-1: Your preference for Alternative 1 is noted. Your suggestions for management of the Malm Gulch area have been incorporated into the Proposed RMP (see PRMP, ACECs - Malm Gulch/Germer Basin ACEC, #4 and 9).

30-2: In general, the Proposed RMP limits motorized vehicle use to existing roads, vehicle ways, and trails throughout the Resource Area, in response to public concern about the impacts of off-road use on other resources. Most roads within the Resource Area would remain open to motorized vehicle use year long. To protect important resource values, a few roads would be designated "closed" to OHV use yearlong or limited seasonally (see PRMP, OHV Use).

30-3: Only Congress can designate wilderness or release from interim management areas that were placed under wilderness study by Congressional authority. The Federal Land Policy and Management Act of 1976 (FLPMA), Section 603(c) directed the Secretary of the Interior to report to the President on the wilderness suitability of lands managed by the Bureau of Land Management (BLM) by October 21, 1991.

The BLM's wilderness recommendations have been forwarded by the President to Congress. Until Congress acts on these recommendations, Section 603(c) further directs the BLM to continue to manage these WSAs in a manner that will not "impair the suitability of such areas for preservation as wilderness." Until designation or release, the BLM will manage these areas as directed in "Interim Management Policy And Guidelines For Land Under Wilderness Review" (BLM, 1995).

If Congress acts and some of the WSAs in the Challis Resource Area are released from wilderness review, those public lands would be managed according to the Proposed RMP decisions listed under WSAs- Management if Released from Wilderness Review.

30-4: The BLM sent you copies of the enabling acts of Congress that apply: The Wilderness Act of 1964 and The Federal Land Policy and Mangement Act of 1976. Please also see response 30-3 above regarding the BLM's Wilderness policy.

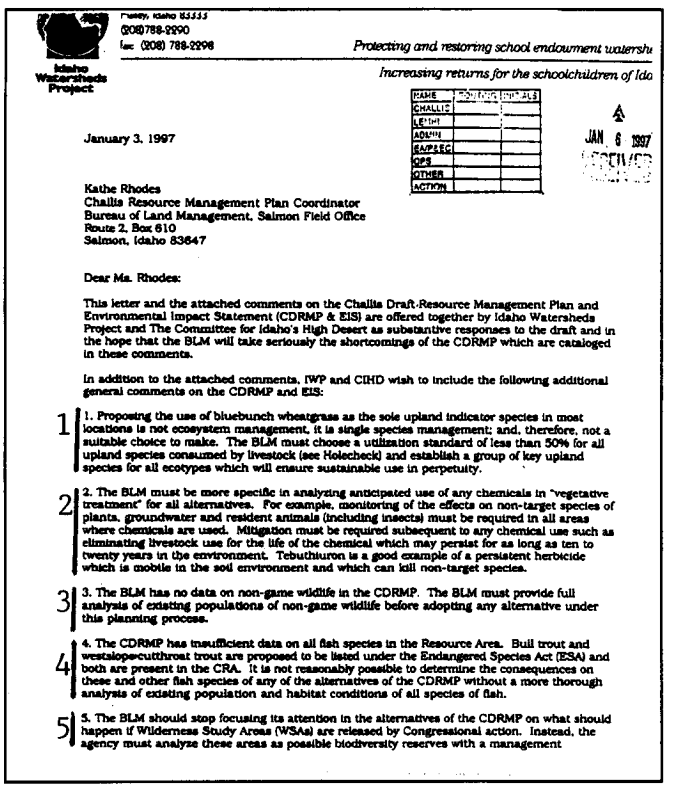
30-5: As stated in the response to 30-2 above, most roads in the Challis Resource Area would remain open yearlong, including the roads in the Burnt Creek area. These open roads would be maintained in accordance with guidance described in the PRMP under Transportation, Goal 1.

Your preference for maintaining the Dry Creek Road is noted. However, the BLM has decided to carry forward the intent of the Draft RMP decision listed under Management Concern: OHV Use, Goal 1, #4, Alternative 2 (p. 434a), which closes the Dry Creek Road at T9N, R24E, Sec. 1,

BLM Response to Letter No. 30 *continued*

N 1/2. This decision was modified in the PRMP to indicate the road would be closed for safety reasons and to maintain primitive values (see PRMP, OHV Use Goal 1, #3). The Dry Creek Road and other BLM roads which are closed would not receive any maintenance.

Letter No. 31



Idaho Watersheds Project

Protecting and restoring school endowment watersh

Increasing returns for the schoolchildren of Ida

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JAN 6 1997

January 3, 1997

Kathe Rhodes
Challis Resource Management Plan Coordinator
Bureau of Land Management, Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83647

Dear Ms. Rhodes:

This letter and the attached comments on the Challis Draft Resource Management Plan and Environmental Impact Statement (CDRMP & EIS) are offered together by Idaho Watersheds Project and The Committee for Idaho's High Desert as substantive responses to the draft and in the hope that the BLM will take seriously the shortcomings of the CDRMP which are cataloged in these comments.

In addition to the attached comments, IWP and CIHD wish to include the following additional general comments on the CDRMP and EIS:

1. Proposing the use of bluebunch wheatgrass as the sole upland indicator species in most locations is not ecosystem management, it is single species management; and, therefore, not a suitable choice to make. The BLM must choose a utilization standard of less than 50% for all upland species consumed by livestock (see Holechek) and establish a group of key upland species for all ecotypes which will ensure sustainable use in perpetuity.

2. The BLM must be more specific in analyzing anticipated use of any chemicals in "vegetative treatment" for all alternatives. For example, monitoring of the effects on non-target species of plants, groundwater and resident animals (including insects) must be required in all areas where chemicals are used. Mitigation must be required subsequent to any chemical use such as eliminating livestock use for the life of the chemical which may persist for as long as ten to twenty years in the environment. Tebuthiuron is a good example of a persistent herbicide which is mobile in the soil environment and which can kill non-target species.

3. The BLM has no data on non-game wildlife in the CDRMP. The BLM must provide full analysis of existing populations of non-game wildlife before adopting any alternative under this planning process.

4. The CDRMP has insufficient data on all fish species in the Resource Area. Bull trout and westslope cutthroat trout are proposed to be listed under the Endangered Species Act (ESA) and both are present in the CRA. It is not reasonably possible to determine the consequences on these and other fish species of any of the alternatives of the CDRMP without a more thorough analysis of existing population and habitat conditions of all species of fish.

5. The BLM should stop focusing its attention in the alternatives of the CDRMP on what should happen if Wilderness Study Areas (WSAs) are released by Congressional action. Instead, the agency must analyze these areas as possible biodiversity reserves with a management

BLM Response to Letter No. 31

31-1: This choice reflects the importance of bluebunch wheatgrass to overall ecosystem health, and is appropriate for most Challis RA sites. Other species are used as key species, either singly or collectively, on non-bluebunch wheatgrass sites. Livestock Grazing, Goal 1, #7 (see PRMP) shows utilization levels for all key species by season; in some cases the standard for bluebunch wheatgrass is below 50%.

31-2: Your concerns were addressed in the Final EIS, Vegetation Treatment on BLM Lands in Thirteen Western States (USDI-BLM 1991) and the Northwest Area Noxious Weed Control Program Final EIS (USDI-BLM 1985, supplemented 1987). The Challis RMP will not duplicate these efforts.

31-3: The DRMP described existing data on nongame wildlife as "limited" for the 290 species of vertebrate non-game, furbearing, and predatory wildlife species that inhabit the RA. Appendix L (see PRMP/FEIS) describes the research studies, inventories, surveys and other data which pertain to nongame wildlife in the Challis Resource Area. The BLM agrees that additional information on the abundance and population trends of nongame species would be useful in the planning process. However, the BLM believes the data available are

Letter No. 31 *continued*

5 emphasis on maintaining natural systems along with the removal of all human disturbance factors. A goal statement as follows might be suitable: "All WSAs will be the core areas for the establishment of larger biological reserves to maintain and restore natural processes which have been degraded by human intervention." The Challis Resource Management Plan should establish a timetable for the inventory of existing WSAs and surrounding and connecting areas to be included in Special Management Areas protecting the full range of local biodiversity.

6 6. The BLM in the CRMP should specify that when the RMP is fully adopted and in place that all existing Allotment Management Plans (AMPs) will be revised to reflect the new plan, and that all allotments where no AMPs exist will have their permit authorizations amended to contain stipulations contained within the RMP.

7 7. IWP and CIHD propose that no season long use be authorized on any allotment within the CRA, and that no temporary non-renewable use be permitted over new AUM preference levels established by the RMP.

8 8. IWP and CIHD propose that the allocation of available vegetative forage in the final selected alternative be adjusted to increase the allocation for wildlife and watershed values to no less than 90% and that livestock be allocated no more than 10% of available forage.

9 9. IWP and CIHD support the termination and retirement of grazing permits and allotments in the event a base property is ever subdivided and for other reasons as proposed for alternatives 2,4,&5 number 14, Range Management.

10 10. The BLM must require permittee compliance with all terms and conditions of a grazing permit with specific consequences for failure to perform.

11 11. The BLM must establish within all alternatives of the CDRMP specific timetables for the recovery of less than high seral upland areas and for the recovery of non-functioning or functioning-at-risk streams or degraded riparian and wetland areas.

12 12. The BLM should initiate under any selected alternative an analysis of the capability and suitability of all lands for livestock use with a specific timetable not to exceed 4 years. Capability can be defined as accessible lands with adequate forage and water available to make them economically useful for livestock use; suitability is defined as lands which can be authorized for livestock use only when all other multiple uses can be sustained without significant negative effects. For example, water quality meeting state standards must be able to be maintained at any level of livestock authorization and habitat for all native plant and animal species is fully maintained without degradation. Both capability and suitability should be established before livestock use is continued to be authorized.

13 13. IWP and CIHD support the inclusion of some positive aspects of management of riparian areas and streams from alternative 5 of the CDRMP in regard to livestock use and proposes adding them to the final selected alternative: for example, only permitting the supervised trailing of livestock in riparian areas.

As a full-time and part-time resident of Custer County since 1969, I can attest to the historical use of the Challis Resource Area as a feedlot for livestock permittees. This fact will change only very slowly under the preferred alternative of the CDRMP, and as such this alternative is a considerable disappointment. Other uses of these public lands have suffered tremendously over the years as the BLM's own documentation of existing conditions affirms. The implementation of so-called "range improvements" including 121 pipelines over the years has not significantly improved conditions in riparian areas throughout the Resource Area. The hundreds of thousands of dollars spent on the San Felipe Allotment over the last 5 years while resource degradation still continues on parts of that large allotment brings into question the ability of the BLM to bring about thorough change on even one allotment. The conditions in the Spring Basin unit and on Sheep Creek on the San Felipe in 1996 create considerable doubt as to the commitment of the agency to making change in public lands management. The

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Letter No. 31 *continued*

14 agency should choose specific and measurable terms and conditions of use for all livestock allotments in the RA and not defer making hard decisions by establishing longer term study groups with no public involvement that will only result in delaying necessary changes. Meeting these terms and conditions should be the responsibility of permittees with permit action resulting in a decrease in permitted use by 25% each subsequent year that the terms and conditions are not being met as a reasonable consequence. This is the only way, given declining federal budgets for public lands management, for improvement to be assured for currently damaged resources.

IWP and CIHD appreciate the opportunity to comment; however, we would appreciate much more seeing positive change in management on all lands and waters of the Challis Resource Area in 1997. The time is long past for the failures of the past to be corrected.

Idaho Watersheds Project

Jon Marvel, President

Committee for Idaho's High Desert

Pam Marcum, Chair

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BLM Response to Letter No. 31 *continued*

adequate to select an alternative.

31-4: The BLM believes available fisheries data are sufficient to determine the environmental consequences of the alternatives. The USFWS and NMFS concurred with the BLM's analysis of "may affect, but not likely to adversely affect" for listed fish species in the CRA (bull trout, sockeye and chinook salmon, steelhead trout), for both the DRMP - Preferred Alternative and the PRMP.

31-5: Your opinions are noted. WSAs in the Challis RA, if released, would generally be managed to maintain existing values and uses, including biodiversity (see PRMP, WSAs - Management if Released from Wilderness Review, goal statement).

31-6: The PRMP has a decision to revise AMPs as needed, with priority outlined (see Livestock Grazing, Goal 1, #4). The specific terms and conditions of individual grazing permits will continue to be established under the discretion of the authorized officer, in accordance with 43 CFR 4130.3. Any terms or conditions deemed necessary to add to grazing permits will also be consistent with, and/or implement the decisions in the approved Challis RMP.

31-7: (a) If allotments can be grazed season long without exceeding the RMP's grazing criteria, the BLM believes resource conditions will continue to improve, and season long grazing will not be inappropriate. (b) Temporary nonrenewable use would be allowed only after related allotment objectives have been met (see PRMP, Livestock Grazing, Goal 1, #16).

31-8: Your opinion is noted.

31-9: Your opinion is noted.

31-10: The grazing regulations (43 CFR) contain penalties for non-compliance.

31-11: Timetables have been included in the PRMP where appropriate.

31-12: Your suggestions on capability and suitability analysis as defined in your comment are noted. However, the BLM does not feel an analysis of suitability or capability is appropriate. Please also see response 31-144.

31-13: The BLM believes proposed livestock management actions will enable the BLM to meet RMP goals for riparian improvement (see PRMP, Livestock Grazing, Goals 1 and 2; and Riparian Areas, Goal 1). Please also see Response 6-2.

31-14: PRMP actions such as stubble height and utilization

Letter No. 31 *continued*

Idaho Watersheds Project

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Protecting and restoring school endowment waters

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CHALLIS DRAFT RESOURCE MANAGEMENT PLAN COMMENTS

IDAHO WATERSHEDS PROJECT AND THE COMMITTEE FOR IDAHO'S HIGH DESERT

GENERAL COMMENTS

Idaho Watersheds Project (IWP) and the Committee for Idaho's High Desert (CIHD) have reviewed the Challis Resource Area Draft Management Plan and EIS and submit the following comments for your use in revising and preparing subsequent RMP/EIS documents.

Our members are deeply concerned about management of public lands in Idaho. Our members use the public lands of the Challis Resource Area (CRA) for recreational, scientific, educational and spiritual purposes. The CRA contains diverse lands and resources of great value to the American public.

After careful review, we have found the RMP to be incomplete and to contain poorly formulated alternatives. It fails to adequately assess the imminent and pressing resource management needs of the CRA.

15 The Preferred Alternative fails to provide management direction and changes necessary to sustain or enhance public lands resources of water, soil, native vegetation, native wildlife, rare species and ecosystem function.

16 A RMP is designed to be a planning document which guides and directs, in a comprehensive and consistent manner, all future resource management activities/decisions in the planning area. The RMP format itself is confusing, and obfuscates issues. It is very difficult for the public to get a clear grasp of proposed actions.

We have recently reviewed the Owyhee Resource Area Draft RMP, and have found it both more user friendly and more consistent with BLM planning guidelines. The ORMP establishes clearly stated objectives, presents issues relevant to these in narrative and table form, presents scientific data and references to support actions, provides site-specific data to support actions, clearly presents management actions and consequences under each alternative - specifies # of acres, is easily referenced and cross-referenced, vs. the nightmarish format of the CRMP, and is consistent in its groupings of issues.

The CRMP is just the opposite, and falls drastically short in all these matters. An example which illustrates the rampant confusion of the RMP: The main table for comparison of alternatives, Table 2-2: Summary of Environmental Consequences, categorizes "Livestock Grazing" as a Resource (On page 178, the RMP again classifies livestock grazing as a resource, but fails to consider land tenure and access as a resource, terming this a "program" instead), and evaluates consequences. In Chapter 4, (p. 187a) "Livestock Grazing" is a Source of Effect, then on p. 191a, "Livestock Grazing/Upland Watershed" is a Source of Effect. The apples and oranges are hopelessly mixed. The reader is at a loss to determine the direction this document, and public lands management, in the CRA is taking. Uncoordinated, wordy and confusing goals are found in Volume 2, yet the evaluation of Alternatives in Volume 1 does not adequately evaluate alternatives in relation to these Goals.

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Letter No. 31 *continued*

16 The consideration of livestock grazing as a Type of Effect is in itself confusing and serves to mask the extractive, damaging nature of this activity, since other Types of Effects evaluated in the RMP, such as Air Quality, Soils, Wildlife, are really best categorized as Resources. In any circumstance, given that the BLM has chosen to evaluate livestock grazing in this manner, shouldn't management activities for other true resources, such as Fisheries, which will impact livestock grazing practices, be openly evaluated in this context? In Analysis of Effects, Vol. 1 p. 235a, Fisheries, an identified Management Concern in Vol. 2, is embedded in Alt. 2, 16. where the word "fish-bearing streams" appears one time. Confused? So are we.

17 Actions which will be taken to manage livestock grazing are sprawled all over Volume 2, or contained in Appendices. At least half of the actions proposed in the RMP are being proposed to ameliorate the specific impacts to resources caused by livestock grazing, yet the RMP invariably cloaks this fact and fails to identify cause or describe need. Proposed management actions often lack specificity, and do not apply to all circumstances.

The absence of clear planning goals, objectives, management guidelines and standards allows BLM to carry out future management actions without accountability and consistency. Without clarity of these basic components, the RMP is not a RMP.

18 A primary purpose of a RMP is to inventory and analyze area resources. The RMP fails abysmally. Inventory data used to develop and analyze alternatives presented for key issues are 15-20 years old. Examples: Riparian inventory - BLM has recent data on only 48 of the 353 miles of CRA streams; Watershed analyses are 15+ years old; Ecological Status/range condition data is 15+ years old; Special Status Wildlife in Table 3.6 - occurrence of most species is "unknown"; BLM has virtually no data on non game wildlife.

19 BLM fails to discuss important issues. Example: military training activity/airspace issues.

20 BLM has provided the public with low-quality, contradictory information. The most complete information presented on plant communities (the basis for understanding range issues) in the CRA is found in Table 3-21 "Vegetation Summary for the Challis Resource Area", which shows - 45,000 acres of coniferous forest. However, Table 3-4: Forest Land Classifications p. 81 shows 58,461 total acres. How many acres of forest exist???

21 Apparently, BLM is not even sure how many acres of land are in the CRA. Table 3-21 p. 132 "Vegetation Summary for the CRA" totals 1,084,000 acres. RMP p. 1 states there are 792,000 acres of land in the CRA. Have 1/4 million acres disappeared?

22 We strongly support the strictest possible management standards for riparian protection, and fully recognize the extreme importance of riparian areas to many native species. However, we must point out that the RMP presents at least 10 times as much data and current information on riparian areas as it does upland communities. This is despite the fact that riparian communities comprise far less than 1% of the lands of the CRA. Much essential information on upland communities is missing.

23 The RMP proposes major changes in land classification without adequate review. Example: VRM reclassification of 50,000 acres from VRM 1 to VRM 2 with no analysis or any rationale for this action provided for public review.

24 The RMP reliance on old, out-dated, incomplete, (or zero) information results in deficient and inadequate analysis of alternatives. Resource conditions and trends are not static. BLM has failed to provide the public with current and accurate baseline information.

Without complete and up-to-date resource information, the RMP cannot properly and accurately address current resource needs and issues in the CRA. Without a clear and accurate understanding of current resource conditions, the RMP cannot properly and adequately assess the net environmental impacts expected to occur under the management actions/options

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BLM Response to Letter No. 31 *continued*

criteria will take effect upon signing of the Record of Decision for the approved RMP. Meeting these terms and conditions will be the responsibility of the grazing permittees (see response 31-10).

31-15: Your opinion is noted.

31-16: Your opinions are noted. (a) The PRMP describes Livestock Grazing as a land use, rather than a resource. (b) The impacts of resource and land use management activities on livestock grazing were analyzed in the DRMP (see pp. 235a-242a, including riparian/aquatic management analyzed on pp. 238a/b, #15-16).

31-17: Your opinions are noted.

31-18: Your comments are noted. Please see responses 12-1, paragraph 2; 15-2; 15-3; and 15-7(b).

31-19: This topic was not identified as a planning issue (see *Glossary*).

31-20: The two sets of numbers are based on two different inventories. The coniferous and juniper forest acreage in Table 3-21 (46,744 acres) is the result of independent range inventories conducted in each applicable planning unit. These inventories calculated forest land by soil mapping units. As a result, where trees grew outside of forest soil mapping units (which is quite common, particularly along ecotones), those trees were not counted as forest land. The total forest land acreage in Table 3-4 (58,461 acres) was based on all forest land (see definition: DRMP, p. 80) inventoried in 1984.

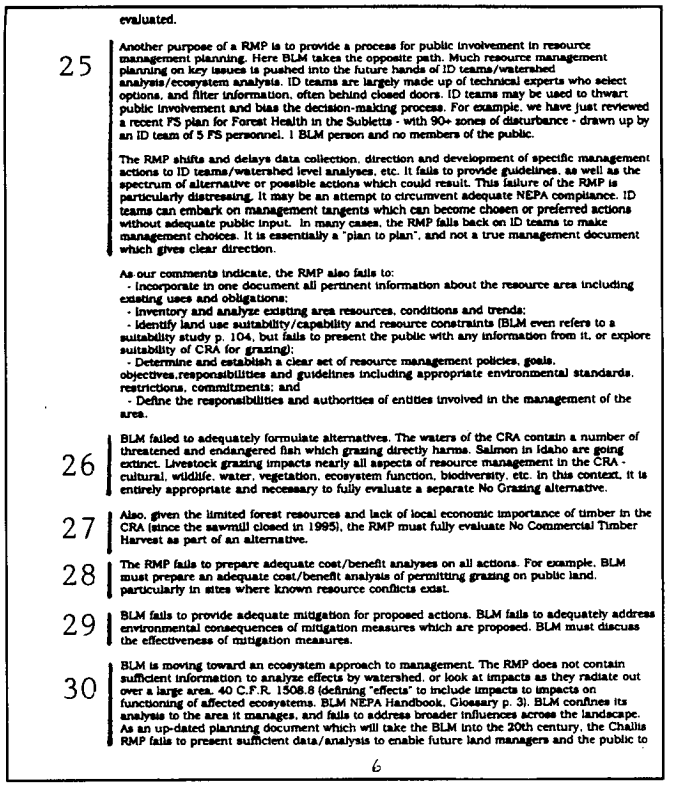
31-21: Table 3-21 has a footnote that explains the difference. The Big Lost-Mackay Draft EIS contained land in the Big Lost area of the Idaho Falls BLM district, which lies outside the boundary of the Challis Resource Area. The Challis Resource Area contains 792,567 acres of public land, which is the figure you will see used throughout the PRMP/FEIS.

31-22: Your comments are noted. The BLM believes the affected environment discussion of uplands provided in the PRMP (see Chapter 3: Forest Resources, Livestock Grazing, and Vegetation) provides a sufficient context for the analysis of environmental consequences.

31-23: The 50,000 acres you have referred to represent acreage along the Salmon River. Proposed management of these acres is not consistent with the BLM definition for VRM Class I (see Glossary: Visual resource management classes), so these public lands were moved into the more correct VRM Class II.

31-24: Please see response 31-18.

Letter No. 31 *continued*



evaluated.

25 Another purpose of a RMP is to provide a process for public involvement in resource management planning. Here BLM takes the opposite path. Much resource management planning on key issues is pushed into the future hands of ID teams/watershed analysis/ecosystem analysis. ID teams are largely made up of technical experts who select options, and filter information, often behind closed doors. ID teams may be used to thwart public involvement and bias the decision-making process. For example, we have just reviewed a recent FS plan for Forest Health in the Subletts - with 90+ zones of disturbance - drawn up by an ID team of 5 FS personnel. 1 BLM person and no members of the public.

The RMP shifts and delays data collection, direction and development of specific management actions to ID teams/watershed level analyses, etc. It fails to provide guidelines, as well as the spectrum of alternative or possible actions which could result. This failure of the RMP is particularly distressing. It may be an attempt to circumvent adequate NEPA compliance. ID teams can embark on management tangents which can become chosen or preferred actions without adequate public input. In many cases, the RMP falls back on ID teams to make management choices. It is essentially a "plan to plan", and not a true management document which gives clear direction.

As our comments indicate, the RMP also fails to:
- Incorporate in one document all pertinent information about the resource area including existing uses and obligations;
- Inventory and analyze existing area resources, conditions and trends;
- Identify land use suitability/capability and resource constraints (BLM even refers to a suitability study p. 104, but fails to present the public with any information from it, or explore suitability of CRA for grazing);
- Determine and establish a clear set of resource management policies, goals, objectives,responsibilities and guidelines including appropriate environmental standards, restrictions, commitments; and
- Define the responsibilities and authorities of entities involved in the management of the area.

26 BLM failed to adequately formulate alternatives. The waters of the CRA contain a number of threatened and endangered fish which grazing directly harms. Salmon in Idaho are going extinct. Livestock grazing impacts nearly all aspects of resource management in the CRA - cultural, wildlife, water, vegetation, ecosystem function, biodiversity, etc. In this context, it is entirely appropriate and necessary to fully evaluate a separate No Grazing alternative.

27 Also, given the limited forest resources and lack of local economic importance of timber in the CRA (since the sawmill closed in 1995), the RMP must fully evaluate No Commercial Timber Harvest as part of an alternative.

28 The RMP fails to prepare adequate cost/benefit analyses on all actions. For example, BLM must prepare an adequate cost/benefit analysis of permitting grazing on public land, particularly in sites where known resource conflicts exist.

29 BLM fails to provide adequate mitigation for proposed actions. BLM fails to adequately address environmental consequences of mitigation measures which are proposed. BLM must discuss the effectiveness of mitigation measures.

30 BLM is moving toward an ecosystem approach to management. The RMP does not contain sufficient information to analyze effects by watershed, or look at impacts as they radiate out over a large area. 40 C.F.R. 1508.8 (defining "effects" to include impacts to impacts on functioning of affected ecosystems. BLM NEPA Handbook, Glossary p. 3). BLM confines its analysis to the area it manages, and fails to address broader influences across the landscape. As an up-dated planning document which will take the BLM into the 20th century, the Challis RMP fails to present sufficient data/analysis to enable future land managers and the public to

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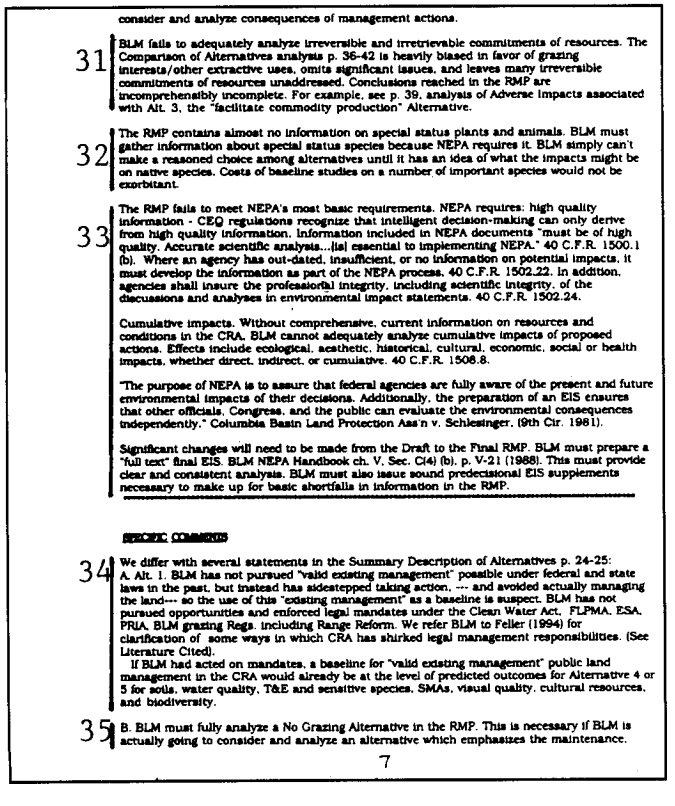
Letter No. 31 *continued*



consider and analyze consequences of management actions.

31 BLM fails to adequately analyze irreversible and irretrievable commitments of resources. The Comparison of Alternatives analysis p. 36-42 is heavily biased in favor of grazing interests/other extractive uses, omits significant issues, and leaves many irreversible commitments of resources unaddressed. Conclusions reached in the RMP are incomprehensibly incomplete. For example, see p. 39, analysis of Adverse Impacts associated with Alt. 3, the "facilitate commodity production" Alternative.

32 The RMP contains almost no information on special status plants and animals. BLM must gather information about special status species because NEPA requires it. BLM simply can't make a reasoned choice among alternatives until it has an idea of what the impacts might be on native species. Costs of baseline studies on a number of important species would not be exorbitant.

33 The RMP fails to meet NEPA's most basic requirements. NEPA requires: high quality information - CEQ regulations recognize that intelligent decision-making can only derive from high quality information. Information included in NEPA documents "must be of high quality. Accurate scientific analysis...[is] essential to implementing NEPA." 40 C.F.R. 1500.1 (b). Where an agency has out-dated, insufficient, or no information on potential impacts, it must develop the information as part of the NEPA process. 40 C.F.R. 1502.22. In addition, agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. 40 C.F.R. 1502.24.

Cumulative impacts. Without comprehensive, current information on resources and conditions in the CRA, BLM cannot adequately analyze cumulative impacts of proposed actions. Effects include ecological, aesthetic, historical, cultural, economic, social or health impacts, whether direct, indirect, or cumulative. 40 C.F.R. 1508.8.

"The purpose of NEPA is to assure that federal agencies are fully aware of the present and future environmental impacts of their decisions. Additionally, the preparation of an EIS ensures that other officials, Congress, and the public can evaluate the environmental consequences independently." Columbia Basin Land Protection Ass'n v. Schlesinger, (9th Cir. 1981).

Significant changes will need to be made from the Draft to the Final RMP. BLM must prepare a "full text" final EIS. BLM NEPA Handbook ch. V, Sec. C(4) (b), p. V-21 (1988). This must provide clear and consistent analysis. BLM must also issue sound predecisional EIS supplements necessary to make up for basic shortfalls in information in the RMP.

SPECIFIC COMMENTS

34 We differ with several statements in the Summary Description of Alternatives p. 24-25:
A. Alt. 1. BLM has not pursued "valid existing management" possible under federal and state laws in the past, but instead has sidestepped taking action, --- and avoided actually managing the land--- so the use of this "existing management" as a baseline is suspect. BLM has not pursued opportunities and enforced legal mandates under the Clean Water Act, FLPMA, ESA, PRIA, BLM grazing Regs. including Range Reform. We refer BLM to Feller (1994) for clarification of some ways in which CRA has shirked legal management responsibilities. (See Literature Cited).
If BLM had acted on mandates, a baseline for "valid existing management" public land management in the CRA would already be at the level of predicted outcomes for Alternative 4 or 5 for soils, water quality, T&E and sensitive species, SMAs, visual quality, cultural resources, and biodiversity.

35 B. BLM must fully analyze a No Grazing Alternative in the RMP. This is necessary if BLM is actually going to consider and analyze an alternative which emphasizes the maintenance.

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BLM Response to Letter No. 31 *continued*

31-25: The decisions made in the PRMP are appropriate for this level of planning. The intent of ID teams is to encourage interdisciplinary interaction, including public involvement, where appropriate.

31-26: Early public scoping for the Challis RMP revealed a concern about how livestock grazing would be managed, but did not demonstrate support for total removal of livestock from the public lands. The concerns you have raised about the "harms" caused by livestock grazing, and the impacts to resource values, were carefully considered by the Challis Planning Team. Impacts from livestock grazing to each resource have been reviewed. It has been determined that the adverse impacts have been appropriately mitigated by the many requirements which the PRMP imposes on livestock grazing activities, including site-specific removal of livestock when appropriate. Both the National Marine Fisheries Service and the U.S. Fish and Wildlife Service, agencies responsible for oversight of activities which might affect species in peril, have concurred that livestock grazing activities, as proposed in the Challis PRMP, are not likely to adversely affect the species of concern.

In addition, planning criteria were presented to the public for comment, prior to approval by the District Manager (see DRMP p. 12). These criteria identified the "sideboards" or direction for the Challis planning effort. Total removal of livestock from the entire Resource Area would not be consistent with the following planning criteria:

1) *Social and economic values* — Livestock grazing is a major part of the local economy and historic lifestyle within the planning area.

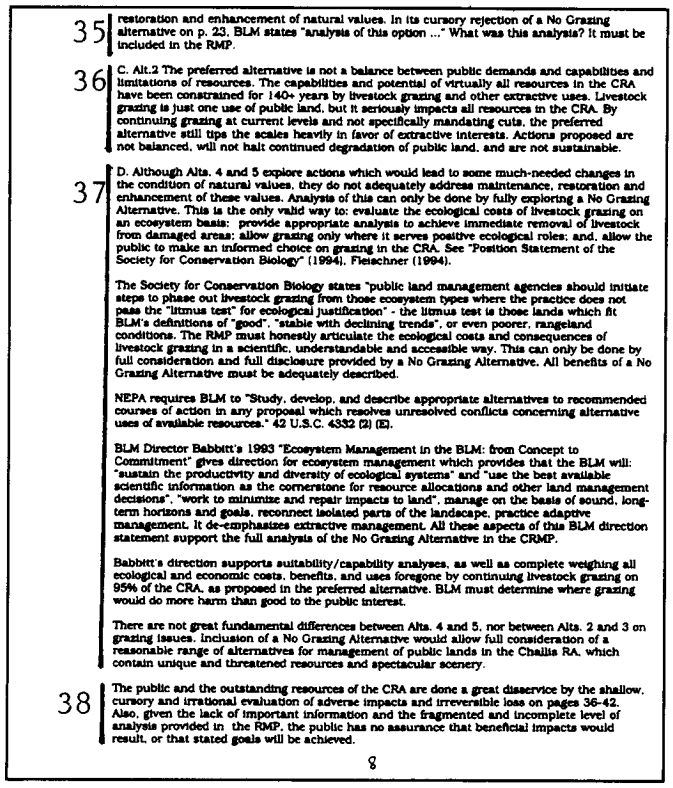
4) *Future needs and demand for existing or potential resource commodities and values* — Because approximately 94% of the lands in Custer County are either State or Federally managed, livestock operators depend heavily on the availability of BLM public lands for livestock grazing.

7) *Past and present use of public and adjacent lands* — See comments on planning criteria #1 and 4 above.

8) *Public value of providing goods and services in relation to the costs* — Although monetary costs are often associated with management of livestock grazing, consideration was also given to the social costs of not making public lands available for grazing (see comments on planning criterion #4 above).

31-27: Your opinion is noted. The Challis RA does not consider "no timber harvest" reasonable management to include in the PRMP for two reasons. First, contrary to your

Letter No. 31 *continued*



35 restoration and enhancement of natural values. In its cursory rejection of a No Grazing alternative on p. 23, BLM states "analysis of this option ..." What was this analysis? It must be included in the RMP.

36 C. Alt.2 The preferred alternative is not a balance between public demands and capabilities and limitations of resources. The capabilities and potential of virtually all resources in the CRA have been constrained for 140+ years by livestock grazing and other extractive uses. Livestock grazing is just one use of public land, but it seriously impacts all resources in the CRA. By continuing grazing at current levels and not specifically mandating cuts, the preferred alternative still tips the scales heavily in favor of extractive interests. Actions proposed are not balanced, will not halt continued degradation of public land, and are not sustainable.

37 D. Although Alts. 4 and 5 explore actions which would lead to some much-needed changes in the condition of natural values, they do not adequately address maintenance, restoration and enhancement of these values. Analysis of this can only be done by fully exploring a No Grazing Alternative. This is the only valid way to: evaluate the ecological costs of livestock grazing on an ecosystem basis; provide appropriate analysis to achieve immediate removal of livestock from damaged areas; allow grazing only where it serves positive ecological roles; and, allow the public to make an informed choice on grazing in the CRA. See "Position Statement of the Society for Conservation Biology" (1994), Fleischner (1994).

The Society for Conservation Biology states "public land management agencies should initiate steps to phase out livestock grazing from those ecosystem types where the practice does not pass the "litmus test" for ecological justification" - the litmus test is those lands which fit BLM's definitions of "good", "stable with declining trends", or even poorer, rangeland conditions. The RMP must honestly articulate the ecological costs and consequences of livestock grazing in a scientific, understandable and accessible way. This can only be done by full consideration and full disclosure provided by a No Grazing Alternative. All benefits of a No Grazing Alternative must be adequately described.

NEPA requires BLM to "Study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which resolves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. 4332 (2) (E).

BLM Director Babbitt's 1993 "Ecosystem Management in the BLM: from Concept to Commitment" gives direction for ecosystem management which provides that the BLM will: "sustain the productivity and diversity of ecological systems" and "use the best available scientific information as the cornerstone for resource allocations and other land management decisions", "work to minimize and repair impacts to land", manage on the basis of sound, long-term horizons and goals, reconnect isolated parts of the landscape, practice adaptive management. It de-emphasizes extractive management. All these aspects of this BLM direction statement support the full analysis of the No Grazing Alternative in the CRMP.

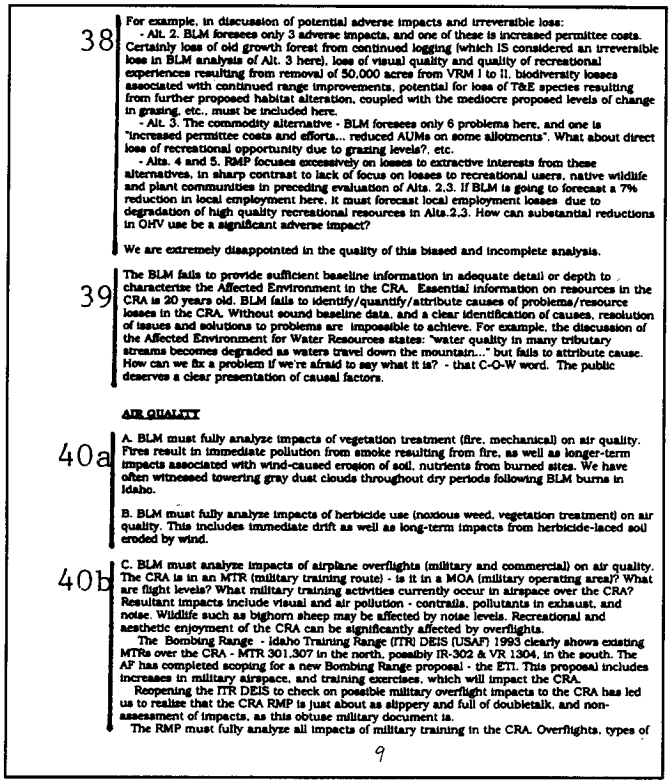
Babbitt's direction supports suitability/capability analyses, as well as complete weighing all ecological and economic costs, benefits, and uses foregone by continuing livestock grazing on 95% of the CRA, as proposed in the preferred alternative. BLM must determine where grazing would do more harm than good to the public interest.

There are not great fundamental differences between Alts. 4 and 5, nor between Alts. 2 and 3 on grazing issues. Inclusion of a No Grazing Alternative would allow full consideration of a reasonable range of alternatives for management of public lands in the Challis RA, which contain unique and threatened resources and spectacular scenery.

38 The public and the outstanding resources of the CRA are done a great disservice by the shallow, cursory and irrational evaluation of adverse impacts and irreversible loss on pages 36-42. Also, given the lack of important information and the fragmented and incomplete level of analysis provided in the RMP, the public has no assurance that beneficial impacts would result, or that stated goals will be achieved.

8

Letter No. 31 *continued*



38 For example, in discussion of potential adverse impacts and irreversible loss:
- Alt. 2. BLM foresees only 3 adverse impacts, and one of these is increased permittee costs. Certainly loss of old growth forest from continued logging (which IS considered an irreversible loss in BLM analysis of Alt. 3 here), loss of visual quality and quality of recreational experiences resulting from removal of 50,000 acres from VRM I to II, biodiversity losses associated with continued range improvements, potential for loss of T&E species resulting from further proposed habitat alteration, coupled with the mediocre proposed levels of change in grazing, etc., must be included here.
- Alt. 3. The commodity alternative - BLM foresees only 6 problems here, and one is "increased permittee costs and efforts... reduced AUMs on some allotments". What about direct loss of recreational opportunity due to grazing levels?, etc.
- Alts. 4 and 5. RMP focuses excessively on losses to extractive interests from these alternatives, in sharp contrast to lack of focus on losses to recreational users, native wildlife and plant communities in preceding evaluation of Alts. 2,3. If BLM is going to forecast a 7% reduction in local employment here, it must forecast local employment losses due to degradation of high quality recreational resources in Alts.2,3. How can substantial reductions in OHV use be a significant adverse impact?

We are extremely disappointed in the quality of this biased and incomplete analysis.

39 The BLM fails to provide sufficient baseline information in adequate detail or depth to characterize the Affected Environment in the CRA. Essential information on resources in the CRA is 20 years old. BLM fails to identify/quantify/attribute causes of problems/resource losses in the CRA. Without sound baseline data, and a clear identification of causes, resolution of issues and solutions to problems are impossible to achieve. For example, the discussion of the Affected Environment for Water Resources states: "water quality in many tributary streams becomes degraded as waters travel down the mountain..." but fails to attribute cause. How can we fix a problem if we're afraid to say what it is? - that C-O-W word. The public deserves a clear presentation of causal factors.

AIR QUALITY

40a A. BLM must fully analyze impacts of vegetation treatment (fire, mechanical) on air quality. Fires result in immediate pollution from smoke resulting from fire, as well as longer-term impacts associated with wind-caused erosion of soil, nutrients from burned sites. We have often witnessed towering gray dust clouds throughout dry periods following BLM burns in Idaho.

B. BLM must fully analyze impacts of herbicide use (noxious weed, vegetation treatment) on air quality. This includes immediate drift as well as long-term impacts from herbicide-laced soil eroded by wind.

40b C. BLM must analyze impacts of airplane overflights (military and commercial) on air quality. The CRA is in an MTR (military training route) - is it in a MOA (military operating area)? What are flight levels? What military training activities currently occur in airspace over the CRA? Resultant impacts include visual and air pollution - contrails, pollutants in exhaust, and noise. Wildlife such as bighorn sheep may be affected by noise levels. Recreational and aesthetic enjoyment of the CRA can be significantly affected by overflights.
The Bombing Range - Idaho Training Range (ITR) DEIS (USAF) 1993 clearly shows existing MTRs over the CRA - MTR 301,307 in the north, possibly IR-302 & VR 1304, in the south. The AF has completed scoping for a new Bombing Range proposal - the ETI. This proposal includes increases in military airspace, and training exercises, which will impact the CRA.
Reopening the ITR DEIS to check on possible military overflight impacts to the CRA has led us to realize that the CRA RMP is just about as slippery and full of doubletalk, and non-assessment of impacts, as this obtuse military document is.
The RMP must fully analyze all impacts of military training in the CRA. Overflights, types of

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BLM Response to Letter No. 31 *continued*

statement, there continues to be local demand for and economic importance of timber from the Challis Resource Area since the Salmon Intermountain sawmill closed in 1995. Successful bidders on recent BLM sales have all been local. In addition, continuing to provide commercial timber is consistent with the approved planning criteria for the Challis RMP (Idaho criteria #4 and 8; Draft RMP, p. 12). Second, timber harvest is a valid means of managing forest lands in order to promote or maintain the health and sustainability of all resources related to forest lands, and therefore supports the accomplishment of Forest Resources, Goal 1 (see PRMP, Forest Resources).

31-28: Your opinions are noted. The NEPA planning regulations discuss cost-benefit analyses in 43 CFR 1502.23. This section states that "the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations." The BLM displayed a "cost-benefit" analysis of the Draft RMP alternatives in Chapter 2 on pages 25-42. The comparison of alternatives describes, in qualitative and quantitative terms, the likelihood and significance of adverse and beneficial impacts which would be expected to occur from implementation of the various alternatives. The costs and benefits of all RMP actions are disclosed in the Draft RMP for all alternatives in Chapter 4 - Environmental Consequences.

31-29: Mitigation measures are incorporated into the management decisions in the PRMP; the effects of proposed management are analyzed in Chapter 4 Environmental Consequences.

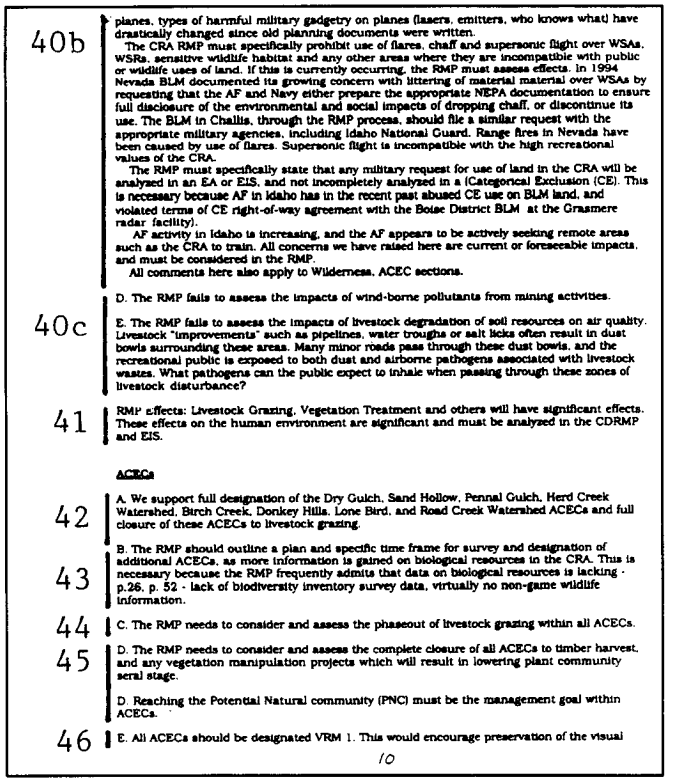
31-30: The watershed level of analysis would be inappropriate for an RMP. Rather, the PRMP establishes direction for the circumstances which would require a watershed assessment (see Attachment 5, "General" Standard Operating Procedure #1).

31-31: The discussion on page 39 is meant to be a summary comparison of the alternatives, rather than a comprehensive discussion of impacts. See Chapter 4 for a detailed discussion of impacts.

31-32: Your opinion is noted. The PRMP contains decisions which will improve the BLM's knowledge of special status species (see PRMP, Special Status Species, Goal 1, #1 and Goal 2, #2).

31-33: Since no specific examples are given, it is difficult to respond to this comment. Please note that in several cases in the RMP, the BLM has described where information is lacking, and provided decisions requiring the BLM to inventory or monitor to acquire the needed

Letter No. 31 *continued*



40b planes, types of harmful military gadgetry on planes (lasers, emitters, who knows what) have drastically changed since old planning documents were written.
The CRA RMP must specifically prohibit use of flares, chaff and supersonic flight over WSAs, WSRs, sensitive wildlife habitat and any other areas where they are incompatible with public or wildlife uses of land. If this is currently occurring, the RMP must assess effects. In 1994 Nevada BLM documented its growing concern with littering of material material over WSAs by requesting that the AF and Navy either prepare the appropriate NEPA documentation to ensure full disclosure of the environmental and social impacts of dropping chaff, or discontinue its use. The BLM in Challis, through the RMP process, should file a similar request with the appropriate military agencies, including Idaho National Guard. Range fires in Nevada have been caused by use of flares. Supersonic flight is incompatible with the high recreational values of the CRA.
The RMP must specifically state that any military request for use of land in the CRA will be analyzed in an EA or EIS, and not incompletely analyzed in a (Categorical Exclusion (CE). This is necessary because AF in Idaho has in the recent past abused CE use on BLM land, and violated terms of CE right-of-way agreement with the Boise District BLM at the Grasmere radar facility).
AF activity in Idaho is increasing, and the AF appears to be actively seeking remote areas such as the CRA to train. All concerns we have raised here are current or foreseeable impacts, and must be considered in the RMP.
All comments here also apply to Wilderness, ACEC sections.

D. The RMP fails to assess the impacts of wind-borne pollutants from mining activities.

40c E. The RMP fails to assess the impacts of livestock degradation of soil resources on air quality. Livestock "improvements" such as pipelines, water troughs or salt licks often result in dust bowls surrounding these areas. Many minor roads pass through these dust bowls, and the recreational public is exposed to both dust and airborne pathogens associated with livestock wastes. What pathogens can the public expect to inhale when passing through these zones of livestock disturbance?

41 RMP effects: Livestock Grazing, Vegetation Treatment and others will have significant effects. These effects on the human environment are significant and must be analyzed in the CDRMP and EIS.

ACECs

42 A. We support full designation of the Dry Gulch, Sand Hollow, Pennal Gulch, Herd Creek Watershed, Birch Creek, Donkey Hills, Lone Bird, and Road Creek Watershed ACECs and full closure of these ACECs to livestock grazing.

43 B. The RMP should outline a plan and specific time frame for survey and designation of additional ACECs, as more information is gained on biological resources in the CRA. This is necessary because the RMP frequently admits that data on biological resources is lacking - p.26, p. 52 - lack of biodiversity inventory survey data, virtually no non-game wildlife information.

44 C. The RMP needs to consider and assess the phaseout of livestock grazing within all ACECs.

45 D. The RMP needs to consider and assess the complete closure of all ACECs to timber harvest, and any vegetation manipulation projects which will result in lowering plant community seral stage.

D. Reaching the Potential Natural community (PNC) must be the management goal within ACECs.

46 E. All ACECs should be designated VRM 1. This would encourage preservation of the visual

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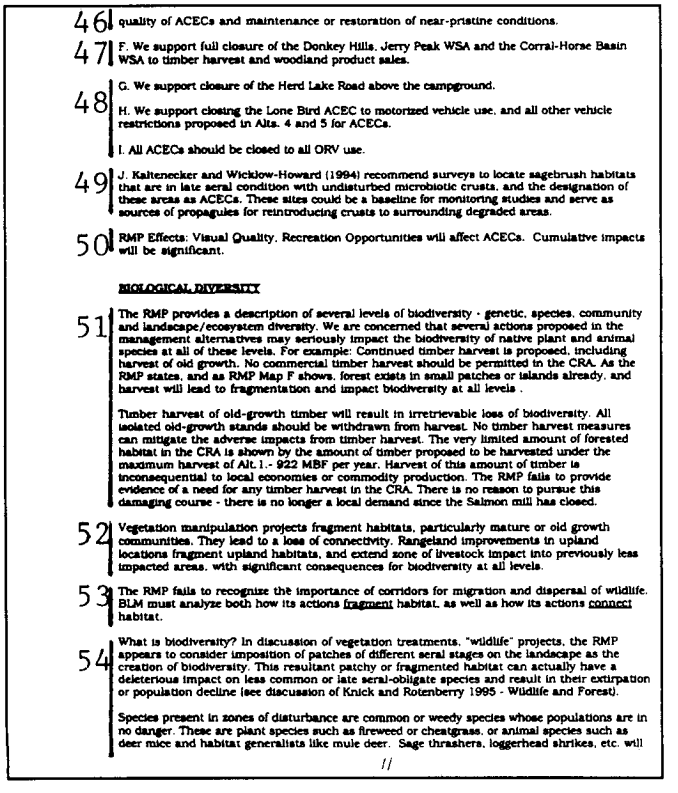

46 quality of ACECs and maintenance or restoration of near-pristine conditions.

47 F. We support full closure of the Donkey Hills, Jerry Peak WSA and the Corral-Horse Basin WSA to timber harvest and woodland product sales.

48 G. We support closure of the Herd Lake Road above the campground.

H. We support closing the Lone Bird ACEC to motorized vehicle use, and all other vehicle restrictions proposed in Alts. 4 and 5 for ACECs.

I. All ACECs should be closed to all ORV use.

49 J. Kaltenecker and Wicklow-Howard (1994) recommend surveys to locate sagebrush habitats that are in late seral condition with undisturbed microbiotic crusts, and the designation of these areas as ACECs. These sites could be a baseline for monitoring studies and serve as sources of propagules for reintroducing crusts to surrounding degraded areas.

50 RMP Effects: Visual Quality, Recreation Opportunities will affect ACECs. Cumulative impacts will be significant.

BIOLOGICAL DIVERSITY

51 The RMP provides a description of several levels of biodiversity - genetic, species, community and landscape/ecosystem diversity. We are concerned that several actions proposed in the management alternatives may seriously impact the biodiversity of native plant and animal species at all of these levels. For example: Continued timber harvest is proposed, including harvest of old growth. No commercial timber harvest should be permitted in the CRA. As the RMP states, and as RMP Map F shows, forest exists in small patches or islands already, and harvest will lead to fragmentation and impact biodiversity at all levels .

Timber harvest of old-growth timber will result in irretrievable loss of biodiversity. All isolated old-growth stands should be withdrawn from harvest. No timber harvest measures can mitigate the adverse impacts from timber harvest. The very limited amount of forested habitat in the CRA is shown by the amount of timber proposed to be harvested under the maximum harvest of Alt.1.- 922 MBF per year. Harvest of this amount of timber is inconsequential to local economies or commodity production. The RMP fails to provide evidence of a need for any timber harvest in the CRA. There is no reason to pursue this damaging course - there is no longer a local demand since the Salmon mill has closed.

52 Vegetation manipulation projects fragment habitats, particularly mature or old growth communities. They lead to a loss of connectivity. Rangeland improvements in upland locations fragment upland habitats, and extend zone of livestock impact into previously less impacted areas, with significant consequences for biodiversity at all levels.

53 The RMP fails to recognize the importance of corridors for migration and dispersal of wildlife. BLM must analyze both how its actions fragment habitat, as well as how its actions connect habitat.

54 What is biodiversity? In discussion of vegetation treatments, "wildlife" projects, the RMP appears to consider imposition of patches of different seral stages on the landscape as the creation of biodiversity. This resultant patchy or fragmented habitat can actually have a deleterious impact on less common or late seral-obligate species and result in their extirpation or population decline (see discussion of Knick and Rotenberry 1995 - Wildlife and Forest).

Species present in zones of disturbance are common or weedy species whose populations are in no danger. These are plant species such as fireweed or cheatgrass, or animal species such as deer mice and habitat generalists like mule deer. Sage thrashers, loggerhead shrikes, etc. will

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information.

31-34: Your opinion is noted.

31-35: Please see response 31-26.

31-36: Your opinion is noted.

31-37: Please see response 31-26.

31-38: Pages 36-42 were meant to provide an overview of impacts, not a rigorous, thorough review. See Chapter 4 - Environmental Consequences for a full discussion of impacts.

31-39: Your opinions are noted. Please see response 31-18.

31-40: (a) These impacts were discussed in the DRMP on page 180, as well as in the FEIS, Vegetation Treatment on BLM Lands in Thirteen Western States and the Northwest Area Noxious Weed Control Program Environmental Impact Statements, which are incorporated in the DRMP/EIS by reference.

(b) Again (see response to comment 31-19), these topics were not identified as a planning issue for the Challis RMP. The Air Force completed an analysis for the proposed Idaho Training Range (ITR). The existing proposal for the ITR does not involve any changes in military activity in the Challis RA. The Challis RMP will not attempt to duplicate the analysis in the Air Forces's EIS.

(c) Air quality impacts from mining activities and concentrated livestock use were considered in the general statement about impacts at project sites (see DRMP, p. 180, #1).

31-41: Your opinion is noted.

31-42: Your preference for designation of all proposed ACECs is noted. The BLM considered designation of both the Carlson Hills portion of the Donkey Hills ACEC and the Road Creek Watershed ACEC, but decided not to include these areas as ACECs in the Proposed RMP. All other proposed ACECs would be designated. The PRMP would maintain grazing closures or would close to grazing the following proposed and existing ACECs: Cronk's Canyon, East Fork-Salmon River Bench, Malm Gulch-Germer Basin, and Sand Hollow. The remainder of the existing and proposed ACECs were not closed to grazing because BLM determined that existing ACEC values could be adequately protected without grazing closures.

31-43: The process for nomination of additional ACECs is

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not nest in early successional habitats, and will be impacted by disturbance. These old-growth shrub obligate species may be eliminated from habitats/ecosystems fragmented by human-imposed "diversity".

54 Thus, a longer-term, broader based ecosystem view of biodiversity strives to maintain necessary habitat for old growth species and those which are declining in numbers, not just tally up the maximum number of species that can be crammed into an area.

55 Goal 1 p. 419 is not congruent with and does not foster maintenance and restoration of biological diversity. It specifically stresses continued sustained production of ecosystem "products" - including forage and timber. Bizarrely, it calls clean water, wildlife and fisheries "products", too - the same as forage and timber. It is commodity-oriented. The Biodiversity Goal must be rewritten to correspond to Secretary Babbitt's 1993 Ecosystem Management Statement - Ecosystem Management in the BLM: From Concept to Commitment. The biological diversity goal must: stress sustaining natural ecological processes and functions to provide resilience and adaptation to long-term change; be based on science; and minimize ecosystem fragmentation, reconnect fragmented parts. Biodiversity and "products" do not mesh.

56 Secretary Babbitt gave BLM clear direction to implement management that conserves the diversity and protects the integrity of the land. Obtaining crucial baseline data must be a BLM priority, as well as objective evaluation of scientific information.

57a Due to the lack of data on biological diversity and many plant and animal species in the CRA, BLM must be highly conservative in taking actions which could fundamentally alter or fragment habitats, destroy connectivity, or affect the capacity for habitat recovery. This includes all commercial harvesting of trees from the "islands" of forested habitat, any vegetation manipulation projects, and all range improvement projects which fragment

57b sagebrush communities. BLM must act quickly and firmly to restrict activities such as livestock grazing which are known to be major causes of biodiversity loss (Fleischner 1994).

58 Where an agency has out-dated, insufficient, or no information on potential impacts, it must develop the information as part of the NEPA process. 40 C.F.R. 1502.22. BLM cannot promise that a biodiversity analysis will be done in 4 years (Alt. 2), or 2 years (Alts. 4, 5). It must be prepared as part of the RMP process. Key ecosystem indicator species must be identified and landscape level biodiversity objectives and management strategies included in the RMP. This is critical to full evaluation of impacts of all RMP alternatives. If this is not done as part of the RMP process, it will never get done - funds will be diverted to other purposes.

59a RMP Effects: Land Tenure, Minerals, Visual Quality, others will affect Biodiversity. Cumulative impacts will be significant.

59b See Wildlife, Forest, Vegetation for additional comments on biodiversity.

CULTURAL RESOURCES

60 A.The RMP states that there is currently a probable downward trend in condition of cultural resources in the CRA. It is the direct observation of our members that the impacts of grazing and trampling by livestock are primary causes of this downward trend. Livestock in the CRA destroy or alter site stratigraphy, expose artifacts and cultural remains to view of looters, directly break or damage and displace artifacts, rub and drool on pictographs and petroglyphs, etc. Trampling and erosion cause irreparable and irretrievable harm to sites. If sites are disturbed before being studied, and chronological sequences/artifacts destroyed, scientific information is permanently lost.

61a B. Sites where livestock are harming cultural resources must be closed to all grazing use.

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61b C. How much site damage in the RA is occurring which can be attributed to grazing impacts? Why does the RMP p.59 carefully avoid any direct mention of the very harmful effects of livestock grazing on cultural resources and ludicrously term both erosion and grazing as impacts of "maintenance activities"?!

62a RMP Effects: Wild Horse and Burro Management, Upland Watershed, Riparian Areas, WSRs, WSAs, Special Status Species , Biological Diversity, Visual Quality, will affect Cultural Resources.
Cumulative impacts will be significant.

62b 1,7. All Alts. Construction and placement of rangeland facilities, particularly water developments and pipelines, destroy archaeological sites. Springs and seeps with fragile resources must be protected by exclusion or elimination of grazing. Vegetation manipulation projects such as burns, discing, seedings whose underlying motive is inevitably based on commodity interests, result in ground disturbance and destruction of archaeological sites.

62c RMP discusses controlling vandalism - how will BLM control site impacts/destruction by livestock?

62d We support archaeological inventory of maximum acres.

62e Burns and seedings should not be termed "wildlife projects". The underlying motivation is almost always commodity production, and describing them as wildlife projects is a subterfuge. Reducing the area for commodity resource use (grazing, forest harvest) reduces damage to archaeological sites.

62f 2. Alts 4,5. A decrease in grazing WILL decrease the general impacts to cultural resources, not "could" decrease impacts.

62h 16, 23. Alts. 2,3,4,5. We support designating the RA as limited to OHV use, the aggressive closure of areas with important archaeological resources, or where site damage is occurring, to all vehicle use - closing the Lone Bird ACEC, and the retention of all cultural resources in Federal ownership.

62i 24. All Alts. We support NSO stipulations and livestock grazing closures in all Native American burial areas, and other sites with important religious significance. We are glad to see the BLM recognizing that cows degrade the quality of aesthetic and spiritual experiences on public land.

ECONOMY AND SOCIETY

63 A. The importance of commodity production is overstated throughout the RMP.

B. The RMP does not adequately discuss or measure the economic benefits of non-use values.

C.The RMP fails to address central socioeconomic questions facing the planning process: What role does the Challis Resource Area play in attracting and retaining people and business to the area, to Idaho? How do roadless areas, wildlife and scenic vistas play a role in attracting people/business to the area, to Idaho? How will alternatives described in the RMP affect people and businesses who are in the area/Idaho for quality of life reasons? How will alternatives affect quality of life?

64 D. Will below-cost timber sales occur?

65a E. How much is each AUM costing the American public? The costs to taxpayers of subsidized public lands grazing "welfare ranching" on the CRA are entirely ignored. The RMP is silent on the economic costs of administering livestock grazing on public land. /////

65b F. The costs in resources impaired, damaged or lost, and alternative uses foregone, as a result of

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outlined in BLM Manual Section 1613; it would not be appropriate to reiterate BLM Manual guidance in the RMP. If a new ACEC nomination is received after implementation of the approved RMP, the BLM authorized officer would assess whether the proposed ACEC's values meet relevance and importance criteria, as defined in the manual. If it is determined that the nominated ACEC should be proposed for designation, the RMP would be amended in accordance with planning guidance and regulations.

31-44: Your opinion is noted. Some ACECs are closed to livestock grazing, and all "open" ACECs have actions to manage livestock grazing. Grazing is normally compatible with ACEC designation, and would be considered in ACEC management.

31-45: (a) In order to protect identified ACEC values approximately 2,398 acres of forest land within the Cronk's Canyon, Malm Gulch/Germer Basin, and Herd Creek Watershed ACECs would continue to be closed to woodland product sales, and 327 acres of commercial timber in the Malm Gulch/Germer Basin and Herd Creek Watershed ACECs would continue to be withdrawn from harvest. The BLM believes forest management practices in the remaining ACECs would not be inconsistent with the protection of identified ACEC values.

(b) Unless another desired plant community better meets resource needs, PNC is the management goal for rangeland sites throughout the Resource Area, including ACECs (see PRMP, Livestock Grazing, Goal 1, #11). Vegetation treatments that may alter seral stage, in the short term, could be an integral part of this management.

31-46: Your opinion is noted. Because visual quality was not identified as an ACEC value by the BLM in any of the proposed or existing ACECs, the PRMP does not emphasize preservation (VRM Class I) of these land areas.

31-47: Your opinion is noted.

31-48: Your preferences for OHV management in ACECs are noted. Some of the OHV management you desire has been included in the PRMP (see PRMP, OHV Use). However, the BLM did not determine it was necessary to close all ACECs to OHV use in order to protect ACEC values.

31-49: This information has been noted.

31-50: Your opinion is noted. The BLM believes that the ACECs analysis stated in the DRMP is accurate.

31-51: Your opinions on commercial timber harvest and

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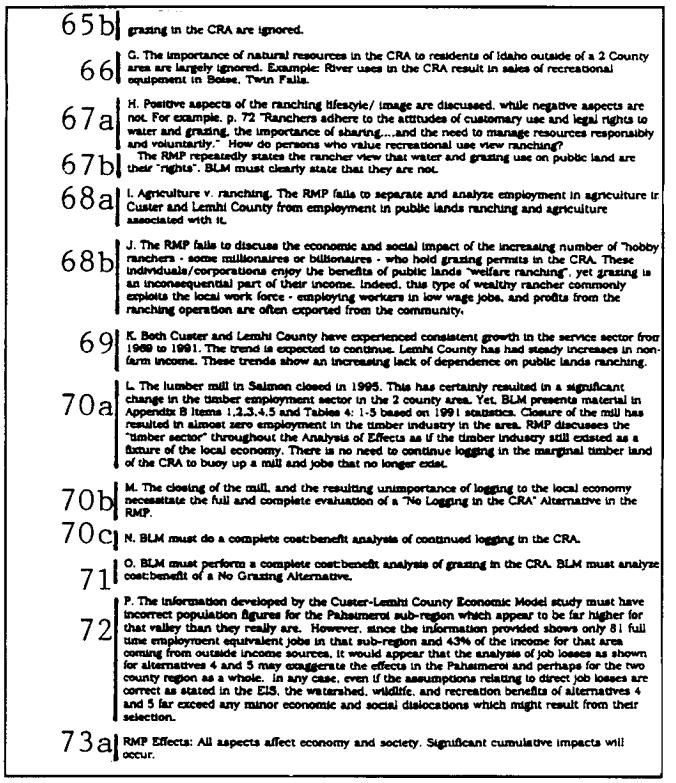

65b grazing in the CRA are ignored.

66 G. The importance of natural resources in the CRA to residents of Idaho outside of a 2 County area are largely ignored. Example: River uses in the CRA result in sales of recreational equipment in Boise, Twin Falls.

67a H. Positive aspects of the ranching lifestyle/ image are discussed, while negative aspects are not. For example, p. 72 "Ranchers adhere to the attitudes of customary use and legal rights to water and grazing, the importance of sharing....and the need to manage resources responsibly and voluntarily." How do persons who value recreational use view ranching?

67b The RMP repeatedly states the rancher view that water and grazing use on public land are their "rights". BLM must clearly state that they are not.

68a I. Agriculture v. ranching. The RMP fails to separate and analyze employment in agriculture in Custer and Lemhi County from employment in public lands ranching and agriculture associated with it.

68b J. The RMP fails to discuss the economic and social impact of the increasing number of "hobby ranchers - some millionaires or billionaires - who hold grazing permits in the CRA. These individuals/corporations enjoy the benefits of public lands "welfare ranching", yet grazing is an inconsequential part of their income. Indeed, this type of wealthy rancher commonly exploits the local work force - employing workers in low wage jobs, and profits from the ranching operation are often exported from the community.

69 K. Both Custer and Lemhi County have experienced consistent growth in the service sector from 1969 to 1991. The trend is expected to continue. Lemhi County has had steady increases in non-farm income. These trends show an increasing lack of dependence on public lands ranching.

70a L. The lumber mill in Salmon closed in 1995. This has certainly resulted in a significant change in the timber employment sector in the 2 county area. Yet, BLM presents material in Appendix B Items 1,2,3,4,5 and Tables 4- 1-5 based on 1991 statistics. Closure of the mill has resulted in almost zero employment in the timber industry in the area. RMP discusses the "timber sector" throughout the Analysis of Effects as if the timber industry still existed as a fixture of the local economy. There is no need to continue logging in the marginal timber land of the CRA to buoy up a mill and jobs that no longer exist.

70b M. The closing of the mill, and the resulting unimportance of logging to the local economy necessitate the full and complete evaluation of a "No Logging in the CRA" Alternative in the RMP.

70c N. BLM must do a complete cost:benefit analysis of continued logging in the CRA.

71 O. BLM must perform a complete cost:benefit analysis of grazing in the CRA. BLM must analyze cost:benefit of a No Grazing Alternative.

72 P. The information developed by the Custer-Lemhi County Economic Model study must have incorrect population figures for the Pahsimerol sub-region which appear to be far higher for that valley than they really are. However, since the information provided shows only 81 full time employment equivalent jobs in that sub-region and 43% of the income for that area coming from outside income sources, it would appear that the analysis of job losses as shown for alternatives 4 and 5 may exaggerate the effects in the Pahsimerol and perhaps for the two county region as a whole. In any case, even if the assumptions relating to direct job losses are correct as stated in the EIS, the watershed, wildlife, and recreation benefits of alternatives 4 and 5 far exceed any minor economic and social dislocations which might result from their selection.

73a RMP Effects: All aspects affect economy and society. Significant cumulative impacts will occur.

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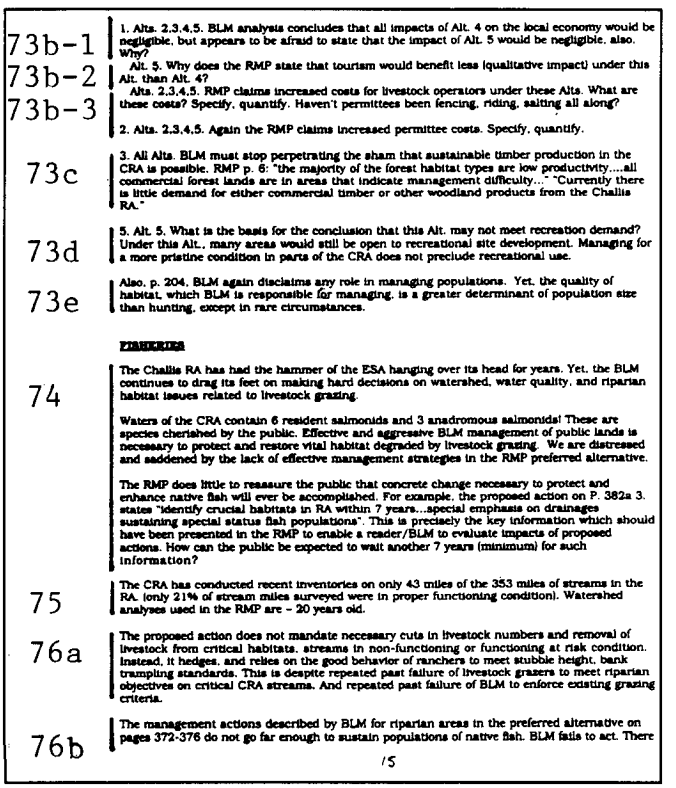

73b-1 1. Alts. 2,3,4,5. BLM analysis concludes that all impacts of Alt. 4 on the local economy would be negligible, but appears to be afraid to state that the impact of Alt. 5 would be negligible, also. Why?

73b-2 Alt. 5. Why does the RMP state that tourism would benefit less (qualitative impact) under this Alt. than Alt. 4?

73b-3 Alts. 2,3,4,5. RMP claims increased costs for livestock operators under these Alts. What are these costs? Specify, quantify. Haven't permittees been fencing, riding, salting all along?

2. Alts. 2,3,4,5. Again the RMP claims increased permittee costs. Specify, quantify.

73c 3. All Alts. BLM must stop perpetrating the sham that sustainable timber production in the CRA is possible. RMP p. 6: "the majority of the forest habitat types are low productivity....all commercial forest lands are in areas that indicate management difficulty..." "Currently there is little demand for either commercial timber or other woodland products from the Challis RA."

73d 5. Alt. 5. What is the basis for the conclusion that this Alt. may not meet recreation demand? Under this Alt., many areas would still be open to recreational site development. Managing for a more pristine condition in parts of the CRA does not preclude recreational use.

73e Also, p. 204, BLM again disclaims any role in managing populations. Yet, the quality of habitat, which BLM is responsible for managing, is a greater determinant of population size than hunting, except in rare circumstances.

FISHERIES

74 The Challis RA has had the hammer of the ESA hanging over its head for years. Yet, the BLM continues to drag its feet on making hard decisions on watershed, water quality, and riparian habitat issues related to livestock grazing.

Waters of the CRA contain 6 resident salmonids and 3 anadromous salmonids! These are species cherished by the public. Effective and aggressive BLM management of public lands is necessary to protect and restore vital habitat degraded by livestock grazing. We are distressed and saddened by the lack of effective management strategies in the RMP preferred alternative.

The RMP does little to reassure the public that concrete change necessary to protect and enhance native fish will ever be accomplished. For example, the proposed action on P. 382a 3. states "identify crucial habitats in RA within 7 years...special emphasis on drainages sustaining special status fish populations". This is precisely the key information which should have been presented in the RMP to enable a reader/BLM to evaluate impacts of proposed actions. How can the public be expected to wait another 7 years (minimum) for such information?

75 The CRA has conducted recent inventories on only 43 miles of the 353 miles of streams in the RA. (only 21% of stream miles surveyed were in proper functioning condition). Watershed analyses used in the RMP are - 20 years old.

76a The proposed action does not mandate necessary cuts in livestock numbers and removal of livestock from critical habitats, streams in non-functioning or functioning at risk condition. Instead, it hedges, and relies on the good behavior of ranchers to meet stubble height, bank trampling standards. This is despite repeated past failure of livestock grazers to meet riparian objectives on critical CRA streams. And repeated past failure of BLM to enforce existing grazing criteria.

76b The management actions described by BLM for riparian areas in the preferred alternative on pages 372-376 do not go far enough to sustain populations of native fish. BLM fails to act. There

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maintenance of biodiversity are noted. The BLM estimates that up to 50% of commercial forest land acres in the RA have old growth characteristics. The BLM agrees some of these stands are in need of maintenance and retention, especially where they form habitat islands (see PRMP, Forest Resources, Goal 1, #22). However, stands with old-growth characteristics may in fact be above historical levels in the RA, as very few stands in early seral condition exist. Therefore, in addition to the maintenance and retention of some existing old growth stands, natural regeneration of early seral stands is an objective (see PRMP, Forest Resources, Goal 1, #8). The BLM believes the PRMP's proposed management of forested areas will facilitate achievement of the goal statement for biological diversity (see PRMP/FEIS: PRMP decisions regarding Biological Diversity, Goal 1 and Forest Resources, Goal 1; and Chapter 4- Biodiversity, analysis of Forest Resource management impacts). Please also see response 31-27.

31-52: BLM believes the analysis of impacts to biodiversity from rangeland vegetation treatment projects is correct (see PRMP, Chapter 4 - Biological Diversity). Vegetative manipulations would affect relatively few acres and thus would have little effect on biodiversity. BLM believes that the PRMP decisions related to vegetation treatments would adequately protect other resource values, including biodiversity of the RA (see PRMP, Rangeland Vegetation Treatment Projects, Goal 1, #1-7). Also, before any vegetative manipulation or other range improvement project could be done, an analysis of impacts to biodiversity would be completed (PRMP, Biological Diversity, Goal 1, #1).

31-53: The BLM determined that the PRMP would have no reasonably foreseeable effects on the dispersal or migration corridors of most terrestrial wildlife species. Therefore, corridors were not discussed in the affected environment or environmental consequences. The effects of fences on the movements of big game animals are analyzed in Chapter 4 - Wildlife, "Rangeland Vegetation Treatments and Range Improvement Projects." Fragmentation of aquatic habitats was discussed in the DRMP on page 56, last paragraph; this discussion is expanded slightly in the PRMP. The Chapter 4 discussion of effects on biodiversity has been revised in the PRMP to more specifically mention impacts on the connectivity of aquatic habitats.

31-54: Your comments are noted. Please see response 31-52.

31-55: Your opinions are noted. The biological diversity goal statement has been revised to describe both "values" and "products."

31-56: The decisions outlined in the PRMP are consistent with

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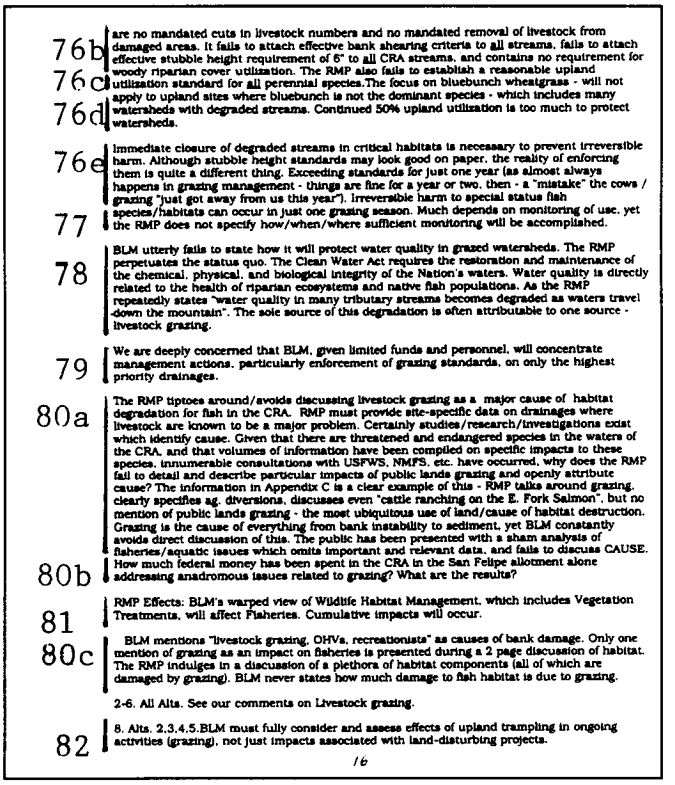

76b are no mandated cuts in livestock numbers and no mandated removal of livestock from damaged areas. It fails to attach effective bank shearing criteria to all streams, fails to attach effective stubble height requirement of 6" to all CRA streams, and contains no requirement for woody riparian cover utilization. The RMP also fails to establish a reasonable upland
76c utilization standard for all perennial species.The focus on bluebunch wheatgrass - will not
76d apply to upland sites where bluebunch is not the dominant species - which includes many watersheds with degraded streams. Continued 50% upland utilization is too much to protect watersheds.

76e immediate closure of degraded streams in critical habitats is necessary to prevent irreversible harm. Although stubble height standards may look good on paper, the reality of enforcing them is quite a different thing. Exceeding standards for just one year (as almost always happens in grazing management - things are fine for a year or two, then - a "mistake" the cows / grazing "just got away from us this year"). Irreversible harm to special status fish

77 species/habitats can occur in just one grazing season. Much depends on monitoring of use, yet the RMP does not specify how/when/where sufficient monitoring will be accomplished.

78 BLM utterly fails to state how it will protect water quality in grazed watersheds. The RMP perpetuates the status quo. The Clean Water Act requires the restoration and maintenance of the chemical, physical, and biological integrity of the Nation's waters. Water quality is directly related to the health of riparian ecosystems and native fish populations. As the RMP repeatedly states "water quality in many tributary streams becomes degraded as waters travel down the mountain". The sole source of this degradation is often attributable to one source - livestock grazing.

79 We are deeply concerned that BLM, given limited funds and personnel, will concentrate management actions, particularly enforcement of grazing standards, on only the highest priority drainages.

80a The RMP tiptoes around/avoids discussing livestock grazing as a major cause of habitat degradation for fish in the CRA. RMP must provide site-specific data on drainages where livestock are known to be a major problem. Certainly studies/research/investigations exist which identify cause. Given that there are threatened and endangered species in the waters of the CRA, and that volumes of information have been compiled on specific impacts to these species, innumerable consultations with USFWS, NMFS, etc. have occurred, why does the RMP fail to detail and describe particular impacts of public lands grazing and openly attribute cause? The information in Appendix C is a clear example of this - RMP talks around grazing, clearly specifies ag. diversions, discusses even "cattle ranching on the E. Fork Salmon", but no mention of public lands grazing - the most ubiquitous use of land/cause of habitat destruction. Grazing is the cause of everything from bank instability to sediment, yet BLM constantly avoids direct discussion of this. The public has been presented with a sham analysis of fisheries/aquatic issues which omits important and relevant data, and fails to discuss CAUSE.
80b How much federal money has been spent in the CRA in the San Felipe allotment alone addressing anadromous issues related to grazing? What are the results?

81 RMP Effects: BLM's warped view of Wildlife Habitat Management, which includes Vegetation Treatments, will affect Fisheries. Cumulative impacts will occur.

80c BLM mentions "livestock grazing, OHVs, recreationists" as causes of bank damage. Only one mention of grazing as an impact on fisheries is presented during a 2 page discussion of habitat. The RMP indulges in a discussion of a plethora of habitat components (all of which are damaged by grazing). BLM never states how much damage to fish habitat is due to grazing.

2-6. All Alts. See our comments on Livestock grazing.

82 8. Alts. 2,3,4,5.BLM must fully consider and assess effects of upland trampling in ongoing activities (grazing), not just impacts associated with land-disturbing projects.

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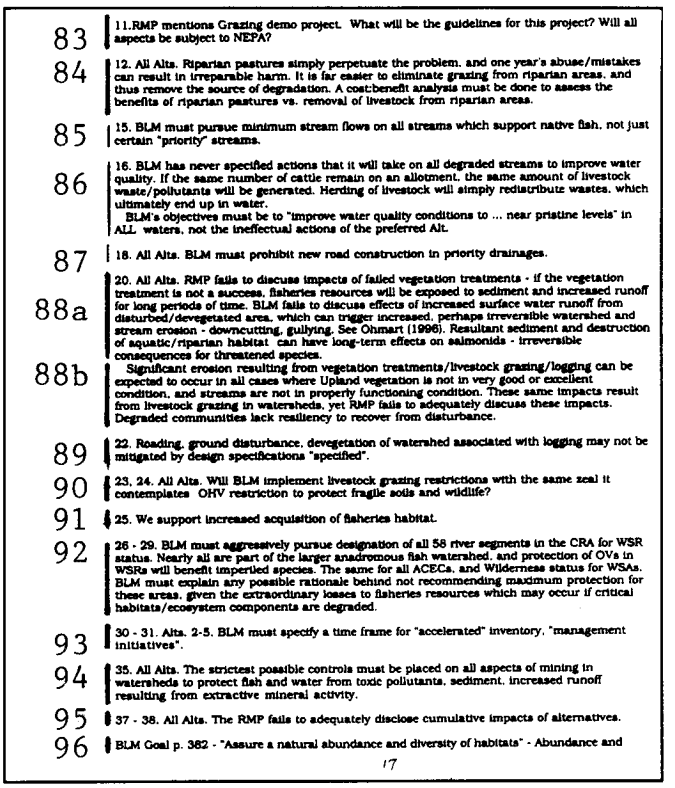

83 11.RMP mentions Grazing demo project. What will be the guidelines for this project? Will all aspects be subject to NEPA?

84 12. All Alts. Riparian pastures simply perpetuate the problem, and one year's abuse/mistakes can result in irreparable harm. It is far easier to eliminate grazing from riparian areas, and thus remove the source of degradation. A cost:benefit analysis must be done to assess the benefits of riparian pastures vs. removal of livestock from riparian areas.

85 15. BLM must pursue minimum stream flows on all streams which support native fish, not just certain "priority" streams.

86 16. BLM has never specified actions that it will take on all degraded streams to improve water quality. If the same number of cattle remain on an allotment, the same amount of livestock waste/pollutants will be generated. Herding of livestock will simply redistribute wastes, which ultimately end up in water.
BLM's objectives must be to "improve water quality conditions to ... near pristine levels" in ALL waters, not the ineffectual actions of the preferred Alt.

87 18. All Alts. BLM must prohibit new road construction in priority drainages.

88a 20. All Alts. RMP fails to discuss impacts of failed vegetation treatments - if the vegetation treatment is not a success, fisheries resources will be exposed to sediment and increased runoff for long periods of time. BLM fails to discuss effects of increased surface water runoff from disturbed/devegetated area, which can trigger increased, perhaps irreversible watershed and stream erosion - downcutting, gullying. See Ohmart (1996). Resultant sediment and destruction of aquatic/riparian habitat can have long-term effects on salmonids - irreversible consequences for threatened species.
88b Significant erosion resulting from vegetation treatments/livestock grazing/logging can be expected to occur in all cases where Upland vegetation is not in very good or excellent condition, and streams are not in properly functioning condition. These same impacts result from livestock grazing in watersheds, yet RMP fails to adequately discuss these impacts. Degraded communities lack resiliency to recover from disturbance.

89 22. Roading, ground disturbance, devegetation of watershed associated with logging may not be mitigated by design specifications "specified".

90 23, 24. All Alts. Will BLM implement livestock grazing restrictions with the same zeal it contemplates OHV restriction to protect fragile soils and wildlife?

91 25. We support increased acquisition of fisheries habitat.

92 26 - 29. BLM must aggressively pursue designation of all 56 river segments in the CRA for WSR status. Nearly all are part of the larger anadromous fish watershed, and protection of OVs in WSRs will benefit imperiled species. The same for all ACECs, and Wilderness status for WSAs. BLM must explain any possible rationale behind not recommending maximum protection for these areas, given the extraordinary losses to fisheries resources which may occur if critical habitats/ecosystem components are degraded.

93 30 - 31. Alts. 2-5. BLM must specify a time frame for "accelerated" inventory, "management initiatives".

94 35. All Alts. The strictest possible controls must be placed on all aspects of mining in watersheds to protect fish and water from toxic pollutants, sediment, increased runoff resulting from extractive mineral activity.

95 37 - 38. All Alts. The RMP fails to adequately disclose cumulative impacts of alternatives.

96 BLM Goal p. 382 - "Assure a natural abundance and diversity of habitats" - Abundance and

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BLM Response to Letter No. 31 *continued*

this direction. The PRMP emphasizes assessment of biodiversity (see Biological Diversity, Goal 1).

31-57: (a) The PRMP provides for maintenance of forested area "islands" (see PRMP, Forest Resources, Goal 1, #22). Please also see responses 31-51 and 31-52. (b) Your opinion is noted. Biological Diversity, Goal 1, #1 requires an assessment of biodiversity as part of project and activity planning.

31-58: Your comments are noted. The BLM believes the biodiversity information available was sufficient to prepare an analysis of impacts from the alternatives.

31-59: (a) The PRMP adds an analysis of impacts from Land Tenure and Access and Minerals decisions. The BLM believes no reasonably foreseeable impacts to biodiversity would occur from Visual Resources decisions. (b) Your opinion is noted.

31-60: The DRMP mentions cultural resources have been disturbed by various agents, including "human and animal intrusion," and recognizes that grazing, as well as other activities, have adversely affected known cultural resources (DRMP, p. 59). The DRMP also analyzes the impacts of livestock trampling and range improvement projects on cultural resources by alternative (pp. 198a-199b).

31-61: (a) Your opinion is noted. Efforts to protect significant cultural resources from impacts due to livestock grazing will be introduced through the project or activity planning process on a case-by-case basis. The BLM feels that cultural resources can be protected from grazing-related impacts through a variety of methods such as fencing, changes in grazing systems (including changes in seasons of use), and moving livestock. All of these options are provided for in the PRMP. (b) The DRMP described the impacts of livestock trampling and range improvement projects on cultural resources under existing management (Alternative 1) ((DRMP, pp. 198a-199a). The statement in the Affected Environment you are concerned about has been revised in the PRMP.

31-62: (a) Decisions within each of the Management Concerns you listed were reviewed; the BLM still believes that there will be minimal or no impacts (including cumulative impacts) to cultural resources from these decisions.

(b) The National Historic Preservation Act (NHPA) of 1966, as amended, and the implementing regulations that define the Section 106 process of that Act reduce or eliminate the potential for destroying archaeological sites through construction and placement of rangeland facilities, vegetation manipulation projects, or any other

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96 diversity can include abundant/diverse degraded habitats, consumptive uses such as livestock grazing/disturbance. The goal must be changed.
We suggest a simpler, clearer goal: To protect and restore native fish and their habitat.

97 BLM proposes taking 7 years to:
1) identify crucial habitats and determine distribution of priority fish species.
2) Inventory anadromous fish habitat on a watershed basis, and determine current distribution of anadromous fish.
3) Develop and implement a plan for enhancing fisheries habitat along 5.7 miles of the Big Lost River.
4) Eliminate or modify natural or artificial barriers to upstream and downstream movement of prority fish species.
5) inventory Bull Trout and Westslope Cutthroat Trout. This is ridiculous! In 7 years, most of the priority fish species will be extirpated or extinct. Further irreversible habitat losses will have occurred.

98 All this information should already be known, and presented to the public in the RMP. BLM must pursue "net gain" of critical habitats.

FIRE

99 A. Fire must be actively suppressed in all sage grouse habitat. See IDFG Idaho Sage Grouse Management Plan Summary 1996-2000.

100 B. All fire in Wyoming big sagebrush habitat and all vegetation types vulnerable to cheatgrass invasion (see Monsen 1994 for discussion of these vegetation types). Fire must be actively suppressed, due to susceptibility of plant communities to exotic species invasions following fire.

101 C. All fire rehabilitation efforts should involve the use of native plant species only. Sagebrush must be seeded in all fires in sagebrush communities.

102 D. Specific post-fire rehabilitation stipulations must be established in the RMP.

E. RMP must establish specific post-fire standards for site recovery which must be met before any livestock grazing can resume.

103 F. A comparison of Maps 14 and 15 reveals that BLM is proposing a great change in Fire management in the CRA. The RMP fails to provide necessary analysis to fully consider impacts of this change. BLM has shifted ~ 95% of the CRA into a conditional suppression zone (currently only~15% is in the conditional suppression zone. Nearly all Wyoming sagebrush habitat in the CRA has been placed in the conditional suppression zone. No consideration of sage grouse habitat needs, needs of other wildlife species, impact of fire on spread of exotic species, cumulative impacts of sagebrush habitat loss on wildlife species, etc. has been presented. BLM must provide a complete analysis of this proposed change.

Also, see additional comments Forest, Vegetation, Livestock Grazing, Wildlife, etc.

FOREST RESOURCES

104a The RMP falls victim to the forest health/ ecosystem salvation through intense manipulation and human interference craze which is currently in vogue. Much scientific evidence exists which negates unsubstantiated and unproven assumptions on forest health and vegetation manipulation made in the RMP. Intensive management forest proposals remain largely undeveloped, untested, and unsupported by empirical evidence (Wright 1996).

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104b RMP Effects: Vegetation Treatment and Biological Diversity will affect forest resources. Cumulative impacts will be significant.

105a 1, 2, 3, All Alts. Timber harvest does NOT decrease susceptibility to fire, insects, or diseases. Unprecedented fire and insect outbreaks are not causes of forest health problems; they are symptoms of underlying problems caused by a century and a half of logging, grazing, road building, mining, introduction of exotics, etc. (Beschta et.al. 1995). Addressing the ultimate,

105b underlying causes of fire and disease, and not simply harvesting more trees, is the solution to achieving healthier forests. The RMP must focus on modifying management to fix forest conditions. The proliferation of human-caused disturbance across the landscape is the

105c principle cause of forest health problems (Henjum et.al. 1994). (Beschta et. al. 1995). Human disturbance does not mimic natural disturbance.

105d The ability of intensive management to control fire and insect outbreak on a landscape scale is speculative. (Wright 1996). Scientific evidence does not support the hypothesis that intensive salvage, thinning, and other logging activities reduce the risk of catastrophic fire. Della Sala et.al. (1995a). No consensus exists on silvicultural practices for minimizing effects of fire, drought, insects and pathogens (Henjum et.al. 1994). Logging may actually increase fire

105e damage, even when fuels (slash) is treated afterwards. (Weatherspoon and Skinner 1995). Fire behavior is predominantly determined by weather (Bessie and Johnson 1995). (Weatherspoon and Skinner 1995). Turner et. al. (1994) found that the severity of a burn was a function of weather: fuel load did not determine burn severity.

105f Insect pests fluctuate on a large geographic scale (Wright 1996). The population fluctuations of defoliators often are driven by dynamic processes that are part of a large population system operating at a regional scale. The degree to which insect outbreaks can be reduced in the interior Pacific northwest by modifying landscape patterns is untested...and speculative." (Mason and Wickman 1994).

105g Management actions may exacerbate problems. In dry areas (fir forests of CRA), opening forest canopies can dry forest understories out earlier in the season; the disruption of soil and litter by heavy equipment can reduce soil moisture retention, creating drier conditions (Harvey et. al. 1994). Fine fuels left behind by logging contribute more to the spread of fires than large fuels (Della Sala 1995b). (Beschta et.al. 1995). Closed canopies reduce sunlight and wind movement

105h and drying of fuels. Opening a stand with partial cutting adds fuels and creates a microclimate conducive to increased fire frequencies. (Weatherspoon and Skinner 1995). (Wright 1996).

105i Roads associated with management activities lead to increased human access and fire risk (Wright 1996)

105j Management techniques may exacerbate insect problems by removing predators (parasitic wasps, birds, ants) and their habitat. Prescribed burning may increase insect pest densities by eliminating nesting substrate for ant colonies (Bull 1994). Many insect-eating birds and predatory or parasitic insect species are dependent on dead wood for nesting. Removing dead wood through prescribed fire eliminates habitat for natural control agents.

105k Tree disease may be increased by roads or management activities. Fragmentation of forested tracts has increased the incidence of soil-borne tree diseases. Disease may be spread directly by disseminating spores or indirectly by altering stand structure and composition. Logging roads alter soil drainage patterns and facilitate spread of fungal disease. (Castello et. al. 1995). Thinning may increase the spread of root rots into adjacent trees. (Heather 1976).

1051 Prior to European settlement, disturbed areas were nested in a mainly undisturbed landscape; now undisturbed areas are surrounded by a sea of recent disturbance (Della Sala 1995a). (Wright 1996). The CRMP fails to consider or address the consequences of further disturbance (logging, thinning, prescribed fire) to the landscape under proposed management scenarios.

The goal of intensive management should be to:

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ground disturbing projects. Through the NHPA, particularly Sections 106 and 110 of that Act, areas which may be affected by ground disturbing activities are inventoried for cultural resources prior to project implementation. If cultural resources are identified, they are evaluated for their eligibility to the National Register of Historic Places and effects are mitigated. Inventory, evaluation and mitigation of cultural resources are done in consultation with the Idaho State Historic Preservation Office, the Advisory Council on Historic Preservation, and appropriate Tribal governments, if necessary.

(c) Please see response 31-61(a).

(d) Your preference for inventory of maximum acres (Alternative 5) is noted. The BLM believes 500 acres of Class III non-project intensive inventory is more realistic and attainable. This objective does not preclude completing additional inventory if funding and staffing permit.

(e) The BLM disagrees. Prescribed burns and seedings can be described as wildlife habitat management projects when the primary objective is to provide forage for wildlife. For example, a number of prescribed burn treatments have been conducted in the Challis RA specifically for bighorn sheep on bighorn winter ranges.

(f) The BLM agrees that reducing the number of acres within the RA that are used for commodity purposes (such as grazing and timber harvest) will also reduce damage to archaeological sites from those activities.

(g) The BLM disagrees. A decrease in livestock grazing within a specific allotment will not always result in a decrease of impacts to cultural resources. Other aspects of grazing activities which are contributing to the impacts may also need to be changed.

(h) Your alternative preferences are noted. In general, the PRMP limits OHV use in the RA to existing roads, vehicle ways, and trails. Areas where there are concerns for cultural resources are designated "closed" to OHV use. The BLM prefers Alternative 2 of Management Concern: Cultural Resource Management, Goal 1, #6, because it retains the flexibility for sale or exchange to other agencies who may be better suited to manage these values for the public benefit.

(i) Your support of proposed management is noted.

31-63: The economic analysis describes quantitative and qualitative impacts to the economic sectors for which data were gathered during the social and economic study of Lemhi/Custer counties (timber, agriculture, government, tourism, mining). Some of these economic

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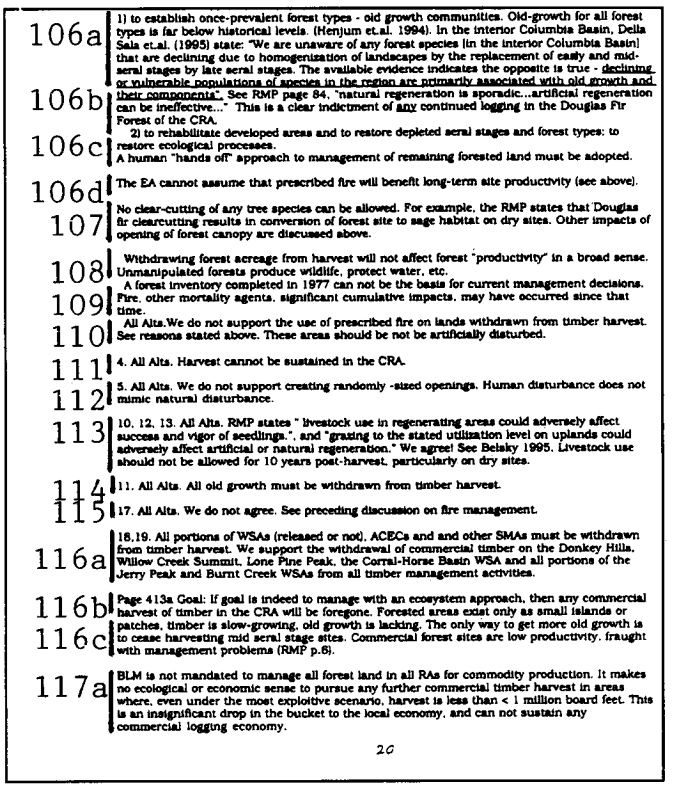

106a 1) to establish once-prevalent forest types - old growth communities. Old-growth for all forest types is far below historical levels. (Henjum et.al. 1994). In the interior Columbia Basin, Della Sala et.al. (1995) state: "We are unaware of any forest species [in the interior Columbia Basin] that are declining due to homogenization of landscapes by the replacement of early and mid-seral stages by late seral stages. The available evidence indicates the opposite is true - declining or vulnerable populations of species in the region are primarily associated with old growth and their components". See RMP page 84, "natural regeneration is sporadic...artificial regeneration can be ineffective..." This is a clear indictment of any continued logging in the Douglas Fir Forest of the CRA.

106b 2) to rehabilitate developed areas and to restore depleted seral stages and forest types: to restore ecological processes.

106c A human "hands off" approach to management of remaining forested land must be adopted.

106d The EA cannot assume that prescribed fire will benefit long-term site productivity (see above).

107 No clear-cutting of any tree species can be allowed. For example, the RMP states that Douglas fir clearcutting results in conversion of forest site to sage habitat on dry sites. Other impacts of opening of forest canopy are discussed above.

108 Withdrawing forest acreage from harvest will not affect forest "productivity" in a broad sense. Unmanipulated forests produce wildlife, protect water, etc.

109 A forest inventory completed in 1977 can not be the basis for current management decisions. Fire, other mortality agents, significant cumulative impacts, may have occurred since that time.

110 All Alts.We do not support the use of prescribed fire on lands withdrawn from timber harvest. See reasons stated above. These areas should be not be artificially disturbed.

111 4. All Alts. Harvest cannot be sustained in the CRA.

112 5. All Alts. We do not support creating randomly -sized openings. Human disturbance does not mimic natural disturbance.

113 10, 12, 13. All Alts. RMP states " livestock use in regenerating areas could adversely affect success and vigor of seedlings.", and "grazing to the stated utilization level on uplands could adversely affect artificial or natural regeneration." We agree! See Belsky 1995. Livestock use should not be allowed for 10 years post-harvest, particularly on dry sites.

114 11. All Alts. All old growth must be withdrawn from timber harvest.

115 17. All Alts. We do not agree. See preceding discussion on fire management.

116a 18,19. All portions of WSAs (released or not), ACECs and and other SMAs must be withdrawn from timber harvest. We support the withdrawal of commercial timber on the Donkey Hills, Willow Creek Summit, Lone Pine Peak, the Corral-Horse Basin WSA and all portions of the Jerry Peak and Burnt Creek WSAs from all timber management activities.

116b Page 413a Goal: If goal is indeed to manage with an ecosystem approach, then any commercial harvest of timber in the CRA will be foregone. Forested areas exist only as small islands or patches, timber is slow-growing, old growth is lacking. The only way to get more old growth is

116c to cease harvesting mid seral stage sites. Commercial forest sites are low productivity, fraught with management problems (RMP p.6).

117a BLM is not mandated to manage all forest land in all RAs for commodity production. It makes no ecological or economic sense to pursue any further commercial timber harvest in areas where, even under the most exploitive scenario, harvest is less than < 1 million board feet. This is an insignificant drop in the bucket to the local economy, and can not sustain any commercial logging economy.

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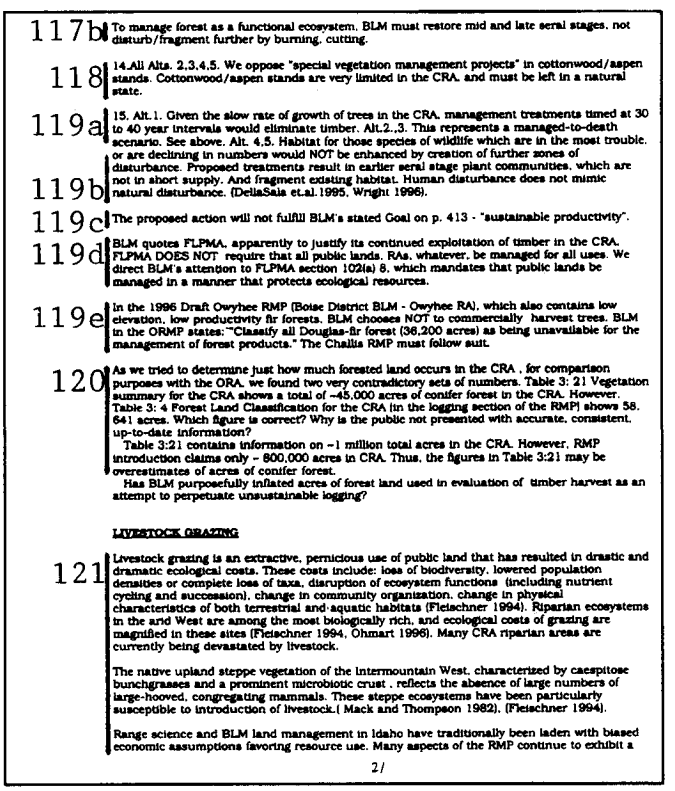

117b To manage forest as a functional ecosystem, BLM must restore mid and late seral stages, not disturb/fragment further by burning, cutting.

118 14.All Alts. 2,3,4,5. We oppose "special vegetation management projects" in cottonwood/aspen stands. Cottonwood/aspen stands are very limited in the CRA, and must be left in a natural state.

119a 15. Alt.1. Given the slow rate of growth of trees in the CRA, management treatments timed at 30 to 40 year intervals would eliminate timber. Alt.2.,3. This represents a managed-to-death scenario. See above. Alt. 4,5. Habitat for those species of wildlife which are in the most trouble, or are declining in numbers would NOT be enhanced by creation of further zones of

119b disturbance. Proposed treatments result in earlier seral stage plant communities, which are not in short supply. And fragment existing habitat. Human disturbance does not mimic natural disturbance. (DellaSala et.al.1995, Wright 1996).

119c The proposed action will not fulfill BLM's stated Goal on p. 413 - "sustainable productivity".

119d BLM quotes FLPMA, apparently to justify its continued exploitation of timber in the CRA. FLPMA DOES NOT require that all public lands, RAs, whatever, be managed for all uses. We direct BLM's attention to FLPMA section 102(a) 8, which mandates that public lands be managed in a manner that protects ecological resources.

119e In the 1996 Draft Owyhee RMP (Boise District BLM - Owyhee RA), which also contains low elevation, low productivity fir forests, BLM chooses NOT to commercially harvest trees. BLM in the ORMP states: "Classify all Douglas-fir forest (36,200 acres) as being unavailable for the management of forest products." The Challis RMP must follow suit.

120 As we tried to determine just how much forested land occurs in the CRA , for comparison purposes with the ORA, we found two very contradictory sets of numbers. Table 3: 21 Vegetation summary for the CRA shows a total of ~45,000 acres of conifer forest in the CRA. However, Table 3: 4 Forest Land Classification for the CRA [in the logging section of the RMP] shows 58, 641 acres. Which figure is correct? Why is the public not presented with accurate, consistent, up-to-date information?

Table 3:21 contains information on ~1 million total acres in the CRA. However, RMP introduction claims only ~ 800,000 acres in CRA. Thus, the figures in Table 3:21 may be overestimates of acres of conifer forest.

Has BLM purposefully inflated acres of forest land used in evaluation of timber harvest as an attempt to perpetuate unsustainable logging?

LIVESTOCK GRAZING

121 Livestock grazing is an extractive, pernicious use of public land that has resulted in drastic and dramatic ecological costs. These costs include: loss of biodiversity, lowered population densities or complete loss of taxa, disruption of ecosystem functions (including nutrient cycling and succession), change in community organization, change in physical characteristics of both terrestrial and aquatic habitats (Fleischner 1994). Riparian ecosystems in the arid West are among the most biologically rich, and ecological costs of grazing are magnified in these sites (Fleischner 1994, Ohmart 1996). Many CRA riparian areas are currently being devastated by livestock.

The native upland steppe vegetation of the Intermountain West, characterized by caespitose bunchgrasses and a prominent microbiotic crust , reflects the absence of large numbers of large-hooved, congregating mammals. These steppe ecosystems have been particularly susceptible to introduction of livestock.(Mack and Thompson 1982). (Fleischner 1994).

Range science and BLM land management in Idaho have traditionally been laden with biased economic assumptions favoring resource use. Many aspects of the RMP continue to exhibit a

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sectors are based on commodities which are normally traded in the marketplace, e.g., timber, livestock, and minerals. The economic analysis may seem to focus attention on these commodity resources, but this is only because these aspects of the regional economy are readily quantifiable. Please note that the DRMP/EIS also analyzes the economic benefits of what IWP terms "non-use values." The economic analysis of the tourism sector specifically addresses the economic benefits of non-commodity resources such as fisheries habitat, wildlife habitat, visual quality, and water quality (see DRMP, p. 208a/b). The economic analysis of the government sector (p. 209a/b) indirectly discusses "quality of life" impacts on local residents, since local taxes provide for many public goods and services (see DRMP, pp. 68-69). The analysis of social effects more specifically documents impacts to "quality of life" considerations such as air quality, water quality, visual/aesthetic/scenic values, and recreational values (see DRMP, p. 209a). The analysis of impacts to recreation opportunities (DRMP, p. 257a/b, #2) indicates that although visitor use of the RA would probably increase as the regional population increases, the increase attributable to RMP actions would not be significant.

31-64: Below cost timber sales occurred in the Salmon District prior to 1990. However, increased stumpage prices and an informal cost accounting process initiated in the Salmon Field Office have prevented below cost sales since that time.

31-65: (a) The economic analysis for the Challis RMP focused on the economy and society of the two regions which primarily use lands in the RA and could be affected by RMP decisions (see DRMP, pp. 204-212). Estimates of economic impacts to other groups/regions (such as the State of Idaho, adjacent counties, "the American public", Canada...) are beyond the scope of this EIS. Laws, regulations, and policies establish AUM costs and grazing administration procedures on all public lands, not just the Challis Resource Area. The PRMP describes management guidance for the physical and biological resources within the Challis RA. It does not set economic policy, although some actions in the PRMP are specifically intended to reduce economic impacts (e.g., Land Tenure and Access, Goal 2, #1). Regarding the topic of what IWP terms "welfare ranching," please see response 31-68b.

(b) The Draft RMP/EIS analyzed the beneficial and adverse impacts of managed livestock grazing (see DRMP, Chapter 4).

31-66: The importance of natural resources in the Challis Resource Area to residents outside the two-county area were not ignored, since comments from residents

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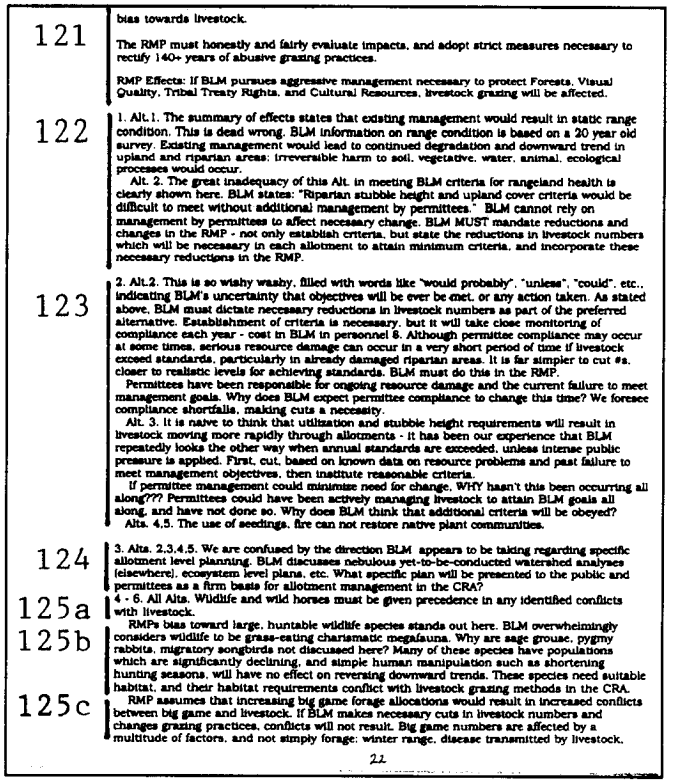

121 bias towards livestock.

The RMP must honestly and fairly evaluate impacts, and adopt strict measures necessary to rectify 140+ years of abusive grazing practices.

RMP Effects: If BLM pursues aggressive management necessary to protect Forests, Visual Quality, Tribal Treaty Rights, and Cultural Resources, livestock grazing will be affected.

122 1. Alt.1. The summary of effects states that existing management would result in static range condition. This is dead wrong. BLM information on range condition is based on a 20 year old survey. Existing management would lead to continued degradation and downward trend in upland and riparian areas: irreversible harm to soil, vegetative, water, animal, ecological processes would occur.

Alt. 2. The great inadequacy of this Alt. in meeting BLM criteria for rangeland health is clearly shown here. BLM states: "Riparian stubble height and upland cover criteria would be difficult to meet without additional management by permittees." BLM cannot rely on management by permittees to affect necessary change. BLM MUST mandate reductions and changes in the RMP - not only establish criteria, but state the reductions in livestock numbers which will be necessary in each allotment to attain minimum criteria, and incorporate these necessary reductions in the RMP.

123 2. Alt.2. This is so wishy washy, filled with words like "would probably", "unless", "could", etc., indicating BLM's uncertainty that objectives will be ever be met, or any action taken. As stated above, BLM must dictate necessary reductions in livestock numbers as part of the preferred alternative. Establishment of criteria is necessary, but it will take close monitoring of compliance each year - cost in BLM in personnel $. Although permittee compliance may occur at some times, serious resource damage can occur in a very short period of time if livestock exceed standards, particularly in already damaged riparian areas. It is far simpler to cut #s, closer to realistic levels for achieving standards. BLM must do this in the RMP.

Permittees have been responsible for ongoing resource damage and the current failure to meet management goals. Why does BLM expect permittee compliance to change this time? We foresee compliance shortfalls, making cuts a necessity.

Alt. 3. It is naive to think that utilization and stubble height requirements will result in livestock moving more rapidly through allotments - it has been our experience that BLM repeatedly looks the other way when annual standards are exceeded, unless intense public pressure is applied. First, cut, based on known data on resource problems and past failure to meet management objectives, then institute reasonable criteria.

If permittee management could minimize need for change, WHY hasn't this been occurring all along??? Permittees could have been actively managing livestock to attain BLM goals all along, and have not done so. Why does BLM think that additional criteria will be obeyed?

Alts. 4,5. The use of seedings, fire can not restore native plant communities.

124 3. Alts. 2,3,4,5. We are confused by the direction BLM appears to be taking regarding specific allotment level planning. BLM discusses nebulous yet-to-be-conducted watershed analyses (elsewhere), ecosystem level plans, etc. What specific plan will be presented to the public and permittees as a firm basis for allotment management in the CRA?

125a 4 - 6. All Alts. Wildlife and wild horses must be given precedence in any identified conflicts with livestock.

125b RMPs bias toward large, huntable wildlife species stands out here. BLM overwhelmingly considers wildlife to be grass-eating charismatic megafauna. Why are sage grouse, pygmy rabbits, migratory songbirds not discussed here? Many of these species have populations which are significantly declining, and simple human manipulation such as shortening hunting seasons, will have no effect on reversing downward trends. These species need suitable habitat, and their habitat requirements conflict with livestock grazing methods in the CRA.

125c RMP assumes that increasing big game forage allocations would result in increased conflicts between big game and livestock. If BLM makes necessary cuts in livestock numbers and changes grazing practices, conflicts will not result. Big game numbers are affected by a multitude of factors, and not simply forage: winter range, disease transmitted by livestock.

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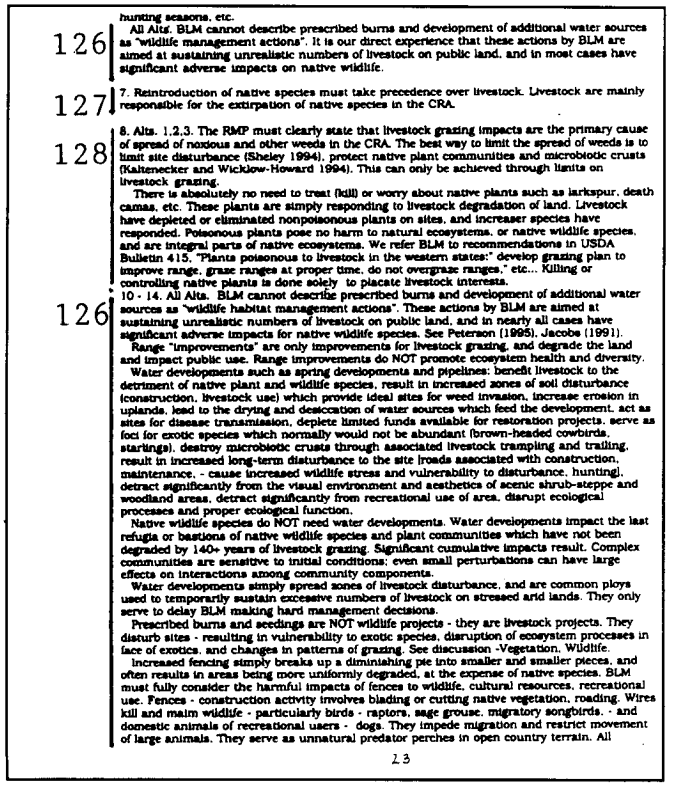

hunting seasons, etc.

126 All Alts. BLM cannot describe prescribed burns and development of additional water sources as "wildlife management actions". It is our direct experience that these actions by BLM are aimed at sustaining unrealistic numbers of livestock on public land, and in most cases have significant adverse impacts on native wildlife.

127 7. Reintroduction of native species must take precedence over livestock. Livestock are mainly responsible for the extirpation of native species in the CRA.

128 8. Alts. 1,2,3. The RMP must clearly state that livestock grazing impacts are the primary cause of spread of noxious and other weeds in the CRA. The best way to limit the spread of weeds is to limit site disturbance (Sheley 1994), protect native plant communities and microbiotic crusts (Kaltenecker and Wicklow-Howard 1994). This can only be achieved through limits on livestock grazing.

There is absolutely no need to treat (kill) or worry about native plants such as larkspur, death camas, etc. These plants are simply responding to livestock degradation of land. Livestock have depleted or eliminated nonpoisonous plants on sites, and increaser species have responded. Poisonous plants pose no harm to natural ecosystems, or native wildlife species, and are integral parts of native ecosystems. We refer BLM to recommendations in USDA Bulletin 415, "Plants poisonous to livestock in the western states:" develop grazing plan to improve range, graze ranges at proper time, do not overgraze ranges," etc... Killing or controlling native plants is done solely to placate livestock interests.

126 10 - 14. All Alts. BLM cannot describe prescribed burns and development of additional water sources as "wildlife habitat management actions". These actions by BLM are aimed at sustaining unrealistic numbers of livestock on public land, and in nearly all cases have significant adverse impacts for native wildlife species. See Peterson (1995), Jacobs (1991).

Range "improvements" are only improvements for livestock grazing, and degrade the land and impact public use. Range improvements do NOT promote ecosystem health and diversity.

Water developments such as spring developments and pipelines: benefit livestock to the detriment of native plant and wildlife species, result in increased zones of soil disturbance (construction, livestock use) which provide ideal sites for weed invasion, increase erosion in uplands, lead to the drying and desiccation of water sources which feed the development, act as sites for disease transmission, deplete limited funds available for restoration projects, serve as foci for exotic species which normally would not be abundant (brown-headed cowbirds, starlings), destroy microbiotic crusts through associated livestock trampling and trailing, result in increased long-term disturbance to the site (roads associated with construction, maintenance, - cause increased wildlife stress and vulnerability to disturbance, hunting), detract significantly from the visual environment and aesthetics of scenic shrub-steppe and woodland areas, detract significantly from recreational use of area, disrupt ecological processes and proper ecological function.

Native wildlife species do NOT need water developments. Water developments impact the last refugia or bastions of native wildlife species and plant communities which have not been degraded by 140+ years of livestock grazing. Significant cumulative impacts result. Complex communities are sensitive to initial conditions; even small perturbations can have large effects on interactions among community components.

Water developments simply spread zones of livestock disturbance, and are common ploys used to temporarily sustain excessive numbers of livestock on stressed arid lands. They only serve to delay BLM making hard management decisions.

Prescribed burns and seedings are NOT wildlife projects - they are livestock projects. They disturb sites - resulting in vulnerability to exotic species, disruption of ecosystem processes in face of exotics, and changes in patterns of grazing. See discussion -Vegetation, Wildlife.

Increased fencing simply breaks up a diminishing pie into smaller and smaller pieces, and often results in areas being more uniformly degraded, at the expense of native species. BLM must fully consider the harmful impacts of fences to wildlife, cultural resources, recreational use. Fences - construction activity involves blading or cutting native vegetation, roading. Wires kill and maim wildlife - particularly birds - raptors, sage grouse, migratory songbirds, - and domestic animals of recreational users - dogs. They impede migration and restrict movement of large animals. They serve as unnatural predator perches in open country terrain. All

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throughout Idaho were considered in development of the Draft RMP and preparation of the Proposed RMP. Information on economies outside of Custer and Lemhi counties were not included in the economic analysis because purchases outside of the region do not contribute to the local economy. In fact, people residing in Custer or Lemhi counties who purchase goods and services outside the two-county region are not contributing to the local economy. If the BLM were to enlarge the region of influence to include Twin Falls or Boise, then the contributions to the economy of the Challis RA would not be measurable because of the size of the greater Idaho region. Please also see response 34-12.

31-67: (a) The DRMP (pp. 70-72) summarizes a recent sociological study of Custer and Lemhi counties. The sociological study did not interview every resident in the two counties; therefore, the results do not show all possible viewpoints which may occur.

(b) RMP decisions address private and public water rights; these decisions were revised in the PRMP to be consistent with current water rights law and policy (see PRMP, Minimum Streamflow, Goal 1, #1-3). Valid existing water rights are recognized; however, stipulations on rights-of-way for water diversions are described in order to protect public lands resources such as fisheries habitat. In addition, the Challis RA describes its intention to pursue minimum streamflows (i.e., to pursue water rights in the BLM's name).

Livestock grazing on public lands in the RA is clearly described as a privilege (allocation), not a right. RMP actions state that adjustments in livestock use can occur (e.g., see Livestock Grazing, Goal 1, #2 and 6; and Riparian Areas, Goal 1, #7).

31-68: (a) An accurate analysis of the economy for the two-county area considers interconnected aspects of the economy; it is not accurate to analyze employment associated with grazing on public lands separately. For example, employment in the agriculture sector includes all of the following: jobs associated with livestock operations which do not utilize public lands, livestock operations which do use public lands; and businesses which supply goods and services to livestock operations which do and do not use public lands (such as veterinarians, feed stores, farm equipment supplies/repairs, etc.).

(b) The BLM does not decide who should and should not receive grazing permits based on outside income. Rather, a grazing permit is based on land base (land that a ranching operation has owned and maintained over a considerable period of time). The term "hobby" rancher usually means a small ranch operation with fewer than 20

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126 impacts of additional and current fences must be fully analyzed.
We do not support the "pasture-ization" of land in the CRA through the construction of new fences.
The RMP must analyze and set a timetable for removal of unnecessary fences. Instead of segmenting land into smaller pieces, remove fences in areas where livestock grazing is not feasible.

129 13, 14. All Alts. Sagebrush IS a dominant plant species in the western U.S. See Vale (1975), Peterson (1995), and its occurrence as a dominant plant species is a natural part of shrub-steppe CRA ecosystems.
The BLM wrongly assumes that prescribed fire will result in improved forage, ecosystem health and function. We refer BLM to Peterson (1995), our discussions elsewhere.

130 15, 16. All Alts. The RMP constantly fusses over increased permittee work or costs. Water quality, fisheries are extremely important issues to the public, and permittee costs/hardship cannot be used as an obstacle to necessary change. Alt. 2,3,4. Water quality and beneficial uses of streams are of paramount importance here, not forage production. RMP does not evaluate costs if status quo continues. What about T&E fish - why aren't impacts to them discussed here?
Alt. 4. What is the minimum habitat condition standard? 100% of unsatisfactory aquatic and riparian habitats must be improved to satisfactory.
Alt. 5. Pastures should be closed in areas where grazing is unfeasible or incompatible with attainment of management objectives for streams/springs/seeps. BLM certainly has a good idea which streams/springs/seeps these are, and should specify these areas in the RMP.

131 17. All Alts. The CRA is riddled with pipelines, pocked with dug out wetlands destroyed by conversion to muddy cow water ponds, laced with pipelines which have spread zones of destruction to upland areas, and filled with archaeological sites destroyed by "spring developments". Instead of taking the backward looking, destructive approach that additional water developments will occur, the RMP must fully examine removal of spring developments pipelines, etc. An analysis of ecological impacts - including wetland desiccation, must be a part of the RMP. RMP must not allow new water developments.
Alt. 2,3,4. All waterholes developed from springs or seeps should be removed and spring/seep areas restored to natural condition and removed from livestock grazing.
Alt. 5. NO alternative sources of water should be developed in upland areas using the excuse of enabling livestock to avoid stream areas. This simply spreads zones of destruction, degrades watersheds, impacts native vegetation, wildlife. (See previous discussion). This is in direct contradiction to the contention of BLM elsewhere that Alt. 5 will move land to a more pristine condition.

132 18. All Alts. All aspects of livestock grazing in the CRA must meet or exceed all state or federal water quality standards. For those allotments which include watercourses, the BLM, pursuant to Section 401 of the CWA must receive written certification from the State of Idaho Department of Environmental Quality which shall be provided by proposed permittees. This certification shall show compliance with State of Idaho standards for all beneficial uses under the CWA. For grazing allotments where streams already listed as water quality limited exist or where tributaries of such streams exist, there is an even greater necessity to show that the authorization of livestock grazing will not further impair beneficial uses under Idaho law and the CWA.

133 19. Alt. 2,4,5. Minimum streamflows should be pursued, and requests for rights-of-way denied for water diversion. This is necessary to protect water for native aquatic and terrestrial species.

134 20. The proposed livestock closures in all Alts. are not sufficient to assure land health and properly functioning ecosystems. Closures based on a suitability and capability study must be specified in RMP.

135a 21. 2,4,5. We are pleased to see the BLM paying attention to the physiological requirements of

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135a bluebunch wheatgrass in seeking management direction. However, the physiological requirements of other native bunchgrasses, shrubs and forbs must be given the same measure of consideration as those of bluebunch wheatgrass. This is particularly necessary in sites

135b where bluebunch wheatgrass is not the dominant grass species. On how many acres in the CRA is bluebunch wheatgrass the dominant grass species? BLM must tell us how much land this will affect. This is critical information for understanding effects.

135c Livestock use should not be shifted to other areas in order to meet bluebunch goals. Shifting use to already exploited sites will result in negative impacts to grass, forbs ,shrubs = although protecting bluebunch wheatgrass is laudable, other species/resources should not be sacrificed to achieve this aim by shifting use. BLM does not go far enough to protect bluebunch wheatgrass. "One time (emphasis added) growing season utilization of 50% + (as commonly occurs under a number of grazing systems) has been shown to cause very long term (upwards of a decade) significant reductions in rigor and productivity, even if followed by complete protection." (Anderson 1991).

136a 22. Alt. 2 seems to be saying that some existing exclosures will be converted to riparian pastures. We strongly oppose this - all existing exclosures should remain closed to livestock grazing, due to their importance as reference areas and informational areas to increase public cognizance of the impacts of livestock grazing.

136b Alt. 4. Removal of livestock from high-priority non-functional and functional-at-risk streams for 3 years may not achieve necessary change in stream condition - specific standards must be met before any grazing resumes.

136c Alt. 5. livestock grazing closures necessary to achieve riparian improvement/protection should involve a minimum of new fencing. Herding, total closure of already fenced pastures, should be used as alternatives to fencing.

137a 23, 24. All Alts. We oppose disposal of public land (See Lands). We specifically oppose disposal of lands to the current permittee. This encourages trespass,abuse, and fosters the idea that public land is actually theirs all along. Again here, the RMP frets excessively over permittee hardship. BLM has a mandate to foster and protect environmental resources on public lands, not custom and culture.

137b Alt. 5.Mentions land tenure adjustments to benefit permittees. What does this mean?

138 25,26. We support designation of all stream segments inventoried as Wild and Scenic Rivers. All WSR corridors should be closed to livestock grazing.
BLM must manage WSRs and candidate WSRs for non-impairment of values. We believe grazing use above "slight" violates the VRM designation of these areas. Realistically, there is no way that livestock grazing can occur in steep, rugged WSR corridors without concentrations of livestock use occurring which will have noticeable and undesirable visual impacts: concentrations of use in excess of slight, resultant unnatural patchy appearance to landscape, and accumulations of livestock waste. Ugly physical impacts of livestock grazing are discussed throughout.
The above comments apply to ACECs, other SMAs.

139 27. All Alts. WSAs released or retained - We oppose the construction of any range improvements, including fences, in these lands. Apply above comments in 25,26.

140a 28. All Alts. Reductions in grazing preference will be necessary to protect recreational uses from negative impacts of livestock grazing - accumulations of livestock wastes, polluted water, etc.

140b 29. Recreational use in SRMAs should take precedence over livestock use; however, recreation use should not take precedence over habitat needs of native plant and animal species. Full impacts of livestock on recreational use - aesthetic, public health, loss of wildlife must be evaluated.

141 Access for Livestock Management. Livestock permittees should not be granted exemptions for OHV use except under the most extenuating of circumstances. Livestock permittees own horses

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head of cattle where more than 50-75% of the wages earned are from part- or full-time work in or around nearby communities. Millionaires and billionaires do not invoke a mental picture of a "hobby" rancher in most people's minds. However, some people raise livestock as a secondary activity and do not necessarily need the additional income to sustain their standard of living; they may operate the ranch solely for income tax purposes. If, hypothetically - as IWP states, these ranch operations employ workers in low wage jobs and export profits from the community, these impacts are not resource utilization issues to be resolved in the RMP but rather issues of public tax and labor policies.

31-69: The trends you mention from the Affected Environment (growth in the service sector; increases in non-farm income) do not correspond to a change in ranchers' dependence on grazing on public lands. They are not at all related - a rancher may be as dependent on grazing on public lands today as he or she was 20 years ago.

31-70: (a) In 1991 timber-related employment in the 2-county area was 314 FTE (DRMP, p. 504). The Salmon Intermountain sawmill employed an estimated 50 workers, or about 16% of this total (DRMP, p. 207; Idaho Employment, August 1995, p. 7). When the mill closed in 1995, it is unlikely all those jobs left the timber sector. Even if they did, remaining timber-related employment would not be "zero" as IWP states. The Affected Environment explains that Salmon Intermountain Lumber depended on timber resources from the Challis Resource Area for only a small fraction of the mill's annual demand (DRMP, p. 88). Instead, timber sales offered by the Challis Resource Area are likely to be purchased by small local sawmills or non-local mills in southwestern Montana or Boise, Idaho. (DRMP, p. 88) Timber resources from the Challis Resource Area were, and are, in demand by sawmills other than Salmon Intermountain Lumber. Forest resource management which includes timber harvest would be beneficial to the local economy (DRMP, p. 207), not unimportant - as IWP states.

(b) The BLM considered a "no-logging alternative" during the process of RMP revision. Please see response 31-27.

(c) The costs and benefits of forest resource management which includes continued timber harvest were analyzed in the Draft RMP/EIS, Chapter 4. Please also see response 31-28, regarding the topic of cost-benefit analyses in general.

31-71: (a) The Draft RMP included a cost-benefit analysis of all RMP actions, including livestock grazing (see DRMP, Chapter 4 and response 31-28). (b) Please see response

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141 (part of custom and culture) and must be required to use them in places with road closures. This is particularly necessary for such things as salt distribution, since many eroding roads on public lands exist for the sole purpose of salt distribution, fence, pipeline maintenance.

142 34. We support Alt. 5. An analysis of biodiversity and site-specific field inventory must be conducted as part of project or activity planning. NEPA requires site-specific data. BLM should have been doing this all along.

143 35. All ADC activity must be prohibited on public land. Predation is simply a cost of doing business on public land. Killing predators disrupts ecosystem processes, can often result in destabilizing predator social structures causing even greater predation problems. RMP must discuss this.
It is absurd to call this section "wildlife habitat management". It is predator killing - whose eyes is BLM pulling the wool over here?

144 36,37. A Suitability/Capability Analysis, as described below, must be part of the RMP. BLM in the past has conducted a suitability study (RMP p. 104), this data should be presented and updated.

Comments: TABLE 2-1. Issue: Range management:

145 GOAL 1 only includes: bringing 75% of riparian/wetland areas into proper functioning condition in 5 years - What about remaining 25%?; increasing rangelands in late seral to PNC from 37 to 40 %. Why so little? BLM must attempt to increase ALL lands in earlier seral stages to later seral stages. Estimates of time and management necessary to achieve this must be included in RMP.

146 1. All Alts. BLM must allocate forage/other resources to wildlife other than big game. For example, nesting requirements of sage grouse - minimum stubble heights for nesting - See Draft Idaho Sage Grouse Management Plan Summary 1996-2000, recommends fall stubble height of
7". Also, DeLong et.al. 1992.

147 2. All Alts.What is meant by "supervised trailing"? Does this include holistic grazing?

148 5. All Alts. BLM must institute additional monitoring in locations which realistically reflect areas where livestock are having negative impacts. The public should be involved in location of monitoring sites. No more 3 monitoring sites in an allotment - all located on top of hills, away from use areas. Analyze degree and intensity of monitoring necessary to assess site-specific land condition.
Grazing permits must specify that permittees shall be held responsible for providing monitoring compliance affidavits signed by themselves or a qualified scientist at the end of each season of use. The BLM will spot-check to verify compliance affidavits. Misrepresentation on compliance affidavits or fraudulent compliance affidavits will result in grazing permit cancellation.

149a 6. All Alts. We recommend upland utilization : 25%.

149b The RMP preferred alternative proposes upland utilization of 50% on ALL sites where bluebunch wheatgrass is not an identified key species. This is simply status quo grazing. Utilization of 50% of upland vegetation in CRA has resulted in degraded watersheds, depleted native plant communities and unhealthy ecosystems.

149c The preferred alternative still allows 50 and even 60 % utilization on bluebunch in all early, late and dormant season grazing.

149d The proposed dormant season grazing utilization on ALL upland sites is 60%, vs. current 50% utilization. This is a major step BACKWARDS. It fails to provide residual cover necessary for: wildlife habitat - sage grouse, other species nesting requirements; watershed protection in steep, erodible or poor and fair condition areas (much of CRA); and exceeds the amount

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149e necessary for maintaining vigor of many species (Mack and Thompson 1982).
25% would be a reasonable attempt at a restoration level. This also gives leeway for those species whose physiological responses to grazing are not as well documented as bluebunch wheatgrass. Holechech (1988) and Pieper (1992) indicate sagebrush-grassland range types should be grazed at 30-40% for key species. Valentine (1990) supports lower utilization levels. Holechech (1993) states: "A 50 per cent use level works well in the flat, humid regions of the Great Plains and Southeast...in most cases it causes range destruction in the rugged, arid ranges of the West."

149f BLM does not mention any utilization standards on woody species. Are any contemplated?

150 7. 11. BLM must specify what is meant by "livestock management systems designed to improve riparian habitat." Does this mean holistic grazing?

151a 8. Riparian pastures require new fencing and are very costly. Electric fences are fraught with problems - if knocked over, or malfunction, livestock will gain access to fenced area. Most riparian areas in non-functioning or functioning -at-risk condition can only recover if livestock grazing is eliminated. Repeatedly, we have seen riparian pastures abused - and it just takes one season of excessive grazing to set any recovery back substantially, or to cause irreparable erosion.

151b 9. All Alts. Just as BLM frets about elk calving, it must include altering livestock turnout/use to accommodate nesting sage grouse, migratory songbirds in the RMP.

152 10. All Alts. Society of Conservation Biologists: grazing should be phased out of lands in Good, or worse, condition. Alts.2,3,4,5. BLM must manage for late seral or PNC communities in very good or better condition.

153 11. Livestock management facilities, including salting, should be located in already degraded or disturbed sites. We have too often encountered native communities in the best condition quickly degraded by establishment of salt licks.

154 13. Herd Creek AMP - IWP and CIHD support closing the Herd Creek Allotment to livestock grazing.

155 14. We fully support Alts. 4 and 5. "Grazing privileges that are lost, retired, relinquished, canceled, or have base property sold for subdivision would have attached AUMs held for watershed protection and wildlife habitat. Vacant allotments would remain unallocated to livestock grazing improve range condition and to help protect watershed condition and wildlife habitat."

156 15.Alts. 2,3,4. What is meant by vegetative cover? Cheatgrass and noxious weeds can make up 70% vegetative cover of watershed. Management MUST be to achieve late seral or PNC on site.
The RMP ignores the "cover" and soil protection provided by microbiotic crusts. How will the BLM manage for intact microbiotic crusts?

157 17. All Alts. Improvements to the grazing permitting process must be implemented:
a) Include 5, 14 above.
b) Grazing permits that require public access easements across private land. If permittees refused to grant access to public land, then all permits shall be canceled.
c) Before issuing any grazing permits on public land, the BLM shall conduct a capability analysis (which identifies lands that can be physically grazed by domestic livestock) followed by a suitability analysis (which determines whether the capable lands have other conflicts with other multiple uses which would result in a choice not to graze those lands by domestic livestock); before any livestock use is authorized. For example, an upper pasture of an allotment is essentially unmanageable for grazing. The land is too rough and difficult to clean livestock out, livestock invariably congregate in flatter riparian areas. On the ground experience indicates that this is fact. The BLM should eliminate livestock grazing from that

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31-26.

31-72: The Pahsimeroi subregion is a census tract; population numbers for the subregion are based on information gathered during the 1990 census (DRMP, p. 65, Table 3-3, footnote 1). These are official numbers, and no other population figures are available. The economic analysis of impacts to the Pahsimeroi subregion under Alternatives 4 and 5 is correct as presented in the DRMP. Your opinion regarding the economic vs. resource impacts of Alternatives 4 and 5 has been noted.

31-73: (a) All actions in the RMP were considered when developing the quantitative and qualitative analysis of regional and Fort Hall economic impacts. The level and significance of direct, indirect, and cumulative impacts are described. (See Draft RMP/EIS, pp. 204-212.)

(b-1) The Alternative 5 analysis begins: "Same effects as Alternative 4,..."; i.e., the quantitative impacts to the regional economy would also be negligible for Alternative 5.

(b-2) The tourism sector would likely benefit less under Alternative 5 because this alternative placed less emphasis on developed recreation than Alternative 4, and the primary recreation demands in the Challis Resource Area are for developed recreation opportunities.

(b-3) Permittee costs are discussed under the qualitative summary because it is not possible to quantify those costs, since they would vary by operator and circumstances in a given year (such as precipitation). Yes, permittees are currently riding, salting, and fencing. The analysis estimates an increase in those efforts, when compared with present management.

(c) The BLM believes that harvest can be sustained in the Challis Resource Area, based on the fact that most trees removed by natural causes or human intervention are being replaced by natural regeneration. Commercial forest sites are relatively low productivity and have management problems, but are manageable. Please also see responses 26-6 and 31-27.

(d) Alternative 5 emphasizes dispersed, undeveloped recreation opportunities. The BLM estimates that under Alternative 5 the demand for developed recreation opportunities is likely to increase at a faster rate than the available supply. In addition, Alternative 5 greatly reduces off-highway vehicle use recreational opportunities.

(e) Your opinion is noted. However, the BLM disagrees. In addition to species harvest regulations, many factors outside the BLM's control and management responsibility

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157 pasture because the area is not capable of being managed properly for grazing!
d) Idaho State water quality standards shall be met as a condition of issuing any grazing permit. Applicants for permits shall provide the BLM with state certification of compliance before the issuance of any grazing permit to graze livestock on public lands. A recent court decision Oregon associated livestock grazing with being a "discharge" point associated with water quality as affected by the CWA. Therefore, State certification will be required before a grazing permit can be completed.
e) All livestock permittees shall be accountable for meeting all standards, guidelines, and other requirements of their permit. Failure to meet annual standards of use shall result in significant reduction of permitted use the following year. A second failure within three years to meet annual standards of use shall result in permit cancellation.
f) The BLM fails to discuss the logistical aspects of ranching on the public lands and how they impact the public lands. The use of reservoirs, pipelines, water tanks, access roads, trailing of livestock, etc. are all important issues that can impact visual resources, soils, water quality, and more. The BLM should address these issues during the permitting process and specify them in the CRMP.
g) No temporary non-renewable forage permits will be granted.

158 18. No TNR!

159 20. All Alts. Livestock must be excluded from areas of known human burial concentration, and all sites with significant archaeological values which could be jeopardized by grazing impacts.

160 Goal 2: This goal should be reworded to state: Limit livestock distribution. The CRA streams, seeps, riparian areas, and many entire watersheds are degraded simply because too many livestock are too "well distributed". The small amount of land in excellent condition (< 10, 526 acres, or PNC (what is this #???? certainly indicates livestock distribution has extended into nearly every nook and cranny of the CRA.

161 2.4. All Alts. Prescribed burns, seedings, as discussed in Vegetation Management, rarely restore native communities or mimic natural processes. Nor do they improve range condition and health- so they should not be included in this goal. They are incompatible with land condition moving toward PNC or later seral stages.

162 3.All Alts. Watershed Level analyses should be done before any new project is undertaken.

163 4.The goal of any vegetation treatment should be to lead the community towards PNC, not to remove it further from it.

164 5.The I, M,C allotment categorization is an outmoded way to classify lands. Given that less than 10,000 acres of land in the CRA are in Excellent condition, ALL allotments should be improved.

165 8. Disturbed areas should be seeded with native woody shrubs, grasses and forbs. See Veg. Treatment.

166 Additional comments on livestock grazing:
A. Due to the historic proclivity of BLM to improve the livestock industry, at the expense of sustainable public lands, future identified conflicts between livestock use and other uses (recreation, wildlife) should be made in favor of the latter.

167 B. Savory or holistic grazing is damaging to shrub-steppe ecosystems in the arid West. Holistic grazing has recently been used in the interior Columbia Basin to 1) buy time and delay management change on degraded lands by continuing to graze unsustainable numbers of livestock, and 2) as an attempt to increase or maintain unreasonable stocking rates on degraded lands. Native plant community structure pre-settlement consisted of spaced bunchgrasses, forbs and shrubs with microbiotic crust covering interspaces between plants.

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167 Mack and Thompson (1982) luckily describe the characteristics of native bunchgrass species in shrub-steppe communities which make them susceptible to grazing and trampling. These bunchgrass characteristics include:
- Growth in discrete clumps, do not send out runners or tillers,and do not readily regrow after grazing.
- Growing points are elevated above soil surface = are damaged by trampling and grazing; grazer removes elevated seed-producing parts.
- Erect bunchgrass stems trap snow and insulate plants with a snow blanket preventing winter damage. Grazing removes blanket.
- Growth form channels water, traps snow.
Limited numbers of bison occurred west of the Rockies. The plant communities of the CRA have not evolved with intense grazing - as lack of rhizomatous grasses, absence of dung beetles indicate.
The fragility and vulnerability of microbiotic crusts to trampling (Kaltenecker and Wicklow-Howard 1994, Belnap 1995) also illustrates the ecosystem unsuitability to holistic or other styles of intensive herding grazing. Once damaged, crusts may take long periods of time to recover (>50 years).
Many studies on trampling unequivocally negate assumptions made by holistic grazers. See Gifford (1966), Johansen (1966), Warren et.al. (1966), Skovlin (1967), Pieper and Heitschmidt (1988), Weltz et.al. (1989).
The steep and rugged topography of the CRA, the limited distribution of water, and current degraded condition of lands make the CRA particularly unsuited to holistic grazing. The RMP must clearly state if use of holistic or other intensive herding methods are contemplated, and if so, discuss all potential impacts of this method on native communities.

168 C. It should be BLM policy to remove all existing water, fence, or similar livestock systems as they become worn out or non-functional for whatever reason - to be paid for with 8100 funds.

169 D. A complete cost:benefit analysis of all proposals - range improvements, water developments, fences, trailing, herding, monitoring costs, other administrative costs must be included.

170 E. Management Decisions pertaining to livestock grazing impacts in Table 2:, including, but not limited to, Issues of Range Management, Wildlife Habitat Management, Vegetation Treatment Projects, Upland Watershed, Water Related Resource Management, Water Quality, Fisheries do not contain adequate standards for livestock grazing management in the CRA.

F.Additional criteria which must be established/evaluated include (at allotment and/or watershed level):
171 - Specific reductions of livestock in all alternatives.
172 - Adjust stocking rates to allow a maximum of 25-30% utilization of key perennial species. Adjust stocking rates further to protect full spectrum of environmental, ecological, cultural
173 and recreational values of the CRA.
- Allow a maximum of 10% utilization of woody riparian vegetation within each allotment.
174 - In the absence of an improved or implemented grazing system designed to provide for satisfactory and functional riparian/wetland areas, immediately eliminate livestock grazing
175 by July 15, or earlier if necessary in all pastures with riparian/wetland areas to meet resource objectives, regardless of the size of riparian /wetland areas and regardless of monitoring status of pasture.
176 - A minimum stubble height of 6 inches will be present on all riparian areas at the end of the growing season.
177 - Eliminate grazing within riparian/wetland areas after the growing season.
178 - Reintroduce livestock grazing to areas from which it has been removed only after a specific time period and specific criteria have been met.
179 - Upon reintroduction of livestock to areas from which grazing has been completely removed for a period of time (as in Alt. 4), adjust stocking rates to sustain and restore proper condition.
- Review stocking rates and grazing systems at least every 5 years.
180 - Removing livestock grazing or reducing stocking rates will be the first choice in achieving

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can affect populations; for example: climate, disease, predation, and downstream migration barriers.

31-74: BLM believes the decisions in the PRMP (especially see those decisions under Livestock Grazing, Riparian Areas, Fisheries) will restore and protect riparian and aquatic habitats. The BLM has received concurrence on the Biological Assessment of impacts due to PRMP actions from both the National Marine Fisheries Service and U.S. Fish and Wildlife Service. The DRMP decision you are concerned about has been changed in the PRMP to delete the 7 year timeframe, because identification of crucial habitats was completed in 1994 (see response 34-83).

31-75: The Affected Environment in the PRMP has been updated to reflect the changes in current conditions observed since the DRMP was originally drafted, including changes in riparian functioning condition. Some information presented in the DRMP and carried forward into the PRMP is "old" information. Appendix L has been included in the PRMP to indicate the types of ongoing monitoring being used to build on this information and help the BLM analyze the effectiveness of past and present management actions. In addition, numerous decisions in the PRMP identify the need for new or updated inventories for a variety of resources where data are lacking (see response 15-7(b)).

31-76: (a) Your comments are noted.

(b) The PRMP would apply bank shearing criteria to all fish-bearing streams (see Riparian Areas, Goal 1, #6). The six-inch stubble height standard would apply only to functional-at-risk, with downward trend, and non-functional condition streams (see Riparian Areas, Goal 1, #5b). However, the four-inch herbaceous stubble height criterion in #5a is believed to be sufficient to improve and/or maintain proper functioning condition. If riparian improvement to meet objectives (including fisheries habitat objectives) is not occurring, other livestock management measures would be implemented (Riparian Areas, Goal 1, #7).

(c) Woody vegetation use requirements would be developed as needed (see PRMP, Attachment 3). In most cases, specific standards would be developed by an interdisciplinary team in specific activity plans.

(d) Upland species are managed for proper degrees of utilization through the use of key species, described in BLM handbook TR-4400-3 (Rangeland Monitoring Utilization Studies, 1984), and defined as (1) those species which must, because of their importance, be considered in a management program; or (2) forage species whose use serves as an indicator to the degree of use of associated species. The BLM believes that the

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goals, objectives, improving ecological site condition. Rotational stocking rates, herding schemes, will be considered only after stocking rate reductions are first implemented.

181 - Grazing use will be adjusted before the next growing season where it is visually obvious or where monitoring data or professional judgment reveal that key resources or watershed
182 functional requirements are not being met because of livestock overuse.
- Continuous season-long grazing will not be authorized.
183 - Terms and conditions of each permit or lease will include stocking rate, season of use, deferment, rest, and completely specify strategies that maintain (good/excellent) and improve
184 (poor/satisfactory) vegetation communities and ecosystem function.
- BLM will retain sole ownership of all future permanent range improvements. Where deemed
185 necessary, BLM will acquire sole title and ownership of existing range improvements.
- No wells will be drilled.
186 - Complete AMPs/watershed analyses within a specific timeframe - 3-5 years.

187 Herding may at times be somewhat effective in adjusting livestock use, but fundamental changes necessary to reverse downward trend, improve stream condition, can only come about through substantial cuts in livestock numbers and strict conditions on use of public land by livestock industry.

MINERALS

Comments on minerals are included in other sections.

PALEONTOLOGICAL RESOURCES

188 Our comments under Cultural Resources also apply to Paleontological resources.

RECREATION

189a A. The RMP fails to analyze the impacts of livestock grazing on the health of recreational users of public land. People are exposed to livestock waste and livestock-associated pathogens in air, soil, dust during recreational outings. Our members have often inhaled dense clouds of dust while passing through areas being beat out by livestock, camped in sites where livestock waste was ubiquitous, swatted flies associated with and spread by livestock waste, and tried to recreate in polluted water. What are the health risks/costs of livestock contamination of the environment?

189b B. The EA fails to address the physical impacts on recreational use caused by livestock grazing. Barbed wire fences cut and maim people, and pets; they kill wildlife. Barbed wire washed into streams poses serious danger to water recreationists. Steep cut banks resulting from grazing hamper safe walking near streams.

C. The RMP completely fails to analyze the aesthetic impacts of livestock grazing on recreational users of public land. These include large-scale visual impacts/intrusions which detract from a sense of wildness and naturalness - such as networks of bare, eroding livestock trails, metal cow water tanks in otherwise pristine areas, salt lick roads, etc., as well as smaller-scale impacts - wet meadows and seeps degraded by livestock surrounded by a sea of cow pies covering them.

190 How has the BLM measured/monitored impacts of livestock recreational users? How will BLM monitor impacts in the future?

189b D. Exotic species such as cheatgrass spread by livestock abuse of land are visually ugly, as well as damaging to pets (awns get in ears, feet) - not to mention the annoyance caused by cheatgrass

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awns to hikers.

191 E. The RMP must fully analyze the impacts of range improvement projects on roading of public land. Construction of range improvements may result in heavy equipment/vehicles traveling across sites and forming new trails which then become routinely driven. Maintenance activity (water systems, salt licks) results in ranchers routinely driving existing roads or ways, and pioneering new ones.
RMP 4, Alt. 1 - Succinctly sums up the impacts of ALL range developments/vegetation treatments. " Land treatments ... degrade natural aesthetics, viewsheds, and primitive recreation and sightseeing opportunities by creating obvious visual intrusions."

192 F. RMP must fully analyze and develop a timetable for removal of all range improvements fences/water systems from areas where livestock grazing is eliminated.

193 G. Motorized travel should be limited to designated roads only, with all designated roads marked as such.

194 H. How will BLM resolve conflicts between livestock and recreation under the preferred alternative? Specify.

195 I. Water quality. BLM must ensure that all waters of the CRA fully support all beneficial uses of the State of Idaho.

196 J. BLM must implement and enforce livestock grazing restrictions in all areas where OHV restrictions are instituted. This is only fair, since sites deemed necessary for protection from OHVs due to their fragile soils, high wildlife values, are also subject to ongoing degradation from livestock. Why should one group be restricted, and the other not?

197 K. Table 3-13 p.112 indicates 118,000 recreational visits to the CRA in 1993. There are 95 livestock operators in the CRA. BLM must stop compromising recreational values for the
198 benefit of 95 people, some of whom are billionaires.
RMP Effects: Vegetation Treatment, Biological Diversity, Air Quality will affect Recreation. Cumulative impacts will be significant.

199 1. Alts. 2,3,4,5. Protection of natural and aesthetic values would benefit all recreation opportunities, not just primitive ones.
200 All Alts. RMP makes predictions about increases in visitor use - less of increase if primitive values are enhanced. What is the basis for this? Provide data to back it up.

201 4. All Alts. It is very difficult to make human-induced disturbance of any kind, including vegetation treatment, look natural.

202 8. We support limiting OHV use in the entire CRA to existing roads and vehicle ways - March 1-Nov. 30.

203 12. All Alts. Why no discussion of beneficial uses here. What "actions" is BLM referring to?

204 16. BLM must maintain or enhance OR values on 58 river segments. Water-associated recreation opportunities in wild settings are extremely important to the recreational public of Idaho. Once these values are degraded, they may be lost forever, resulting in irreparable losses to recreational users, wildlife.

205 18. All Alts. All OHV use must be prohibited in WSAs, including any WSAs released from review. See comments - WSA section.

206 19. Disturbance and treatments cannot mimic natural events: harvested areas do not have an aesthetic appearance - Is BLM planning to remove all stumps and erase evidence of logging?

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degree of utilization prescribed for bluebunch wheatgrass and other upland key species is sufficient to protect watersheds. The PRMP also manages upland watersheds through cover standards (Livestock Grazing, Goal 1, #14) and other upland management actions (Upland Watershed, Goal 1).

(e) Your opinion is noted. The BLM believes that resource conditions on degraded streams will improve with implementation of the six-inch residual stubble height grazing standard and bank stability standard prescribed in the PRMP (see response 31-76b above).

31-77: The RMP provides a general vegetative monitoring framework in the following decisions: Livestock Grazing, Goal 1, #2 and #6. However, an RMP is not the place to describe the details of how, when or where resource monitoring will be performed. These details are provided at the activity plan level where specific, measurable objectives are identified, which in turn guide the direction of monitoring.

31-78: BLM believes that the following PRMP decisions will be adequate to protect water quality in grazed watersheds: Livestock Grazing, Goal 1, #7 and 14; Riparian Areas, Goal 1, #4-7; and Water Quality, Goal 1, #2, 3, and 7.

31-79: As stated in the PRMP, Fisheries, Goal 1, #4, management strategies and objectives would be developed for all fish-bearing streams, to ensure good quality aquatic and riparian habitats. In addition, grazing practices would be designed to be consistent with attainment of desired riparian and aquatic habitat conditions in all fish-bearing streams (PRMP, Livestock Grazing, Goal 1, #11). The PRMP's grazing and cover criteria on upland sites (Livestock Grazing, Goal 1, #4 and 14) and riparian areas (Riparian Areas, Goal 1, #4-7) are expected to benefit watershed and riparian function (and therefore fisheries habitat) throughout the Resource Area, not just on certain streams.

31-80: (a) The DRMP discusses the effects of livestock grazing management on fisheries habitat for all alternatives, including existing management (see p. 213a, General Discussion of Effects to Fisheries, third paragraph; and pp. 214-217, #2, 3, 5, 6, 9, 11, and 12). The emphasis the PRMP places on management of livestock grazing is a direct result of the BLM's concern about the effects of livestock grazing on fisheries habitat.

(b) The results of monitoring to date indicate that substantial progress has been made by the permittee toward achievement of resource management objectives, particularly with respect to fisheries habitat improvement.

(c) The DRMP, pp. 213a/b provide a general discussion

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206 RMP must recognize the value of intact old-growth communities (forest or shrub-steppe) to recreational users. These communities are essential to everyone from birdwatchers to photographers to persons seeking religious and spiritual experiences on public land.

207 23. RMP mentions development of a hiking, biking, OHV trail. Where is this planned? Biking and OHV trails must be carefully located so that they do not lead to degradation of other resources. The RMP must fully analyze impacts, locations.

208 24. We support Alt. 5. limiting OHV use on the entire RA to existing roads and ways, and closing areas to OHV use.

209 27. We oppose new road construction for campground purposes. Campgrounds can easily be located by existing roads.

210 28. Alt. 5. A scarcity of developed sites on BLM land may be a boon to the local economy and taxpayers. Private landowners can establish and profit from campgrounds, and BLM will have no maintenance/resource damage costs.

SOILS

211 A. Microbiotic crusts are vital to the health of soils and properly functioning ecosystems in the CRA. None of the goals, or discussion of alternatives provide guidance relative to microbiotic crusts. The importance of crusts in reducing erosion has been well-documented. (Eldridge and Green, 1994). (Williams et. al. 1995 a and b). Microbiotic crusts provide provide important protection from erosion. See Vegetation comments also.

212 B. Microbiotic crusts are essential for nitrogen nutrient cycling in arid ecosystems (Fleischner 1994). Crusts fix nitrogen (Kaltenecker and Wicklow-Howard 1994). Proper nutrient cycling is critical to maintaining or improving biomass. The RMP fails to discuss nutrient cycling. Livestock grazing, fire, and logging disrupt nutrient cycling (Belsky 1996). The RMP must discuss impacts of these activities.

213 C. The RMP fails to analyze impacts of livestock trampling on upland and riparian areas, watersheds. These impacts are well documented (Gifford and Hawkins 1978). (Gifford 1986). (Warren et.al. 1986). (Pieper and Heitschmidt 1988). (Weltz et. al. 1989). (Thurow 1992). (Wilcox 1994).

214 D. RMP must focus on upland sites as well as riparian areas. Although riparian resistance to soil erosion is vital, the condition of upland vegetation and soils impacts rate and volume of runoff, particularly in drainages with damaged riparian zones - where riparian areas are not in properly functioning condition, and will not be for a considerable period of time.

215 E. The RMP is sorely lacking in analysis at the watershed level, even though data of the same age as most other info in the RMP is available. What do late 70's watershed analyses say about soils, erosion?

216 F. The RMP fails to quantify erosion rates, estimate soil loss, and attribute cause. This is necessary for the public to understand the magnitude of losses caused by extractive practices and OHVs. How much soil loss, gullying in the CRA is caused by grazing?

217 G. The BLM fails to discuss the issue of desertification. Desertification of western arid lands is a reality, brought about by the abuse and mismanagement of lands. Livestock grazing is a major cause of desertification (Sheridan, CEQ Report 1981). Desertification includes declining groundwater tables, salinization of topsoil and water, reduction of surface waters, unnaturally high soil erosion, desolation of native vegetation (Sheridan, CEQ Report 1981). The existence of any one of these symptoms can indicate that the area is undergoing desertification. We have witnessed reduction of surface waters at spring sites and in streams, high soil erosion - gullies,

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217 cut banks, and vegetation changes specifically caused by livestock. BLM must address desertification. Cumulative impacts must be analyzed.

218 H. The lack of concern for soils - RMP states: "the soils resource will not be a priority issue". The RMP fails to include Soils as a Management Concern in Volume 2. Currently, soils and soil health are prominent parts of regulations and policies relating to BLM resource management. C.F.R. 4180.1: Fundamentals of rangeland health - 9 (a) Watersheds specifically mentions "soil and plant conditions support infiltration,soil moisture storage..." Current Standards and Guidelines drafted by the Idaho Resource Advisory Councils repeatedly discuss soil characteristics. Soils are a priority issue, and the incomplete discussion in the RMP must be redone - causes of soil damage identified, corrective management actions specified.

219 I. How will BLM determine, through life of RMP, if management actions have net positive or negative impact on soil erosion, and therefore modify actions to take advantage of this knowledge?

220 Management decisions which WILL impact soils include: Wildlife Habitat Management, Water Quality, WSR, Visual Quality, Cultural Resource Management.

221 1(a). All Alts. Would improvements expected outweigh losses?

222 1(b). All Alts. The RMP must fully discuss livestock grazing and range improvements as irreversible and irretrievable commitments of soil resources, on both localized and generalized basis. Why is road building any different than livestock gullying? The RMP must quantify losses, and develop specific management actions to limit these.

223 2 - 6. All Alts. Impacts of livestock grazing to soil resource are not adequately addressed. BLM "improvements" in livestock distribution will lead to increased soil losses in wider areas due to soil disturbance in previously less used sites. Trails can rapidly erode and be incipient sites of gully formation. Impacts of "improvements" and range management techniques which further extend the zone of livestock impact, or the amount of trampling activity, must be fully analyzed.

224 8. Alt. 4. Maintenance of a 6" stubble height will not ensure improvement.

225 11. All Alts. The impacts of "pasture-ization"/more fences = more concentrated use of areas must be adequately analyzed. More uniform use of areas as smaller pastures are developed may result in LESS vegetation cover remaining and greater microbiotic crust damage overall, particularly in upland areas, and hence GREATER soil impacts. Impacts are magnified in steep terrain.

226 14. All Alts. Fire causes long-term damage to microbiotic crusts.

227 17. All Alts. The analysis of impacts of vegetation treatment are based on an optimistic assumption that vegetation treatments would be successful. What would happen if there were only 50% success in revegetation/ 10% success? Scenarios exist in which revegetation fails, and serious long-term impacts result (Hagmann 1996). How will BLM determine through length of plan if management actions have positive or negative impact on soil

228 19. All Alts. Many aspects of logging have serious impacts on soils; mitigation measures in RMP are inadequate.

RMP Effects: Wildlife Habitat Management, Water Quality, Land Tenure, WSRs, Visual Quality, Cultural Resources will affect soils. Cumulative impacts will exist.

VEGETATION

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of impacts as a context for understanding the specific analysis on pp. 214a-226a; specific livestock grazing impacts on fisheries habitat are described in the analysis points listed in response 31-80(a) above. Please note that the specific analysis discusses the same factors as the summary (*e.g.*, sedimentation, vegetation condition).

31-81: Your opinion is noted. The BLM believes no reasonably foreseeable impacts to fisheries would occur from wildlife habitat actions. Impacts to fisheries from rangeland vegetation treatment projects are described in the PRMP, Chapter 4 - Fisheries, #20.

31-82: The impacts of trampling on upland sites by livestock, wild horses, big game, recreationists or any other activity were not specifically addressed or analyzed in the Draft RMP impact analysis. Trampling impacts were analyzed as a component of or companion to the application of management actions. Reducing impacts from trampling is implied through applying utilization and plant cover criteria, managing for late seral and PNC, and improved livestock distribution (DRMP, p. 279, #5, 6, 9), limiting livestock trailing and structural facilities (DRMP, p. 283, #29), and limiting OHV use (DRMP, p. 283, #26). Where appropriate, the PRMP impact analysis has been revised to discuss the effects of trampling more directly. Upland Watershed, Goal 1, #2 (as revised in the PRMP) requires the BLM to consider the effects of resource use timing and intensity on soils before new soil disturbing actions (including changes in livestock grazing) are authorized.

31-83: No specific guidelines for Management Concern: Riparian Areas, Goal 1, #10 were considered necessary in the DRMP; however, this project would require an environmental assessment (EA). The BLM expects this would involve a cooperative effort with a grazing permittee or permittees to manage riparian habitats on perennial streams on all or part of an entire watershed. Development of the San Felipe AMP/EA is an example of such an effort and would meet the intent of this decision once the AMP/EA is completed.

31-84: Your opinion is noted. The BLM feels that riparian pastures are a valuable opportunity for demonstrating that livestock use and riparian improvement are compatible. The "cost-benefit" analysis you desire is provided in the DRMP on p. 217, #12, Alternatives 2 (riparian pastures) and 5 (supervised trailing only). Please also see comment 31-28 regarding cost-benefit analyses in general.

31-85: The decision to set priorities doesn't mean the BLM won't pursue minimum streamflows on the other fish-bearing streams - it just says the BLM will apply for minimum streamflows on certain streams first.

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229 A. We are appalled at the lack of up-to-date information about vegetation resources presented to the public in the RMP. A primary purpose of an RMP is to inventory and analyze area resources. Table 3-21, "Vegetation Summary for the Challis Resource Area", illustrates the problem - It is a summary based on old planning documents from 15 to 20 years ago. Total acreage of vegetation contained in Table 3-21 is ~1 million acres. RMP page 1 states that there are 792, 567 acres in the CRA. Has BLM somehow lost 200,000 acres???? The public must be presented with accurate, site-specific, current information.

230 B. Although only a small percent of the CRA is riparian communities (total riparian acres in Table 3-21 is 2,170, the RMP contains far more information and analysis of riparian areas than it does uplands. Indeed, almost NO specific data on uplands is presented to the public.

231 C.Springs and seeps are of vital importance to native wildlife species in the arid CRA, yet the RMP contains virtually no discussion of management of them. According to BLM's definition of riparian area on p. 131, springs and seeps are riparian areas. Will the same management standards applied to streams be applied to all springs and seeps? We urge the BLM to fully protect these areas, which our members have observed are commonly the most degraded sites in the CRA.

232 D.Table 3-23 again exhibits a big-game bias. Structure of all woody vegetation in Table is vital for nesting of many species of migratory songbirds, and far more critical to reproduction and viable populations of these birds than it is of importance to deer or cows. Duff (1979), Taylor (1986) show that woody riparian vegetation is of fundamental importance to abundance of these birds, and that grazing significantly affects bird abundance and species richness. Duff found that after 4 years raptors and passerines increased 350% within an exclosure. Taylor found that abundance of passerines was negatively correlated with frequency of grazing.

233 E. Our repeated observations contradict statements in Table 3-23. Roses and red osier dogwood are often severely grazed, sandbar willow is rarely over-utilized by wildlife.

234 F. RMP p.137 states that little is known about distribution, size, trend of special status vascular plant species, and no data exist for non-vascular plants. This information must be developed as part of the RMP process, particularly where vegetation treatment, prescribed burns, etc. are commonly discussed, and where livestock grazing is a known impact to these plants.

235 G. We recommend the use of biocontrol agents to control weeds on BLM land. Where no known agents exist, mechanical or hand control of weeds is necessary. Sheley (1994) states that limiting disturbance is necessary to control spread of noxious weeds = limiting livestock,OHV use.

236 H.Intact, healthy microbiotic crusts limit the spread of exotic species (Kaltenecker and Wicklow-Howard 1994) = management to protect crusts from harmful effects of grazing and trampling is vital to control of weeds and protection of soil resource.

237 I. Microbiotic crusts must be discussed fully, and impacts of proposed actions of all alternatives evaluated on them. Crusts stabilize soil, contribute to soil fertility - fix nitrogen (limiting nutrient in arid western lands, facilitate nutrient uptake by vascular plants, aid in establishment of vascular plants and may aid in soil moisture infiltration and retention (Kaltenecker and Wicklow-Howard 1994). Physical disruption of crust by trampling impacts reduce coverage values, species richness, and rates of nitrogen fixation. "Land use by domestic livestock results in compaction and disturbance of the surface soil, with resulting negative impacts on microbiotic crusts." Kaltenecker and Wicklow-Howard 1994).

238 J. "Maintenance and Restoration of Native Vegetation Communities" must be included/analyzed as a Management Concern in Vol. 2. The RMP fails to adequately discuss importance of native species. There are no identified Vegetation goals. If the RMP can analyze

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238 Vegetation Treatments, as it does in Vol. 2, it can certainly analyze the importance of native plant communities. The RMP fails to clearly state goals for vegetation.

239 K. The RMP is grossly negligent in failing to analyze impacts of cheatgrass/exotic species on native vegetation, and its impacts for management actions. This huge shortcoming is magnified by the numbers in Table 3-21, which shows that almost 200,000 acres of the CRA is classified as Wyoming big sagebrush. All Wyoming sagebrush sites are vulnerable to invasion by cheatgrass following fire or site disturbance by livestock. Additionally, salt desert shrub, low sagebrush, mountain big sagebrush and low elevation conifer forests, juniper woodlands and mountain mahogany are now being invaded by cheatgrass following disturbance, as cheatgrass is rapidly adapting to grow at higher elevations(Monsen 1994). Cheatgrass appears to pave the way for subsequent invasion by noxious weeds in arid ecosystems (Monsen, pers.comm.). This means that virtually ALL of the CRA, except higher elevation conifer forests,and highest elevation mountain sagebrush communities are in danger of cheatgrass invasion and dominance. Our members have observed cheatgrass dramatically increasing in abundance in the CRA, particularly in burned areas and sites heavily degraded by livestock.

Cheatgrass profoundly alters site conditions, and post-burn cheatgrass dominance dooms native ecosystems (Billings 1994). Rehabilitation of cheatgrass-dominated sites is very, very expensive, and may not be possible. Rosentreter (1994) discusses impacts of cheatgrass on rare native plants. Whisenant (1990) articulates the impacts of cheatgrass on changing fire frequency on cheatgrass sites. The shortening of fire frequencies - from 60 -110 years or longer in pre-settlement sagebrush communities - to every 2 to 5 years in cheatgrass range - represents a significant change with direct and cumulative impacts to virtually all native species in these ecosystems, as well as to human uses of public land.

Actions which result in cheatgrass invasion represent an irreversible and irretrievable commitment of resources. Impacts of fire in the CRA in 1996 are Unnatural in sites where cheatgrass gains post-disturbance dominance. Disturbance may push plant community across a threshold from which it cannot recover, resulting in a permanent early seral state. All the glorious results of prescribed fire trumpeted throughout the RMP will not occur on cheatgrass-vulnerable sites.

BLM cannot blithely assume, as is ubiquitously done in the RMP, that outcome of fire, herbicide use, or other site disturbance termed as a vegetation treatment will be innocuous, or beneficial - or reversible. Microbiotic crusts protect sites from cheatgrass/weed invasions. Cheatgrass-dominated communities are in the earliest possible seral state, and may be permanently stuck there since rehabilitation/recovery may be impossible.

How will cheatgrass/exotics affect BLM management actions in the CRA? The public must be given a full analysis here.

240 L. The RMP focuses on upland grasses (because cows, deer and elk eat them?) , and virtually ignores shrubs and forbs, which are of vital importance to a myriad of native wildlife species. Sagebrush is the most widespread native shrub in the CRA, and BLM proposals and analyses ignore its importance to the ecosystem.

Sagebrush positively affects site hydrology (Peterson 1995) - it acts as a living snowfence, traps snow which melts off more slowly and increases the potential to improve the water table. Ground water is replenished mainly through snowmelt. It provides shade, and functions as a water pump which moves water from soil depths by "hydraulic lift" to the surface where water is then released through sagebrush roots and can be taken up by other grasses and forbs (Caldwell and Richards 1989).

Sagebrush physically protects native bunchgrasses from impacts of livestock grazing and trampling - in many sites in the CRA, the only healthy remaining native bunchgrass occurs in the protection of sagebrush plants. It holds soil and provides vertical structure which adds structural diversity to the plant community and habitat structure for many native animal species (Peterson 1995). Sagebrush provides soil stabilization, wildlife habitat, forage, and ecosystem stability (McArthur 1994).

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Attachment 14, #3 ends by saying "...indefinitely, until minimum streamflow needs are satisfied."

31-86: Your preference that RMP actions "improve water quality conditions to as near pristine levels as possible" (Alternative 5) is noted. The PRMP contains numerous management decisions which would directly or indirectly improve degraded water quality throughout the Resource Area. For example, see the PRMP decisions listed under Water Quality, Goal 1 (please note that these decisions varied little among alternatives; see DRMP, pp. 380a/b); Riparian Areas, Goal 1, #4-7; and Fisheries, Goal 1, #4.

31-87: Your opinion is noted. All road construction will be in compliance with the road standards set forth in BLM Manual Section 9113 (see PRMP, Attachment 5, General SOP #7). Additional PRMP decisions would limit or define new road construction in the Resource Area: see Riparian Areas, Goal 1, #12; Water Quality, Goal 1, #2, 3, 5, and 6; and Transportation, Goal 1, #1 and 9.

31-88: (a) The risk of failed treatments is considered negligible. Various PRMP actions would ensure rapid revegetation of the disturbed site (see Attachment 8: Design Specifications). Alternative 1 describes impact to fisheries values through increased sedimentation. As noted under Alternative 2, buffer zones and vegetative conversion acreage limitations would mitigate potential sedimentation impacts. The BLM feels that this description of impacts is adequate.

(b) The PRMP contains management to prevent the types of erosion impacts you describe. An ID team would review proposed actions to evaluate site recovery potentials and suitability as well as susceptibility to erosion (e.g., see Upland Watershed, Goal 1, #2).

31-89: The PRMP analysis has been clarified.

31-90: Once approved, the Challis RMP would implement livestock management actions to protect fragile watersheds and wildlife habitat; for example, see PRMP, Livestock Grazing, Goal 1, #3 and Wildlife Habitat Management, Goal 1, #6.

31-91: Your preference is noted.

31-92: Your preference for Wild & Scenic River designations is noted. In addition to considering the qualities of a river segment and its corridor, BLM recognized that determining a river suitable for management as part of a National Wild & Scenic River System is an issue of allocation. For example, there may be rivers that have numerous OR values present within the river corridor, but because of other issues such as current or proposed uses

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240 Vegetative production, vegetative diversity or biodiversity do not increase in the long-term as a result of sagebrush removal. Sagebrush is a climax dominant species, and its removal will result in a lower seral stage community. Species diversity is higher in older communities (Odum 1971).

Mature sagebrush communities contain a diversity of age classes interspersed with understory that is more dense on well-managed ranges. Livestock management, coupled with soil type and climate affect understory species more than stand density. Lomasson (1948) showed that sagebrush communities survive and maintain productivity for long periods of time. On properly managed rangelands, grasses and forbs can increase under sagebrush. (Peterson 1995). Total plant production decreases with the removal of sagebrush. (Peterson 1995).

There is no evidence of long-term increases in biodiversity as a result of sagebrush removal. Billings (1994), McArthur (1994) discuss the loss of sagebrush habitats to native species. Short-term bursts of weedy species immediately following disturbance cannot be termed true increases in biodiversity, but it is precisely this (hopefully transitory) increase in weediness which is used by proponents of alteration of sagebrush habitat to proclaim post-fire, post-herbicide increases in biodiversity. Increases in nutrient levels in burned grass plants are also fleeting, and long-term nutrient loss may occur - nitrogen volatilized in fire, fire kills microbiotic crusts - main nitrogen fixers, and crusts recover very slowly from fire - 10-40 years or longer.

Post-fire nutrient loss occurs in wind or water erosion of soil. (Peterson 1995, Belsky 1996).

Sagebrush community commonly exists as a complex mosaic. Diversity is inherent.

The canopy protection afforded grass plants by dense clumps of shrubs is the sole reason why any perennial grass remains on depleted ranges.

All positive effects of sagebrush and other native woody plants on native ecosystems must be fully considered and evaluated in analysis of vegetation manipulation schemes in any of the alternatives.

241 M. Fire directly damages or kills native bunchgrasses and forbs. Peterson (1995) reviews literature on effects of fire on bunchgrass: The most common effect of fire on Idaho fescue is negative. Effects on bluebunch wheatgrass are variable, but may be negative. Many positive effects may be only short-term.

242 N. The RMP completely fails to specify site conditions/criteria under which vegetation manipulation would occur.

243 O. Restoration of crested wheatgrass seedings, exotic communities to native shrub cover. We recommend that BLM fully analyze the active conversion of all seedings to native shrub (sagebrush) communities as a vegetation goal of the RMP. This is necessary because of 1) the great loss of sagebrush habitat throughout the West (see previous discussion of cheatgrass/exotics) and impacts on native wildlife species, biodiversity, ecosystem processes. 2) Crested wheatgrass seedings offer the least expensive opportunity to restore native shrubs. Plant structure/spatial dispersion in seedings resembles the ground-level structure of native bunchgrass communities, i.e. bunchgrass plants with open interspaces between plants,which are necessary sites for seeding native shrubs. Sagebrush requires bare soil interspaces for germination and establishment, and cannot successfully reestablish in sites blanketed by exotic annuals.

244 P. The RMP must specifically state all goals, analyze all actions, alternatives in relation to native plant species. We are deeply concerned that the RMP constantly discusses "forage" "cover", yet never states whether this discussion is about native vs. exotic species, and shrubs vs. grass.

245 Q. BLM wrongly applies the Forest Health "fire is good for forests" mantra to sagebrush communities. Although salt desert and sagebrush communities evolved with fire, the introduction of highly flammable exotic species (cheatgrass, medusahead, tumblemustard) and aggressive noxious weeds has disrupted plant succession in sagebrush communities throughout the West. Fire in the 1990's in the CRA has direct, immediate long-lasting and cumulative

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245 impacts on native ecosystems and wildlife. Billings (1994) best sums up the implications of cheatgrass/exotics to the CRA:

"There could be a genuine threat to the existence of large,integrated ecosystems which have existed since the Pleistocene... These large operational ecosystems could disappear over large areas...primarily because of one innocuous-appearing grass...the results could be conversion of these native ecosystems to unproductive and simplistic annual grasslands lacking not only native vertebrates but also those invertebrates and cryptogams that are involved in the operation of the ecosystem including energy flow, water cycling, and nutrient balance...there is always the possibility that ecosystemic destruction may be irreversible."

All impacts of proposed vegetation treatments and fire suppression policy must be completely analyzed, based on science and not myth:

Human-caused fires (recreationists, ranchers) account for a significant number of wildfires in the CRA, beyond natural lightning-caused fire. As human use of the CRA is increasing, occurrence of fire is becoming less natural, with significant cumulative impacts.

Fire on land degraded by 140+ years of livestock grazing may not behave in a predictable manner. Livestock grazing has resulted in lack of fine fuels in some sites = fires must burn hotter to carry in woody communities, abundance of continuous fine fuels (cheatgrass, weeds) in others = Fire may not have "natural" outcome. Plant communities may be pushed over thresholds from which they cannot recover. Exotic species alter community resiliency.

All fire in vegetation types, particularly sagebrush, susceptible to exotic species invasions, must be fully suppressed. BLM must control fire if fire can lead to irreversible losses of native plant species. We are appalled at BLM's recommended changes in Fire Management which would remove nearly all communities which may be negatively affected by fire from full suppression zone.

246 R. More delays! Watershed analysis, ID teams will result in further delays in making much-needed land management changes. BLM must establish a specific time frame and act, not plan to plan.

247 RMP Effects:There WILL be effects to vegetation from management concerns: Water Quality, Visual Quality, Cultural Resource. Cumulative impacts will occur.

248 1. Alts. 2,3,4,5. RMP states that "criteria for vegetation treatments ensure that they would accomplish the goals for which they were designed." This naive arrogance demonstrates lack of experience with dryland vegetation treatments in the arid West. Precipitation and other weather conditions following treatment determine the ultimate outcome of vegetation manipulation projects - there is a high degree of uncertainty. The only way this could be a valid claim is if the sole goal was to kill existing woody vegetation (as we suspect it is).

249 2. All Alts. Again here, RMP only considers impacts of livestock grazing on big game, and wildlife forage consumed, thus ignoring importance of vegetation structure, and 100's of wildlife species.

250 5. All Alts. 50% upland utilization will not improve condition (see Livestock comments). BLM must specify upland utilization criteria for all species, not just bluebunch wheatgrass. Establish sound upland utilization criteria for all desirable species under all alternatives.

251 6. All Alts. BLM must always manage for late seral to PNC communities, and not Desired Plant Community. ID team decisions, arbitrary imposition of Desired Future Condition: This concept is based on a set of human values and commodity needs rather than what may be in the best interest of the range of resources present. The concept is defined in terms of human defined values, including economic and social conditions, and not in terms of a resource condition which may reflect non-commodity needs, issues and concerns. ID teams may make arbitrary, commodity-biased decisions without adequate public involvement.

"Maximum amount of forage" is not related to PNC. For example, TNR use -indicating an abundance of forage exists, is commonly issued by BLM in Idaho in places such as the Jarbidge RA, where this overabundance of forage is based on cheatgrass and crested wheatgrass - early or unnatural seral stages.

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in or near the corridor, BLM may have chosen not to allocate that river for management as a national wild, scenic, or recreational river. Many of the important resource values which are present along the rivers in the Challis Resource Area are protected by legislation other than the Wild and Scenic Rivers Act, such as the Endangered Species Act and various cultural resource laws. The same allocation principle is true for ACEC designations. Those included in the PRMP are those the BLM feels are appropriate for meeting the resource needs of the planning area, while also allowing other uses of the public lands. The issue of recommendations for wilderness designation was addressed by the BLM in the 1980s, and is not within the scope of this PRMP (see DRMP, p. 13, Challis RMP Planning Criteria - #5).

31-93: A time frame for special status species inventories would be identified in the RMP implementation plan, if determined necessary.

31-94: Your comments are noted. The BLM believes the PRMP provides adequate restrictions on mineral development.

31-95: Your opinion is noted. The PRMP expands the analysis of cumulative impacts to fisheries resources.

31-96: A "natural abundance and diversity of aquatic habitats" does not include degraded habitats. Degraded habitats are not "natural." The goal also states: "to support fisheries resources in a healthy and productive condition.....", etc. Degraded habitats cannot support fisheries resources in a healthy and productive condition.

31-97: The PRMP decision on identifying critical habitats has been changed to delete the 7 year timeframe, because these inventories were mostly completed during preparation of the DRMP. The timeframe for inventory of anadromous fish, bull trout, and westslope cutthroat trout habitats and distribution has been deleted from the PRMP, since such efforts are on-going and will continue throughout the life of the RMP. The 7 year timeframe for developing and implementing a fisheries plan for the Big Lost River is realistic, as this is a lower priority fisheries within the Resource Area and management guidelines in the PRMP will ensure riparian habitats are maintained or restored. The 7 year timeframe is also reasonable for elimination or modification of migration barriers, since this action could require substantial effort and take years to complete.

31-98: Priorities for land tenure adjustments (PRMP, Land Tenure and Access, Goal 1, #2)) indicate that BLM would attempt to acquire lands with high resource values, and facilitate threatened/endangered species recovery. This should result in a "net gain" of critical habitats.

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252 9. All Alts. Vegetative cover alone does not ensure that watersheds, plant health, water infiltration are protected. Again, annuals and exotic weeds can smother the ground surface with ~100% vegetative cover, but do not support these values. BLM has must clearly define what is meant by "cover". All cover MUST be native plant cover.

253 10. Alts. 2,3,4,5. BLM fails to describe components of watershed analysis which would make this analysis superior to AMP. Specify these, supply time frame. Does the CRA contemplate using the AIE process to address livestock problems?

254 11. All Alts. We oppose the allocation of any increase in forage claimed by BLM as a result of burns, seedings, treatments, etc. to livestock for any reason. This is simply sacrificing resources on one site to make up for resource shortfalls elsewhere, and results in further harmful impacts. It is impossible to understand what the various RMP Alts. are saying here.

255 12. All Alts. Burning results in immediate (for example, nitrogen volatilization) and long-term nutrient and water losses, often results in losses in vigor and cover as well as outright death of bunchgrasses and forbs, and targeted woody plants. (Previous discussion).
BLM directly contradicts itself in analysis of Alt. 3 (compared to analysis here for other alternatives). BLM states that prescribed burning to enhance livestock forage would lower vigor of existing grasses and forbs. Yes! Prescribed burning in grazing-impacted communities does, and it makes no difference if the human-imposed purpose was livestock forage, or lofty claims of ecosystem health. BLM alters predictions of outcomes depending on what it wants to achieve. This is not science. This is why DFC, or ID team Desired vegetation goals which are not based on PNC, are not valid. Too often land managers warp facts, bow to political pressures, or just plain mislead the public.

256 13. All Alts. Wild horse trampling impacts vegetation, microbiotic crusts not just "forage".

257 14. 15. All Alts.Why not simply title this big game forage? - BLM misleads the public by using the inclusive term "wildlife" here.

258 15. Alts.2,3,4,5. Specify goals, methods of watershed analysis. Will watershed analysis supplant or augment AMP?

259 17.All Alts. Spurious rosy assumptions about beneficial impacts of fire, treatment are the only impacts considered. Completely detail ALL impacts.

260 18. BLM must specify "success standards". What are failure standards? If a project fails, will livestock be permanently removed from the site? Will BLM spend sufficient money to restore a prescribed burn invaded by cheatgrass to a native community? The analysis of impacts of vegetation treatment are based on an optimistic assumption that vegetation treatments would be successful. Analyze impacts of failure.

261 19. Alt. 5, all Alts. RMP states "livestock would be removed from all riparian areas, with potentially significant impacts to uplands" in WSRs. Does this mean that BLM will not adequately reduce numbers of livestock in allotments/pastures with WSRs, but simply shift zones of abuse? Won't these same impacts occur in any situation where livestock use is shifted, but numbers not reduced????

262 21. All Alts. There is no need for construction of improvements in WSAs if livestock are being managed properly in the first place.

263 22-25. All Alts. Evaluate impacts - of mineral exploration, development on vegetation. What are these impacts? BLM must establish strict mitigation criteria in the RMP to minimize mining impacts on vegetation.

264 26. We support limiting OHV use on the entire RA and additional vehicle closures to limit

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damage to native vegetation.

265 27. We support closure of the Herd Creek allotment.
Alts. 4,5. Even with complete removal of livestock from riparian areas, BLM cannot assume that attainment of riparian goals would occur, unless uplands are fully protected from livestock abuse.

266 28. All Alts. BLM must fully analyze all impacts of establishing riparian pastures.

267 30. All Alts.The slow rate of developing AMPs is often due to permittee resistance to management change. AMPs could be quickly developed. BLM cannot expect watershed analysis to be faster. We expect it would be far more cumbersome.

268 33. All Alts. We fully support acquisition of riparian, floodplain, and salmon, steelhead and bull trout habitat, and subsequent removal of livestock grazing from all land acquired for this purpose.

269 36. All Alts. What are these standards?

270 37. Discussion of impacts of reintroduction of native species cannot be limited to beaver.

271 39. BLM completely fails to analyze negative impacts of fire on riparian communities. By exposing livestock-degraded community to any disturbance, including fire, unpredictable and harmful results may occur.

272 40. All Alts. As discussed in Lands, we strongly oppose potential disposal of 65, 000 acres of public land, and believe this disposal would have significant impacts on native vegetation in the CRA - disposed lands could become further degraded, serve as sources for exotic species invasions, management practices leading to devegetation of these lands could impact watersheds and riparian areas on remaining BLM lands = further wildlife habitat losses. This land exchange must be fully analyzed in the RMP.

273 51- 53. A full discussion of limiting disturbance to limit spread of weeds must be included.

274 56. BLM narrowly limits discussion of cumulative effects to effects of actions on adjacent land under other ownership. For example, BLM must discuss: Cumulative effects of all related proposed actions on BLM lands. How will prescribed burns on poor condition range in watersheds with non-functioning streams affect fisheries values?

275 The RMP contains no clear vegetation goals and objectives. We are appalled that BLM does not state a Vegetation Goal which which states "All management actions will promote the perpetuation or restoration of native plant species." Instead, the only specific goal dealing with vegetation is "Veg..Treatment Projects", p. 365-366. BLM's analysis of this goal is fraught with bias toward manipulation scenarios, and full impacts of alternatives are shallowly evaluated. (See our preceding comments). Vegetation management projects, despite claims of ecosystem health, are almost always aimed at providing forage for livestock.

276 Specific management actions which will be taken to assure BLM meets goals are not listed. Instead, BLM talks around issues. The RMP states that an ID team will establish Objectives for vegetation treatment projects. Who or what will be on the ID team? Will this be Agency and technical people, will it involve, as we believe it must, "interested publics"? On what basis will it reach conclusions? We view this establishment of innumerable ID teams as an attempt to limit and sidestep open public involvement in the planning process. The RMP is the main planning document. The BLM here avoids any actual planning, and asks the public to rely on (probable) closed door discussions by an ID team in the future to determine management actions and policy. This circumvents NEPA.

Intact native plant communities are the foundation on which BLM must build any

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31-99: Your opinion is noted. The PRMP would provide for full suppression of wildfire in sage grouse habitats (i.e., sagebrush-grassland ranges) in the absence of a fire management activity plan (see Fire Management, Goal 1, #2). Development of fire management activity plans would consider resource values and the need for full suppression of wildfires in sage grouse habitats.

31-100: The BLM agrees that areas vulnerable to cheatgrass invasion (and noxious weeds) must be protected from fire. These areas are often low elevation Wyoming sagebrush communities with reduced native grass compositions, but still producing enough fine fuels to support fire. Not all Wyoming sagebrush communities are susceptible to cheatgrass invasion, however. Many areas in the Resource Area have very good native grass compositions which would respond favorably to prescribed fire or controlled wildfire. Fire suppression efforts will be determined on a site-specific basis with activity plan level direction, as described in Fire Management, Goal 1, #2.

31-101: "General" design specification #4 (see PRMP, Attachment 8) requires the use of native species in riparian areas. The PRMP emphasizes use of native species in upland areas, but does not require it (see "General" design specification #3). The BLM agrees fire rehabilitation efforts should encourage the use of native species, including shrub species where appropriate. However, there are instances where non-native species may be utilized to enhance the establishment of native species or where immediate watershed protection is necessary. An example may be including annual ryegrass (a short lived, weakly competitive species) in the seed mix to provide a rapid ground cover. An interdisciplinary team would be used to identify specific objectives (see PRMP, Upland Watershed, Goal 1, #8) and the need to consider non-native species in meeting those objectives.

31-102: Many PRMP decisions adequately direct post fire rehabilitation stipulations. Please see Rangeland Vegetation Treatment Projects, Goal 1, #4-6; Upland Watershed, Goal 1, #8; Fire Management, Goal 1, #8; and Attachment 9.

31-103: The "Note" on Map 16 explained that fires would be fully suppressed unless a fire management activity plan exists for an area. Thus, there would not be an immediate shift from "full suppression" to "conditional suppression" throughout the Resource Area. All "conditional suppression" areas would become so only after site-specific analysis during preparation of an activity plan. The PRMP analysis has been revised, where appropriate, to clarify the impacts of this management strategy.

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277 management plans, yet native plant communities are barely given lip service in the RMP. The lack of current information is shown by Table 3-21, which is the main source of upland vegetation information in the whole document. It is based on very old information, from old EISs - and has 200, 000 more acres than are currently in the CRA! It provides no detailed information.

The poor structure/organization/analysis provided in the RMP is illustrated by the shoddy discussion of vegetation. BLM must assess a set of vegetation goals which clearly support a larger and more diverse set of wildlife and vegetation biodiversity objectives. BLM must rewrite many parts of the RMP. Start with healthy native plant communities as a foundation, then discuss such things as veg treatments, noxious weeds, livestock management as a subset of this.

278 BLM must supply the public with supplemental documents which adequately characterize upland communities in the CRA.

279 The public is at a loss as to the direction BLM is taking for public land management in any alternatives. BLM must establish clearly defined goals for public land in the CRA, then evaluate all impacts of proposed management activities in relation to these goals in all alternatives. What are classified as "Goals" in volume 2 are narrow, incomplete, often impossible to understand, and often are biased in favor of livestock interests.

Goals and proposed management activities which are in different ways related to vegetation are sprawled all over what is called "Table" 2-1, the format of this table is not directly related to format or topics analyzed in Volume 1, Chapter 4 - the main analysis of alternatives. BLM's choice of "Management Concern" appears to be arbitrary. Example, why is vegetation treatment a Management Concern, and native communities not? Throughout, the format of the RMP is hopelessly unclear and muddled. Type of Effects - points used to evaluate impacts, differ from issue/management concern and Goals in Vol.2. There is no linking, cross-referencing is nearly impossible. The public is left with a user-unfriendly management document, full of confusion and serious omission. RMP must establish basic goals and evaluate all effects of actions in relation to these.

280 BLM p. 30 calls Livestock Grazing a Resource !!!! just like soil, water, air and evaluates and compares alternatives/impacts in relation to livestock grazing as a "Resource". This is an astounding new level of bureaucratic doublespeak. Livestock grazing is an extractive use of public land. Unfortunately, this type of thinking represents the deep-seated bias of the RMP toward extractive interests.

Then, in Chapter 4 which discusses impacts of implementing alternatives, "Livestock Grazing" is a Source of Effect, p. 187a. BLM's classification of Source of Effect itself is unclear, muddled and illogical. For example, p. 187a Livestock Grazing is a Source of Effect, yet p. 191a Livestock Grazing/Upland Watershed is a Source of effect. How can BLM categorize Upland watershed as a Source of Effect? p. 238 Livestock Water Availability and Quality is considered a Type of Effect. There appears to be no clear direction for any of this.

To confuse matters even further, p.. 289 calls Type of Effects "Positive" and "Negative". There is no consistency. How can the public review a document like this? Meanwhile, serious Effects/Impacts are totally unanalyzed in the RMP.

As a consequence of this obfuscation of issues, we ask that all comments on issues, points of concern, actions that we make at any point in this confusing document- be applied to the same thing - issue, concern, whatever, no matter what name or category BLM uses to describe or disguise issues.

We are fearful that the RMP may have been purposefully structured to maximize confusion, blur issues/impacts/analyses. The end result is a slippery unclear management document, which will make it very difficult in the future to hold BLM to any course of action. We are also

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fearful that BLM will use the lack of specificity to disregard sound science, and bend to political winds.

VISUAL QUALITY

281 A. The visual resource inventory for lands in the CRA was done ~ 20 years ago, as part of planning process for 3 separate Resource Areas, before the CRA was formed. BLM must, as part of the current RMP process, reinventory and classify visual resources of the CRA and present a thorough discussion in the RMP. Cumulative impacts of various actions in Central Idaho, management area consolidation (juxtaposition of lands in one Visual Category occurring adjacent to lands in the other, but with disparate classifications), cannot have been considered at that time. Further, the visual environment of the CRA and public demands on resources have changed. Extractive uses such as livestock grazing and mining have further altered lands. RMP p. 147, states: "the demand for high quality visual experiences in the RA is growing". Recreational use is highly dependent on high visual quality - 40-50% of all tourist visits are for sightseeing.

282 B. p. 289 mentions "visual simulations". What are visual simulations? By managing for properly functioning ecosystems and intact native plant and animal communities, the BLM will have no need to resort to mock-naturalness, and other forms of fakery. How about visual simulations of cows, and abolish the real thing?

283 C. The RMP preferred alternative proposes removing 50,000 acres of land currently in VRM Class I and placing them in VRM II. WHY? Specify the mandate under which this is being done. We oppose the removal of any lands currently in VRM I from that category without a full and detailed analysis. Apparently, the BLM has NO current information which would enable it to make ANY change in VRM designation, given that the data in Table 3-30 p. 148, stems from the ancient EISs.

Meanwhile, the 1996 Owyhee RMP preferred alternative proposes moving VRM II lands into VRM I. This is just the opposite of the Challis RMP. The Owyhee RMP proposes PLACING 70,000 acres in VRM Class I, relying on guidance in NEPA, sec 101(b), sec 102, and guidelines in BLM Manual Handbook 8410-1.

The RMP provides NO explanation of its proposed action - and this action is incomprehensible in a RA where "visual quality ... is very high" RMP p. 147. Why act to reclassify lands so that their visual qualities can be degraded?

284 D. BLM must fully discuss types of grazing impacts and their relation to VRM Class. For example, is heavy utilization compatible with VRM Class I or II? We believe not. Vale BLM, in management of the Owyhee WSR corridor, believes not. Is the artificial patchiness created on the landscape by fenceline contrasts, different use levels in different fenced areas, livestock trails converging on a limited water source compatible with VRM II? We believe that such impacts seriously detract from the visual quality of public land. Basis and guidelines for visual classification in the Challis RA must be discussed in the RMP.

285 E. The summary of Positive Effects is inaccurate. BLM fails to evaluate the negative, cumulative impacts of modifying fire suppression - and possible increases in cheatgrass/exotics/ugly landscapes as a result of not suppressing fire in habitats vulnerable to post-fire cheatgrass invasion. Cheatgrass has an unnatural appearance, and disrupts the visual appearance of native landscapes. Exclosure construction or other fences built for grazing management impair visual resources.

286 F. RMP states "current livestock grazing practices... have a negative effect on visual quality". We agree, and believe they must be drastically modified to be compatible with BLM VRM Class vs. RMP shifting class to be compatible with cows.

287 G. Prescribed vegetation treatments do not mimic the natural visual environment.

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31-104: (a) The BLM agrees that the PRMP forest management proposal is intensive, even though 60% of all CRA forest lands would not receive such management. You state that such proposals "remain largely undeveloped, untested, and unsupported by empirical evidence." The BLM believes the validity of management to maintain the sustainability of forest lands is tested through previous logging or natural disturbances. Marking prescriptions in the CRA are based on previous field observation on similar sites. Both logged and unlogged sites are monitored to determine: 1) in what conditions natural regeneration thrives; 2) the historic distribution of large (old growth) trees; and 3) the role of insects/disease/fire in the stand. These observations are then used to determine what prescriptions should be implemented to maintain the ecological integrity of a given forest stand. "No action" is often deemed appropriate management.

(b) Vegetation treatment decisions are unlikely to affect forest resources, because vegetation treatment decisions focus on rangeland vegetation. The BLM maintains that biological diversity decisions are not expected to affect forest resources.

31-105: (a) The BLM disagrees. Timber harvest may decrease susceptibility to fire, insects or diseases. For example, clearcuts can effectively remove all fuel for fires, food for insects, and substrate for disease. Any harvest level achieves the same, to a lesser effect. For example, partial cuts in lodgepole pine have been shown to reduce disease infestation levels and tree mortality (Schmidt et. al., 1988; Cole and McGregor, 1985).

(b) The BLM believes PRMP decisions do modify forest management to "fix forest conditions." Existing management (Alternative 1 - see DRMP) and the PRMP decisions are quite different. Chapter 4 - Forest Resources describes how PRMP actions are expected to change forest conditions in order to achieve the forest resources goal statement.

(c) The PRMP does not adopt the Alternative 5 decision which requires forest stand management treatments to mimic natural disturbance (see DRMP, p. 414b, #15).

(d) Your comments are noted. Observations made on local wildfires indicate intensive forest management can affect fire behavior. For example, on the Long Tom Complex Fire along the Salmon River in 1985, it was observed that in both Ponderosa and lodgepole pine types, fires usually changed from crown fires to non-lethal understory fires where harvesting had previously occurred (Joe Carvelho, personal communication).

(e) Although weather (e.g., winds, air temperature, humidity) may be the primary determinant of fire

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288 H. We support moving VRM Class III lands to VRM II, or I.

289 I. Burned shrub and forest lands are visually unappealing (ugly). How will recreational uses be impacted? Visual effects of burns can persist for several decades, even in areas which undergo normal successional processes.

290 RMP Effects: Wild Horse and Burro Management, Special Status Species will affect VRM Class.

WATER RESOURCES

291 A. We are astounded at the lack of current information on water resources contained in the RMP. Watershed erosion susceptibility data are from 1977, a current riparian inventory has only been done on 43 of 353 miles of streams in the RA, and extensive efforts to study and collect water and watershed data last occurred in the late 70's, early 80's. This is particularly distressing, since the RMP alternatives rely heavily on watershed level analysis and Water Related Resource Management (What is this?) as the basis for management action. BLM even claims that watershed level analysis process will be more rapid than the AMP process, but given the lack of basic data to start from, we believe it will take much longer - and probably never occur in most instances.

292 B. The overwhelming cause of water degradation and water quality problems on most of the streams in the CRA is livestock grazing. This is the direct observation of our members. BLM also knows this - witness the number of measures aimed specifically at livestock grazing (but not specifically mentioned as being aimed at grazing) in discussion of the issue of Water Related Resource Management (372-374).

293 C. Water quality limited streams - Again, livestock grazing is the foremost cause of the condition of most WQL segments. We believe that many additional stream segments in the CRA deserve to be designated as WQL segments, and that the initial list of designated streams overlooked many smaller, tributary drainages, or less popular recreational waters which nevertheless have important values, and water quality problems as serious as any of those on the list.

294 D. BLM should identify priority streams for acquiring minimum instream flows as part of the RMP process. Instream flows should be vigorously pursued for all 58 streams identified as eligible, suitable, or deferred for WSR status. Minimum flows necessary to support cold water biota and salmonid spawning must be pursued for all streams containing native fish. Don't keep delaying everything!

295 RMP Effects: Wildlife Habitat Management, Visual Quality, Cultural Resource will affect Water. Cumulative impacts will occur.

296 2. Alt. 2. Stringent upland utilization standards are necessary to achieve improved water storage, flood attenuation effects.
Alts. 4,5. We support immediate closure of Herd Creek, Dry Creek, Burnt Creek allotments, Road Creek drainage, Big Lost River and Big Creek corridors, Garden Creek watershed, and Corral Basin Creek drainage. In addition, we recommend that all streams in identified Priority allotments be closed to livestock grazing.

297 3. Alts. 2,3,4,5. All the new resource planning documents in the world will not make any difference, if they are not based on firm data about resource conditions in the CRA. Data on which these proposed planning documents will base decisions must be included in the current RMP, but as discussed in (A) above, BLM is sorely lacking in high quality information.

298 5. All Alts. Range improvements are a major part of the water quality problem. They support artificially high numbers of livestock which leads to more uniform degradation of watersheds and direct impacts on water resources. Range improvements such as spring developments and

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298 pipelines desiccate springs and wetlands and extend the zone of livestock abuse. BLM must remove developments from sites with erodible soils, located in steep terrain, or which are built in sites where the land is in poor or fair condition. Water resources are impacted by sediment, livestock waste, increased runoff from such sites. As range improvement projects break down or become non-functional, they should be eliminated.

299 10. All Alts. What is the allotment-scale grazing management demo project that is referred to here?

300 15. Alts. 2,3,4,5. WILL the Procedure for Nonpoint Source Consistency be used? The RMP uses the term "would", which does not mean that BLM will do this. BLM must clearly state that this procedure will be followed. We believe that a Nonpoint Consistency Review should have been done for all streams in the CRA, and a stream-by-stream summary of this information should have been presented in the RMP. What are site-specific management systems and component strategies which will be used correct nonpoint source pollution in the CRA?

301 16. Alts. 2,3,4. The conclusion that the risk of large fire will decrease over time as more small fires burn is erroneous in sites vulnerable to exotic species invasion. Fire risk is linked to climate: in dry conditions in drought years - any site can burn, any fire can become large.

302 18. All Alts. Logging roads, new roads. BLM must analyze the impacts of construction or upgrading of roads in the CRA. RMP must specify and provide management direction here.

303 21. All Alts.The negative impacts to water quality and other resources in the CRA which result from logging far outweigh the "limited" forest development potential. Timber in the ORA occurs on steep slopes, and all impacts from road construction in steep terrain are significant. Instead of claiming that "no adverse effects to water quality would occur from management of forest resources", RMP must analyze impacts!

304 28-31. All anadromous watersheds should be withdrawn from locatable mineral entry, and NSO stipulations attached.

305 33-35. All Alts. Cumulative impacts of proposed actions are not adequately addressed.

Our comments under Livestock Grazing, Vegetation Treatment and elsewhere also apply here:

306 Comments on Table 2:1, 1-16.
a. The measures listed in Table 2.1 will not achieve stated Goals to restore or maintain 75% in proper functioning condition in 5 years.

307 b. This section contains bureaucratic gibberish and fails to clearly state actions in alternatives-Example: The use of "knowledgeable and reasonable practices to manage livestock would be used". The reader is referred to Glossary for definition of "knowledgeable and reasonable" p. 573 - which gives a non-definition -more bureaucratese, which says nothing. RMP must clearly specify actions.

308 c. Permitting one-third measured streambank instability is too great to allow recovery of non-functioning, functioning at risk streams. Further resource damage will occur on all streams with this standard. A bank trampling standard in which trampling can not exceed 25% of the linear length of ALL streams should be used. Permitting 50% trampling on other streams in the RA is ridiculous. Resources will rapidly deteriorate under these criteria.
6 here apparently is written for maximum confusion. What is the rationale behind all this?

309 d. RMP continues to use the terms "trailing" and "supervised trailing" but does not specify what this means. Does this mean twice-a-year cattle drives to move livestock to and from ranges, does this mean daily treks to water, does this mean holistic grazing - with periodic mass inundation of riparian zone with livestock? Impacts of these vary greatly. All must be analyzed.

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behavior, fuel obviously plays a major role in determining fire severity. For example, if weather conditions are the same, a fuel load of 35 tons to the acre of dead-and-down woody material cured to 12% fuel moisture would have a higher severity rating than one-ton-to-the-acre of grass and forbs cured to 12% fuel moisture. The BLM considers tree stocking densities in the RA to be a forest health concern, partly due to fuel loading and the concurrent elevated fire severity rating.

(f) This information is noted. The PRMP focuses on minimizing the risks of insect and disease infestations within the planning area. Cumulative impacts at a landscape level are stated in the Forest Resources analysis (see PRMP, Chapter 4, Forest Resources, #24).

(g) This information is noted. PRMP forest management focuses on maintaining adequate shade to prevent drying, yet opening the canopy enough to reduce interception loss. Many studies have been presented showing increased water yields from partial cutting (Knight et. al., 1991; Troendle and Kaufmann, 1987; Meiman, 1987), due to reduced interception loss and moisture competition.

(h) Increased fire frequencies (whether natural or prescribed) are needed in the CRA to minimize fuel loading and increase vigor. The fuels created from harvest activities are often used as a tool for reintroducing fire.

(i) This information is noted. Please see Chapter 3 - Fire Management, for a discussion of the incidence and cause of unplanned ignitions in the Challis Resource Area.

(j) Although it is true that some (e.g., high-intensity) fires would destroy predators and their habitat, fire generally produces more "dead wood" than it consumes, resulting in a net gain of habitat for insects, birds, and other animals which depend on dead wood for their habitat.

(k) None of the forest diseases known to occur within the CRA are believed to be exacerbated by roads. Proposed management activities are expected to reduce the risk of disease. Root rot diseases are undocumented in the CRA, and no symptomatic evidence has been documented. The most notorious root rot disease, Armillaria spp. appears to be limited to moister, warmer habitat types associated with northern Montana and Idaho (McDonald, et. al., 1987).

(l) This information is noted. The consequences of both further disturbance and decisions to set aside some stands from forest management are analyzed in Chapter 4 Forest Resources.

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310 e. A 6" stubble height requirement must be applied to ALL perennial and intermittent streams.Many intermittent stretches of stream are intermittent because of devegetation and erosion caused by livestock. If watersheds are to function properly, an adequate stubble height requirement must be in place on all stream segments.

311 f. A 6" stubble height requirement must be applied to ALL springs and seeps. Overgrazing and trampling here results in spring desiccation due to removal of protective vegetation, hummocking and other trampling impacts. The end result is drying and desertification.

312 g. Stubble height criteria cannot be exceeded on pastures used prior to July 10.

313 h. We support complete removal of livestock if monitoring indicates stubble height has been exceeded.

314 i. As previously stated, we do not support the development of riparian pastures. If BLM goes to the trouble to fence a riparian area, all livestock use must be discontinued.

315 j. If 6" stubble height is not adequate to protect resource values, remove livestock.

316 BLM goal must be to restore ALL riparian areas to proper functioning condition, not just some.

317 GOAL 2: BLM should have identified all streams which support beneficial uses as part of the RMP process, not just plan to someday identify these.

318 GOAL 3: We advocate a "net gain" policy.

WSAS RELEASED FROM WILDERNESS REVIEW

319 A. BLM has titled this section as if hopefully anticipating the release of WSAs for exploitive activities.

320 B. BLM must consider and assess present condition of WSAs, and evaluate impairment of WSAs, as part of the RMP process. Values remaining "largely unchanged" is not good enough. BLM must identify ongoing impacts, and act to protect WSAs. This is the clear direction of BLM Interim Management Policy (IMP). FLPMA requires that WSAs be managed for the protection of wilderness values. WSA management must be consistent with the management of designated wilderness.
Are livestock grazing or other activities causing degradation of resources and wilderness values in WSAs? If so, what specific management actions will BLM take to halt and reverse degradation? The RMP must address these issues.

321 C. The description of condition of WSAs p. 155-157 virtually ignores discussion of direct impacts of livestock grazing to WSAs.

322 D. WSAs, ACECs, RNAS should be closed to/withdrawn from mineral entry and leasing, material sales,community pits, oil and gas leasing, free use permits, and exploration activities.

323 E. The RMP must consider and assess the closure of WSAs, ACECs and RNAs to motorized vehicle activity. Executive orders 11644 and 11989 establish policies and procedures to ensure that the use of ORVs on public lands will be controlled and directed to protect resources, promote user safety, minimize user conflict, and ensure that any permitted uses will not result in significant adverse environmental impacts or cause irreversible damage to existing resources.
If existing roads or trails in WSAs are causing increased ORV use/access, these must be closed.
All WSAs must be designated "primitive, non-motorized".
BLM is directed to protect and enhance wilderness values and authorize management actions

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which will ensure their suitability for preservation as wilderness = motorized travel should either be eliminated from WSAs or limited to existing, designated roads only.

324 F. The RMP needs to consider and assess the phaseout of livestock grazing within WSAs, ACECs, RNAs, SRNAs,and Wild and Scenic River areas.

325 G. Reaching PNC must be the goal within WSAs, and BLM must specify measures which will be used to attain this goal in the RMP.

326 H. The RMP needs to prohibit military training exercises within WSAs.

I. The RMP needs to prohibit the use of chaff, flares and supersonic flight in military training exercises over WSAs. (See Air Quality).

327 J. All portions of all WSAs must be closed to all vegetation manipulation projects - including "forest health" projects, prescribed burns, timber harvest for "salvage purposes".

328 H. All WSAs must be designated and managed as VRM Class 1. The CRA BLM proposal to remove lands from VRM Class I is hopelessly unclear about whether any of these lands are WSAs. It simply makes sense that if designated wilderness is VRM 1, then lands managed for non-impairment must also be managed as VRM 1.

329 I. The draft BLM Wilderness Inventory and Planning Procedures, dated July 19, 1996, grants BLM authority to reexamine its earlier wilderness recommendations conducted pursuant to FLPMA. The draft guidelines state: "Through the RMP process, areas identified as having wilderness character are evaluated to determine if they should be identified as WSAs and recommended for wilderness designation." The RMP process gives the CRA a timely opportunity to revisit its original wilderness designations. The important role of roadless, undeveloped lands as reservoirs of biological diversity have become much better understood since original wilderness recommendations occurred. WSAs provide critical refuge areas for declining native species and will be cornerstones in any eventual recovery effort made to expand these species to their former ranges.
BLM should conduct another wilderness review for the CRA through the RMP process which considers: not only the value of roadless lands for wilderness, but also their values to the protection of biodiversity.

330 1-9, Alt. 5. If WSAs are released from wilderness review, we support all actions proposed under Alt. 5. Plus, BLM must take additional measures to protect the resource qualities of these lands and ensure that biodiversity and naturally functioning ecosystems are preserved.

WILD HORSES AND BURROS

331 A. How will proposed utilization levels for upland plant species such as bluebunch wheatgrass be enforced/implemented in the Challis HMA?

332 B. Wild horse management is supposed to attain a "thriving ecological balance". BLM must specify conditions/attributes of a thriving ecological balance in the HMA, and discuss the impacts of livestock on maintaining this balance.

333 C. RMP must fully assess the cumulative impacts of livestock grazing/trampling and horse grazing/trampling on land in the HMA. BLM has been gathering extensive data on the HMA, so this information is clearly available for analysis and presentation to the public.

334 C. The RMP must consider and assess removal of livestock from all parts of the HMA.

335 D. The RMP must assess closure of roads in the HMA to limit disturbance to horses; the RMP must consider prohibition of all OHV use in the HMA.

45

BLM Response to Letter No. 31 *continued*

31-106: (a) The BLM agrees that one of the goals of intensive management should be to "establish once-prevalent forest types", although we disagree that old-growth communities are in need of establishment. The BLM estimates that up to 50% of commercial forest land acres in the RA have old growth characteristics (DRMP, p. 82). The majority (85%) of forest stands are dominated by larger trees, greater than 10" DBH. In the Challis Resource Area, stands with old-growth characteristics may in fact be above historical levels, as very few stands in early seral condition exist. A drive along the upper Salmon River from Thompson Creek to Stanley demonstrates the extensive presence of mid seral forest stands due to fire, but little to no early seral forests. This shows that historically, at least during the previous 100 years, extensive early seral stands existed in forests like the Challis Resource Area's. Therefore, in addition to the maintenance and retention of old growth stands, natural regeneration of early seral stands is an objective (see PRMP, Forest Resources, Goal 1, #8, 14 and 22.

(b) Your citation of the DRMP is taken out of context. If you read on, the next sentence discusses the conditions which must be provided for natural regeneration to occur. The PRMP identifies forest management which provide for these conditions.

(c) Your suggested goal statement and opinions are noted. The BLM does not believe the "human hands off" approach you suggest would "restore ecological processes."

(d) Your opinion is noted. The Forest Resources analysis discusses the role of prescribed fire in forested systems (see PRMP, Chapter 4, Forest Resources, #3, 17, 24, and 25).

31-107: Your opinion on clear cutting is noted. The proposed reduction in clearcut size for Douglas fir stands from 40 acres (DRMP, p. 413, #7, Alternative 1) to 10 acres (Alternative 2) was primarily to address concerns like the ones you raise. Additional requirements to minimize wildlife escape distance, blend into the surrounding landscape, and design for natural regeneration would adjust the shape and position of a 10-acre clearcut to adequately regenerate. On higher (and therefore moister) elevation clearcut sites in the CRA, particularly in lodgepole pine stands, sagebrush invasion is minimal and regeneration is more successful. This is particularly true in lodgepole pine stands, as best germination occurs in full sunlight, and a residual overstory following a partial cutting generally reduces germination and survival (Fowells, 1965).

31-108: Your comments are noted.

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336 E. There are 51,000 AUMs in the CRA, and ~ 220 wild horses. Any conflicts between wild horses and livestock must be resolved in favor of wild horses. The fact that conflicts do exist indicates the degree to which lands of the CRA are overstocked with cattle and sheep.

337 F. Any conflicts between wild horses and native plant communities or native animal species must be resolved in favor of native species.

338

339 RMP Effects: Fire Management, Water Quality, WSR, Cultural Resource, Air Quality, Noxious weeds will affect WSAs. Cumulative impacts will occur.

340 1. Alt. 2,3,4,5. The RMP must discuss proper livestock stocking rates for the HMA -
Alt. 4. We support minimizing livestock numbers, AUMs in the HMA.

341 3. Alt. 2. What is the proper stocking rate for the San Felipe and Warm Springs allotments? How will BLM act to achieve this rate?
Alt. 4. We support exclusion of livestock from 39,000 acres in the HMA.

342 6. Alt.. 4. We support the most restrictive upland utilization levels as well as exclusion of livestock from riparian areas, as in Alt. 5.

343 7. Alt. 7. Makes no sense. Typo?? Only PNC should be used.
12, 20, 49. All Alts. Land treatments should not be done in the HMA for any reason. BLM is supposed to be managing the land. If grazing is properly managed, there is no need for land treatments, and no need for ID teams to contemplate them.

344 15-18. BLM must analyze cumulative impacts of grazing in HMA on all wildlife, not just big game.

345 17, 56. Alt. 5. We strongly support Alt. 5 - No ADC activity in the CRA.

346 18. Although there are no officially designated water quality limited stream segments in the HMA, the waters of the HMA are very degraded - all 92 acres of riparian zone are in poor condition. Achievement of watershed objectives will impact wild horses.

347 22. Alt. 2. BLM here discusses fire rehabilitation in terms of an all-knowing ID team determining fire rehab objectives. Objectives must be delineated in the RMP process. These include - minimum period of post-burn rest (we recommend 5 years) - See Eddleman et.al.(1994). recommendations for post-burn rest of 3-4 years on degraded lands, then reduced use if criteria not met. See also BLM -Snake River Birds of Prey Management Plan (1995): 5 years rest may be necessary for establishment of dryland planting. Specific criteria for site recovery must be met before grazing can resume. These include: vigor of native perennial vegetation, recovery of microbiotic crusts.

348 23, 24. Alts. 2,3,4,5. BLM must completely analyze negative and cumulative impacts of modified/conditional fire suppression and prescribed fire on the HMA.

349 25. Alt.4. Instead of simply saying livestock grazing will be removed for three years, BLM must establish criteria which must to be met before grazing can resume again.
30. All Alts. Any WSAs, released or not, must be closed to ORV use, due to impacts of vehicle disturbance on horses.

350 38-44, 50 - 54. All Alts. See E above.
45-48. See F above.

351 46. We do not believe that native wildlife species benefit from water developments. This is particularly true in a wild horse herd area where horses attracted to water may have significant impacts on previously less-disturbed areas.

352 60. All Alts. No commercial logging or "forest health" treatments can be allowed in the HMA - including helicopter logging.

WILDLIFE

The RMP presents a myopic, out-dated analysis of wildlife. This is particularly disappointing for a RMP which claims to be considering biodiversity, and which will be used in future ecosystem management. A discussion of wildlife cannot be separated from a discussion of

353 biodiversity. Throughout its analysis of impacts, the RMP fails to consider impacts on the wide array of species in the CRA, or discuss species other than charismatic, huntable herbivore

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megafauna -deer, elk, bighorn sheep. The main topic of discussion under wildlife impacts of proposed actions is competition for, or lack of, "forage" - meaning grass for these species to eat.

354 Wildlife habitat requirements are far more complicated than "forage". Forage is improperly used throughout to signify all food- forage according to RMP glossary - "browse and non-woody plants". Loggerhead shrikes do not eat forage.

355 The fundamental problem with the RMP is that for most non-game species, indeed everything except mule deer, elk, and bighorns, the BLM does not know 1) what species are out there; 2) where they are located; 3) why they are there; 4) the status of their populations. Lacking data on population status, population distribution, metapopulation structure, and habitat requirements for many species, it is difficult or impossible to assess potential impacts of the RMP - especially on populations of habitat specialists and sensitive, rare and locally endemic (or geographically restricted) species.

356 No evaluation of habitat condition for the vast majority of species endemic to the CRA was conducted as part of the RMP process. The RMP makes no attempt to apply coarse-filter approaches for assessing the likelihood of retaining viable, well-distributed populations of native species.

357 There is no evaluation of mechanistic relationships within the CRA. There is no evaluation of: 1) impacts of exotic species such as brown-headed cowbirds, starlings, on native species. 2) predator-prey relations. 3) sensitivity of species to human intrusions. 4) site-specific disturbance in critical or core population centers.

358 There is also a lack of data for biodiversity at higher levels of organization, such as unique assemblages, and for gradient-related diversity and variability across the landscape. The RMP thus offers no assurance that areas of particular ecological uniqueness or species richness will be conserved.

359 While a similar lack of information is a shared problem facing many resource managers, the concepts of managing for biodiversity and ecosystem management are based on the recognition that it is better to be proactive than to wait until species become threatened or endangered. The RMP must require a proactive procedure for identifying the basic habitat requirements and population status of all species of concern, not just ESA-listed species. Specific management indicators and guidelines must be identified and presented for these species, either up-front, where data exist, or through subsequent assessment where it does not.

360 Without fundamental knowledge about wildlife in the CRA, the RMP cannot adequately link impacts to proposed actions, and adequately evaluate alternatives.

361 The RMP states the following about big game populations: elk-increasing, mule deer - stable, pronghorn-optimum, bighorn sheep? Yet, it devotes 5 pages to discussion of these species (163-167), and half a page (189-170) to discussion of non-game wildlife, of which there are hundreds of species in the CRA, many with declining populations. For example, see Saab and Groves (1992) for information on significantly declining migratory songbirds in Idaho.

362 The RMP states that "little is known about presence, absence, distribution or abundance of candidate species. It is BLM's mandated responsibility to obtain data on these species and present it in the RMP.

Table 3-36 shows great gaps in knowledge about special status species. The amount of information on many wildlife species in the RMP is less than in current EAs from other Idaho BLM RAs which we have recently reviewed! A few days afield for a BLM biologist, toting tape recordings of owl calls, and mist nets for bats, would have gleaned information on occurrence of many of the species listed as "unknown" in Table 3-36.

As a consequence of lack of information and analysis regarding wildlife species presented in the Draft RMP, we believe BLM must issue a supplemental document (EIS) with current data on

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31-109: Current law, regulation, and policy, as well as prior inventories, formed the basis for proposed forest management (see PRMP, Forest Resources, rationale statement). Reconnaissance, monitoring, and incidental observation activities performed since formal inventories were completed in 1984 provide current information pertaining to insect and disease levels, reforestation needs, fire occurrence, etc.

31-110: Your opinion is noted. The use of prescribed fire to manage forest lands withdrawn from timber harvest would be addressed during the development of fire management activity plans (see PRMP, Fire Management, Goal 1, #1 and #3).

31-111: Your opinion is noted. The BLM believes that harvest can be sustained in the CRA based on the fact that most trees removed by natural causes or human intervention are being replaced by natural regeneration.

31-112: Your opinion is noted.

31-113: Your recommendation for a 10 year closure is noted. BLM would prefer to monitor sites to determine the need for livestock closure in forest regeneration areas.

31-114: Your opinion is noted. See response 31-106a

31-115: Your opinion is noted.

31-116: (a) Your comments are noted. The BLM believes that some of these areas can be managed for timber harvest without significant adverse effects on other resource values.

(b) Your opinion is noted. The BLM does not agree that timber harvest must be foregone in order to manage on an ecosystem basis.

(c) Forested areas do not exclusively exist as small islands in the Challis Resource Area (see PRMP, Map D: Forest Lands). Neither is old growth lacking (see response 31-106a). Although timber is often slow growing, this is usually a result of excessive stocking density. Commercial forest sites are relatively low productivity and have management problems, but are manageable.

31-117: (a) Your opinion is noted. Recent timber sales in the Challis Resource Area have all sold, indicating a local demand for timber and some economic importance.

(b) Your opinion is noted.

31-118: Your opinion is noted. Aspen stands in the RA which are left in a "natural state" continue to decline, with little

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362 wildlife in the CRA as part of the RMP process. The public cannot accept the shoddy analysis of wildlife in the RMP, nor can it make informed comments on proposed actions without such data. The BLM cannot analyze impacts without additional data. Where an agency has outdated, insufficient, or no information on potential impacts, it must develop the information as part of the NEPA process. 40 C.F.R. 1502.22. Similar documents must be prepared for upland vegetation, proposed VRM and Fire Management changes in the CRA, to make up for previously discussed deficiencies in information.

Examples of management actions which may significantly affect non-game wildlife species about which the BLM has no data:
- Prescribed burns in sagebrush habitat.
- Development of livestock water in upland areas to provide alternative livestock water.
- Trailing or herding in upland and riparian habitats.
- Logging in old-growth fir in "commercial timberlands".

363a The RMP fails to analyze impacts of habitat fragmentation, and loss of connectivity which will be caused by management actions. The viewpoint that burning and other vegetation treatments improves wildlife habitat by creating mosaics or earlier seral stage communities is a fallacy for most native wildlife species, particularly for those species dependent on the structural complexity of woody vegetation for food and cover. Many shrub-steppe and forest obligate species need late seral/old growth woody vegetation. Vegetation treatments fragment habitat. Patchy or fragmented habitat results in increased nest predation on migratory songbirds in forests (Wilcove 1985). Knick and Rotenberry (1995) found higher predation rates and higher brood parasitism by brown-headed cowbirds on shrub-steppe bird species nesting adjacent to burned or disturbed habitats in southern Idaho. Not only did the burn result in a direct loss of habitat, it also impacted birds nesting in adjacent unburned areas.

363b We know of no sensitive, rare or declining species in the CRA which is dependent on early seral stage or mid-seral stage vegetation communities (except long-billed curlew). Declining or vulnerable populations of species in shrub-steppe habitat in the CRA are primarily associated with old growth sagebrush communities or forest communities. See also Forest discussion.

364 Information must be gathered now, and management actions planned on a broad basis, not on a fragmented project-by-project basis. Cursory analysis at the individual project level overlooks the broad picture, connectivity, fragmentation of habitats, populations. The CRA is woefully behind the times in acquisition of key data on wildlife species.

365 RMP Effects: Visual Quality will affect wildlife. Cumulative impacts will occur.

366 1. All Alts. BLM cannot assume that general improvement will result from its actions, given that it has insufficient information on most species in CRA.

367 2. Alts. 2,3,4,5. Riparian habitat stubble height criteria may not result in sufficient willow regeneration (if livestock are grazed at a time when they eat willows) to support suitable yellow warbler, flycatcher habitat. RMP must recognize that wildlife has needs other than forage.

368 3. Alt. 4,5. Utilization of bluebunch wheatgrass after the critical stage may not result in sufficient residual cover for sage grouse nesting requirements. (1996 IDFG Draft Sage Grouse Management Plan 7" fall stubble height). Also see Gregg et.al. (1994), DeLong et.al. (1995). Successful nesting of shrub-steppe songbirds may also depend on sufficient residual cover.

369 5. Alt. 5. Early spring use (in a rotation grazing system) will impact vegetation height necessary for sage grouse nesting, antelope fawning cover.

370 7. Just as BLM considers delaying turnout on key elk calving areas, BLM must identify key areas for migratory songbirds, and specify delays in turnout until nesting is completed. Livestock trample and destroy nests.They flush nesting birds, thus increasing vulnerability to predation and brood parasitism.

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371 9. Alt. 2,3,4,5. All plant communities must be managed for PNC. Climax and late-seral habitats are vital to declining native species. Disturbed early and mid-seral communities are not. BLM has not made a firm commitment to managing for PNC - only token effort of the preferred alternative.

372 11. All Alts. What is a wildlife water development? The only water development which could be construed as such is a chukar guzzler. See Livestock Grazing for discussion of impacts of water developments on native wildlife.

373 12. All Alts. BLM here admits "Range improvements generally change patterns of livestock use... may reduce wildlife cover and forage on areas that previously received little or no livestock use." This same reasoning must be applied to 15,16.

374 14. All rights-of-way for water diversions must be denied.

375 17. All Alts. Vegetation treatments decrease the availability of food for late seral or old-growth dependent wildlife species - sage thrasher.
BLM completely fails to evaluate impacts of vegetation treatments on non-forage eating creatures - Brewer's sparrow, sage thrasher, sagebrush lizard.

376 20. Reintroduction of native wildlife species should take precedence over competing land uses.

377 21. Why is "no ADC activity" not analyzed here? BLM specifically discusses this as a management action elsewhere. No ADC activity should be allowed in the CRA. Only non-lethal methods of controlling specific problem animals can be used. Predation is a part of the cost of doing business on public lands for livestock operators.

378 22. All bighorn sheep habitat should be closed to livestock use.

379 24. All Alts. Minimum upland stubble height requirements of 7" of residual herbaceous cover are necessary in all sage grouse nesting areas. IDFG Draft Idaho Sage Grouse Management Plan 1996). 50 and 60% proposed upland utilization levels will not achieve this.

380 28. If the RMP is attempting to authorize large exchanges of lands near Mackay with the State of Idaho, the RMP must fully address all impacts, and evaluate such potential exchanges in the RMP.

381 29,30. We support rejection of all current and future DLE applications. DLE lands are typically lowest elevation lands, and most such land has already been lost from public ownership. Remaining low elevation federal lands may be important habitats for low elevation wildlife and plant species. DLE lands typically will not support sustainable farming, and when farming is abandoned, become giant weed patches which serve as sources of weeds for neighboring federal lands. We support exclusion of rights-of-way from from all SMAs, and termination of all ag trespass.

382 31,32. We support all motor vehicle closures here. (Substitute the word Cow for motor vehicle use in 31...).

383 33. Alt.2, 3,4,5. Wildlife OR values along nonsuitable WSR segments must be managed to have no adverse effects.

384 35. Alt. 3. BLM's statement "the patchiness of forest security cover ... magnifies the adverse effects of disturbance" can be applied to logging impacts.

385 36. RMP refers to a biological evaluation of the preferred alternative. This must be included in the RMP, for full disclosure to the public of impacts of the alternative.

386a 37-39. RMP must specify what requirements will be - for design specifications or site-specific

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BLM Response to Letter No. 31 *continued*

to no regeneration, and conifer encroachment/ replacement. The BLM believes special management is necessary to preserve aspen, and possibly cottonwood, stands in the RA.

31-119: (a) Treatments designed to "maximize timber productivity" (DRMP, p. 414a, #15, Alternative 1) would not eliminate timber. Your opinion regarding Alternatives 2 and 3 is noted.

(b) Many special status species of the Challis RA require late-seral or PNC habitats. However, many special status species are known to use and depend upon early-seral and mid-seral habitats in the Challis RA. For example, burrowing owls are found in relatively open, grassland and sagebrush-grassland habitats, such as those that exist as a result of wildfire or prescribed burning. Wavy-leaf thelypody is commonly found in road cutbanks and on fill slopes created as a result of road construction. The Ute ladies'-tresses orchid, a threatened plant species that may occur in the Challis RA, has been found associated with habitats heavily influenced by human activities, including irrigated pastures, irrigation ditches, and below leaky diversion dams.

(c) Your opinion is noted.

(d)Your comment is noted. The BLM believes that proposed management of forested areas would protect ecological resources.

(e) Your opinion is noted. The BLM believes that commercial timber harvest is an ecologically viable use of some forested areas in the Challis RA. Also see response 31-27.

31-120: Please see response 31-20.

31-121: Your opinions are noted.

31-122: (a) Your opinion is noted. (b) The statement you quoted was meant to convey the fact that permittees would have to do more riding, salting, and other intensive management in order to meet the stated criteria. It was there to show an impact to them. Please also see response 14-1(c).

31-123: (a) Your comments are noted.

31-124: Specific strategies for allotment management will continue to be included in activity plans such as Allotment Management Plans or Integrated Resource Activity Plans. The PRMP emphasizes watershed assessment (instead of watershed analysis or ecosystem level plans) and provides guidance for when a watershed assessment must be completed and used. The PRMP also

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inventories.

386b Alt. 5 states that adverse impacts would be fully mitigated. How? What mitigation criteria would be used? Throughout, the RMP is virtually silent on mitigation measures.

387 43. All Alts. The discussion of logging impacts to wildlife is cursory, incomplete, inadequate. What will impacts be on blue grouse, northern goshawks, flammulated owls, bats, pygmy nuthatches?

388 44-47. Discussion of cumulative impacts is inadequate.

389 46. What specific measures does the RMP take to protect strutting and nesting complexes for sage grouse? RMP Alt. 2 claims positive management would be instituted. What are the details?.

390

391 GOAL 2 will not be met with limited measures specified in RMP for non-game wildlife habitat, and the negative impacts of vegetation treatment. This discusses ongoing monitoring of "key habitats". What are these habitats? Where is the data? Why is it not presented to the public?

392 11. Almost all wildlife species whose populations are declining are dependent on PNC/late seral vegetation - artificial DFC classification for some other seral stage is incompatible with management for habitat needs of declining species.

393a 13. Why has the BLM 2000 plan not yet been implemented? What has been accomplished so far?

393a All Alts. Developing new wildlife water sources will not benefit native species - what is the basis for the claim of benefit to 90,000 acres? Any water developments which BLM claims to be for wildlife must provide NO livestock water. This is necessary to prevent livestock water from being developed under the ruse of wildlife water.

393b See BLM's own comments on water in # 12 Comparison of Alternatives.

393c Will commercial timber stands be closed until the 10 year inventory is complete?

394 14. All Alts.How will this be done? Be specific. BLM appears to be giving lip service to biodiversity, but doing absolutely nothing to manage for it.

How will proposed management reconnect fragmented parts of wildlife habitats?

WILD AND SCENIC RIVERS

395 IWP and CIHD propose the maintenance of all current potential wild and scenic rivers as eligible in the final CRMP for future classification as wild, scenic, or recreational segments. We oppose any delisting, as unsuitable, of any currently listed eligible stream or river segment in the Resource Area.

LAND TENURE AND ACCESS

396 1. Considerable effort was expended identifying tracts of public land for potential disposal but very little effort was given to identifying areas for potential public acquisition. Priority acquisitions should be identified by location when possible and by description otherwise, i.e. acquire those lands which: provide public access to perennial streams which offer recreational opportunities; would increase the protection or enhancement of habitat for special status species; provide improved public access to existing public lands and resources; contain resource values which would be of benefit to the public and the programs of BLM; and so on.

397 2. The analysis of potential impacts to other resources and programs as a result of Land Tenure actions mostly focused on possible negative effects caused by the loss of public lands. Very little consideration was given to potential benefits for the various programs and resources that should occur from well planned and executed land exchanges. Exchanges should be the

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397 preferred method of achieving not only Land Tenure Goals, but enhancing all the various resources and BLM programs. Every exchange should be planned to achieve clear public benefits, i.e. more will be gained than lost. A BLM Land Use Plan such as this should provide the guidance to steer Land Tenure Adjustments for the maximum benefits not just minimize adverse impacts.

398 3. Why limit the public lands available for exchange in the Chilly Slough Project area to only those near Chilly Slough as shown on Map A? Why can't any other public lands in the Resource Area (or elsewhere for that matter) be traded for property in Chilly Slough?

399 4. Why is only one area identified for potential BLM/state exchanges? Why are public lands identified for trade only to the state? If the identified public lands are suitable for disposal in a state exchange, why aren't they suitable for disposal in a private exchange? State exchanges should be treated no differently than private exchanges. Each exchange must offer benefits to the public and BLM (the land acquired must offer more public benefits than the public land disposed of).

400 5. Thousands of acres are identified for public sale in each of the alternatives. No lands should be identified for disposal by sale only. If public land is suitable for disposal by sale, it is just as suitable for disposal by exchange. There is no sale that is as beneficial to the public as an exchange. There is no sale that cannot be accomplished as part of an exchange, particularly with the use of an exchange facilitator. Public lands are a finite resource. Land Tenure actions should enhance or improve the public lands and resources, not diminish them.

401 6. All methods of disposal should be lumped together. Public lands that are identified for potential disposal should be listed as available for private exchange, state exchange, sale, R & PP, (DLE?), etc. This will allow the most flexibility and most public benefits.

402 7. It appears that sale of public land is a preferred method of resolving cases of unauthorized use (trespass). You can definitely end a trespass on public land by eliminating the public land. This method, however, can create more cases of trespass by offering a sure way of acquiring public land that would otherwise not be available. Sale should rarely be used in such instances. Although more difficult, the most equitable and beneficial tactic over the long term is trespass elimination and prevention.

403 8. The use of "covenant language" or agreements with the new owners are proposed to protect wildlands, riparian areas, and floodplains on lands that are transferred out of public ownership. It is assumed that this term (covenant language) means the title to the property will contain some encumbrance or restrictions on uses meant to protect certain areas. What are the consequences for violations of the "covenants" or agreements? Who will enforce these restrictions? How will compliance be monitored in the future (100 years from now)? Federal enforcement of actions on private land is very impractical and currently politically incorrect. If there are sensitive values on some public lands that may be jeopardized by transfer to private ownership, then those lands should be retained in public ownership.

404 9. Restricting the areas available for Desert Land Entry is an excellent proposal. Elimination of all public lands from such consideration would be in the highest public interest.

405 10. There is an incorrect citation in Volume One, page 91, paragraph 1, line 10. This reference was intended to be that portion of the federal regulations that provides authority for the acquisition of public access (easements). The regulations at 43 CFR 2920 are cited incorrectly. Part 2920 provides authority for the BLM to grant easements on public land rather the reverse.

Additional comments:

406 Mitigation measures must be enforceable by being described and committed to in the Record of Decision. BLM must specify mitigation measures.

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introduces Integrated Resource Activity Plans, and clarifies when these and other plans will be appropriate.

31-125: (a) Your preference is noted. (b) The PRMP provides management emphasis for a broad range of wildlife species groups and habitats (see Wildlife Habitat, Goals 1-4). These decisions, coupled with the other decisions in the PRMP, are expected to maintain and improve habitat for the species you mention. The species you mention were not discussed on pp. 236-237 of the DRMP because the analysis in this section was focusing on the impacts of BLM's wildlife management decisions on livestock grazing, not the reverse. The effects of livestock grazing on wildlife resources are discussed in the DRMP on pages 319-320, #5-9. (c) Your comments are noted.

31-126: Your comments are noted. The BLM believes prescribed burns and water developments can be described as "wildlife management actions" when the primary objective is to provide forage or water for wildlife. For example, a number of prescribed burn treatments have been conducted in the Challis RA specifically for bighorn sheep on bighorn winter ranges. Most of these burned areas are not grazed by livestock due to steepness of slope, or because they are within areas closed to livestock use. The BLM has observed that big game animals are attracted to any area treated by prescribed burning, regardless of the original purpose of the burn. A number of water developments have also been specifically developed for bighorn sheep in the Challis RA. These developments are called "guzzlers" or "catchments" because rainwater is often the primary water source. Water developments developed for livestock are also heavily used by many species of wildlife, particularly when the water is piped into areas devoid of natural water sources. The impacts of fencing were considered, and are described in the DRMP in Chapter 4 - Wildlife, pp. 321-322, #11, 12, 15, and 16.

31-127: Your preference is noted. The PRMP would provide for consultation with the IDFG, appropriate Federally recognized tribes and other interested parties to resolve resource conflicts prior to any reintroduction of native wildlife (see PRMP, Wildlife Habitat, Goal 4, #1).

31-128: Livestock grazing is not the primary cause of noxious weed spread within the Challis RA. As noted in the Affected Environment (DRMP, p. 143), road corridors are the main areas of infestation. Also note that the PRMP (Noxious Weed Infestations, Goal 3 #1) limits the control of native poisonous plants to those circumstances where an ID team determines the need.

31-129: The BLM believes the analysis tracks with the preponderance of evidence that sagebrush species,

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407 At first glance, we were impressed at the number of large maps provided in the RMP. However, as we examined them, we saw that many dealt with the same issues, and that many issues and important information which should have been provided in map form was lacking.
- Special status animal species distribution/occurrence
- Plant community seral stage - PNC
- Upland vegetation information - since the change in upland vegetation utilization in preferred alternative focuses on bluebunch wheatgrass, maps should have been provided bluebunch distribution, and parts of CRA where management will focus on bluebunch utilization.
- Upland vegetation maps identifying plant community type. Map 1 is visually pretty, but does not identify communities at the level of resolution which is necessary for the public to understand
RMP proposals which focus solely on grasses.
- Current range improvements.
- Proposed range improvements.
- Areas of proposed vegetation treatment.

408 The RMP does not adequately locate/identify sites of proposed action. The RMP does not adequately predict and quantify outcomes or impacts of proposed actions. If the preferred alternative is adopted and followed, -What % of RA will be impacted? What % improvement
409 can be expected? How many acres will be affected? The RMP does not provide scientific evidence and site-specific evidence necessary to support many proposed actions.

410 The preferred Alternative does not take the clear, decisive measures necessary to protect resources of the CRA from further degradation or destruction.

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although a natural feature of intermountain rangelands, is a very effective competitor for light, water, and nutrients and can become a monoculture if subordinate species are adversely impacted or removed from the site. Through improved grazing and fire management practices, sagebrush can continue to dominate the landscape, while occurring with a wide diversity of other plant species. This diverse mix of flora provides for resilient, healthy rangelands.

31-130: The paragraphs you comment on in Chapter 4 discuss impacts TO the livestock grazing program, FROM actions related to riparian and aquatic habitat management. Your opinions and preference for alternative 5 are noted. Specific closures, and/or exclosures would be discussed in detail at the activity plan level.

31-131: Your opinions and comments are noted.

31-132: Your concerns about compliance with the Clean Water Act are noted. The PRMP decision under Water Quality, Goal 1, #2 ensures that grazing activities will be designed and conducted to support State and BLM identified beneficial uses.

31-133: Your preference for Alternatives 4 and 5 is noted. Please see response 16-7.

31-134: Your opinion is noted. The BLM believes rangeland health and functioning ecosystems will be realized through proposed changes in grazing management. Area closures can be entertained on a case-by-case basis if management actions are ineffective in reaching the desired goals.

31-135: (a) Bluebunch wheatgrass is a key species on many sites throughout the Resource Area because of its growth characteristics, its palatability to grazing animals, and its wide-spread distribution. These criteria make it a true "indicator" species for the overall condition of the plant community, being the first to respond both positively and negatively to management.

(b) The DRMP, p. 130 and Table 3-21 provide some general information on the distribution of bluebunch wheatgrass. Of the sites listed, only the low elevation windswept sites, Saltbrush sites, Chicken Sage sites, riparian areas, high mountain sagebrush sites and north slope timber sites lack noticeable amounts of bluebunch wheatgrass. Given this distribution (roughly estimated at 60-70% of the Resource Area) it is virtually impossible, and not the intent, to shift livestock use to non-bluebunch sites in order to meet the utilization criteria. In addition, those areas not supporting bluebunch wheatgrass have other key species subject to the 50% utilization standard

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for plant maintenance and watershed protection.

(c) We are aware of the growth characteristics of bluebunch wheatgrass which is why we imposed very specific utilization criteria on this species. As Anderson (1991) pointed out there are many variables that may determine the effects to individual bluebunch plants; vigor, drought, competition, plant spacing, season of use, use levels, repeat utilization, timing, duration and amount of precipitation events, temperature, soil and site limitations, to name a few. The fact that the plant is still as wide-spread as it is after 100 years of grazing indicates it is resistant, to some degree, to grazing pressure. The BLM believes that by modifying grazing systems and applying use standards, bluebunch wheatgrass and other desirable species will be adequately protected and encouraged to expand to the extent of the site's potential.

31-136: (a) Your opinion is noted. It is not the BLM's intent to allow grazing in existing riparian exclosures that were developed for the purpose of establishing reference areas.

(b) As noted in the decision this analysis is based upon, a six-inch stubble requirement would be implemented until the streams are in proper functioning condition (see DRMP, p. 374, #7).

(c) Your opinion is noted.

31-137: (a) Sections 203 and 206 of FLPMA authorize disposal of public lands when certain conditions exist. Decisions concerning disposal are considered on a case-by-case basis and are pursued with the public benefit in mind. Your opinion on this issue is noted. (b) Some land tenure adjustments are intended to resolve unauthorized use situations, often associated with long-standing agricultural use of the public lands. These adjustments benefit the permittee/private landowner by allowing them to acquire public lands.

31-138: Your opinion on WSR designations is noted. When the wild and scenic river eligibility evaluation was completed, the BLM noted current uses, while determining if outstandingly remarkable (OR) values existed within each free- flowing river corridor. The OR values identified existed under current levels of use; those uses may continue on the segments found suitable or eligible for coordinated study, as long as those uses are managed to maintain the level of development that resulted in the segments' tentative classifications, to ensure non-degradation of OR values, and to protect free-flowing characteristics (see PRMP, Wild and Scenic Rivers).

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31-139: Your opinion is noted.

31-140: (a) Your opinion is noted.

(b) Your opinions are noted. The impacts of livestock grazing on recreational opportunities are described in the DRMP, pp. 257a-258b, #3 and 4.

31-141: Your preference is noted. Temporary exemptions for permittees to use motorized vehicles to access some areas would be reviewed and permitted on a case-by-case basis. Exemptions, if granted, are not expected to have adverse effects on resource values because off-road use would be infrequent.

31-142: An analysis of biodiversity and a site-specific field assessment of special status species would be part of all project planning activities (see PRMP, Biological Diversity, Goal 1, #1 and Special Status Species, Goal 2, #1).

31-143: Your opinions are noted. Please see response 14-4.

31-144: The process of assessing suitability referred to on page 104 of the DRMP differs from the suitability determinations as currently defined by BLM (see PRMP, Glossary: Suitable ranges). Those earlier procedures were wrought with problems of expense, interpretation and application. Under PRMP management direction, suitability (and capability) would be determined through utilization pattern mapping (UPM) and other resource monitoring procedures, with the appropriate interpretation and application at the activity plan level (see PRMP, Livestock Grazing, Goal 1, #2). The specified monitoring methods are approved methods outlined in BLM's Technical References TR 1734-3, TR 1734-4, and Idaho's Minimum Monitoring Standards. These monitoring activities would determine where livestock are grazing, the intensity of use, and if adverse impacts to resources are occurring.

Using monitoring to determine suitability is preferred for a variety of reasons: it is obtained from actual on-the-ground observations; it reflects and is responsive to site-specific and allotment-specific management strategies; and it is much more efficient, since it is an ongoing activity throughout the Resource Area. Furthermore, PRMP decisions (see Livestock Grazing Goal 1, #2 and 6) specify that levels of livestock use will be determined for various allotments based upon monitoring.

31-145: The stated ecological condition goals are based on current BLM policy direction (see Livestock Grazing, Goal 1, rationale statement). The goals reflect the fact that some areas will not respond quickly to improved management, and, over the life of the RMP, may not achieve the desired condition. Increasing all lands in earlier seral stages to late seral may not be consistent with biological diversity or special status species management objectives, as some plant or animal species require habitats in early or mid seral stage (see response 31-119(b)).

31-146: The PRMP contains numerous decisions which are effectively resource allocation decisions for wildlife habitat and watershed protection (e.g., see Livestock Grazing, Goal 1, #7; Riparian Areas, Goal 1, #5; Wildlife Habitat, Goal 2, #7 and 9; and ACECs, Goal 1, Cronk's Canyon, Donkey Hills, and Thousand Springs ACECs). The upland utilization criteria provide for residual herbaceous cover for sage grouse, as an example, and the riparian stubble-height criteria provide for residual cover and regrowth of herbaceous vegetation for riparian-dependent wildlife species. Virtually all decisions that allocate vegetative resources or habitat to big game directly benefit upland game birds and nongame wildlife.

31-147: A definition of "supervised trailing" has been added to the Glossary in the PRMP.

31-148: Your opinions are noted. BLM Manual Handbook H-4400-1, Rangeland Monitoring and Evaluation, provides the framework for past, present, and future monitoring procedures in the Challis Resource Area.

31-149: (a) Your recommendation is noted.

(b) The BLM disagrees with your statement that 50% utilization on key forage plants has "resulted in degraded watersheds, depleted native plant communities and unhealthy ecosystems". Where this standard has been met, healthy ecosystems and watershed stability have occurred.

(c) Early moderate grazing of current production, and grazing after seeds are ripe, has little impact on bluebunch wheatgrass vigor, production, reproduction or root reserves (Anderson, 1991).

(d) Dormant season utilization of 60% describes the upper limit allowed. Where other issues are a concern (e.g., sage grouse) the levels can be modified. Watershed protection considers total biomass, not just forage production/removal. The degree of forage defoliation affecting plant maintenance is dependent upon time of removal, regrowth, and subsequent periods of recovery or non-use, all of which are incorporated into proper grazing management decisions.

(e) Your comments are noted.

(f) Woody use standards would be considered, as necessary, at the activity plan level (see PRMP, Attachment 3).

31-150: Under Alternative 1, livestock grazing systems to improve riparian habitat were designed and implemented on a case-by-case basis, where practical. Under Alternative 2 - Preferred Alternative, specific criteria for stubble height and bank shearing would be implemented to ensure attainment of desired aquatic and riparian habitat conditions.

31-151: (a) Your comments are noted.

(b) Special emphasis on specific species' habitat requirements will be determined at the activity plan level through the ID team process. Managing for late seral to PNC uplands in good condition and properly functioning condition riparian habitats provides adequate habitat for the majority of species.

31-152: Your comments are noted. As stated in the PRMP, Livestock Grazing Goal 1, #10, the BLM would manage for late to PNC upland habitat, unless an ID team determines that some other desired plant community would better achieve multiple use objectives. In all cases, management would focus on achieving or maintaining the Idaho Standards for Rangeland Health.

31-153: Your suggestion is noted.

31-154: Your preference for Alternatives 4 and 5 is noted.

31-155: Your preference for Alternatives 4 and 5 is noted.

31-156: (a) The specific figure of 70% vegetative cover (for live vegetation and vegetative litter) referenced in the DRMP, Livestock Grazing, Goal 1 #15, page 353 was obtained from cover measurements and observations made primarily on higher elevation upland monitoring sites in the Resource Area. Lower elevation sites typically have much less vegetative cover. Rather than describing a wide range of site-specific cover objectives, it was decided to use the Ecological Site Guides published by the Natural Resources Conservation Service (NRCS) as a reference. Since these sites are site-specific for soil type, vegetation, climate and landform, BLM determined that maintaining 90% of site potential would be adequate to stabilize upland watersheds, promote water infiltration, and provide for the ecological processes necessary to meet the fundamentals of rangeland health and standards.

(b) Vegetative cover objectives would be implemented simultaneously with management to achieve the ecological condition goals stated in Livestock Grazing, Goal 1 (also see PRMP, Livestock Grazing, Goal 1, #10).

(c) The BLM believes microbiotic crusts will be adequately protected by the application of numerous decisions pertaining to livestock grazing and upland watershed health (e.g., Upland Watershed, Goal 1, #1).

31-157: Your comments are noted. The specific terms and conditions of individual grazing permits will continue to be established at the discretion of the authorized officer, in accordance with 43 CFR 4130.3. Any terms or conditions deemed necessary to add to grazing permits will also be consistent with, and/or implement the decisions in the approved Challis RMP. Please also see response 31-144 regarding suitability.

31-158: Your preference for Alternatives 4 and 5 is noted.

31-159: The PRMP incorporates the management you prefer regarding known burial sites. Please also see response 31-61.

31-160: Your opinion is noted.

31-161: Your opinion is noted. The BLM, however, disagrees that prescribed fire or vegetation manipulations are ineffective in restoring native plant communities or rangeland health (see response 31-129).

31-162: Situations which require a watershed assessment are described in the PRMP (see Attachment 5, "General" SOP #1).

31-163: Your opinion is noted. Please see response 31-129.

31-164: The categorization process is used to prioritize BLM's limited funding and staff resources. Finite budgets do not allow the BLM to work on every area simultaneously.

31-165: The PRMP has been revised in response to your comments (see Attachment 8: Design Specifications, "General" #3).

31-166: Your preference is noted.

31-167: Holistic grazing could be evaluated by an ID team as a potential knowledgeable and reasonable practice; however, any proposed knowledgeable and reasonable practice would be subject to completion of a site-specific environmental assessment and must meet other stated criteria (see Livestock Grazing, Goal 1, #7).

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31-168: Your opinion is noted.

31-169: Please see response 31-28.

31-170: Your opinion is noted.

31-171: Your opinion is noted. Please see response 6-2.

31-172: Your opinion is noted. The PRMP includes decisions to conduct vegetative monitoring to determine long term stocking levels (Livestock Grazing, Goal 1, #2) and provides for reduced levels of livestock use, if necessary to achieve riparian resource objectives (e.g., see Riparian Areas, Goal 1, #7). The PRMP also emphasizes watershed assessment and integrated resource activity planning, which would ensure that other resources and land uses are considered when plans to manage livestock grazing are developed.

31-173: Your opinion is noted. The BLM is unaware of any literature or other references or studies that would suggest a 10 percent limit on woody vegetation. The riparian stubble-height and bank shearing criteria (Riparian Areas, Goal 1, #5 and 6) are expected to limit utilization of woody riparian vegetation and promote the productivity and health of shrubby riparian communities without the necessity for woody utilization limits. The BLM would prefer to establish species-specific limits on woody use at the activity planning level, if an ID team determines that use limits are necessary.

31-174: Your opinion is noted. The PRMP contains livestock grazing management decisions to maintain and improve riparian habitat condition throughout the Resource Area; this management would apply to all livestock grazing, upon signing of the Record of Decision for the approved RMP.

31-175: Your preference is noted. The BLM believes that the stubble-height standards outlined in the PRMP would result in satisfactory progress toward meeting riparian objectives (see Riparian Areas, Goal 1, #5). The BLM believes that a 6 inch stubble height standard would not be necessary to maintain streams that are already in proper functioning condition.

31-176: Your preference is noted. The BLM believes that grazing of riparian areas after the growing season would be an acceptable practice on many sites, as long as riparian stubble-height standards are met.

31-177: Your preference is noted.

31-178: Your preference is noted.

31-179: Your opinion is noted. Activity level planning will determine individual allotment monitoring and evaluation schedules.

31-180: Your opinion is noted. Please see response 6-2.

31-181: Several PRMP actions address your stated concerns; please see Livestock Grazing, Goal 1, #1 and Riparian Areas, Goal 1, #5 and 7.

31-182: Please see response 31-7a.

31-183: Please see response 31-157.

31-184: Your opinion is noted. However, this topic is beyond the scope of the RMP, since ownership of future range improvements on public land is an issue of national BLM policy (grazing regulations) which is currently unresolved. The BLM is currently operating under Interim Guidance for Implementation of the Wyoming District Court Ruling on Grazing Regulations (W.O. IM-96-138). All questions relative to range improvement ownership and other issues addressed in the ruling are to be directed to the Washington Office.

31-185: Your opinion is noted.

31-186: Timeframes for completing activity plans and watershed assessments have not been included in the PRMP to allow BLM managers flexibility in planning workloads to address highest priority resource needs. Those timeframes will be determined as part of the Implementation Plan which is developed immediately following approval of the RMP and signature of the Record of Decision. The Implementation Plan addresses at least the first five years following approval, and is modified and adjusted in response to such things as actions completed, effectiveness of actions in achieving RMP objectives, and changes in staffing and budget priorities.

31-187: Your opinion is noted. Please see response 6-2.

31-188: The BLM could not determine how the IWP wants the "Cultural Resources" comments to apply to paleontological resources. Some cultural resources comments *(e.g.,* preference for maximum acres of inventory) have no comparable proposed management for paleontological resources.

31-189: (a) The BLM does not agree there are substantial risks to the health and safety of the recreating public due to livestock grazing. The PRMP/FEIS describes how PRMP actions are expected to reduce the types of impacts mentioned in your comment (see ***Chapter 4*** - Recreation Opportunities, Visitor Use, and OHV Use). Developed recreation sites are monitored by

recreation, safety and maintenance personnel for health and safety hazards on a continuous basis. The BLM also recognizes that there are inherent risks to any recreation use or activity, which if removed, would destroy the very recreational values visitors are pursuing.

(b) Aesthetic impacts of livestock grazing and range improvements were described in the DRMP on pp. 257-258, #3 and 4.

31-190: The BLM monitors all developed recreation sites through maintenance, management, and law enforcement site visits, through public input during those visits, or through correspondence with individuals and organizations. The BLM also monitors use in SRMAs and in the Extensive Recreation Management Area in much the same way, although not as often.

31-191: The following PRMP decisions would prevent proliferation of new roads to access range improvement projects: Attachment 8 - Design Specifications, Rangeland Improvement #1 and OHV Use, Goal 1, #1.

31-192: When compared with existing management, the PRMP only closes one additional area to livestock grazing (south half of the Highway Allotment); this area has no range improvements. Range improvements have been removed from areas already closed to grazing.

31-193: The PRMP limits motorized vehicle use to existing roads, vehicle ways, and trails throughout the Resource Area (see Off-highway Vehicle Use, Goal 1, #1), unless additional limitations or closures also apply. Once the Record of Decision for the approved RMP is signed, an OHV implementation plan will be developed to manage OHV use. Maps and narratives describing permissible OHV activities will be made available to the public, and signs which indicate permissible uses will be placed along travel routes.

31-194: Conflicts between livestock and recreation use in designated recreation sites would be resolved as specified in the PRMP under Livestock Grazing, Goal 1, #17. All other conflicts would be resolved on a case-by-case basis.

31-195: The PRMP contains this management - see Water Quality, Goal 1, #2.

31-196: Your opinion is noted.

31-197: Your opinion is noted.

31-198: The PRMP analysis has been revised to reflect the impacts on recreation opportunities which are expected to occur from Air Quality, Rangeland Vegetation Treatment, and Biological Diversity management decisions.

31-199: Your comment is noted.

31-200: Recreation use at developed sites is increasing much faster than primitive based recreation use. This assessment is based on visitor counts within developed sites, an increased need for site maintenance, and the general increase in RV-based recreation within the area. Primitive based recreation is growing, but not at the rate of developed recreation. This conforms with National trends, and is confirmed by observations of BLM recreation personnel. Although an increase in primitive based recreation use is expected as the population increases, this increase is likely to be insignificant.

31-201: Man is a part of the natural environment, and human-induced impacts are not necessarily negative. Projects can be designed to blend in with the natural terrain.

31-202: The PRMP limits motorized vehicle use in the RA to existing roads, vehicle ways, and trails yearlong, unless additional limitations or closures also apply (see Off-highway Vehicle Use, Goal 1, #1).

31-203: The "actions" referred to include all decisions listed in the DRMP under Management Concern: Water Quality. Beneficial uses are an aspect of water quality, and are therefore considered in the DRMP analysis on p. 260, #12.

31-204: Your opinions are noted. Please see response 31-395.

31-205: Your opinions are noted. The BLM feels proposed OHV management (see PRMP, OHV Use, Goal 1) is sufficient to protect resource values in existing WSAs and those WSAs if released from wilderness review. Proposed management is consistent with the Interim Management Policy and Guidelines for Lands Under Wilderness Review, p. 47, #11 (July 5, 1995).

31-206: Your opinion is noted. The "disturbance and treatments" mentioned under the Alternative 5 analysis do not necessarily refer to timber harvest; treatments to mimic natural events could include prescribed natural fire. Please note that the PRMP sets aside old growth timber stands for wildlife and associated (*e.g.*, bird-watching) purposes. Please also see response 31-51.

31-207: Location of a hiking, biking and/or OHV trail would be identified at the activity plan level, based on

resource and allocation needs. Impacts of the proposed action would be analyzed during the NEPA process.

31-208: Your preference for Alternative 5 is noted. Please see response 31-202.

31-209: Your opinion is noted.

31-210: Your opinion is noted.

31-211: The BLM agrees microbiotic crusts are an important element in the health and function of the soil resource; the PRMP adds mention of microbiotic crusts as a crucial element to consider when evaluating new soil disturbing actions (see Upland Watershed, Goal 1, #1). Additional PRMP decisions support resource conditions which are indicators of and encourage stable, thriving microbiotic crust populations. PRMP goals and management decisions are directed at stabilizing soil erosion (Livestock Grazing, Goal 1, #10 and 14; Upland Watershed, Goal 1 and decisions #1, 2, 4, 5, 6,1 0, and 11), obtaining high seral stage upland plant communities (Livestock Grazing, Goal 1 and decision #10), and obtaining healthy, functional upland watersheds (Livestock Grazing, Goal 1, #10 and Upland Watershed, Goal 1). An analysis of impacts on microbiotic crusts has also been added to the PRMP (see Chapter 4 - Soils).

31-212: Microbiotic crusts contribute to the process of nutrient cycling in concert with the distribution of vascular plant species, plant and other organic residues (*e.g.*, dung), soil invertebrates and bacteria, atmosphere, and climate. The effects of management actions on nutrient cycling were not specifically analyzed in the DRMP; however, effects on upland health and function, which includes nutrient cycling as a component, were adequately analyzed in Chapter 4 (see DRMP, Soils, #6, pp. 268-269; Vegetation #2, 5, and 9, pp. 278-279; and Water Resources, #5 and 6 pp. 292-293).

31-213: Please see response 31-82.

31-214: The DRMP also focused on upland soils resources - see Management Concern: Upland Watershed, Goal 1, #2, 4-7, 10 and 11 (pp. 267-268) and Management Concern: Livestock Grazing, Goal 1, #6, 10 and 15 (pp. 352-353). Impacts of DRMP decisions on uplands were analyzed in Chapter 4: see Soils, #1, 4-6, 21, pp. 267-269, 272 ; Vegetation, #1, 2, 4-6, 8 and 9, pp. 278-279; and Water Resources, #1, p. 291. This emphasis has been carried forward in the PRMP/FEIS.

31-215: Your opinion is noted. The PRMP has been revised to place greater emphasis on watershed assessment (see PRMP, Attachment 5: SOPs, General SOP #1). The DRMP soils information is primarily from data collected on a watershed basis; see Chapter 3, pp. 110-121 and p. 149, Table 3-31.

31-216: The DRMP does not contain or analyze any quantitative soil erosion data. This is largely due to a lack of useable soil erosion models that can be applied to rangeland environments. The qualitative analysis of the soils resource beginning on page 267 is accurate in summarizing an overall reduction in soil erosion, given the surface protection measures proposed in the preferred alternative.

31-217: Your opinion is noted. The BLM does not feel desertification is an issue in the Challis Resource Area. The characteristics described in the referenced *Desertification of the United States*, Council on Environmental Quality, 1981 by David Sheridan are largely non-existent in the Resource Area. PRMP actions (see Livestock Grazing, Upland Watersheds, Fisheries, and Water Resources) are adequate to nullify any threats of desertification.

31-218: Management of the soils resource is an integral part of the DRMP *(e.g.*, see Management Concerns: Livestock Grazing, Upland Watershed, Riparian Areas, Fisheries). Impacts to the soil resource were analyzed in Chapter 4 (DRMP, pp 267a-276a). The Soils, Vegetation, and Water Resources analyses adequately describe the effects of the management decisions in attaining the fundamentals of rangeland health and meeting Idaho's Standards.

31-219: Rangeland monitoring (both quantitative and qualitative) includes numerous procedures designed to monitor the health of the vegetation (nested frequency, cover, vigor plots) and soils resources (apparent trend, soil surface factor ratings). The intensity and priority of monitoring will be included in the implementation plan developed upon the signing of the Record of Decision for the approved RMP.

31-220: Your opinion is noted. The BLM believes no reasonably foreseeable effects would occur from decisions listed under Wildlife Habitat Management, Water Quality, WSR, Visual Quality, and Cultural Resources Management.

31-221: The BLM believes current soil loss would not increase and would, in fact, be reduced through the application of management described under the preferred alternative.

31-222: (a) The BLM disagrees that livestock grazing and range improvements are irreversible and irretrievable

commitments of the soil resource. The BLM believes the DRMP analysis of Alternative 2 stated in Chapter 4 - Soils, #1b (p. 267a) is correct, because the proper management of forage use, vegetation and ground cover provided for by RMP decisions will adequately protect the soil. Range improvements require interdisciplinary team involvement and NEPA compliance designed to avoid resource impacts. In addition, Livestock Grazing, Goal 2, #8 page 355, Upland Watershed, Goal 1, #2, and Attachment 8: Design Specifications by Alternative, "General" #2 (p. 465) and "Rangeland Improvement" (pp. 468-469) outline specific protective measures to mitigate ground disturbing activities.

(b) Please see response 31-216.

31-223: Your opinions are noted. The PRMP/FEIS expands the analysis of impacts from livestock grazing and range improvement decisions. The BLM believes the PRMP's livestock grazing management for upland and riparian areas would prevent the types of impacts you describe.

31-224: Your opinion is noted. Research, specifically Clary and Webster (1989) and Myers (1989), has indicated that improvement in floodplain development and desirable vegetation is likely with 6" stubble heights and the accompanying "low impact" grazing conditions. Monitoring results obtained within the Resource Area also support this concept (see response 20-11).

31-225: Your opinions are noted. However, the BLM feels the impact analysis is adequate. The PRMP's livestock grazing management for upland and riparian areas would prevent the types of impacts you describe.

31-226: Fire does impact microbiotic crusts, as well as all micro-organisms living in the surface soils. The manner and extent of those impacts would vary site specifically and would be assessed in an Environmental Assessment at the activity planning or project implementation phase.

31-227: The analysis of impacts assumes successful implementation of the decisions as stated (see DRMP, p. 177, "Assumptions"); *i.e.,* that the decisions will support the stated goals. Management Concern: Vegetation Treatment Projects, Goal 1, #5 (DRMP, p. 365) requires that standards for vegetation treatment success be established during project planning. These standards must be met before grazing is allowed in the treated area. Soil stability would be evaluated as described in response #31-219 above.

31-228: (a) Timber harvesting activities may have an adverse effect on the soil resource; however, adverse effects on soils are expected to be minimal (see PRMP, Chapter 4 - Soils, #21). (b) No reasonably foreseeable impacts to soils from land tenure actions are expected. Please also see response 31-220. (c) Cumulative impacts to soils resources were described in the DRMP - see pp. 275-276.

31-229: The footnote to Table 3-21 explains that the Big Lost-Mackay vegetative inventory also included the Big Lost area of the Idaho Falls District - BLM.

31-230: Water related issues were identified by the public as a major issue to be dealt with in the RMP. For this reason, the RMP places substantial emphasis on the management of riparian areas. Data on uplands are included in various sections of the Affected Environment; for example, see the PRMP, Chapter 3 - Fire Management; Forest Resources; Livestock Grazing, "Rangeland Inventory" and "Rangeland Monitoring and Evaluation"; Soils; and Vegetation. Please also see response 31-214.

31-231: Isolated upland springs and seeps would be managed in accordance with decisions directed toward upland vegetation and watershed management. Springs and seeps within stream riparian areas would be managed as part of the riverine system.

31-232: Your opinions and comments are noted. Table 3-23 mentions the importance of the listed woody vegetation species to non-big game wildlife such as "beaver" and "small mammals and songbirds."

31-233: Your comments are noted.

31-234: The need for these inventories is noted in the PRMP. See Special Status Species Goal 1 and Goal 2 for decisions relating to inventories and actions to protect these species.

31-235: The PRMP proposes actions to (a) prevent weed infestations by limiting surface disturbance and revegetating disturbed areas when they occur, and (b) apply integrated pest management to control noxious weed infestations (see Glossary).

31-236: The BLM agrees that healthy microbiotic soil crusts will help limit the spread of noxious weeds. The PRMP decision stated in Upland Watershed, Goal 1, #1 emphasizes consideration of impacts to microbiotic crusts.

31-237: The PRMP/FEIS adds an analysis of impacts to microbiotic crusts, where appropriate *(e.g.,* see Chapter 4 - Soils). An analysis of impacts to microbiotic soil crusts would also be completed

during project planning, as individual activities are designed.

31-238: The PRMP has been revised, where appropriate, to clarify the intended emphasis on native vegetation (*e.g.*, see Attachment 8: Design Specifications, "General" #3). Livestock Grazing, Goal 1 (goal statement) and Goal 1, #10 describe the RMP's goals for ecological condition.

31-239: Please see response 31-100. The BLM agrees that the Challis RA has many sites that have the potential to experience invasion by cheatgrass. However, as noted in Chapter 3 - Fire Management (DRMP, p. 72), fire activity in the Challis RA due to unplanned ignitions is low. The potential for cheatgrass invasion through wildfire is therefore not considered to be significant. PRMP decisions have been revised to increase consideration of the potential for cheatgrass invasion (*e.g.*, see Fire Management, Goal 1, #7; Rangeland Vegetation Treatment Projects, Goal 1, #2; and Attachment 8: Design Specifications, "General" #2). The discussion of environmental consequences has also been revised, where appropriate, to describe how PRMP actions are expected to mitigate the potential for cheatgrass invasion (see PRMP, Chapter 4 - Soils, #16; Vegetation, #17; and Water Resources, #16).

31-240: The PRMP recognizes the importance of sagebrush as a component of the Potential Natural Community. For this reason, the decision under Livestock Grazing, Goal 1 #10 to manage for Potential Natural Community was chosen, restrictions were placed on sagebrush treatment in antelope or sage grouse winter ranges and sage grouse strutting grounds (see Attachment 8: Design Specifications, "Rangeland Improvement" #2), and the PRMP emphasizes native species, including shrubs, if appropriate, in seed mixes (see Attachment 8: Design Specifications, "General" #3).

31-241: The BLM agrees that fire may have positive or negative impacts to bunchgrass ranges.

31-242: The circumstances under which vegetation manipulations would occur are expected to vary among sites. Objectives for each site would be identified during activity planning.

31-243: Your recommendation is noted. Any proposed vegetative treatment would be analyzed by an interdisciplinary team (see PRMP, Rangeland Vegetation Treatment Projects, Goal 1).

31-244: Vegetation goals are stated in the PRMP under Livestock Grazing, Goal 1 (see also decision #10 under that goal).

31-245: The PRMP proposes full suppression of all wildfires in the Resource Area, unless a fire management activity plan has been completed for a conditional suppression area (see Fire Management, Goal 1, #1-4). This activity plan would address specific concerns relating to invasion of cheatgrass, etc.

31-246: Watershed assessment (see PRMP, Glossary) is not expected to delay necessary management action.

31-247: Your opinion is noted. The BLM asserts no reasonably foreseeable impacts to vegetation resources would be expected from Water Quality, Visual Quality, and Cultural Resources decisions contained in the PRMP.

31-248: These criteria include specific establishment success standards and post-treatment management designed to help ensure treatment success. The BLM recognizes that not every treatment can be successful, but the criteria are designed to maximize the chance for success.

31-249: The effects of livestock grazing on vegetation structure and associated wildlife are described in the PRMP in Chapter 4 - Biological Diversity, #19 and Chapter 4 - Wildlife Habitat, #19-22.

31-250: Please see responses 31-1 and 31-76(d).

31-251: Your opinion is noted.

31-252: Your opinion is noted. This decision was written to ensure watershed cover (*e.g.*, perennial plants, annual plants, rock, litter) exists to protect the ground surface from the direct impact of water droplets. Other RMP decisions address other aspects of rangeland health and vigor, such as ecological condition goals.

31-253: (a) The PRMP emphasizes watershed assessment and integrated resource activity planning, rather than watershed analysis, ecosystem level planning, or AMPs (see PRMP/FEIS: Glossary - watershed assessment; Attachment 2: Procedures Used When Developing or Revising Activity Plans; and Attachment 5: SOPS, "General" SOP #1). Although AMPs consider resource and use needs other than livestock grazing, they are restricted to the area within grazing allotment boundaries. Integrated resource activity planning would provide the opportunity to define the planning boundary in whatever way is most appropriate for the issues to be addressed. Watershed assessments would be completed under the circumstances described in "General" Standard Operating Procedure #1 (see PRMP: Attachment 5).

(b) The PRMP revises all references to the AIE process to say "allotment analysis."

31-254: Your opinion is noted. This statement (DRMP, Chapter 4 - Vegetation, #11, p. 280) analyzes the DRMP decision under Livestock Grazing, Goal 2, #4. Please note that additional AUMs from these sources could be allocated for livestock grazing use only after resource management objectives for the allotment have been met.

31-255: Please refer to the decisions upon which this analysis is based (see DRMP, Management Concern: Livestock Grazing, Goal 2, #2, p. 354). The prescribed burns would be done to achieve different objectives under the different alternatives; therefore, the actions would result in different outcomes.

31-256: BLM agrees that wild horses can trample microbiotic soil crusts as well as vegetation. See PRMP, Chapter 4 - Soils, #8 and Vegetation, #13.

31-257: The headings in the left column refer to Management Concerns listed in Volume 2, Table 2-1: Management Decisions by Alternative.

31-258: See response 31-253 above. Integrated resource activity plans may still be completed for planning areas which are defined by allotment boundaries; however, the required watershed assessment and activity plan would focus on multiple resource concerns, rather than just livestock grazing.

31-259: Your opinions are noted.

31-260: Projected impacts of a proposed vegetation treatment project would be completed on a site-specific basis during the planning phase for the project. Establishment success standards for a project must be met before grazing is allowed in the treated area (PRMP, Rangeland Vegetation Treatment Projects, Goal 1, #4).

31-261: This portion of the environmental consequences refers to the decision under Management Concern: Riparian Areas, Goal 1, #5 that states that livestock use in all streams with riparian vegetation would be limited to supervised trailing. This analysis was meant to describe that if such a limitation were in effect, the use of entire pastures or allotments could be affected, since some pastures or allotments could not be grazed at all if such a limitation were imposed. Therefore, the impact to upland vegetation would be significant, but positive. Under the PRMP, the BLM would manage livestock use on upland sites through implementation of utilization criteria. Livestock would be removed when prescribed utilization levels have been met. Thus, no significant adverse effects on upland vegetation would be expected. No change was made to clarify the analysis, since Alternative 5 was not selected in the PRMP.

31-262: The analysis has been revised in the PRMP to describe the environmental consequences of constructing range improvement projects when and if WSAs are released from wilderness review. The BLM recognizes range improvement projects as an accepted and appropriate method of managing livestock use and distribution on the public lands.

31-263: Numerous criteria in the PRMP would protect vegetation from the adverse impacts of mineral development (see PRMP decisions - Minerals; Attachment 5: SOPs, "Minerals"; Attachment 8: Design Specifications, "Minerals"; and Attachment 10: Minerals Stipulations). The PRMP has been revised to describe the nature of vegetation impacts which would result from mineral material sales or locatable mineral development activity, if those development activities were to occur.

31-264: Please see response 31-202.

31-265: Your preference for closure of the Herd Creek Allotment is noted. The BLM would manage livestock use on upland sites through implementation of utilization criteria. Livestock would be removed when prescribed utilization levels have been met (see PRMP, Livestock Grazing, Goal 1 #7). Thus, no significant adverse effects on upland vegetation would be expected.

31-266: Your opinion is noted. This analysis has been revised slightly in the PRMP.

31-267: Your comments are noted.

31-268: Your opinions are noted. Habitat acquired for riparian or floodplain protection, salmon, steelhead, or bull trout fisheries, or other special values would be managed for the purposes for which it was acquired (see PRMP, Land Tenure and Access, Goal 1, #4). Livestock grazing would be permitted if found to be compatible with these purposes.

31-269: The standards referred to on page 284, #36 are found in Attachment 15, page 496.

31-270: This analysis occurs in the riparian vegetation section of the vegetation analysis, so limiting the discussion to beaver is appropriate. The potential effects of any reintroductions would also be addressed in a site-specific environmental assessment, as required by BLM Manual direction.

31-271: As noted in the decision that this analysis is based on (see DRMP, *Management Concern: Fire Management*, Goal 1, #7, p. 370), the purpose of these prescribed fires would be to enhance ecosystem health and function and biodiversity. Fires that would damage riparian communities would not be done under these criteria.

31-272: Your opinion is noted. As stated in the DRMP analysis, the actual amount of land that would be transferred out of public ownership would be anticipated to be much lower than 63,075 acres. The impacts of transfer of any land would be addressed in a separate environmental analysis.

31-273: Your opinion is noted. PRMP decisions (see *Attachment 8: Design Specifications,* "General" #2) require all ground disturbing activities undertaken by the BLM to meet certain design specifications to limit the spread of noxious weeds.

31-274: The cumulative effects discussion considers known or reasonably foreseeable activities on adjacent lands, **together with** management proposed in the PRMP for BLM-administered lands, to determine the overall effect of all those actions. The BLM is unaware of any proposal in the PRMP to conduct a prescribed burn on poor condition range in watersheds with non-functioning streams.

31-275: Vegetation goals are stated in Livestock Grazing, Goal 1. The PRMP contains a decision to manage for late seral or Potential Natural Community to meet those vegetation goals (see Livestock Grazing, Goal 1, #10).

31-276: The Glossary definition of the interdisciplinary (ID) team planning process (DRMP, p. 572) clearly states that members of the general public or specialists from outside groups or agencies may be asked to participate with ID teams.

31-277: Your opinions are noted. See responses 31-229 and 31-275.

31-278: It is unclear what type of documents you are seeking. The discussion of upland communities in Chapter 3 (DRMP, pages 130-132) provide an overview of upland vegetation suitable for an analysis of impacts at an RMP level. Anyone interested in a greater level of detail can contact the BLM for more information.

31-279: Your opinions are noted.

31-280: Your comments are noted.

31-281: The proposed Visual Resource Management (VRM) Class changes described in the DRMP, Alternatives 2 through 5, are based on an evaluation of the current visual values and characteristics of the Resource Area **and** the land use allocations, resource condition objectives, and management actions proposed under a given alternative. The BLM recognizes the importance of protecting the high visual values on public lands and has responded by dramatically increasing the acreage in the VRM Class II category (see PRMP: Visual Resources, Goal 1, #1). Conversely, VRM Class III acreage has been reduced significantly and Class IV acreage has been eliminated altogether.

31-282: A visual simulation is a "realistic visual portrayal which demonstrates the perceivable changes in landscape features caused by a proposed management activity. This is done through the use of photography, artwork, computer graphics and other such techniques." (BLM Manual 8400, April 5, 1984, Glossary, p. 5)

31-283: See response 31-23.

31-284: A definition of VRM classes, including the objectives of each and permissible levels of change, is included in the Glossary (see Visual Management Classes). Each of the activities you describe, if proposed, would be considered in accordance with the VRM classification which applies in the proposed project area.

31-285: The analysis is considering the positive effects of "modifying fire suppression practices" in order to better protect the visual landscape. This is done through "light on the land" techniques --more sensitive placement of fire suppression staging areas, fire camps, fireline placement and use of different types of equipment (*e.g.,* using a handline instead of bulldozer lines). Also see response 31-289 below.

31-286: Your opinion is noted.

31-287: Your opinion is noted.

31-288: Your comment is noted. The PRMP substantially increases the acreage which would be designated as VRM Class II and decreases the acreage designated as VRM Class III.

31-289: A natural appearing landscape sometimes has evidence of fire mixed in the total viewshed, just as a natural appearing landscape does not have to be aesthetically pleasing. To expect a landscape to be burn scar free is unrealistic and actually evidence of man's interference with natural processes.

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31-290: VRM Classes would not be affected or changed by activities, since the Class merely describes management objectives and constraints within a specified area.

31-291: Updated information on riparian condition and water quality trends has been included in the PRMP (see Chapter 3 - Water Resources). The 1997 water erosion susceptibility ratings were derived from soil survey data and physical features such as topography and geology, and are not likely to change over time. A standard operating procedure (SOP) describing when a watershed assessment would be required as been added to the PRMP (see Attachment 5, "General" SOP #1).

31-292: Your opinion is noted.

31-293: Water Quality Limited segments are not determined by the BLM; they are designated by the Idaho Department of Environmental Quality.

31-294: Priority for minimum streamflow acquisition in order to improve or maintain fish and riparian habitats would be determined as described in the PRMP, Attachment 14: Procedures for Minimum Streamflow Application, #2.

31-295: Your opinions are noted. The BLM believes no reasonably foreseeable impacts to water resources would occur from the PRMP's Cultural Resources, Visual Resources, or Wildlife Habitat decisions.

31-296: The BLM believes the proposed upland utilization and riparian stubble height standards would improve water storage and flood attenuation attributes. Your preference for Alternatives 4 and 5 is noted.

31-297: Please see response 31-291.

31-298: Your opinions are noted. Range improvements are a tool in livestock management. Rather than supporting artificially high numbers of livestock, they help ensure proper, uniform use of the range resource.

31-299: See response 31-83.

31-300: Once the Record of Decision for the Challis RMP is signed, the Procedure for Nonpoint Source Consistency Review will be applied in the Challis Resource Area as described in the PRMP under Water Quality, Goal 1, #3 and Attachment 12. This management decision is not current management (Alternative 1), so it would not be appropriate to apply this process in order to develop the stream-by-stream summary of information you request. Site-specific management to address non-point source pollution is developed through the interdisciplinary team or activity planning process, rather than described in a general planning document such as an RMP.

31-301: The BLM agrees that climate is a primary factor in fire occurrence and behavior. However, the BLM believes the analysis on page 295, DRMP, is still appropriate; by managing and distributing fuels and promoting small, controlled fires the potential for large fires is reduced. Also see response 31-100.

31-302: A site-specific analysis would be done when/if new roads or upgrades are proposed. A general Resource Area-wide analysis of road construction impacts is described in Chapter 4 - Water Resources, #17 (DRMP, pp. 296a/b). The PRMP provides management direction for new road construction and improvement of existing roads (*e.g.*, see Transportation, Goal 1, #6, 7, 8 and 9).

31-303: The BLM analyzed the impacts of proposed forest resource management on a Resource Area-wide basis and determined no significant impacts to water resources would occur. The PRMP analysis has been clarified (see Chapter 4 - Water Resources, #21).

31-304: Your opinion is noted.

31-305: Your opinion is noted.

31-306: Your opinion is noted. See response 20-11.

31-307: Your opinion is noted.

31-308: Management Concern: Riparian Areas, Goal 1, #6 has been re-written in the PRMP.

31-309: A definition of "supervised trailing" has been added to the glossary for the PRMP.

31-310: See response 31-175.

31-311: Your opinion is noted. The PRMP provides for the use of fencing to protect and improve the condition of springs and seeps (see Attachment 5: SOPs, Rangeland Improvements, #4 and 8). The PRMP would not preclude the interdisciplinary planning team from implementing other knowledgeable and reasonable practices (*e.g.*, rest-rotation and deferred-rotation grazing) to maintain and improve vegetation around springs and seeps.

31-312: Your preference is noted.

31-313: Your comment is noted.

31-314: Your opinion is noted.

31-315: Your comment is noted.

31-316: Your opinion is noted. Riparian Areas, Goal 1 does not preclude greater achievement or more improvement ("75% *or more* ..." [emphasis added]). Rather, it sets a reasonable target for a five year timeframe.

31-317: Your opinion about Riparian Areas, Goal 2, [#1?] is noted. The information available to the BLM at the time the Draft RMP was published is shown in Appendix J, Item 1 (DRMP, pp. 557-561). Designated beneficial uses and a stream's support of them are determined by the State of Idaho, not the BLM. However, for the purposes of management, the Challis Resource Area has completed a tentative identification of beneficial uses on many stream segments within the Resource Area which have not yet received State determination of beneficial uses (see Appendix J, Item 1). Riparian Areas, Goal 2, #1 has been clarified in the PRMP to reflect that the BLM still desires to determine beneficial use support status on BLM-identified segments.

31-318: Your opinion is noted.

31-319: Your interpretation is incorrect. This section of the PRMP is intended to provide guidance on the management of WSAs **if** Congress releases them from wilderness review. The BLM cannot release the WSAs; only Congress has that prerogative. The BLM's wilderness recommendations were previously submitted to Congress by the President in 1991.

31-320: The present condition of each WSA was described in Chapter 3 of the DRMP (see pp. 153-157). The BLM believes that the wilderness values within WSAs have not been impaired since the WSAs were designated by the BLM State Director in 1980. The management proposed in the Challis PRMP is consistent with BLM policy to manage existing WSAs under BLM's Interim Management Policy and Guidelines for Lands under Wilderness Review (as revised, July 5, 1995) until Congress releases them from wilderness review (see PRMP, WSAs - Management if Released from Wilderness Review, Goal 1, #1).

31-321: Livestock grazing was mentioned as one of several *authorized* uses within the WSAs (DRMP, p. 154), and the description of each WSA describes livestock management-related intrusions (DRMP, pp. 155-157). Livestock grazing use in existing WSAs has remained essentially the same since designation. The Interim Management Policy and Guidelines for Lands under Wilderness Review (BLM, 1995) states that grazing is a "grandfathered" use and may therefore continue in the "manner and degree" of the date of approval of FLPMA "even if this impairs wilderness suitability." The PRMP proposes livestock management decisions which would continue authorized livestock use in WSAs, but manage grazing activities so as to improve resource conditions where appropriate.

31-322: Your opinions are noted. The PRMP provides for restrictions on minerals activities within ACECs/RNAs and WSAs (see Minerals, Goal 1, #4 and 5; Goal 2, #4 and 5; and Goal 3, #3 and 4).

31-323: Please see responses 31-202 and 31-205.

31-324: The DRMP considered and assessed the closure of some special management areas to livestock grazing. The PRMP closes six ACECs to livestock grazing (Cronk's Canyon, East Fork Salmon River Bench, Malm Gulch/Germer Basin, Summit Creek, Sand Hollow), has special restrictions on livestock grazing in three additional ACECs (Thousand Springs, Donkey Hills, Birch Creek), and closes all designated recreation sites to livestock grazing (some recreation sites are in SRMAs). The remaining special management areas or portions of special management areas would remain open to livestock grazing, because the BLM has determined that livestock grazing in those areas in accordance with PRMP decisions would not impair special management area values.

31-325: Your opinion is noted. PNC is the management goal for rangeland sites on the entire Resource Area, including WSAs, unless an ID team determines another desired plant community would be better (see PRMP, Livestock Grazing, Goal 1, #10).

31-326: Please see response 31-40(b).

31-327: The PRMP's proposed management of vegetation manipulation in WSAs is consistent with current BLM policy for management of WSAs (Interim Management Policy and Guidelines for Lands under Wilderness Review, July 5, 1995, p. 39) - see PRMP: WSAs - Management if Released From Wilderness Review, Goal 1, #1.

31-328: All WSAs would continue to be designated as VRM Class I, in accordance with BLM policy (see DRMP, Maps 43 - 46).

31-329: The BLM provided the Secretary of Interior with the BLM's recommendations for wilderness designation in the Challis Resource Area just prior to the start of the RMP planning process. Approved planning criteria for the RMP state that no additional WSAs will be proposed for designation in the RMP, and no additional acreage will be recommended to Congress as suitable for Wilderness inclusion (DRMP, p. 13).

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31-330: Your preference for Alternative 5 is noted.

31-331: Upland utilization and riparian stubble height standards for livestock grazing would apply throughout the Resource Area, including the HMA. If unacceptable levels of resource degradation are occurring due to wild horse use, wild horse numbers would be adjusted to a lower appropriate management level by gathering (see PRMP: Wild Horses and Burros, Goal 1, #1).

31-332: The Wild Free-Roaming Horse and Burro Act of 1971 (16 U.S.C. 1331-1340) did not define a "thriving natural ecological balance." The Challis Resource Area interprets this phrase to include all of the vegetation attributes and ecological processes that define a healthy rangeland. The impacts of livestock grazing on wild horses and the Herd Management Area are discussed on pages 306-308 and 313-315 of the DRMP.

31-333: Please see response 31-82.

31-334: The BLM considered closing the HMA to livestock grazing; however, livestock grazing was found to be compatible with wild horse management within the Herd Management Area. The RMP closes portions of the HMA to livestock grazing for the protection of the indicated values: Sand Hollow area (watershed), Malm Gulch area (watershed), East Fork Salmon River Bench (ACEC), and all areas of known human burial concentrations (cultural resources).

31-335: The DRMP assessed the disturbance and habitat impacts to wild horses of closing portions of the HMA to OHV use and limiting OHV use on the remainder of the HMA to existing roads, vehicle ways, and trails (DRMP, p. 312, #37, Alternative 5 and p. 317, #65, Alternative 5). The BLM considered closing the HMA to OHV use, but determined that wild horse habitat and populations would be adequately protected from disturbance impacts by proposed OHV management (see PRMP: OHV Use, Goal 1 and Chapter 4 - Wild Horses and Burros, #1, 32 and 59).

31-336: Your opinion is noted. PRMP decisions would decrease wild horse - livestock competition by changing livestock grazing management in the wild horse HMA (see Chapter 4 - Wild Horses and Burros).

31-337: Your opinion is noted. The PRMP allocates forage for wild horses and also recognizes them as part of the environment of the area. If unacceptable levels of resource degradation occur due to wild horse use, wild horse numbers could be adjusted as stated in the PRMP (see Wild Horses and Burros, Goal 1, #1).

31-338: We assume you mean "the HMA" instead of "WSAs." The DRMP describes impacts to wild horses and the HMA from Fire Management and Noxious Weeds Infestation decisions, and also describes cumulative impacts. The BLM believes no reasonably foreseeable impacts to wild horses or wild horse habitat would occur from Air Quality, Cultural Resources, Water Quality, or WSR decisions.

31-339: Your preference for Alternative 4 is noted. Stocking rates for allotments within the HMA would be established as stated in the PRMP under Livestock Grazing, Goal 1, #2 .

31-340: See response 31-339 above.

31-341: Your preferences are noted.

31-342: Your preference for Potential Natural Community rather than some other Desired Plant Community is noted. There is no typographical error in this section.

31-343: The BLM disagrees. Land treatments can be used to improve habitats within the Herd Management Area as well as other areas within the Resource Area.

31-344: This section analyzes impacts *to* wild horses and wild horse habitat *from* the decisions listed under Management Concern: Wildlife Habitat Management.

31-345: Your preference for Alternative 5 is noted. Please see response 14-4.

31-346: Your comments are noted. Wild horses could be removed to protect fragile watersheds, and wild horse management could be adjusted if impacts are inconsistent with attaining desired riparian and aquatic habitat conditions or otherwise causing unacceptable resource degradation (see PRMP, Wild Horses and Burros, Goal 1, #1, 3 and 7).

31-347: Your comments are noted. The BLM believes rehabilitation objectives for areas affected by fires and fire suppression activities can best be established on a site-specific and incident-specific basis.

31-348: These analyses would be done when and if an activity plan for conditional fire suppression within the HMA is developed (see PRMP: Fire Management, Goal 1, #2) or during the project planning phase for a prescribed burn proposal.

31-349: Your opinion is noted.

31-350: (a) Please see responses 31-205 and 31-335. (b) Please see response 31-336. (c) Please see response 31-337.

31-351: Your opinion about the effects of livestock water developments on wildlife is noted. BLM believes that livestock water developments affect many wildlife species in much the same way they affect livestock. Developing a water source (such as a trough at the end of a long pipeline) in an otherwise dry area of rangeland will often attract and hold wildlife in an area they would not otherwise frequent. Big game and small birds are some of the more common species observed using livestock troughs.

31-352: Your opinion is noted.

31-353: Your statements about wildlife and huntable big game species are noted. The Proposed RMP/Final EIS addresses wildlife other than big game in numerous places. For example, please see PRMP decisions: Biological Diversity, Goal 1, Special Status Species, Goals 1 and 2, and Wildlife Habitat, Goals 2 and 3; Chapter 3 - Biological Diversity and Wildlife Habitat; and Chapter 4 (all resource analyses). The term wildlife (see Glossary) is used throughout the PRMP/FEIS, and particularly in the analysis of Environmental Consequences. Generically, the term refers to the majority of wildlife species collectively, except where other species or species groups are specifically identified.

31-354: The BLM agrees that wildlife habitat requirements are more complicated than forage. The BLM disagrees that the terms "forage" and "competition" are used improperly in the analysis. Please refer to the Glossary definition of "competition."

31-355: Please see response 31-3.

31-356: Your opinions are noted. The BLM disagrees that "coarse-filter approaches....." are essential to the implementation of the RMP. The BLM also disagrees that no evaluation of habitat condition was conducted as part of the RMP process. Existing rangeland monitoring studies and rangeland ecological site inventories (ESI) provide invaluable information that was used to infer habitat conditions for wildlife. Appendix L: Summary of Studies - Challis Resource Area (see PRMP Appendices) lists other inventories and studies that were used by BLM resource specialists to evaluate habitat conditions for wildlife.

31-357: Your opinions are noted. The BLM does not believe that an *"evaluation of mechanistic relationships"* is an essential analysis at the RMP level of planning. If deemed appropriate, some of the evaluations you mention may be considered during project or activity planning. The PRMP identifies site-specific limitations on human disturbance in specific habitat areas for a number of wildlife species and species groups (*e.g.*, see Wildlife Habitat, Goal 1, #6 and Goal 2, #6, 8, 9, and 11) and standard operating procedures to protect habitat for and populations of special status species (see Attachment 5, "General" SOPs #3 through 5).

31-358: Your opinion is noted. The BLM agrees that data on biodiversity are limited. The PRMP provides direction to increase knowledge of biodiversity at all levels (see Biological Diversity, Goal 1). The PRMP also designates several areas "of particular ecological uniqueness or species richness" as ACECs or ACEC/RNAs.

31-359: The PRMP provides direction for increasing knowledge of biodiversity (see Biological Diversity, Goal 1) and managing habitat for sensitive species so they will not become listed as threatened or endangered (see Special Status Species, Goals 1 and 2 and Attachment 5, "General" SOPs #3-5).

31-360: Your opinion is noted. The BLM had sufficient knowledge about wildlife to complete an analysis of impacts from the proposed management decisions by alternative (see DRMP, pp. 318-331).

31-361: The number of pages devoted to discussion of big game, nongame, and special status wildlife in the Affected Environment does not reflect the amount of emphasis the PRMP would place on management of these species; it merely reflects that more data and information are available on big game species. The PRMP provides direction to improve the BLM's knowledge of nongame wildlife in the Challis RA (*e.g.*, see Wildlife Habitat, Goal 2, #1 and 9(b), and Goal 3, #2; and Special Status Species, Goal 1, #1-5 and Goal 2, #1) (also see response 31-3).

31-362: Your opinions are noted. PRMP decisions would improve the BLM's knowledge of special status wildlife in the Challis RA (see Special Status Species, Goal 1, #1-5 and Goal 2, #1). Also see response 31-3.

31-363: (a) Please see responses 31-52 and 31-53. (b) Many special status species are ***known*** to use and depend upon early-seral and mid-seral habitats in the Challis RA. For example, burrowing owls are found in relatively open, grassland and sagebrush-grassland habitats, such as those that exist as a result of wildfire or prescribed burning. Wavy-leaf thelypody is commonly found in road cutbanks and on fill slopes created as a result of road construction. The Ute ladies'-tresses orchid, a threatened plant species that may occur in the Challis RA, has been found associated with irrigated pastures, irrigation ditches, and leaky diversion dams. The best habitats for many

special status species are those in late-seral status or PNC; however, many species can meet their life cycle requirements in early and mid-seral habitats as well.

31-364: The PRMP's emphasis on watershed assessment (see PRMP: Glossary and Attachment 5, "General" SOP #1) would ensure a broad-based look at the needs of wildlife and other resources prior to any major action.

31-365: Visual resource management actions may have some limited potential to maintain undisturbed wildlife habitat, if a land use permit (LUP) or some other land use application involving surface disturbance is denied in order to be consistent with an area's VRM classification. However, it is unlikely that these situations would have any reasonably foreseeable effects on wildlife habitats or populations.

31-366: Please review the Assumptions of Analysis (Wildlife) (DRMP, p. 318). The BLM believes that maintenance or improvement of habitat would occur as a result of PRMP decisions, and that maintenance or improvement of habitat would likely contribute to the maintenance of wildlife populations.

31-367: The BLM believes the knowledgeable and reasonable practices contained in the PRMP (see Riparian Areas, Goal 1, #4-7) would maintain and improve habitat to support viable populations of these bird species.

31-368: The need for residual grass stubble-height requirements for nesting sage grouse or other wildlife species would be identified and assessed during development of site-specific resource activity plans.

31-369: The effects on wildlife of implementing early spring grazing utilization criteria were analyzed in the DRMP on p. 319, #5, Alternative 4; the impacts under Alternative 5 would be the same as stated for Alternative 4.

31-370: Your opinion is noted. Nesting habitat for songbirds is present throughout virtually the entire Challis RA. Key areas for nesting would vary substantially by species and their habitat requirements. Extensive areas that are free of cattle use (*e.g.*, rested pastures, late use pastures, areas closed to grazing) would remain available for songbird nesting.

31-371: The PRMP directs the BLM to manage rangeland sites for late seral or PNC to achieve the vegetation goals stated in Livestock Grazing, Goal 1, unless some other desired plant community would better achieve multiple use and meet the goals of rangeland health (see Livestock Grazing, Goal 1, #10). The BLM disagrees that **only** late seral and PNC communities are "*vital to.....native species*" (see response 31-363(b)).

31-372: Wildlife water developments vary considerably by design and purpose. Many wildlife water developments have been constructed in the western U.S. with the primary purpose of providing water for bighorn sheep, elk and other large ungulates, in addition to game birds. Headboxes and pipelines have also been used to tap into springs and seeps in order to provide water for wildlife in otherwise dry habitats that are a long distance from the spring source. Nongame wildlife species benefit substantially from these water sources.

31-373: Range improvements, as defined in the DRMP and PRMP, include fences. The discussion of effects in the DRMP on p. 321, #11 would also apply to #15 and 16, p. 322. Repeating this same discussion in #15 and 16 would be redundant.

31-374: Your opinion is noted. Management decisions related to rights-of-way and water development have been revised in the PRMP (see Floodplain/Wetland Areas, Goal 2, #3 and 4).

31-375: The analysis has been revised (see PRMP/FEIS, Chapter 4 - Wildlife Habitat, #32). The statement "Loss of shrubs or forbs would reduce the abundance of some wildlife species in the area of treatment or displace wildlife into adjacent habitats ..." would apply to species such as sage thrashers. In addition, see response 31-52.

31-376: Your opinion is noted.

31-377: Your preference is noted. See response 14-4.

31-378: Your preference is noted. The PRMP would provide for limitations on human activities and use within key bighorn sheep habitat areas (*e.g.*, see Wildlife Habitat, Goal 1, #6 and Goal 2, #8; and ACECs - Cronk's Canyon ACEC, #2 and Birch Creek ACEC, #2).

31-379: Please see response 31-368.

31-380: The PRMP only makes these lands *available* for potential disposal through exchange; any future exchange proposal would require a site-specific analysis which would "fully address all impacts," as you request.

31-381: (a) Your preference for the Alternative 4 DLE management decision is noted. However, the BLM has determined that the Alternative 4 decision was not in conformance with existing law. The PRMP proposes to process DLE applications in conformance with existing law, with the limitation that lands proposed for DLE must fall within Adjustment Areas

(see Land Tenure and Access, Goal 2, #4).

(b) Your preference is noted.

(c) Your preference is noted.

31-382: The BLM is not sure what closures you support, since your comment did not specify the alternative you support. Please note that OHV management has been revised in the PRMP (see Off-highway Vehicle Use, Goal 1).

31-383: Your preference is noted.

31-384: The BLM agrees with your statement. If logging were authorized in the Jerry Peak area above Herd Lake, the effects of logging on elk and other big game would be magnified by the patchiness of the forested areas, at least on a short-term basis.

31-385: The Biological Assessment of the Draft RMP - Alternative 2 is available for review by the public at the Salmon Field Office. There is no regulatory requirement to print the BA as part of the RMP/EIS.

31-386: (a) The term "design specifications" was used as a reference to management direction outlined in the following DRMP decisions affecting special status species: Special Status Species Management, Goal 2, #2; Attachment 5: Standard Operating Procedures, General, #3; and Management Concern: Wildlife Habitat Management, Goal 2, #13. These decisions would require that projects and other land use proposals be designed to reduce or eliminate adverse effects on special status species and certain other wildlife species. Because a wide range of possible land use activities might be proposed during the life of the RMP, the PRMP does not identify site-specific design requirements, mitigation measures or inventories for special status species.

(b) The analysis under Alternative 5: "adverse effects would be fully mitigated" relates to the management direction stated in the DRMP, Management Concern: Special Status Species Management, Goal 2, #2; Alternative 5. No specific decisions identified as mitigation measures are proposed in the DRMP or PRMP. Instead, necessary mitigation measures are incorporated into RMP management decisions (*e.g.*, see PRMP, Attachment 5: "General" SOP #3-5).

31-387: The BLM believes the analysis of logging impacts on wildlife is adequate. Blue grouse, northern goshawks, flammulated owls, bats, and pygmy nuthatches are not specifically named in the analysis, but are included in the terms *"wildlife"* and *"species"* where these terms are used in the analysis.

31-388: The BLM believes the analysis of cumulative impacts is adequate.

31-389: Please see responses 32-10 and 32-17.

31-390: The BLM disagrees. The PRMP incorporates many management decisions that would directly or indirectly contribute to the maintenance and improvement of habitat for nongame wildlife, and the achievement of Wildlife Habitat, Goal 2 (*e.g.*, see PRMP: Livestock Grazing, Goal 1, #1 and 7-10; and Wildlife Habitat, Goal 2, #2, 8, and 11, and Goal 3, #3).

31-391: "Key habitats" for wildlife are species-specific and vary substantially. Riparian habitat would be key habitat for riparian-dependent nongame birds. Sagebrush habitats would be key habitats for sagebrush lizards and other species dependent on sagebrush. Winter ranges and birthing areas are key habitats for big game animals. Key habitats cannot be specifically listed in the PRMP for every species because the list would be extensive, as would any presentation of data or known information about key habitats. Inventories of key wildlife habitats are limited in the Challis RA; for many species, information about key habitats is available only in the scientific literature. The PRMP presents key habitats for big game animals and sage grouse on Maps 3, 17, 21, 32, and 36.

31-392: Please see response 31-363(b).

31-393: (a) The BLM's Fish and Wildlife 2000 Plan has been partially implemented. Accomplishments include acquisition and management of wetland habitats in Chilly Slough, coordinated efforts to improve riparian and aquatic habitats on important fisheries streams on many grazing allotments in the Challis RA, and completion of certain wildlife inventories and surveys.

(b) Regarding wildlife water - please see responses 31-126, 31-351, and 31-372. The figure of 90,000 acres is BLM's estimate of habitat acres that could be improved to benefit big game and upland game animals in the Challis RA by developing new wildlife water sources, modifying livestock fences, and using prescribed fire or other types of vegetation treatments (see PRMP, Wildlife Habitat, Goal 2, #9(a)). The BLM disagrees that no water should be provided for livestock when wildlife water is developed. For example, the IDFG and BLM have cooperatively developed and funded a number of wildlife projects (water developments) in the Challis RA. These projects involved fencing of springs to protect the riparian habitat and the water source for wildlife. In

these situations, livestock water is piped off-site to a trough for livestock.

(c) The 10 year time-frame was established as a goal for completion of wildlife inventories on all commercial timber stands in the RA. Commercial timber stands would be inventoried for wildlife conflicts at the time a timber sale is proposed, if inventories have not been previously completed.

31-394: The PRMP outlines biodiversity management decisions under Biological Diversity, Goal 1. Currently, no available data or other information indicate that fragmentation of terrestrial wildlife habitat is a serious concern in the Challis RA. Some terrestrial habitats (*e.g.,* forested areas) are "naturally" fragmented because of their patchy distribution on the landscape. If fragmented habitats exist in the RA, they would be identified when a formal biodiversity assessment is completed, as directed in the PRMP under Biological Diversity, Goal 1, #3. Actions could then be developed and implemented to address these fragmented habitats.

31-395: BLM policy requires that a river suitability study be completed as part of the land use planning process, which means that rivers identified as eligible do not remain eligible indefinitely. Once the suitability study is completed, eligible rivers that are found unsuitable are released from wild and scenic river consideration and any special management that might have been associated with eligible rivers.

31-396: The PRMP does identify land acquisition as a priority. Land Tenure and Access, Goal 1 presents the goal as follows: "Seek to acquire additional lands having high public values...." Several decisions under Goal 1 describe specific priorities for acquisition; see, for example, Goal 1, #2, 3, 7, 13, and 14. Decisions under Goal 5 describe the BLM's priorities for increasing public access.

31-397: The BLM disagrees that the DRMP does not present a balanced discussion of impacts from land tenure actions. In virtually every case where some adverse impacts of disposals are described, the off-setting beneficial impacts of lands actions are also identified. For example, see the description of environmental consequences of Alternative 2 on p. 196a, #25 (Biological Diversity) and p. 261, #15 (Recreation). In addition, the discussion of land tenure impacts on fisheries is entirely positive (see p. 220, #25-26). In only a few impact discussions were the positive impacts of land tenure actions omitted (see Cultural Resources, p. 200a, #8, 9; Livestock Grazing, p. 239, #23). Until site-specific proposals for land acquisitions and land exchanges are identified, impacts would be difficult or impossible to adequately assess. Therefore, the positive effects of land acquisitions and land exchanges on cultural resources and livestock grazing are unknown.

31-398: The PRMP does not limit Chilly Slough land exchanges to only those areas identified in Land Tenure, Goal 1, #6. Any lands located within the Adjustment Area boundaries on Map A could potentially be exchanged for private land in Chilly Slough. However, the lands identified in #6 would only be available for disposal in exchange for lands in Chilly Slough.

31-399: This decision is in response to a request by the State of Idaho during the public scoping phase of RMP development.

31-400: Your preference is noted. The Federal Land Policy and Management Act (FLPMA) requires BLM land use plans to identify potential disposal parcels that meet FLPMA criteria for sale. Public lands which are listed in the PRMP on Attachment 17 would be *available* for potential disposal through sale, because they meet certain FLPMA criteria; however, other authorities for disposal could be implemented, including the option of exchange for other lands.

31-401: Your preference is noted. As stated in response 31-400 above, all sale tracts identified in the PRMP would also be available for disposal by exchange or other disposal methods. All areas available for disposal cannot be "lumped together" under one category, because disposal criteria for a sale differ from criteria for a DLE, which differ from criteria for an R&PP patent, etc.

31-402: As noted in Land Tenure and Access, Goal 4, #1, only long term trespass situations may be resolved through sale, exchange, or lease. New trespass cases would be terminated and rehabilitated.

31-403: The use of covenant language in patents for lands containing riparian areas, floodplains, and wetlands transferred out of public ownership would be for the purpose of protecting important resource values from degradation. It is the policy of the BLM to retain these lands in Federal ownership if their disposal would violate the intent of Executive Orders 11988 (Floodplain Management) or 11990 (Protection of Wetlands). The PRMP also provides for "no net loss" of important resource values (see Land Tenure and Access, Goal 1, #3). Should the lands meet FLPMA criteria for disposal and be transferred out of Federal ownership, then the patents would include restrictive language to protect the areas. The patent would specifically describe the land and the restrictions set

forth for the land, whether it be no subdivision or other types of protection measures. The BLM would make every reasonable effort to ensure compliance with the covenants.

31-404: Your opinions are noted.

31-405: Thank you for pointing out the error. The citation for the Code of Federal Regulations should read "43 CFR 2130." This regulation is titled 2130 - Acquisition of Lands or Interests in Lands by Purchase or Condemnation. This citation has been corrected in the PRMP.

31-406: Mitigation measures are not displayed separately in a Resource Management Plan (RMP), but rather incorporated as decisions within the Plan itself. When the Record of Decision is signed it will specify which individual decisions are included.

31-407: The BLM shares your desire to have as much information as possible displayed on maps. Changes have been made to maps in the PRMP to improve their usefulness. The BLM has presented only those maps that were deemed necessary for an adequate understanding of the management decisions proposed in the PRMP.

31-408: Where specific sites of proposed actions are *known*, the BLM has included the locations in the PRMP (*e.g.*, ACEC boundaries, Wild & Scenic River corridors, Special Recreation Management Areas, full fire suppression areas, lands available for sale or exchange, areas closed or limited to OHV use, areas closed to livestock grazing). The PRMP also analyzes the impacts of these actions. However, the sites of many actions would only be identified in the future as projects are proposed by outside proponents (*e.g.*, rights-of-way) or project proposals are developed during project or activity planning (*e.g.*, vegetation treatment projects, noxious weed treatment sites, riparian study sites). The site-specific impacts of these types of future proposals would be analyzed during activity or project planning.

31-409: The entire Resource Area would be affected by the PRMP, because PRMP decisions address all aspects of management of public lands within the Challis Resource Area. The summary of environmental consequences (see Chapter 2) indicates a net improvement in resource conditions would occur in the Resource Area as a result of PRMP management.

31-410: Your opinion is noted.

Letter No. 32

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Philip E. Batt / Governor
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January 6, 1997

Mr. Mark Johnson
Area Manager
Challis Resource Area

Attention: Kathe Rhodes
RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon ID 83467

Subject: Challis Resource Area draft RMP and EIS

Dear Mark:

Idaho Department of Fish and Game personnel have reviewed the referenced documents. They are well-written, organized, and understandable. Specific comments below pertain to your preferred alternative (number 2), unless otherwise noted.

Fisheries

1 Page 6 Vol 1 & Summary page 6, incorrectly state that westslope cutthroat trout is a candidate for Federal listing as threatened or endangered. Wild/natural steelhead should be included as a proposed candidate for Federal listing.

2 Page 75 Vol 1, last paragraph states: "Since 1982, returns of hatchery-produced steelhead have been adequate in most years to support a harvest of 2 to 6 fish per season." During the last several years the season limit on steelhead has been increased to 10 per year.

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Letter No. 32 *continued*

3 Page 78 Vol 1, paragraph 1 states: "Most fishing resources in the RA are managed as wild trout fisheries under State of Idaho general sport fishing regulations." Current 1996-97 regulations read "Wild rainbow (with adipose fin) greater than 14 inches may be harvested in the Salmon River upstream of North Fork and in the Pahsimeroi River." Cutthroat trout may not be harvested in the Salmon River, East Fork Salmon River, or Pahsimeroi River. All cutthroat caught in these waters must be released. See page 55 of IDFG 1996-97 General Fishing Seasons and Rules for complete and current regulations.

All discussion of Pahsimeroi chinook should refer to them as summer chinook and as natural, not wild.

The word wild steelhead should be replaced with natural when discussing steelhead above North Fork.

Vol 3 page 523, paragraph 2: The Pahsimeroi River drainage description should include the fact that the upper river and the upper 1/3 of private property dewaters in early summer.

Vol 3 page 523, paragraph 5: The discussion on resident salmonids describes Pahsimeroi as an excellent resident rainbow trout fishery. We suggest excellent be replaced with good.

Appendix C, Fisheries page 530, paragraph 2: The last paragraph describes summer chinook spawning areas as "mainstem Salmon River and the East Fork Salmon River." Add Pahsimeroi River here.

Vol 1 page 75, paragraph 4 states: "... 33% are allowed to move upstream and spawn naturally." This was correct prior to 1994, but now all natural (non clipped) summer chinook and all left ventral fin clipped are released above the weir for natural production. (Left ventral fin clipped fish are part of the Idaho Supplementation Program.) All adipose clipped adult summer chinook are retained for hatchery production.

Off Highway Vehicle Use

4 With the abundance of roads and trails within the Resource Area, off highway use should be limited to existing roads and trails outside of the areas of environmental concern. Designating the entire Resource Area as "Limited" would protect resources and limit conflict between motorized and nonmotorized recreationists. Alternative 5, page 433b, reasonably handles OHV use and should be incorporated into the preferred alternative, with the exception that new (i.e. established in the

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BLM Response to Letter No. 32

32-1: Thank you for providing updated information. As of the date the Draft RMP/EIS was sent to the printer (April 1996), the westslope cutthroat trout was a category 2 candidate species and wild/natural steelhead rainbow trout were not yet proposed for Federal listing as threatened. The Proposed RMP/Final EIS has been revised to reflect all changes in special status species listings which have occurred from May 1996 to the date of printing of the PRMP/FEIS.

32-2: The PRMP/FEIS has been corrected in response to your comment.

32-3: The PRMP has been revised to incorporate your suggested changes.

32-4: Your preference for Alternative 5 is noted. The majority of your suggestions for OHV management have been incorporated into the Proposed RMP. Except for some areas with additional restrictions or closures, OHV use on the entire Resource Area would be limited to existing roads, vehicle ways, and trails yearlong (see PRMP, OHV Use). However, some aspects of Alternative 5 OHV management were not included in the PRMP because the BLM determined the restrictions or closures were not necessary to protect resource values. Please also see response 32-18.

32-5: Your comments are noted. The PRMP (Wildlife Habitat, Goal 2, #8) has been revised to provide for restrictions on permitted activities in sage grouse nesting areas from 4/15-6/30. Casual or incidental OHV use would not be addressed by this decision. However, the PRMP limits motorized vehicle use to existing roads, vehicle ways, and trails yearlong (see response 32-4 above), which should provide adequate protection for nesting sage grouse.

32-6: (a) Your opinion on the validity of commercial timber harvest is noted. Please see response 31-27. The PRMP specifically states that timber harvest per decade would not exceed the sustained yield average of 6.6 million board feet per decade (see Forested Areas, Goal 1, #1). Actual cut would be based on the availability and demand for timber. There is no requirement in the PRMP to meet the 6.6 million board foot figure.

(b) The PRMP would remove 41 isolated timber stands from the commercial timber base (see Forest Resources, Goal 1, #22); most timber stands less than 40 acres in size would be removed from the commercial timber base under this decision.

32-7: Your comments regarding the Donkey Hills ACEC are noted. BLM agrees that forage (including browse) on southerly aspects and windswept ridges is a critical

Letter No. 32 *continued*

4 future) "vehicle ways" should not be allowed to be incorporated into the system of open motorized routes. See our comments under Management of WSA's below.

5 Dates of closure for the Donkey Hills and Birch Creek ACECs will work well for big game. Closures for sage grouse nesting should extend through June.

Forested Areas

6a Goal 1, No. 1: With the extremely small acreage of forested cover within the Resource Area, and the importance of these habitats to wildlife species, the validity of commercial timber harvest is questionable. The 6.6 million board feet average yield per decade should be labeled as an absolute maximum with no requirement to meet this quota.

6b Small isolated (surrounded by sagebrush) timber patches < 40 acres should be removed from the timber base; most of them already have been indicated as such on Map D. These are important wildlife habitat features that should be preserved in their current state.

Areas of Critical Environmental Concern

7 Donkey Hills, page 407: Nothing in the proposal specifically addresses elk winter forage. The most important elk winter range includes the open, wind-swept ridges on southerly exposures of the Donkey Hills. Primary elk use occurs on these ridges at mid to upper elevations in the Idaho fescue types. Changes need to be made in the Pines / Elkhorn allotment management plan to limit grazing on these areas to early season to allow regrowth of grasses and leave residual winter forage. Additional water developments at lower elevations and elimination of developments at mid to upper elevations may reduce livestock use of these critical sites. The lack of winter forage will have a more serious effect on the population than delaying livestock turnout until after calving. Although delaying turnout would be helpful to the 10% of the elk that remain to calve on the Donkey Hills, it is not nearly as important as leaving adequate winter forage.

Wildlife Habitat Management

8 Goal 1, Numbers 2 & 3: Elk, antelope, and bighorn sheep may have some dietary overlap with cattle at certain times of the year. If there was complete dietary overlap of these species with cattle (which there is not), the total big game consumption would be 4018 AUMs during the 5/1 to 11/30 period. Given that

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Letter No. 32 *continued*

8 cattle actual use is 43,769 AUMs annually, big game would currently use at most 8% of the annual offtake and livestock the other 92%. If big game / livestock conflicts do exist, which we doubt, it is highly unlikely they could be resolved by reducing the small fraction taken by wildlife. In the spirit of multiple use, if conflicts are identified they should be resolved to maintain existing big game populations.

9 Elk winter ranges not identified as ACECs should be grazed lightly in the spring prior to June 1 to allow regrowth and leave residual winter forage.

10 We recommend BLM implement guidelines contained in draft Idaho Sage Grouse Management Plan (1997).

11 Goal 2, No. 12, page 359a: We recommend the restricted period for big game winter range extend at least through April 30; and the restricted period for sage grouse nesting habitat begin on April 15.

12 Goal 2, No. 18, page 361a: Forty-one forest stands totaling 980 acres would average only 24 acres in size, and they would be separated by potentially large distances. This is inadequate to sustain old-growth-dependent species.

Range Management

13 On page 163, the elk numbers are reversed with the season of use. The larger number use BLM land during the winter.

14 The only reference to stubble height or utilization standards appears to be associated with riparian issues and water quality. Standards for grass stubble height and litter should be established for uplands, to ensure proper functioning condition for the upland portion of watersheds (Goal 1, page 367a).

15 Goal 2, No. 2, page 354a: We recommend no prescribed burning or mechanical vegetation treatments be conducted unless adequate supplies of native grass, forb, and shrub seeds are available, and the native mix is used to reseed treated areas.

Vegetation Treatment Projects

See above comments in Range Management.

4

BLM Response to Letter No. 32 *continued*

habitat component on the Donkey Hills elk winter range. The PRMP includes management to ensure that elk habitat values in this area are maintained (see Wildlife Habitat, Goal 2, #6 and ACECs, Donkey Hills ACEC, #1-12). Revision of the Pines/Elkhorn Allotment Management Plan or development of a new resource activity plan (see PRMP: Livestock Grazing, Goal 1, #4; and ACECs, Goal 1, "Management Common to All ACECs," #4) would be the BLM's preferred approach to address forage use, water developments and livestock grazing.

32-8: Your preference for Wildlife Habitat Management, Goal 1, #3, Alternative 4 (DRMP, p. 357b) is noted. Your comments about dietary overlap between big game and livestock are also noted. BLM would prefer to address any perceived conflicts between livestock and big game on a case-by-case basis (see PRMP, Wildlife Habitat, Goal 1, #3). The BLM expects that these conflict resolutions would involve the IDFG, BLM, and interested publics in the collection and analysis of monitoring data and a thorough review of related scientific studies that would provide a better understanding of the issue by all involved parties.

32-9: Your comments on light spring livestock use on elk winter ranges are noted. The BLM believes that implementation of utilization criteria on key upland sites, as provided for by the PRMP (see Livestock Grazing, Goal 1, #7) would ensure that sufficient winter forage would remain available for elk. Utilization criteria would generally result in a mosaic of areas with light livestock use, areas of moderate livestock use, and areas that receive little or no livestock use (such as windswept ridgetops and steeper slopes).

32-10: The IDFG Draft Sage Grouse Management Plan (1997) contains land management guidelines that focus on management of sagebrush-grassland and other habitat types to maintain and improve these areas for sage grouse. The PRMP incorporates a number of management decisions that meet the general intent of the many guidelines proposed in the Draft Sage Grouse Management Plan: Livestock Grazing, Goal 1, #1, 4, 7 and 8; Wildlife Habitat, Goal 2, #8; Floodplain/Wetland Areas, Goal 2, #2; Riparian Areas, Goal 1, #1-7; and *Attachment 8: Design Specifications,* Rangeland Improvement, #2, 4, 7, and 8.

32-11: The PRMP has been revised to incorporate your suggested changes (see Wildlife Habitat, Goal 2, #8). The wording of the decision has also been changed to provide for permitted activities within the restricted period, if it is determined on a case-by-case basis, through consultation with IDFG, that the restriction can be lifted for a permitted activity.

Letter No. 32 *continued*

16 Goal 1, No. 6, page 365a: In addition to the proportionate decrease of livestock use on the entire allotment, this section should contain requirements to control livestock use in newly planted/seeded areas until revegetation is successful.

Fire Management

17 Page 389a: Sage grouse populations have suffered dramatic declines throughout their range over the past few years. Research indicates that other sagebrush-dependent species populations are also declining. Although the exact causes of the declines are unknown, it is clear that habitat for sage grouse and other sagebrush-dependent species needs to be protected. Maintenance of current sage grouse habitat should be given a high priority in this Plan. This would include provisions for 1) avoiding the negative impacts potentially associated with prescribed fires, reseeding mixtures (e.g. crested wheatgrass, and seed mixtures without sagebrush), and other vegetation treatments; and 2) placing a high priority on wildfire suppression in sage grouse nesting and wintering areas. Habitat management should be implemented as proposed in Idaho's 1997 Sage Grouse Management Plan (in draft form at this time). These comments also apply to multiple Issues and Management Concerns in the draft RMP.

Management of WSA's

18 Goal 1, No.3, page 411a: We oppose including "vehicle ways" in the provision for motorized vehicle use. It appears the glossary definition would incorporate newly pioneered roads and trails into the permitted road and trail system. This is virtually unenforceable. Automatically incorporating any new vehicle way into the motorized system does not complement many goals stated in the draft RMP, including on page 411a: "To limit the proliferation of roads and trails" and "... maintenance of existing primitive values and landscape biodiversity".

This same comment applies to the entire Off-highway Vehicle Use Plan in the draft RMP.

Forested Areas

19 Goal 1, No. 10, page 414a: We recommend changing "seedings" to seedlings. We assume this is just a typographical error.

5

Letter No. 32 *continued*

Oil, Gas, Geothermal, Locatable, and Saleable Minerals

20 We recommend no leasing be permitted in existing and proposed Areas of Critical Environmental Concern; Research Natural Areas; suitable wilderness areas; all riparian areas (not just in salmon, steelhead, and bull trout habitat); and eligible wild, scenic, and recreational rivers. These are the areas where outstanding resource values should be protected from mining and associated physical and human disturbance.

21 We recommend at least the No Surface Occupancy protection for currently delineated Wilderness Study Areas and bald eagle and peregrine falcon nesting home ranges. This would complement the draft RMP biodiversity goals for rare species sensitive to human disturbance.

22 We recommend at least the No Surface Occupancy protection for delineated "crucial" big game winter ranges. Within the rest of big game winter ranges, we recommend a timing limitation of at least December 1 through April 30 for surface occupancy and mining disturbance.

Winter range is recognized as being the habitat essential to the long-term survival and viability of elk populations. Within delineated "crucial" winter range, vegetation is critical for herd health. Therefore, we recommend at least the No Surface Occupancy protection be granted these crucial areas. It is also important to protect these areas from the human disturbance associated with leasing activity during the period of December 1 (at the latest) through April 30.

Within the rest of delineated winter range, we recommend stipulating a timing limitation for surface occupancy and mining activities at least for the period of December 1 through April 30. Oil and gas leasing and other mining activities at fixed locations can disrupt normal big game migration patterns. Especially when this type of disturbance occurs during the migration period (November through at least December), potential consequences include undesirable movements to lower-quality winter range, long-term disruption of traditional movement patterns, and increased depredation damage on private land. Additional assurance of maintaining migration timing and patterns would be provided by including November in the timing limitation period.

23 For the delineated Donkey Hills elk calving area (which is also delineated winter range), we recommend a timing limitation extend through at least June 30.

24 Fisheries Goal 1, No. 13, page 384 includes a reference to Oil, Gas ... Goal 2, No. 9, which is missing from page 424a.

6

BLM Response to Letter No. 32 *continued*

32-12: Your comments are noted. The intent of this decision was to maintain these isolated stands of timber cover for wildlife species that make heavy use of transition zones between sagebrush-grassland and forested area habitats. However, most of these stands do meet the definition of old-growth forest, based on the stand structure and other vegetation characteristics.

32-13: Thank you for bringing this error to our attention. The PRMP/FEIS has been corrected.

32-14: The PRMP establishes utilization criteria for key forage species on upland sites (Livestock Grazing, Goal 1, #7). These utilization criteria are expected to provide for a residual stubble height that would maintain upland sites in a properly functioning condition. In addition, the PRMP proposes decisions to manage rangeland vegetation to achieve a late seral stage or potential natural community (Livestock Grazing, Goal 1, #10; and Wildlife Habitat, Goal 2, #7) and to manage watersheds to maintain minimum amounts of vegetative cover (Upland Watershed, Goal 1, #3). The BLM believes that these decisions would help to ensure that litter and residual herbaceous cover are maintained on upland sites.

32-15: Your recommendations are noted. The BLM believes the scoping process for vegetation treatment projects, as provided for by the PRMP (Rangeland Vegetation Treatment Projects, Goal 1, #2 and 3) would help to ensure that native species are emphasized. The PRMP has been revised to clarify that non-native species would be included in the seed mix only when resource conditions or project objectives warrant their use (see Attachment 8: Design Specifications, General, #2, 3, 4, and 5).

32-16: The Draft RMP contained management to control livestock use in newly seeded areas (see p. 365a, Goal 1, #5, Alternative 2). This management is carried forward to the PRMP.

32-17: The BLM recognizes that maintenance of current sage grouse habitat should be a priority. Please see response 32-10 above. The PRMP would require the full suppression of any wildfires on sage grouse nesting and wintering areas where a fire suppression activity plan has not yet been prepared (Fire Management, Goal 1, #2) Site-specific wildfire suppression activity plans would consider the need for full suppression of wildfires in sage grouse habitats, since the IDFG would be consulted for input and comment, during the development of fire suppression activity plans.

32-18: The PRMP defines "existing roads, vehicle ways, and trails" in order to address your concern and clarify this issue (see PRMP, Glossary).

Letter No. 32 *continued*

Attachment 8

25 General, No. 3, page 465a: Native shrub species should be included in seeding plans, unless there is a commitment to revegetate the shrub community by planting seedlings.

26 Forest Roads, No. 3, page 467a: This should include a provision that permits recontouring, seeding, and putting haul roads "to bed."

27 Minerals, No. 1, page 467a: We recommend this apply to all riparian areas to protect water quality, desirable fish species, and riparian habitat.

28 Rangeland Improvement, No. 2, last section, page 468a: This should apply to all riparian areas. This would complement BLM goals for riparian health, water quality, and biodiversity.

Attachment 15

29 c, page 496: The lower bank angle of 90 "%" should be 90 degrees.

Maps

30 Map 3: Antelope winter range also occurs in the area of R24E and R25E, T7N.

Map 12: The Donkey Hills elk winter area should be extended to the Forest boundary.

Map 28: The mapped mule deer winter range does not include all of the current mule deer winter distribution.

31 Map A and Map 33: We are not in favor of trading BLM land to private entities that could convert rangeland to agricultural uses in the Barton Flats area. The area provides essential antelope winter range and year-round sage grouse habitat. Conversion of habitat to agricultural cropland would adversely affect the already dwindling sage grouse population. It would also add to the serious elk and antelope depredation problems that occur on croplands and haystacks in the area as early as August. No land trades should be permitted to worsen the problem.

Letter No. 32 *continued*

Thank you for the opportunity to provide comments.

Sincerely,

Gary Power
Regional Supervisor

GP:DW:ML:MH:RM

c: USFWS, Pocatello
Natural Resources Policy Bureau

BLM Response to Letter No. 32 *continued*

32-19: Thank you for bringing this error to our attention. The PRMP/FEIS has been corrected.

32-20: Your recommendations are noted. There are no known deposits of non-energy leasable minerals in the Challis RA, and the potential for leasable mineral development is nearly nonexistent in the RA (see DRMP, Chapter 4 - Minerals, #2 and 8, pp. 244-245). Therefore, the BLM does not believe that mandatory NSO stipulations on or closure of all the areas you list would be needed to protect resource values. If energy or non-energy leasing development is proposed on public lands which are open to leasing, an interdisciplinary team would review the proposal and recommend appropriate stipulations for the protection of resource values.

32-21: Your recommendations are noted. Existing WSAs are closed to energy and non-energy leasing and leasable mineral development. PRMP decisions (e.g., Attachment 5: SOPs, "General", #3-5; and Attachment 10: Leasable Minerals Stipulations, Stipulation Number 1) would protect Federally listed species such as the bald eagle and peregrine falcon from adverse effects of leasable minerals activities.

32-22: Your recommendations are noted. Standard stipulations (Attachment 10) may be applied to any mineral lease on big game winter ranges, at the discretion of the BLM authorized officer (Stipulations 1 and 2 specifically address crucial wildlife habitats - also see PRMP, Wildlife Habitat, Goal 1, #9(e)). The PRMP also provides for restrictions on permitted activities from 11/15 to 4/15 on big game winter ranges (see Wildlife Management, Goal 2, #8), which would apply to leasable mineral development and sale of mineral materials. Locatable mineral development activities would be managed under regulations found in 43 CFR 3800.

32-23: Your recommendation for a timing limitation on the Donkey Hills calving area is noted. The PRMP would provide for a limitation on permitted activities on the calving area (see Wildlife Habitat, Goal 2, #8). Other stipulations and limitations (as noted above in response 32-22) may also apply.

32-24: Thank you for bringing this error to our attention. The decision should have referred to "Oil, Gas ... Goal 2, #8." The PRMP/FEIS has been corrected.

32-25: Your opinion is noted. The PRMP revises this design specification to specify that shrubs may be included in the seeding, if appropriate to meet project objectives.

32-26: Although recontouring and putting "to bed" new or existing roads would seem to be an appropriate management practice, the BLM believes that such a

decision would actually result in greater potential for surface disturbance, sedimentation, and erosion than leaving the existing road bed in place. The potential use of the haul road for future timber harvest or other purposes such as horseback riding, hiking, or cross-country skiing would also be permanently lost. Several PRMP decisions address the issues of road construction, maintenance, closure, and rehabilitation (see Water Quality, Goal 1, #5 and 6; and Attachment 8: Design Specifications, "General", #1 and 2, and "Forest Management - Road Construction and Rehabilitation", #2 and 3).

32-27: The potential for leasable mineral development is extremely low to nonexistent in the RA (see DRMP, p. 244a, #2, Alternative 1; and p. 245a, #8). This low potential for development would also result in a low potential to affect riparian habitats. Standard stipulations for the protection of resource values could be applied to any energy mineral lease at the discretion of the BLM authorized officer.

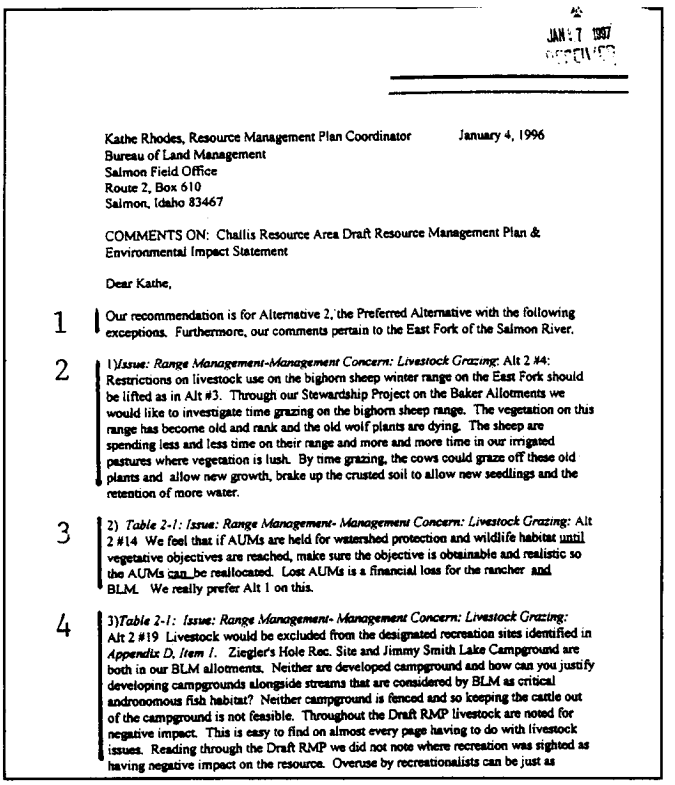
32-28: The wording of the design specification in Attachment 8 has been changed in response to your comment.

32-29: Thank you for bringing this error to our attention. The PRMP has been corrected.

32-30: Changes to the maps have been made in the PRMP.

32-31: Any proposed land exchange within the adjustment area on Barton Flat would only be implemented if agreed upon by the Chilly Slough Working Group. The IDFG is a key partner in the Chilly Slough Working Group and thus could reject any land exchange that might be proposed in the Barton Flat area.

Letter No. 33



JAN 17 1997

Kathe Rhodes, Resource Management Plan Coordinator January 4, 1996
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

COMMENTS ON: Challis Resource Area Draft Resource Management Plan & Environmental Impact Statement

Dear Kathe,

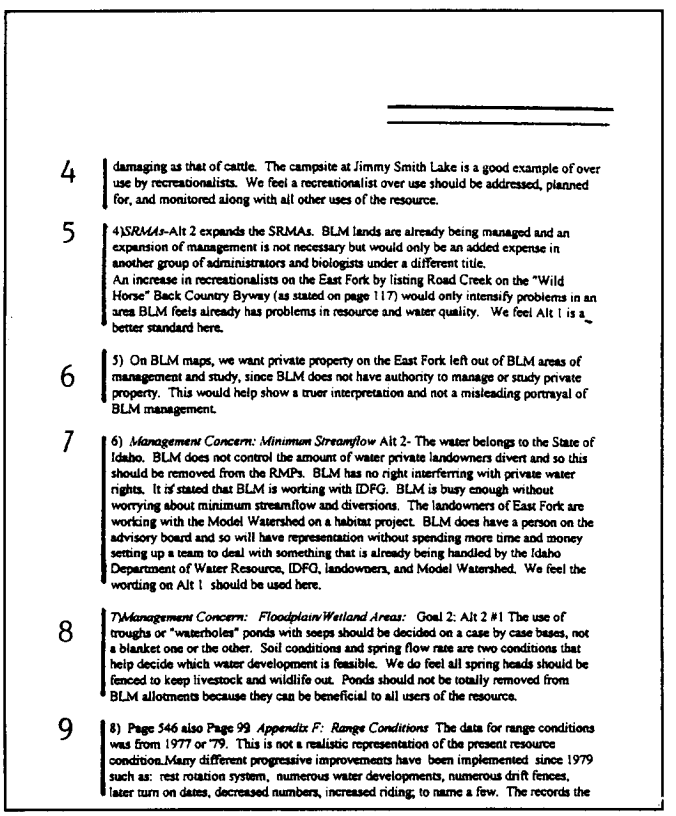
1 Our recommendation is for Alternative 2, the Preferred Alternative with the following exceptions. Furthermore, our comments pertain to the East Fork of the Salmon River.

2 1)*Issue: Range Management-Management Concern: Livestock Grazing:* Alt 2 #4: Restrictions on livestock use on the bighorn sheep winter range on the East Fork should be lifted as in Alt #3. Through our Stewardship Project on the Baker Allotments we would like to investigate time grazing on the bighorn sheep range. The vegetation on this range has become old and rank and the old wolf plants are dying. The sheep are spending less and less time on their range and more and more time in our irrigated pastures where vegetation is lush. By time grazing, the cows could graze off these old plants and allow new growth, brake up the crusted soil to allow new seedlings and the retention of more water.

3 2) *Table 2-1: Issue: Range Management- Management Concern: Livestock Grazing:* Alt 2 #14 We feel that if AUMs are held for watershed protection and wildlife habitat until vegetative objectives are reached, make sure the objective is obtainable and realistic so the AUMs can be reallocated. Lost AUMs is a financial loss for the rancher and BLM. We really prefer Alt 1 on this.

4 3)*Table 2-1: Issue: Range Management- Management Concern: Livestock Grazing:* Alt 2 #19 Livestock would be excluded from the designated recreation sites identified in *Appendix D, Item 1.* Ziegler's Hole Rec. Site and Jimmy Smith Lake Campground are both in our BLM allotments. Neither are developed campground and how can you justify developing campgrounds alongside streams that are considered by BLM as critical anadroomous fish habitat? Neither campground is fenced and so keeping the cattle out of the campground is not feasible. Throughout the Draft RMP livestock are noted for negative impact. This is easy to find on almost every page having to do with livestock issues. Reading through the Draft RMP we did not note where recreation was sighted as having negative impact on the resource. Overuse by recreationalists can be just as

Letter No. 33 *continued*



4 damaging as that of cattle. The campsite at Jimmy Smith Lake is a good example of over use by recreationalists. We feel a recreationalist over use should be addressed, planned for, and monitored along with all other uses of the resource.

5 4)*SRMAs*-Alt 2 expands the SRMAs. BLM lands are already being managed and an expansion of management is not necessary but would only be an added expense in another group of administrators and biologists under a different title.
An increase in recreationalists on the East Fork by listing Road Creek on the "Wild Horse" Back Country Byway (as stated on page 117) would only intensify problems in an area BLM feels already has problems in resource and water quality. We feel Alt 1 is a better standard here.

6 5) On BLM maps, we want private property on the East Fork left out of BLM areas of management and study, since BLM does not have authority to manage or study private property. This would help show a truer interpretation and not a misleading portrayal of BLM management.

7 6) *Management Concern: Minimum Streamflow* Alt 2- The water belongs to the State of Idaho. BLM does not control the amount of water private landowners divert and so this should be removed from the RMPs. BLM has no right interferring with private water rights. It is stated that BLM is working with IDFG. BLM is busy enough without worrying about minimum streamflow and diversions. The landowners of East Fork are working with the Model Watershed on a habitat project. BLM does have a person on the advisory board and so will have representation without spending more time and money setting up a team to deal with something that is already being handled by the Idaho Department of Water Resource, IDFG, landowners, and Model Watershed. We feel the wording on Alt 1 should be used here.

8 7)*Management Concern: Floodplain/Wetland Areas:* Goal 2: Alt 2 #1 The use of troughs or "waterholes" ponds with seeps should be decided on a case by case bases, not a blanket one or the other. Soil conditions and spring flow rate are two conditions that help decide which water development is feasible. We do feel all spring heads should be fenced to keep livestock and wildlife out. Ponds should not be totally removed from BLM allotments because they can be beneficial to all users of the resource.

9 8) Page 546 also Page 99 *Appendix F: Range Conditions* The data for range conditions was from 1977 or '79. This is not a realistic representation of the present resource condition.Many different progressive improvements have been implemented since 1979 such as: rest rotation system, numerous water developments, numerous drift fences, later turn on dates, decreased numbers, increased riding; to name a few. The records the

BLM Response to Letter No. 33

33-1: Your preference for Alternative 2, with exceptions, is noted. The BLM's responses to the exceptions you recommend are stated in responses 33-2 through 33-13 below.

33-2: Please see response 25-2.

33-3: Please see response 25-4.

33-4: Please see response 25-5.

33-5: Please see response 25-3.

33-6: Please see response 25-6.

33-7: Your preference for Alternative 1 is noted. Please see response 16-7.

33-8: Your opinions are noted.

33-9: Please see response 25-9.

33-10: Please see response 25-10.

33-11: Please see response 25-11.

33-12: Approximately 10 acres in each of the two land areas you requested (T11N, R18E, Section 35, SWNESE and T9N, R18E, Section 5, NWNENW) have been included in the Proposed RMP as adjustment areas for exchange only (see PRMP, Map A: Adjustment/Management Areas). These parcels have not been added to the PRMP for potential sale because they contain important riparian, river frontage, or other resource values which would only be exchanged for lands with equal or greater resource value (see PRMP, Management Concern: Land Tenure, Goal 1, #3). In addition, a portion of the parcel you requested in T9N, R18E, Section 5, NWNENW is located in a Wilderness Study Area and is not available for disposal unless it is released by Congress from wilderness review (see PRMP, WSAs- Management if Released from Wilderness Review, Goal 1, #8).

33-13: Please see response 25-12.

9 BLM Range Con has collected from '79 to '96 should be on file and should have been used for current, accurate data of the present range condition. Once again you contradict your statements. In response to page 100, drought in the late 1980's has not offset the improvements that have been made. We understood that part of BLM's management duties was to monitor the range for changing conditions. You cannot plan the future of a resource using outdated data and untrue information. How can anyone choose the best alternative for managing the resource when the data used is 20 years old?

10 9) Page 101 - 104 on *Range Monitoring and Factors* affecting livestock management. You have just contradicted your previous statement. On page 103- Table 3-11 is a Summary of Existing Range Improvements. Every allotment is different and should be managed differently. It is unrealistic to use the same criteria for every allotment. You admit that the big game population has increased during the past 15 years and state that SOME persons attribute poor range condition to increased use by wildlife. This is true. You should consider that the wildlife population remains there year round. Not only do decreased grazing numbers cause a financial hardship so does the increased loss of pasture on our private property also being utilized by the big game population. You paint a bleak picture of range conditions - yet you have the authority to control this. There are several other factors contributing to this picture other than cattle grazing. It is due to increased number of recreationists, greatly increased numbers of big game herds, and weather conditions to name a few.

11 10) Vol 3 Pages 524 and 525 *Appendix C: Summary of Fisheries Habitat Condition* in Drainages of the Challis RA - East Fork Salmon River Drainage = BLM has stated that habitat has significantly degraded over the past 30 years, bank stability is rated fair to poor on most private ground, and the private sections have unstable banks and channels as a result of poor grazing management in the riparian zones. This is untrue.

In the *Model Watershed Plan* prepared by: Idaho Soil Conservation Commission in cooperation with: Bonneville Power Administration BLM, IDFG, NRCS, Northwest Power Planning Council, Shoshone-Bannock Tribe, and U.S. Forest Service it states under Chapter 6-2: East Fork of the Salmon River Watershed: Fish Habitat Conditions: "Overall, the quality and quantity of salmon habitat in the East Fork watershed is good and conditions have changed very little in the past 50 years. The major problem is simply a lack of returning adult fish." The landowners on the East Fork are working in cooperation with the Model Watershed on a habitat project. This involves approximately 10 miles of river corridor through private property on the East Fork.

12 11) Under *Attachment 17: Tracts Considered for Sale, by Alternative:* There are two tracts we would like to see added to this list of proposed tracts for consideration as sale tracts under *Management Concern: Land Tenure*, Goal 2, #3

12 #1) 11N 18E Sec 35 SW of NE of the SE
#2) 9N 18E Sec 5 NW of NE of the NW

13 SUMMATION: This report has been a frustrating draft to read. Under every alternative that supported cattle was a comment only showing negative consequences. We do not feel this was a true picture or a fair interpretation to present to the public. It set grazing up for sure failure regardless of your alternative.

We feel the management by BLM using utilization standards and stubble height further set the rancher up for failure. We do feel BLM management standards and ranching practices can not only sustain the resource but improve the resource if properly implemented.

We feel all involved parties must allow for flexibility in managing the resource to reach its full potential. There are opportunities for innovation if we work together towards the common goal of protecting and enhancing the environment.

We are currently working through the Experimental Stewardship Program to find a feasible solution that will be a win-win system for all. Through Holistic Resource Management, we will address all interested parties' concerns and goals for the resource through a thorough plan including a biological assessment, time grazing and intensive herding. We feel the community can benefit economically and still improve the resource for cattle, wildlife, recreation and future generations.

We reserve the right to amend our above comments and protest.

Sincerely,

[redacted]

Letter No. 34

IDAHO CONSERVATION LEAGUE

January 2, 1997

JAN 17 1997

Kathe Rhodes
RMP Coordinator
BLM Salmon Field Office
Rt. 2, Box 610
Salmon, ID 83647

Dear Kathe:

Thank you for this opportunity to comment on the Challis Resource Area Draft Resource Management Plan and Environmental Impact Statement. I am submitting these comments on behalf of the Idaho Conservation League and The Wilderness Society, two groups working to protect Idaho's clean water and public lands for our use and the use of future generations. Our members have requested our participation in resource planning documents because they recreate in and value the resources of the Challis Resource Area (CRA) and other public lands.

We want to commend you for proposing to take actions which, if implemented, will greatly improve the condition of the CRA. I have worked extensively with some members of the CRA staff and have come to respect them and their growing knowledge of the resources under their stewardship. Particularly on the San Felipe allotment, I have seen a real commitment to gathering information necessary to make responsible management decisions about this important piece of our heritage.

We also have concerns about the document as written and sincerely hope that you will make some changes based on our comments. These comments are not meant as a criticism of your efforts, but as a way to fill in the blanks that exist in the plan.

GENERAL COMMENTS

Goals

1 Many of the goals identified in the plan are generally vague, with no way of measuring whether or not they are achieved. If the current staff of the CRA were to remain in place for the next 20 years, we would feel much more comfortable that the direction described in the draft plan would be followed. But, that's not the case. How will you assure that the goals you envision in the plan will be met?

2 More of the progress envisioned in the plan will be accomplished if the goals are presented like Riparian Areas Goal 1: Restore and maintain riparian and wetland areas so that more are in proper functioning condition within 5 years.... It would be helpful to identify measurable benchmarks along the way as well to show that the BLM is on the right track to improving the condition of the resource.

Letter No. 34 *continued*

3 Some of the goals need to be written to incorporate changes in BLM policy which are identified in the Range Reform regulations (see the section on Standards below).

Arrangement of the DRMP

4 Upon careful reading and examination of the entire document, I was able to understand the RMP. It would be helpful to people who don't want to read the entire document, yet wish to learn about something specific if you would make some changes to make it more user friendly.

When other parts of the RMP are referenced, it would be very helpful to include page numbers. Example: "...special status fish species concerns as shown in Management concern: Fisheries, Goal 1." It is very difficult to find various management concerns when the issue is not identified and because the management concerns are not in alphabetical order. I spent a tremendous amount of time thumbing through the document trying to locate references.

5 It is also difficult to determine how the management concerns match up to the alternatives. Some beginning explanation for the way the RMP is set up and how these two things are related to one another would be veryhelpful.

6 It is confusing to have livestock grazing identified both as a resource and as a source of effect. Livestock *forage* might be a better word for the resource you are discussing in Chapter 4 and elsewhere; livestock grazing is an effect. In the same way, forested areas, although described as a source of effect, are a resource. Timber management is the source of effect.

Description of Alternatives

7 Alt. 3 emphasizes "traditional" commodity uses. Alt. 4's description should be changed to say that it emphasizes *traditional* non-commodity multiple uses like fishing, hunting, and other forms of recreation. Using the word traditional only in reference to commodity extraction will cause some readers to overlook traditional uses that are extremely important to many Idahoans who make their living from these uses as well as the thousands who rely on these activities as an important part of their heritage and quality of life.

Standards and Guidelines

8 The DRMP makes no mention of the 4 fundamentals of rangeland health or the fall back standards and guidelines identified in the Range Reform regulations. The fundamentals have been in effect since August, 1995 and the fall back standards will be in effect in February, 1997. The RMP must incorporate the fundamentals and standards as goals along with management actions to achieve them. The actions proposed in the plan will probably achieve the 4 fundamentals if implemented; but the plan must describe how.

In addition, specific standards have been developed by Idaho's 3 Resource Advisory Councils (RAC's), with the expert help of the BLM, and these will be amended into RMP's at some future date. The RAC's are working to see that happens as soon as

BLM Response to Letter No. 34

34-1: The PRMP describes the resource condition objectives, land use allocations, and specific management actions and direction needed to direct the BLM's management of public lands in the Challis Resource Area during the life of the RMP. Implementing these actions as stated will ensure goals are met.

34-2: As noted in the Glossary (see DRMP, pp. 571 and 575), the BLM recognizes goals and objectives separately. Where appropriate, the BLM has included measurable criteria in the individual decisions in the PRMP.

34-3: Goals, objectives and management decisions of the RMP are compatible with 43 CFR 4180, Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration. A new decision in the PRMP (Livestock Grazing, Goal 1, #1) addresses compliance with current standards for rangeland health and guidelines for grazing administration.

34-4: Your suggestion is noted and incorporated into the PRMP.

34-5: The organization of the PRMP/FEIS has been simplified by listing the PRMP decisions in the same (alphabetical) order as the discussion of resources and land uses in the Affected Environment (Chapter 3) and Environmental Consequences (Chapter 4). The Draft RMP and PRMP contain "guides" (a content/organization overview at the beginning of Volume 1; a table of contents for each volume) which are intended to help the reader use and understand the documents.

34-6: The "source of effect" is the collection of decisions found under a particular section of the Draft RMP, such as "Management Concern: Livestock Grazing" or "Management Concern: Forested Areas." The PRMP refers to livestock grazing as a land use rather than a resource and eliminates the "source of effect" column heading in the discussion of environmental consequences (Chapter 4).

34-7: Your comments are noted. No changes were made to the PRMP, since these sections were not restated in the PRMP.

34-8: Please see response 34-3. The PRMP contains management actions to achieve rangeland health; for example, see these PRMP sections: Livestock Grazing; Upland Watershed; Rangeland Vegetation Treatment Projects; Noxious Weed Infestations; and Wildlife Habitat.

34-9: The analysis of environmental consequences assumed "Funding and personnel would be sufficient to implement any alternative as described" (DRMP, p. 177). The

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8 possible. I have enclosed a copy of these standards and guidelines for your information, as well as a copy of the fundamentals of rangeland health and the fall back standards and guidelines.

Funding

9 We're very concerned about the prospects of funding this plan. What levels of funding do the actions described in the DRMP assume? Do those levels match current funding? In other words, do you believe that there will be money to do the things you propose? If not, or if the levels you assume are reduced in the future, which goals and actions will be the priority for implementation? The plan should not leave the decisions about what will be implemented in the plan and what deferred or cast aside to unknown decision makers in the future. The plan needs to make those decisions now.

Please make a list of all the proposals to plan, monitor, and analyze in the DRMP; arrange them by priority; and predict which ones can be accomplished with current funding levels so we know which ones may not happen if funding drops.

Accountability

10 The DRMP makes no mention of what is to happen if the various planning processes and management actions are not implemented. There is no time table set for many of these proposed plans and actions. Where time tables are set, there are no consequences if the time tables are not met. This raises serious concerns when we look at the history of the Challis BLM, as well as the agency in general.

Under Management Concern: Livestock Grazing #3, we see that existing management promised us 1 to 2 AMP's per year. Yet all but 5 AMP's are more than 10 years old and 21 allotments have no AMP at all. The most recent AMP was put in place in 1989. The RMP needs to show real commitment to achieving the proposed actions.

There are some excellent standards in this plan to improve the resource and ideas for further study and inventory of resources which will provide a much better basis for decision making. The DRMP needs some fall back mechanisms to ensure that management decisions made in this planning effort go forward. Probably the most helpful way to assure accomplishment of the various site-specific planning efforts is to tie use of the land to the successful completion of the plans that are proposed. In this way, public land users of all kinds will be encouraged to lobby for funding for completion of planning efforts and will be co-operative in expediting the development of the plans, whether they are AMP's or watershed analyses or anything else.

Lack of Information

11 We are concerned about the lack of monitoring and inventory information available on the CRA. The last information on range condition dates back to the late '70's and early '80's. Timber inventories were done in the late '70's. We know that significant monitoring has occurred in the past few years. But what was the CRA staff doing in the intervening years? Please provide an answer, if you can. It would be helpful to take a look at BLM's priorities over the past 20 years, when funding levels were higher, in order to re-

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11 assess future priorities. It's difficult to make planning decisions when so much baseline information is missing.

Social and Economic Analysis

12 The social and economic analysis for the CRA focuses on Lemhi and Custer Counties. Lemhi County contains 3 sub-regions which are not even part of the CRA, yet information on this county is included in the analysis of the CRA. Salmon is about as far from the CRA as Ketchum. If Lemhi County is included in the analysis, Blaine County should also be. The CRA is just over Trail Creek Summit from Ketchum and many residents and tourists hunt and fish there. Some hunting and guiding operations, as well as retail operations, are dependent on activities in the CRA.

13a The Sociological study of the two county area is probably biased, since the results showed a desire to maintain a "small cow-town" atmosphere. If resource decisions are made in the CRA according to what local folks think, isn't it important to tap into the thoughts and desires of folks in Blaine County as well?

13b Much is made of the fact that community stability is provided by ranchers. Including Blaine County in the analysis, as well as Lemhi County, would provide a more balanced picture of the economy of the region.

Perhaps folks in the Stanley subregion wouldn't feel so "isolated" from the rest of the 2 county region if you made it a 3 county region.

SPECIFIC COMMENTS BY MANAGEMENT CONCERN

ISSUE: RANGE MANAGEMENT

Livestock Grazing

14 Goal 1 is a big step forward. The fundamentals of rangeland health require that a plan be in place to bring all rangelands into functioning condition, so a plan must also be in place for the rest of the land not mentioned in this goal.

15 #1 - Alt. 1 and 2- It should be noted, along with the other percentages described, that 44.7% of forage allocations are for livestock. It's important for readers to see that under existing management and preferred future management, more forage is allocated for livestock on the CRA than for any other use.

Table 3-13 shows clearly that over 30,000 visits to the CRA were for fishing and hunting, two uses that are negatively effected by livestock grazing. The forage allocation proposed seems grossly unfair in light of these numbers. Alt. 4 and 5, which both allocate about 22% of forage to cows also seem generous when viewed in this important light.

16 #1 - Alt. 2 - Set dates and priorities for determining stocking levels on allotments.

BLM Response to Letter No. 34 *continued*

schedule for implementing the decisions contained in the RMP is dynamic and would not be appropriate to include in the Proposed RMP/Final EIS. This schedule will be in the Implementation Plan prepared following signature of the Record of Decision for the approved RMP. The Implementation Plan will address at least the first five years following approval of the Plan, and will be modified and adjusted in response to such things as actions completed, effectiveness of actions in achieving RMP objectives, or changes in staffing and budget priorities. Many decisions will be implemented as part of site-specific activity planning and will require NEPA documentation in addition to that provided in the EIS.

34-10: Your comments and suggestions have been considered. Please see response 34-9. Where appropriate, the PRMP provides general management direction for circumstances when goals are not being achieved (for example, see Riparian Areas, Goal 1, #5 and 7).

34-11: Please see responses 15-2, 15-3, and 15-7. A summary of studies, inventories, surveys, and other research activities pertinent to the Challis Resource Area is listed in Appendix L, Item 1 of the PRMP.

34-12: Although residents of Blaine, Custer, and Lemhi counties all utilize resources within the Challis Resource Area and some Blaine County businesses are dependent on activities in the CRA, Sun Valley and Ketchum are generally not trading areas for residents of Custer and Lemhi counties. Residents of those counties primarily trade in Salmon, Challis, Idaho Falls, and Missoula. Lemhi and Custer counties have more economic similarities with each other than with Blaine County. The Tendoy-Leadore, Salmon and North Fork subregions were included in the study even though they lie outside the RA boundary because (a) they trade in the Salmon area (Lemhi County) and are thus economically interconnected with subregions that lie within the RA boundary, and (b) they are within the boundary of Lemhi County, a geographic area which was considered as a whole to facilitate discussion of topics such as payments in lieu of taxes.

34-13: (a) Your opinion is noted. BLM believes the social and economic information presented in the PRMP is accurate and appropriate. The Draft RMP was developed following an extensive scoping process, and revised (in the PRMP) after consideration of public comments from local and non-local commentors. Residents of Blaine County were among those who commented during the initial scoping period and submitted letters of comment on the Draft RMP/EIS.

(b) The BLM agrees that the economy and society of Stanley are probably more similar to Blaine County than

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17 #2 - Alt 3 and 4 - There is a definite need to provide areas where no grazing is allowed for wildlife and fish habitat needs, as well as for the multiple recreation uses, on the CRA. Keeping over 97% of the CRA open to grazing is excessive. Since we don't believe that the BLM will close 77,000 acres of land to grazing, the plan should include an alternative that realistically identifies areas that can be closed to grazing.

18 #3 - Alt 2 - What are the watersheds with special status fish species concerns? What are the ecosystem level plans described here? Would they be watershed level plans? What will be the watershed boundaries? They should be identified in the RMP, as well as a prioritization for the analysis of these watersheds or ecosystems.

19 #5 - Alt 2 - RMP needs a date for "development of vegetative monitoring". Which are the "perennial riparian systems with high potential for improvement" which will be emphasized and what does "emphasized" mean?

20 #6 - Alt 2 - Will BLM have time to monitor utilization to determine proper time to move? What if livestock are not moved in time? Move dates must be clearly spelled out in permit terms and conditions and permit actions taken when terms are not met. If BLM personnel are responsible for determining dates for moving livestock, then they should be held accountable in job performance evaluations.

21 What are "knowledgeable and reasonable practices"? Please give some examples in the final RMP. The glossary definition was not helpful.

22 The protocol for developing other utilization criteria sounds good, and "interested public" should be added to the list.

23a The discussion on Vegetation in Chapter 3 - Affected Environment gives no information on the condition or trend of various plant communities on the CRA. We know that agsp vigor on the San Felipe is low; this is probably true for other locations as well. If utilization levels on agsp are exceeded, that pasture should be rested the next year to allow recovery. We want to make very sure that blue bunch wheatgrass is

23b protected, given it's large scale eradication across most of Idaho since the beginning of livestock grazing.

24 The RMP should identify a goal to protect and increase native vegetation. RAC standard #4 states that "Healthy productive, and diverse populations of native plants are maintained or promoted as appropriate to soil type, climate and landform", including a indicator, "Plant vigor (production, seed and seedstalk production, cover, etc.) is adequate to enable reproduction and recruitment of plants when favorable climatic events occur." This is important because, in all the continuing analysis the plan

25 proposed, the BLM will probably discover that native vegetation goals are not being met, and there should be a mechanism and plan to revisit these utilization levels.

26 #8 - Alt 2 - Identify riparian study exclosure possibilities in the RMP and prioritize them. The CRA staff must have a good idea of where these should be, with your extensive experience.

27 #10 - Alt 2 - We like the direction to manage for late seral or Potential Natural Community. Desired Plant Community (DPC) is a concept which concerns us. We believe it is in the best interests of the ecosystem to manage for native plants. Crested wheat grass seedings could serve as indicators of rangeland health as described in the RMP. Range Reform regulations require that state or regional standards (developed by

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the RAC's) address the habitat quality for native plant and animal populations and communities. We don't want to see DPC used to avoid restoring native plant communities.

28 #11 - Alt 2 & 4 - Needs dates and timelines. Alt 2 will still have sacrifice streams - those outside salmon, steelhead trout, and bull trout drainages. This will not meet the standards, either the fall backs or the RAC's. Alt. 4 is the choice required by the new regulations.

29 #13 - Alt 2 - Within 2 years of what date will current management be assessed?

30 #14 - Alt 4 - Vacant allotments should remain unallocated or be retired for the reasons stated in the RMP.

31 #15 - Alt 2 - Does 70% cover meet the fundamental for rangeland health and the standard?

32 #17 - Alt 2 - When will watershed analysis be completed to determine livestock carrying capacity and season of use? Time lines are needed.

33 Goal 2 should list measurable resource management objectives and measurable range conditions so we can all see if the proposed actions are achieving the goal.

34 #1 - Alt 2 - It's a good idea not to allow grazing until range improvements (livestock facilities) are functional. Who will check on this? Will BLM have time and personnel? What if you don't? Use of a pasture should be delayed until you're sure that livestock facilities are functional.

35 #2 - Alt 2 & 5 - No burns should be done in sage brush to create forage for livestock. Alt 5 is by far the better idea. Ecosystem health and diversity can best be promoted by using alt.5. If you have seen studies describing the necessity and desirability of burning sage brush for other than livestock forage increases, please site them for us. Even if sage brush burns increase forage for livestock and big game, what about wildlife species dependent on sage?

36 #3 - Alt 2 - If resource concerns exist in a watershed because of current grazing management, then cost/benefit analyses should accompany any proposal for new livestock facilities. And this analysis should be compared to the benefits of removing grazing from the problem area.

37 #4 - Alt 2 - We oppose new seedings of anything other than native grasses, unless some other kinds of seeds included could help facilitate establishment of native plants.

38 #5 - Alt 1 - We are disturbed by the M category for allotments that have so many acres in fair or poor condition. What is the rationale for this category?

39 #6 - Alt 2 - Suitable seed mix must be a native mix. No more introduction of exotics - even if they benefit cows.

BLM Response to Letter No. 34 *continued*

to Lemhi or Custer Counties. However, as stated in response 34-12 above, the BLM believes the economic analysis should not be expanded to Blaine County because economic activities of that county center on communities other than Challis or Salmon. Just as the North Fork, Salmon and Tendoy-Leadore subregions were included in the study even though they are outside the RA boundary, the Stanley subregion was included in the study because Stanley lies within Custer County and the study needed to consider counties as whole geographic units. Part of Lemhi County is in the Challis Resource Area land base. The economic focus of the area is also toward Lemhi County (Salmon), especially for those in the Pahsimeroi Valley and even Challis.

34-14: Please see response 34-3.

34-15: The PRMP does not set fixed forage allocations. Rather, it describes management to ensure that sufficient vegetative cover is maintained for watershed improvement, plant maintenance, wildlife habitat needs, and wild horse habitat needs. Short term livestock grazing allocations are specified (in AUMs); however, the PRMP decisions and analysis of impacts indicate these allocations would be adjusted as needed to ensure resource conditions are maintained or improved to meet RMP goals.

34-16: Livestock Grazing, Goal 1, #2 in the PRMP sets initial priorities. The Implementation Plan for the RMP will direct how, where, and when future allotment evaluations are scheduled (see response 34-9).

34-17: The BLM believes this was done in the preferred alternative (see DRMP, Management Concern: Livestock Grazing, Goal 1, #2, 19, and 20, pp. 350a and 354a) Similar management was carried forward in the PRMP (see Livestock Grazing, Goal 1, #3, 17, and 18). On the remainder of the Resource Area, the BLM believes that livestock grazing in accordance with PRMP decisions is compatible with other uses.

34-18: Watersheds with special status fish species concerns include those with Federally listed species (chinook and sockeye salmon, steelhead trout, bull trout) or the sensitive species westslope cutthroat trout. This decision has been rewritten in the PRMP (see Livestock Grazing, Goal 1, #4) to clarify that AMPs would be developed or revised following completion of a watershed assessment (see PRMP/FEIS: Glossary and Attachment 5: SOPs, "General" #1). Watershed boundaries would be defined during the assessment process and could vary depending on the needs for analysis; therefore, it would be premature to attempt to identify watershed boundaries at the RMP level.

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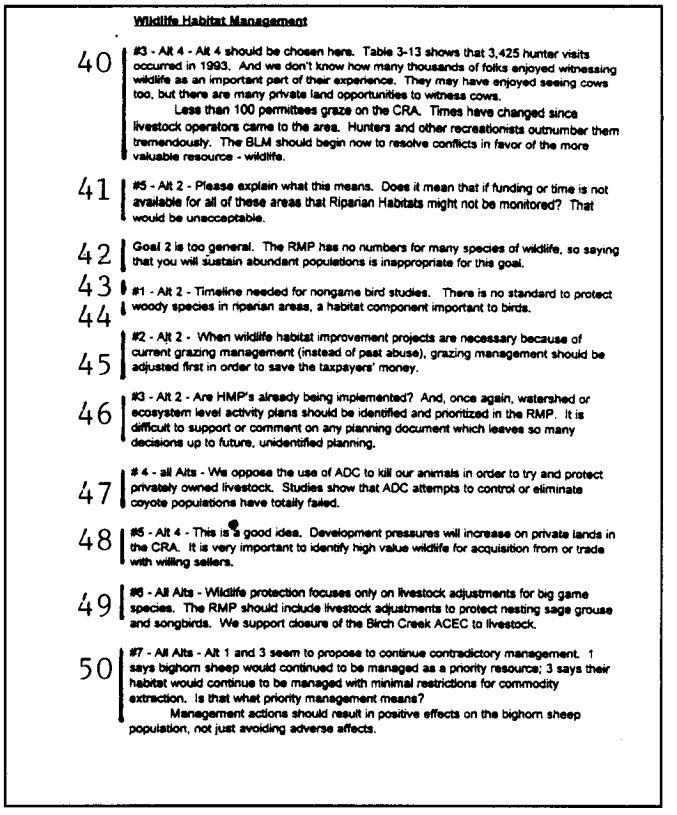

Wildlife Habitat Management

40 #3 - Alt 4 - Alt 4 should be chosen here. Table 3-13 shows that 3,425 hunter visits occurred in 1993. And we don't know how many thousands of folks enjoyed witnessing wildlife as an important part of their experience. They may have enjoyed seeing cows too, but there are many private land opportunities to witness cows.
Less than 100 permittees graze on the CRA. Times have changed since livestock operators came to the area. Hunters and other recreationists outnumber them tremendously. The BLM should begin now to resolve conflicts in favor of the more valuable resource - wildlife.

41 #5 - Alt 2 - Please explain what this means. Does it mean that if funding or time is not available for all of these areas that Riparian Habitats might not be monitored? That would be unacceptable.

42 Goal 2 is too general. The RMP has no numbers for many species of wildlife, so saying that you will sustain abundant populations is inappropriate for this goal.

43 #1 - Alt 2 - Timeline needed for nongame bird studies. There is no standard to protect
44 woody species in riparian areas, a habitat component important to birds.

45 #2 - Alt 2 - When wildlife habitat improvement projects are necessary because of current grazing management (instead of past abuse), grazing management should be adjusted first in order to save the taxpayers' money.

46 #3 - Alt 2 - Are HMP's already being implemented? And, once again, watershed or ecosystem level activity plans should be identified and prioritized in the RMP. It is difficult to support or comment on any planning document which leaves so many decisions up to future, unidentified planning.

47 # 4 - all Alts - We oppose the use of ADC to kill our animals in order to try and protect privately owned livestock. Studies show that ADC attempts to control or eliminate coyote populations have totally failed.

48 #5 - Alt 4 - This is a good idea. Development pressures will increase on private lands in the CRA. It is very important to identify high value wildlife for acquisition from or trade with willing sellers.

49 #6 - All Alts - Wildlife protection focuses only on livestock adjustments for big game species. The RMP should include livestock adjustments to protect nesting sage grouse and songbirds. We support closure of the Birch Creek ACEC to livestock.

50 #7 - All Alts - Alt 1 and 3 seem to propose to continue contradictory management. 1 says bighorn sheep would continued to be managed as a priority resource; 3 says their habitat would continue to be managed with minimal restrictions for commodity extraction. Is that what priority management means?
Management actions should result in positive effects on the bighorn sheep population, not just avoiding adverse affects.

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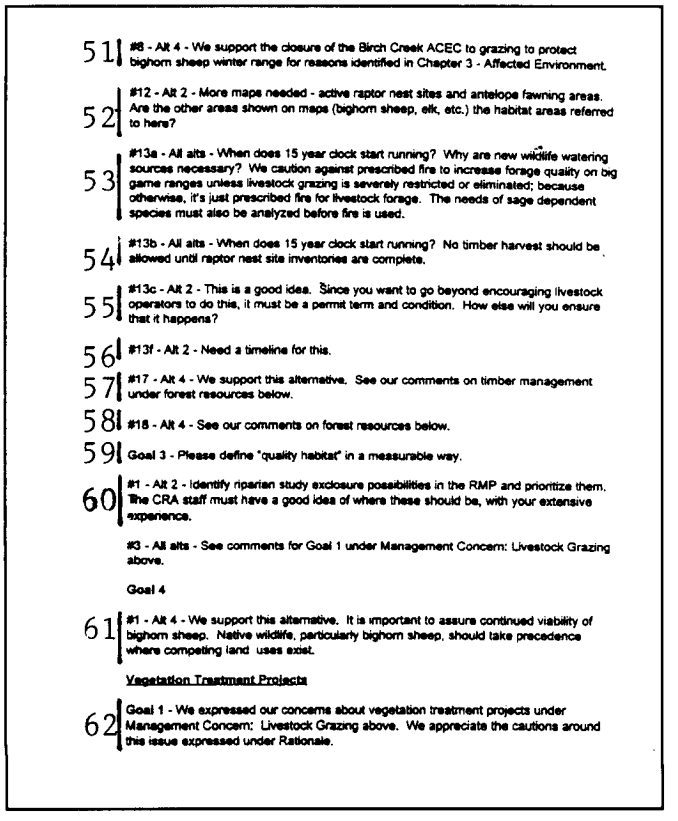

51 #8 - Alt 4 - We support the closure of the Birch Creek ACEC to grazing to protect bighorn sheep winter range for reasons identified in Chapter 3 - Affected Environment.

52 #12 - Alt 2 - More maps needed - active raptor nest sites and antelope fawning areas. Are the other areas shown on maps (bighorn sheep, elk, etc.) the habitat areas referred to here?

53 #13a - All alts - When does 15 year clock start running? Why are new wildlife watering sources necessary? We caution against prescribed fire to increase forage quality on big game ranges unless livestock grazing is severely restricted or eliminated; because otherwise, it's just prescribed fire for livestock forage. The needs of sage dependent species must also be analyzed before fire is used.

54 #13b - All alts - When does 15 year clock start running? No timber harvest should be allowed until raptor nest site inventories are complete.

55 #13c - Alt 2 - This is a good idea. Since you want to go beyond encouraging livestock operators to do this, it must be a permit term and condition. How else will you ensure that it happens?

56 #13f - Alt 2 - Need a timeline for this.

57 #17 - Alt 4 - We support this alternative. See our comments on timber management under forest resources below.

58 #18 - Alt 4 - See our comments on forest resources below.

59 Goal 3 - Please define "quality habitat" in a measurable way.

60 #1 - Alt 2 - Identify riparian study exclosure possibilities in the RMP and prioritize them. The CRA staff must have a good idea of where these should be, with your extensive experience.

#3 - All alts - See comments for Goal 1 under Management Concern: Livestock Grazing above.

Goal 4

61 #1 - Alt 4 - We support this alternative. It is important to assure continued viability of bighorn sheep. Native wildlife, particularly bighorn sheep, should take precedence where competing land uses exist.

Vegetation Treatment Projects

62 Goal 1 - We expressed our concerns about vegetation treatment projects under Management Concern: Livestock Grazing above. We appreciate the cautions around this issue expressed under Rationale.

BLM Response to Letter No. 34 *continued*

34-19: Vegetative monitoring is an ongoing process that is performed to assess progress towards objectives at the activity plan level. "Perennial riparian systems with high potential for improvement" are those which can respond to management changes to make significant progress towards achieving riparian health. Table 4-7 in Chapter 4, page 226a of the DRMP listed priority streams by allotment. "Emphasis" simply means that those values will raise the level of priority for management planning on those allotments containing perennial riparian systems.

34-20: Pasture movement sequences would be identified in allotment management plans or other resource activity plans that would be developed for allotments. Actual move dates would be determined in response to the condition of the resource and individual permit terms and conditions. BLM grazing regulations provide administrative remedies for failure to meet the terms and conditions of grazing permits. Also see letter 40, responses 40-2, 40-3, 40-4, and 40-5.

34-21: Knowledgeable and reasonable practices would include management practices which meet the objectives and satisfy the evaluation criteria stated in the Glossary definition (see PRMP, Glossary, p. 175). The PRMP contains knowledgeable and reasonable practices for grazing management (see Livestock Grazing, Goal 1, #7 and Riparian Areas, Goal 1, #5 and 6), and provides for alternative knowledgeable and reasonable practices to be suggested, evaluated, and, if appropriate, implemented (see Livestock Grazing, Goal 1, #7, paragraph 2 and Riparian Areas, Goal 1, #4).

34-22: The knowledgeable and reasonable practice evaluation procedures provide for the involvement of interested publics. Interested publics may be included on ID teams (see Glossary), and interested publics would be involved in the process of developing site-specific environmental assessments.

34-23: (a) In the PRMP, the BLM's data on the condition of plant communities are summarized by allotment (see Appendix F, Item 2) and also described in Chapter 3 - Livestock Grazing, "Rangeland Inventory" and "Rangeland Monitoring and Evaluation." Vegetation classifications are summarized in Table 3-21: Vegetation Summary for the Challis Resource Area. Appendix L, Item 1: Summary of Studies of the Challis Resource Area was added to the PRMP to list the various inventories and other studies which are ongoing or have been completed.

(b) The BLM believes upland utilization criteria (see PRMP, Livestock Grazing, Goal 1, #7) will be adequate to maintain the vigor of bluebunch wheatgrass on most sites. Additional management actions to protect and

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63 #1 - Alt 2 - Once again, time lines and priorities for watershed analyses, as well as descriptions of what those watersheds are needed in the plan. There is no mention of the NEPA process in references to watershed analyses in the plan. To the extent that these analyses propose actions, NEPA compliance (i.e. public involvement) will be necessary. Interested public input will be important in these analyses and in proposed vegetation treatment projects. RAC standards will be important in these proposals.

Upland Watershed

64 Goal 1 should be rewritten to reflect the 4 fundamentals and fall back standards, as well as some way to measure progress.

65 #11 - Alt 4 - We support the protection of native plants over any exotic species. No more exotic seedings - particularly not in new locations.

ISSUE: WATER RELATED RESOURCE AREAS

Riparian Areas

66 Goal 1 - This is an excellent and measurable goal! Fundamental of rangeland health and fall back standard should be included here as a goal. While it's appropriate to set time lines for achievement of certain goals for a percentage of the land (i.e. 75% of riparian areas in proper functioning condition in 5 years), *all* riparian areas must be functioning in a reasonable amount of time.

The RMP makes no provision for what will happen if this goal is not reached. How will you ensure that it is?

67 #1 - Alt 2 - Should be rewritten to include the fall back standard.

68 #3 - Alt 2 - A good idea. RMP should include time line for selecting riparian monitoring sites.

69 #4 - Alt 2 - What are "knowledgeable and reasonable practices" that may be implemented in lieu of standards? Please give some examples in the final RMP. The glossary definition was not helpful. We don't believe that you can meet the fall back standard for riparian/wetland function and stream channel function or the RAC standards for dissipating energy for high water flows and sediment filtration without adequate stubble height.

70 #5 - Alt 2 - We support and are happy to see stubble height standards in the plan. If stubble height is too low on pastures used before July 10, riparian areas will not be able to provide the 2 functions named in #4 above. Stubble height standards should be applied at the end of grazing use in a specific pasture. Will these standards be amended into the terms and conditions of grazing permits to help assure compliance? We recommend that a woody species utilization standard be added.

71 #6 - Alt 2 - This is confusing. On how much of each stream would bank shearing by livestock be allowed? It sounds as if, where bank instability exceeds 10%, 1/3 or 1/2 of that can be caused by livestock bank shearing. So, the worse the streambank

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71 instability, the more bank shearing allowed by livestock? We would oppose this, of course.

#6b & c - Alt 2 - This allowance seems excessive. How will riparian vegetation re-establish itself if banks are being sheared by livestock?

72 #10 - Alt 2 - Please give more details about this allotment scale grazing management demonstration. What does this mean?

73 #11 - Alt 2 - We appreciate the move away from structures to repair bank erosion.

74 Goal 2 - By what date?

75 #1 - Alt 2 - Needs a timeline and determination of priority streams.

76a #2 - Alt 2 - What are the major ecosystem management units on the CRA and how many riparian site types are in each one?

76b Goal 3 - We support this goal.

Goal 4

77 #3 - Alt 4 - We support this alternative. It is important to protect the wetland values of this special place.

Floodplain/Wetland Areas

78 Goal 2 - Springs and seeps are considered riparian areas and must be protected under the fundamentals for rangeland health. The fall back standard should be included in the goal.

79 #1 and 2 - Alt 2 - One problem with having livestock grazing on 97.5% of the CRA is that there are probably not any springs and seeps that aren't being impacted by livestock grazing. The damage we have seen at upland spring sites is very disturbing. How much longer can springs survive the trampling and overgrazing that they seem to face. On the other hand, development of those springs is costly and benefits only permittees. No other uses benefit.

Alt 2 is an improvement over existing management direction. It would be beneficial to wildlife, visual resources, water quality, and recreation to eliminate livestock from at least some springs. At the very least, please incorporate one of the RAC guidelines into the plan: "The development of springs, seeps or other projects affecting water and associated resources shall be designed to protect the ecological functions, wildlife habitat, and significant cultural and historic/archaeological values associated with the water source."

80a Water Quality
Goal 1 - Essential to the achievement of goal 1 is the discovery of which beneficial uses

BLM Response to Letter No. 34 *continued*

improve the vigor of bluebunch wheatgrass would be identified for individual sites when Allotment Management Plans or other activity plans are developed or revised.

34-24: The PRMP provides for management for late seral or PNC vegetation (which would include native species) to achieve the goals stated in Livestock Grazing, Goal 1 (see Livestock Grazing, Goal 1, #10). Various design specifications stress maintenance and restoration of native vegetation (see PRMP, Attachment 8: Design Specifications, "General" #3-5). Also see response 34-3.

34-25: The BLM believes the second paragraph of Livestock Grazing, Goal 1, #7 (see PRMP) provides an adequate mechanism for revising the proposed utilization criteria.

34-26: An RMP provides general management direction and is not intended to identify site-specific project locations. An interdisciplinary team would determine the location and priority of riparian study projects during development of activity plans for specific allotments or watersheds. Riparian study sites would be selected according to guidelines stated in the PRMP under Riparian Areas, Goal 2, #3.

34-27: Livestock Grazing, Goal 1, #10 states that the BLM would manage for a Desired Plant Community only if it would better meet the goals of rangeland health. On certain sites and in the short term, DPC objectives may be more practical than PNC objectives for achieving the fundamentals of rangeland health. Also see response 34-3.

34-28: This decision has been revised in the PRMP to apply the action to all fish-bearing streams (see PRMP, Livestock Grazing, Goal 1, #11). The timeframe for completing these actions would be identified in the Implementation Plan for the approved RMP (see response 34-9).

34-29: This action has been deleted from the PRMP, since the assessment and adjustments in grazing practices have already been completed.

34-30: Your preference for Alternative 4 is noted. Management under Alternative 2 which allows vacant allotments to be unallocated and scheduled for intermittent or temporary use, would allow the BLM flexibility to improve rangeland conditions elsewhere in the Resource Area.

34-31: Please see response 31-156(a).

34-32: This decision and all other references to watershed analysis have been deleted in the PRMP. Livestock carrying capacity would be determined according to Livestock Grazing, Goal 1, #2. Season of use would be

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80a are being supported in which streams. As we asked above, what is the timeline for the development of this information?

80b #5 - Alt 2 - What is the timeline?

Minimum Streamflow

81 #2 - Alt 4 - We support the denial for request for diversion of water from BLM lands. Water is too scarce to allow them.

Fisheries

82 Goal 1 - Need to include timeline for this goal. Also some measurable achievements.

83 #3 - Alt 2 - Why will it take 7 years to identify crucial habitats? With the current staff's knowledge, you must know where these are. When does the 7 year count down begin?

84 #7 & #14 - Alt 4 - We support the pursual of acquisitions of fish habitat from willing sellers. Much of the habitat is on private land and is often badly degraded.

85 #15 - Alt 2 - What is the consequence if this inventory is not completed? What is it's priority for funding?

86 #17 - Alt 4 - We support this action. Table 3-12 shows that there were nearly 27,000 fishing visits to the CRA in 1993. Many of those were to the Big Lost River. Closing a mere 5.7 miles of river to grazing would greatly benefit those thousands of users, while impacting very few permittees. Waiting 7 years to implement management changes on that stretch is unacceptable.

ISSUE: LAND TENURE AND ACCESS

87a Goal 1 - We support this goal.

Goal 2

87b #3 - Alt 4 - Public lands should not be disposed of to accommodate economic development or community expansion. Instead the goal should be to sell public lands adjacent to towns to provide public infrastructure when necessary. Open space will be valuable for everyone's sanity in the crowded world of the future. It is our responsibility to protect our public lands for the future.

Wild and Scenic Rivers

88 ICL and TWS agree with the comments submitted by Idaho Rivers United. To save paper, we ask that you read their comments. We would just say that given the condition of some of the segments which have been enjoying the "protection" accorded to rivers that were found eligible for Wild and Scenic designation, it's hard to support any alternative which would grant less protection for these creeks and rivers.

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ACEC's

89 We support the designation of all the ACEC's in Alt 4. The Road Creek watershed is deserving of the extra protection, in part because of it's anadromous habitat; but also for the reasons stated in the RMP under relevance and importance - and thank you for pointing these out.

90 The attainment of PNC's should be identified as a goal for ACEC's.

91 We support the closures to motorized use as identified in alt. 2, as well as restricting motorized vehicles to existing roads where the RMP suggests. In addition, if OHV users ride off the road where it is prohibited, the area should be closed to motorized use entirely. Signs explaining this natural consequence to failure to protect critical values should be placed at the entrance to the ACEC's for information.

92 Timber harvest should not be allowed in the Donkey Hills. Elk habitat can be better protected by leaving the trees. There is no shortage of openings in the CRA; there is a shortage of trees.

93 We support the closure of the Birch Creek ACEC to grazing to protect bighorn sheep.

WSA's If Released From Wilderness Review

94a WSA's should be managed for primitive, non-motorized recreation, even if released from Wilderness review. Although there isn't much motorized use in the CRA, there is a lot of motorized use on many other BLM lands and National Forests in Central Idaho. The CRA is adjacent to the SNRA where motorized use is becoming a serious issue. Noise pollution is recognized as a problem in many cities and noise abatement procedures are in place. It is important to provide quiet areas on the public land too, for wildlife and for recreation. WSA's are a perfect place to continue to provide this opportunity.

94b VRM Class I should be maintained in all WSA's, even if released from Wilderness review. The fact that they were designated as WSA's indicates the unique and special scenic values of these areas.

94c WSA's should be managed for PNC's in order to protect biodiversity.

ADDITIONAL MANAGEMENT CONCERNS

Forested Areas

- **Goal 1**

95 It's difficult to understand why you are proposing any timber harvest at all when we look at Table 3-4 in Chapter 3. All of the commercial forest land is identified as being on fragile sites, problem reforestation sites, or adverse locations. When we combine this information with the map showing forested sites on the CRA, we realize that timber harvest on this resource area is simply not appropriate.

BLM Response to Letter No. 34 *continued*

determined through periodic review and/or renewal of grazing permits. Timelines for completing these actions would be included in the Implementation Plan for the approved RMP.

34-33: Please see response 34-2.

34-34: Challis Resource Area staff will make periodic inspections for compliance. The number of inspections would depend on staffing levels, funding, and priorities. BLM grazing regulations have procedures to follow if range improvement maintenance is not done.

34-35: Your preference for Alternative 5 is noted. Prescribed burning of sagebrush for resource objectives other than livestock forage have been conducted in the Challis RA specifically for bighorn sheep on bighorn winter ranges. Most of these burned areas are not grazed by livestock due to steepness of slope, or because they are within areas closed to livestock use. The BLM believes that the PRMP decisions related to vegetation treatments (e.g., prescribed burns) would adequately protect other resource values (see PRMP, Rangeland Vegetation Treatment Projects, Goal 1, #1-7 and Attachment 8: Design Specifications, "Rangeland Improvement" #2 and 7).

34-36: Your preference for a cost-benefit analysis of any new livestock facilities is noted. A site-specific environmental assessment would be completed on all livestock management facilities prior to construction. An environmental assessment is essentially a non-economic cost-benefit analysis that considers the benefits of the project and potential for adverse effects on other resource values. Removal of livestock may be considered as an alternative on a case-by-case basis.

34-37: The PRMP has been revised in response to your comment. The PRMP emphasizes the propagation and health of native plant communities (see Livestock Grazing, Goal 1 and decision #10). Native species would also be emphasized when designing vegetation treatment projects; non-native species would be included in the seed mix only when resource conditions or project objectives warrant their use (see PRMP, Attachment 8: Design Specifications, "General" 3-5).

34-38: Please see the Glossary definition of "allotment categorization."

34-39: Please see response 34-37.

34-40: Your preference for Alternative 4 is noted. Please see response 32-8.

34-41: This decision is intended to identify monitoring priorities among wildlife habitats in the Challis Resource Area.

Letter No. 34 *continued*

95 Timber harvest levels described in the RMP are so low that they would not support any mill or logger. There is simply no reason to harvest timber, except if the BLM believes that it is obligated to supply timber from any land which has trees growing on it. WE hope that is not the case. The fact that very little timber was harvested in the last decade shows good judgment on the part of the BLM.

96 #2 - Alt 2 - No timber should be harvested, and certainly no "sustained yield averages" set until the intensive forest inventory is completed.

97 #3 - Alt 2 & 4 - Please define "forest ecosystem values". (Don't forget to include micchorizal fungi.)

98 #7 - Alt 2 - If timber harvest is allowed, there should be no clearcutting of any forest types. It is impossible to control dwarf mistletoe in Doug fir stands - ask the Challis National Forest. In any case, dwarf mistletoe very rarely causes mortality and does not qualify as a reason to remove trees.

99a #11 - Alt 2 - National Forests in Central Idaho have had problems regenerating Douglas fir, even in shelterwood stands. A shelterwood cut is really nothing more than a clearcut when the overstory is removed. It is still even-aged management and the young trees that *may* have grown 15 years after the initial harvest will provide little in the way of cover for wildlife or for ecosystem values. And for all those 15 years, all we have is a greatly thinned stand with a few large trees left in the middle of a big arid land mass.

99b #15 - Alt 2 - This might work if the weather cooperates and you weren't dealing with fragile and problem reforestation sites.

#15 - Alt 5 - Some forest management might be needed if timed to mimic natural levels of disturbance - possibly if stands are seriously overcrowded. The problem with thinning prescriptions is that large diameter trees always seem to be added to the sale to make it economically viable.

100 #17 - All alts - Buffer strips for riparian areas should be 300 feet wide. No logging should be allowed in these strips to reduce insect or disease risks or where stream degradation is highly unlikely.

101 #20 - Alt 4 - We support this alternative and believe that all forested areas in ACEC's should be withdrawn from harvest.

102 #20 - Alt 4 - What are the elk habitat requirements for regeneration that would allow removal of 200 foot buffer strips around clearcuts? For an interesting look at the effectiveness of buffer strips between clearcuts in a big open area (it's a big open area now), visit the Moose Creek plateau of the Targhee National Forest. They don't have any elk left.

103 #21 - Alt 4 - We support the withdrawal from commercial harvest of the Willow Creek Summit elk winter range.

Letter No. 34 *continued*

104 #25 - We support the withdrawal of all commercial timber in the Corral-Horse Basin, Jerry Peak and Burnt Creek WSAs to maintain biodiversity, primitive values, and old growth timber values.

Managing for Biodiversity

105 Goal 1 - Please replace the term ecosystem *products* with ecosystem *values*. It is time for the BLM to turn its focus from production to stewardship of values, a concept found many places in this plan.

106a #3 - Alt 2 - A good idea. How will you ensure implementation?

106b # 8 - Alt 2 - When does the clock start on the 4 year requirement? What if the timeline is not met? Are there consequences?

107 #7-10 - Alt 2 - All of these are excellent ideas. The completion of these pieces of alt.2 would be very helpful to the protection of biodiversity. But, how will they be accomplished. This plan is full of hopeful ideas that we fear will never happen.

Oil, Gas, Geothermal, Locatable and Salable Minerals

108 It seems unreasonable that 99.8% of the CRA is open to oil and gas development. All WSA's and ACEC's should be withdrawn from oil and gas development to protect other resource values.

109 The Thousand Springs ACEC should certainly be closed to mineral material sales because its values are unique in the CRA. Other ACEC's and WSA's should be withdrawn from mineral development to protect biodiversity, scenic values and primitive values.
110

Visual Quality Management

111 We support the increased acreage in Alt 4. Is the 50,000 acre decrease in Class 1 because of release of Wild and Scenic River eligible segments? If not, what has caused the decrease?

Off Highway Vehicle Use

112 Goal 1 - As well as protecting other resource values from degradation, the goal should also be to protect some areas from noise pollution. Thousands of acres on public land are effected by noise pollution. There are few opportunities to designate quiet trails in those areas. The BLM should take this opportunity to designate quiet areas and protect the hush of the land.

113 We support the closures identified in Alt. 4. We have concerns about areas which are infinitely open to motorized use and allow cross country travel. Mechanisms for monitoring should be determined in the RMP in order to determine if resource damage is occurring. If it becomes a problem, use should be limited to designated roads and trails.

BLM Response to Letter No. 34 *continued*

The decision has been reworded in the PRMP to clarify that each habitat area has equal priority for monitoring.

34-42: Although the BLM agrees that specific data on the abundance of many wildlife species are limited, goal statements are generally written in relative terms to establish an intent. Please also see response 31-3.

34-43: Non-game bird studies are ongoing (see PRMP, Appendix L, Item 1 for studies performed to date). The BLM's ability to perform future studies is influenced by overall funding priorities and special funding opportunities such as cost-sharing grants.

34-44: Woody riparian habitats important to non-game birds would be protected by the riparian stubble-height and bank shearing criteria established in the PRMP (see Riparian Areas, Goal 1, #5 and 6). These criteria are expected to limit utilization of woody riparian vegetation and promote the productivity and health of riparian communities, without specific utilization limits on woody species. BLM would prefer to establish species-specific limits on woody use at the activity planing level, if an interdisciplinary team determines that use limits are necessary (see PRMP, Attachment 3, last paragraph).

34-45: Your preference is noted.

34-46: This decision is clarified in the PRMP - see Wildlife Habitat, Goal 2, #3.

34-47: Your preference is noted. Please see response 14-4.

34-48: Your preference for Alternative 4 is noted.

34-49: BLM believes that PRMP utilization criteria for key forage species (Livestock Grazing, Goal 1, #7), coupled with riparian stubble-height and bank shearing criteria (Riparian Areas, Goal 1, #4-7) would maintain or improve nesting habitat for sage grouse and songbirds. Please also see responses 31-146, 32-10, and 32-14.

34-50: This decision was revised in the PRMP (see Wildlife Habitat, Goal 2, #6). Alternatives 1 and 3 in the DRMP represented differences in emphasis on management of resources and were intended to display a range of reasonable management options. Alternatives 1 and 3 are meant to have different meanings, as each alternative displays a different management philosophy (discussed on pp. 24-25 of the DRMP).

34-51: Your preference for Alternative 4 is noted.

34-52: The DRMP provided maps of big game winter ranges, Donkey Hills elk calving areas, and sage grouse winter ranges and strutting grounds (Maps 3, 8, 12, 28, and 36).

114 In areas where OHV use is limited to existing roads, signs should be in place which explain that failure to comply with these limits will result in the closing of the area to motorized use.

115 All WSA's should be closed to OHV use, whether or not they are released from Wilderness Review, in order to provide quiet places on the CRA.

Cultural Resources Management

We support the protection of cultural resources. This is a diminishing resource, because of unintentional impacts on cultural sights. On the CRA, this problem is caused mainly by livestock grazing.

116 How will you ensure that the proposals you make in Alt 2 will be implemented?

Thank you for the opportunity to comment on this important plan. We look forward to working with you during the rest of the planning process.

Sincerely,

Linn Kincannon
Idaho Conservation League
Public Lands Associate

Craig Gehrke
The Wilderness Society
Regional Director

Enc: 2

These maps delineate only some of the habitat areas referred to in Wildlife Habitat Management, Goal 2, #12.

34-53: (a) The 15 year timeframe was established as a general goal for accomplishing the actions listed, and would begin when the Record of Decision for the approved RMP is signed. (b) Habitat suitability can be improved for many species by providing water sources in otherwise dry areas. Please see response 31-372. (c) All prescribed burn proposals would be subject to an environmental assessment to document expected effects on other resources, including sagebrush-dependent wildlife species. Please see response 34-35.

34-54: The 15 year timeframe would begin when the Record of Decision for the approved RMP is signed. It is a general goal for completion of forest raptor surveys on all commercial forest areas in the Challis RA. However, it is expected that a site-specific raptor nest site survey would be completed prior to timber harvest on any proposed timber sale area (see PRMP, Wildlife Habitat, Goal 2, #8 and 9(b)).

34-55: Your opinion is noted. Permit terms and conditions are developed on a case-by-case basis. The decision you have cited would be included when appropriate.

34-56: Timelines for developing and revising activity plans would be identified in the RMP Implementation Plan.

34-57: Your preference for Alternative 4 is noted. Please see response 16-3(e).

34-58: Please note that Alternative 4 and the Preferred Alternative are the same. This management is included in the PRMP. The BLM could not find any further comment on this decision in the "Forest Resources" section of your letter.

34-59: Quality habitat is highly diverse, varying by species, and thus, cannot be defined under this goal in a measurable or meaningful way for all riparian-dependent wildlife species. Many species have their own unique habitat requirements.

34-60: Please see response 34-26.

34-61: Your preference for Alternative 4 is noted.

34-62: Your concerns and preferences are noted.

34-63: This decision has been revised in the PRMP. Any rangeland improvement project proposal would be evaluated during activity or project planning, with full public involvement and compliance with BLM policies, including current standards for rangeland health and

guidelines for grazing administration.

34-64: (a) The PRMP adds a decision which addresses compliance with current standards for rangeland health and guidelines for grazing administration (see Livestock Grazing, Goal 1, #1). The Upland Watershed goal to achieve "satisfactory condition watersheds" (see Glossary: watershed condition class) is consistent with these standards and guidelines. (b) The PRMP specifies several means to measure progress towards achieving upland watershed health, including periodic Ecological Site Inventory, analysis, interpretation, and evaluation of long term upland monitoring studies, and rangeland health assessments.

34-65: Your support for Alternative 4 is noted. The use of non-native species may be necessary for recovery of some sites (see PRMP, Attachment 8: Design Specifications - "General" #3 and 4).

34-66: Your comments are noted. Please see responses 31-316, 34-1, and 34-3.

34-67: Your opinion is noted. Please see response 34-3.

34-68: Riparian monitoring is ongoing in the Challis RA, with several new key areas being established each year. Monitoring sites are selected in conjunction with activity planning, as they are the primary means of assessing progress towards site-specific resource objectives. The schedule for implementing monitoring is dynamic and would not be appropriate for inclusion in the PRMP.

34-69: See responses 34-3 and 34-21.

34-70: (a) The PRMP has been revised to state that riparian stubble height standards must be maintained during the scheduled grazing period, or, on pastures grazed before July 10, sufficient regrowth prior to the end of the growing season must be expected (see PRMP, Riparian Areas, Goal 1, #5). (b) Stubble height criteria would be implemented upon signature of the Record of Decision for the approved RMP. Criteria would be incorporated into the terms and conditions of grazing permits as appropriate. (c) Your opinion is noted.

34-71: This decision has been rewritten in the PRMP (see Riparian Areas, Goal 1, #6).

34-72: Please see response 31-83.

34-73: Your support for Alternative 2 is noted.

34-74: The activities in Goal 2 are ongoing.

34-75: Timelines and priorities for determining support status of

streams will be identified in the Implementation Plan for the approved RMP.

34-76: (a) This decision has been clarified in the PRMP (see Riparian Areas, Goal 3, #2). The intent of the decision is to develop riparian exclosures throughout the Resource Area that would provide a reasonable representation of the variety of riparian site types for future use as reference areas. (b) Your support for Goal 3 is noted.

34-77: Your support for Goal 4, #3, Alternative 4 is noted. The PRMP has incorporated this provision.

34-78: Your opinion is noted. Please see response 34-3.

34-79: Your preference is noted. The PRMP has incorporated the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (see response 34-3). Attachment 8: Design Specifications, "Rangeland Improvements" #4 and 8 detail the parameters to be used for the protection of developed springs and seeps.

34-80: (a) The beneficial use and support status information available to the BLM at the time the PRMP was published is shown in Appendix J, Item 1. No timeline has been established for achieving Water Quality, Goal 1, since the workload is unknown. Current water quality of all streams has not been assessed, nor have all problem areas been identified and evaluated. Please also see response 34-75.

(b) The timeline for implementing Management Concern: Water Quality, Goal 1, #5 will be established in the Implementation Plan for the Challis RMP. Please note that this decision does indicate priority streams.

34-81: Your preference for Alternative 4 is noted. Please see response 16-7.

34-82: A timeline for achieving Management Concern: Fisheries, Goal 1 is not realistic because many of the PRMP fisheries decisions involve ongoing activities, such as monitoring (Goal 1, #3, as revised in the PRMP) and cooperative management (Goal 1, #5, 6, 9). Where appropriate, the PRMP fisheries decisions specify a timeframe.

34-83: The timeframe has been deleted from the PRMP. Identification of crucial habitats was completed in 1994, although refinement of habitat and population data are ongoing efforts performed as necessary.

34-84: Your preference for Alternative 4 is noted.

34-85: Most of the fish distribution work has been completed (see response 34-83 above), but the habitat inventory,

following R1/R4 survey protocols, may take several years, given current funding and staffing levels. Inventory efforts have thus far provided a good indication of habitat condition on most streams. This effort continues to be one of the highest priorities in the Resource Area for funding.

34-86: Your preference for Alternative 4 and opinions about Alternative 2 are noted.

34-87: (a) Your support of Goal 1 is noted. (b) Your opinion is noted. The Federal Land Policy and Management Act of 1976, Title II -- Land Use Planning; Land Acquisition and Disposition, Sec. 203 Sales, (a)(3) provides for disposition through sale for the purposes you oppose.

34-88: Your support of Idaho Rivers United's comments is noted. Please see the responses to letter 22.

34-89: Your preference for Alternative 4 is noted. Please see response 6-3.

34-90: Unless another desired plant community better meets resource needs, attainment of PNC is a goal for the entire Resource Area, including ACECs; see PRMP, Livestock Grazing Goal 1, #10.

34-91: Your opinions and suggestions are noted. The PRMP limits motorized vehicle use to existing roads, vehicle ways and trails throughout the Resource Area, unless more stringent limitations or closures apply (see PRMP, OHV Use, Goal 1).

34-92: Your preference for Alternative 4 and your opinions are noted. Based on the analysis of environmental consequences, the BLM believes elk habitat in the Donkey Hills ACEC can be managed in conjunction with timber harvest (also see response 34-101).

34-93: Your preference for Alternative 4 is noted. The BLM believes bighorn sheep habitat in the Birch Creek area can be adequately protected without closing the area to grazing; see PRMP, Wildlife Habitat, Goal 2, #6.

34-94: (a) Your opinions regarding motorized vehicle use in WSAs if released are noted. Proposed OHV management would continue to limit OHV use in WSAs, even if released from wilderness review (see PRMP, Off-highway Vehicle Use, Goal 1, #3). (b) Your opinion is noted. (c) Your preference is noted. Most WSA acreage is estimated to be in late seral stage, or at PNC; this condition should be maintained through the management proposed in the PRMP.

34-95: Please see responses 26-6 and 31-27. Approximately 60% of forest land in the Resource Area is not proposed

for commercial timber harvest in the PRMP. Although commercial forest sites have relatively low productivity and management problems, they are manageable. Little timber was harvested in the Resource Area during the past decade because forest management efforts focused on backlog regeneration projects (see DRMP, p. 207a, Note #1).

34-96: Your opinion is noted. The PRMP proposes harvest limits within the sustained yield levels calculated through extensive inventories. The decadal sustained yield average proposed while inventories are being completed (6.60 MMBF/decade) is well below the current allowable sale quantity (922 MBF/year) and recent harvest levels, and is considered sustainable, based on eastern Idaho zone forest inventories completed in 1984 (see DRMP, p. 227a, analysis point #2, Alternative 2 and p. 207a, Note #1).

34-97: Forest ecosystem values include all abiotic and biotic components necessary for long term sustainability of forests. In order to maintain forest ecosystem values, the BLM must maintain all the parts of the forest community, regardless of whether or not their function in the complex system is fully understood.

34-98: Please see responses 31-105(a) and 31-107. Regarding your point on dwarf mistletoe, planting of non-host species has resulted in mistletoe-free stands in the Lemhi Resource Area (which adjoins the Challis Resource Area). Your point about dwarf mistletoe-caused mortality is usually true. However, the BLM regularly observes significantly increased mortality in heavily mistletoed forest stands, often caused by secondary factors such as insects (usually Douglas-fir beetle) due to tree weakening. For example, in the Birch Creek area within the Lemhi Resource Area, up to one tenth of the mistletoed trees noted alive in 1986 are currently dead (Elzinga, personal observation, October, 1997).

34-99: (a) Natural regeneration has not been a problem in most of the CRA. In fact, in the similar dry conditions of the Lemhi RA, excessive amounts of regeneration have become a concern; excessive regeneration has most often occurred on shelterwood cuts. In the forests of both the Lemhi and Challis RAs, only one (90 acre) overstory removal has been implemented on a shelterwood harvest area to date. All of the other re-harvested shelterwood stands have been logged to remove the dying, diseased, or poor vigor trees for stand maintenance. In some stands, group selection (less than .25-acre groups removed) has been used to release regeneration or enhance the growth of new regeneration.

(b) Your comments are noted. Commercial thinning has not been economically viable in the CRA, due to the

small diameter trees and distance from multiple product centers like particle board and pulp mills.

34-100: Your comments are noted. This decision has been revised in the PRMP to clarify the BLM's proposed management of commercial timber harvest activities in riparian habitats (see Forest Resources, Goal 1, #15). The BLM prefers to retain the flexibility to manage forest stands within riparian areas in order to promote and sustain long term watershed health.

34-101: Your preference for Alternative 4 and your other comments are noted. The Donkey Hills ACEC is proposed to maintain elk winter range and calving habitat. Harvesting as proposed in the PRMP would not change human access to the area or significantly alter current elk hiding and/or thermal cover in the Donkey Hills. Forage may increase as a result of timber harvest. As a result, the values for which the Donkey Hills ACEC has been proposed would not be compromised through timber harvest, and timber harvest could continue without adverse effects on elk.

34-102: When buffer strips can be removed would be determined in the future by BLM staff specialists in consultation with IDFG and appropriate Federally recognized tribes. Only 2 to 3 percent of commercial timber in the Donkey Hills is in lodgepole pine dominated stands. As a result, widespread clearcuts could not occur within the Donkey Hills under the PRMP (see ACECs, Donkey Hills ACEC, #3(c)). Buffer strips would then primarily exist only around group selection and shelterwood cuts in Douglas-fir stands, where there would be large amounts of post-harvest timber. The comparison with the Moose Creek plateau of the Targhee National Forest is inconsistent with management techniques that would be employed under the PRMP.

34-103: Your preference for Alternative 4 is noted.

34-104: Your opinion is noted.

34-105: The PRMP has been revised to read "ecosystem products and values."

34-106: (a) This management decision is not included in the PRMP. (b) The PRMP does not specify a timeframe for accomplishing this action.

34-107: Your support of Biodiversity, Goal 1, #7-10, Alternative 2 is noted. The Challis Resource Area will seek partnerships and other opportunities to implement these decisions. The schedule for implementing these actions will be established in the Implementation Plan for the approved RMP.

34-108: Your opinion is noted. Please be aware that the potential for oil and gas leasing in the Challis Resource Area is low (see PRMP, Map 31). Existing WSAs are closed to energy mineral development. In WSAs if released from wilderness review, stipulations would be applied to protect resource values. (See PRMP, Minerals, Goal 1, #4.) Resource values in designated ACECs would be protected by standard stipulations, which can include "no surface occupancy" (see PRMP, Minerals, Goal 1, #5). The BLM believes the PRMP's provisions for stipulations to protect resource values are sufficient; no withdrawal is necessary.

34-109: Your preference for Alternative 4 is noted. Mineral material sales are discretionary actions and can be refused for any particular site.

34-110: Your opinion is noted.

34-111: Your preference of Alternative 4 is noted. Please see response 31-23.

34-112: In general, the PRMP limits OHV use to existing roads, vehicle ways, and trails throughout the Resource Area (see PRMP, Off-highway Vehicle Use). The PRMP's proposed changes in OHV management are in response to public concern over the impacts of OHVs (including noise pollution) on other resources, activities and uses. OHV use is restricted in some areas (e.g., WSAs) where motorized vehicle travel would affect primitive resource values such as solitude and quiet.

34-113: Your support for Alternative 4 is noted. No areas within the Challis Resource Area would be "open" to OHV use (cross-country travel) under the PRMP (see PRMP, OHV Use, Goal 1).

34-114: Once the RMP is signed, an OHV implementation plan would be developed to manage OHV use. Maps and narratives describing permissible OHV activities would be developed and made available to the public. Signs indicating permissible uses would also be placed along vehicle travel routes. If necessary, appropriate action would be taken to enforce these decisions.

34-115: Your opinion is noted. Please see response 34-112.

34-116: Management of cultural resources in the Challis Resource Area will be in conformance with the approved RMP, as required by Sec. 302(a) of FLPMA. Cultural resource management will also be consistent with other relevant law, regulation, and policy (such as the ARPA, American Antiquities Act, and National Historic Preservation Act). The cultural resources decisions in the PRMP will be implemented according to the Implementation Plan for the approved RMP.

Letter No. 35

Kathe Rhodes, Resource Management Plan Coordinator
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Salmon Field Office
Route 2, box 610
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COMMENTS ON: Challis Resource Area Draft Resource Management Plan & Environmental Impact Statement

Dear Kathe,

We feel that there are numerous points of potential debate spread throughout the document. The general under tone of the entire document is biased against cattle grazing. The lack of current inventory and monitoring information on which this document is
1 based is incredible. Your data is too old to be used to prepare a document that is going to have such an influence on so many peoples lives, at least 1977 or 1979. We believe it is extremely difficult to decide where you are going without having any idea of where you are currently. How can you determine the successes or failures of past management without knowing the condition and trend of these resources in relation to those management alternatives used in the past?

2 If range conditions are as deteriorating as the Draft RMP implies, why do we see record numbers of elk and antelope, wild horse herds continuing to increase, recreational use of the public lands increasing and livestock numbers maintaining to declining slightly over the past 20 years? With all of these demands on the resource that is declining in condition, one would expect that range conditions would continue to suffer, which would in turn cause the wildlife, wild horses and others dependent upon the habitat, to eventually decline.

3 We do not agree with alternatives 2,3,4,or 5 on increasing the ACEC'S such as Herd Creek ACEC and Road Creek ACEC. We currently have a number of these ACEC sites in the Challis Resource Area.

4 We do not agree with the grazing restrictions that are on maps 22 and 23.

5 We do not agree that the existing management has all negative effects from livestock grazing. Herd Creek has improved and we have photos from the same photo points since 1974 that show this to be true fact. Most of the stream damage that has occurred along the Lake Creek is due to the wash out of the Herd Lake in the early summer of 1982. We see no mention of this occurrence in the document.

6 On page 205a and 205b we prefer alternative one because it has no AUMs cut whereas alternative 2 has 25% cut, alternative 3 has about
7 a 25% cut, alternative 4 has a 59% cut and alternative 5 has a 57% cut. How can you say that alternative 1 would cause the range conditions to remain static or deteriorate if you have no data to

Letter No. 35 *continued*

7 show what has happened the last 20 years.

8 The general thrust of this section appears to be preparation of the local economy for the shift to more service oriented functions associated with tourism and retirees. This should be done with open eyes and the realization that shifts from basic industries such as agriculture, timber and mining to services will result in significant changes in the local economy. From your economic models, what can you say about the numbers of retirees or river rafters or some other service-oriented sector employees that would be need to replace the lost income and employment from reducing grazing by 25 percent in the resource area?

9 Management Concern: Minimum Streamflow Alt 2 The water belongs to the State of Idaho. BLM does not control the amount of water private landowners divert and so this should be removed from the RMP. BLM has no right interfering with private water rights. It is stated that BLM is working with IDFG. BLM is busy enough without worrying about minimum streamflow and diversions. The landowners of East Fork are working with the Model Water shed on a Habitat project. BLM does have a person on the advisory board and so will have representation without spending more time and money setting up a team to deal with something that is already being handled by the Idaho Department of Water Resource, IDFG, landowners, and Model Watershed.

10 Volume 3 pages 524 and 525 Appendix C: Summary of Fisheries Habitat condition in Drainage of the Challis RA East Fork Salmon River Drainage--BLM has stated that habitat has significantly degraded over the past 30 year, bank stability is rated fair to poor on most private ground, and the private sections have unstable banks and channels as a result of poor grazing management in the riparian zones. This is untrue. In the model Watershed Plan prepared by: Idaho Soil Conservation Commission in cooperation with: Bonneville Power Administration, BLM, IDFG, NRCS, Northwest Power Planning Council, Shoshone-Bannock Tribe, and USFS it states under Chapter 6-2: East Fork of the Salmon River Watershed: Fish Habitat Conditions: "Overall, the quality and quantity of salmon habitat in the East Fork watershed is good and conditions have changed very little in the past 50 years. The major problem is simply a lack of returning adult fish."

We reserve the right to amend our above comments and protest.

BLM Response to Letter No. 35

35-1: Please see response 20-1.

35-2: Please see response 20-9.

35-3: Your preference for Alternative 1 (no additional ACEC designations) is noted.

35-4: Your preference is noted. These alternatives were not adopted in the PRMP.

35-5: (a) The Draft RMP/EIS acknowledges the economic benefits of livestock grazing.

(b) Resource conditions along Herd Creek have improved under grazing management applied since 1993, as evidenced by the results of the recent 1995 upland range inventory of the Herd Creek and Warm Springs allotments. Analysis of these data shows a generally favorable trend on the upland portions of those allotments. This favorable trend is believed to be the result of implementing intensive grazing systems and constructing new range improvement projects. Riparian habitat improvement has been measured on numerous streams within the East Fork Salmon River drainage since initial baseline data were established in 1993. Within the Herd Creek Allotment, noticeable improvement has been documented in Herd Creek and Lake Creek.

(c) The BLM acknowledges that damage caused by natural catastrophic events can have adverse effects on stream channels. However, certain areas in the Herd Creek Allotment, including the Lake Creek drainage above the lake, have sustained past levels of livestock use that have adversely affected riparian and aquatic habitats. Damage would likely have been less, and recovery rates after natural occurrences more rapid, with lower levels of livestock use. There is no mention of the 1982 natural event in the Draft RMP because this level of detail was not essential to the development of an adequate plan and NEPA analysis.

35-6: Your preference for Alternative 1 is noted.

35-7: The effectiveness of past rangeland management actions was evaluated in 1992 through an analysis of 120 upland trend studies, which included nested frequency data and permanent photo plots. This analysis indicated that management applied up until 1992 had produced only very limited changes in resource conditions (see PRMP, Chapter 3 - Livestock Grazing, "Rangeland Monitoring and Evaluation").

35-8: Please see response 20-12.

35-9: Your comments are noted. Please see response 16-7.

BLM Response to Letter No. 35 *continued*

35-10: Please see response 25-11.

Letter No. 36

Kathe Rhodes-RMP Coordinator
BLM/Salmon Field Office
Rt 2 Box 610
Salmon, Idaho 83467

Re: DRAFT RMP/EIS 1610/1793 (045)

Dear Ms. Rhodes:

As a livestock permittee of the Challis Resources Area, I would like to have the following written comments included as part of the record, and complete consideration given to my comments concerning the Challis Draft RMP/EIS, dated May 1996.

1 I realize that accompanying changes in political administrations, new public policies are adopted to express the desired goals of that particular administration. It is obvious to me that the Fundamental Rangeland Health and Standards Guidelines For Grazing Administration (subpart 4180, August, 1995), as adopted by the current administration, were designed to achieve specific administration goals, and those goals are not favorable to the continued existence of grazing the public lands. As government employees, you are compelled to administer accordingly, or suffer the consequences of being removed in favor of someone who will follow those directives. My greatest objection to this procedure is the total disregard given to the previous goals and standards that were implemented to attain a similar result...improved rangeland health.

Each time new rangeland health objectives are being adopted, the message being given to society is that the old standards were a failure. Because both you and I (you as agency personnel calling the shots, and I as a permittee complying to your decisions) are looked on as the prime culprits of NOT meeting the new goals, it only follows that society will view us as failures as well. Maybe you are content with that, but I am not. I also do not believe the old standards were failures, and one look at comparison photographs of the rangeland conditions will prove my point.

As you well know, I have cooperated with your agency to the fullest extent possible in trying to attain the desired goals. This I have done even at times when we didn't agree on the specified action. But, then again, I really do not have any choice given that you are the agency who decides the goals and directs the actions. I am the permittee who must adhere to your policies or be removed from using the range. This process has been repeated a number of times. Now, you are giving me a new set of goals and directives to comply with which says that the old ones were a failure. I object to your reasoning, your actions, and your ID Team's conclusions.

2 The three Management Framework Plans currently being used to determine stocking rates etc. have been effective in accomplishing the desired results...improved rangeland health. These current goals have been modified and revised a number of times in order to comply

BLM Response to Letter No. 36

36-1: Your comments are noted.

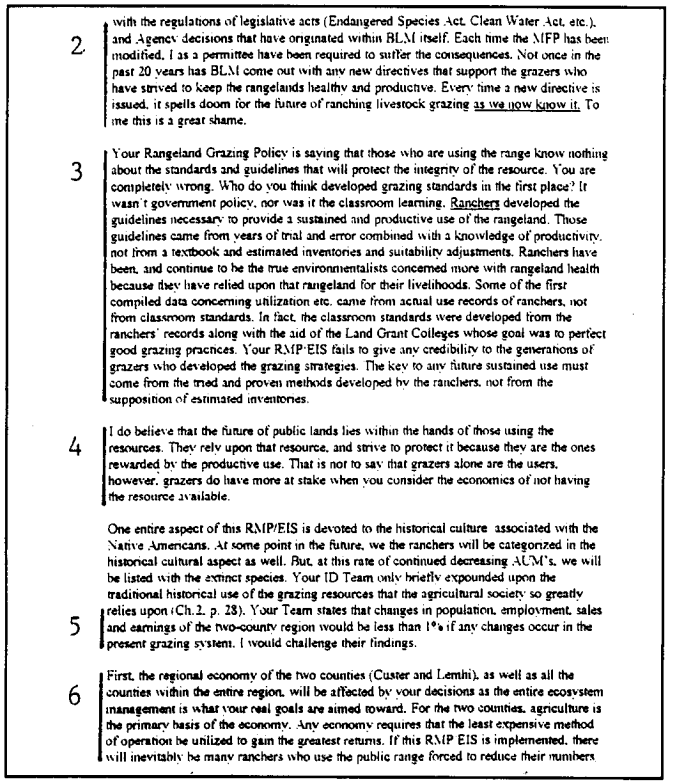
36-2: Although the management provisions of the existing Management Framework Plans (MFPs) have contributed some to the improvement of range conditions, existing management has not been successful at improving range conditions throughout the Resource Area. Implementation of the Proposed RMP and the Standards and Guidelines for livestock grazing administration (43 CFR 4180) would enhance efforts to improve rangeland health.

36-3: Your comments are noted.

36-4: Your opinions are noted.

36-5: The economic model the BLM used was specific for the region and based on information collected through the University of Idaho and the Cooperative Extension System of Custer and Lemhi counties. Based on expected changes to grazing management from Alternative 1 (existing management) to Alternative 2, the economic model indicates less than 1% decrease in population, employment, earnings, and sales would occur in the two-county region. These changes are not as large s you might have expected, because the two-county economy is diverse - grazing is just one of many economic activities which occurs in the two-county region. For the Pahsimeroi subregion, where the economy is predominantly agricultural, the impacts

Letter No. 36 *continued*



with the regulations of legislative acts (Endangered Species Act, Clean Water Act, etc.), and Agency decisions that have originated within BLM itself. Each time the MFP has been modified, I as a permittee have been required to suffer the consequences. Not once in the past 20 years has BLM come out with any new directives that support the grazers who have strived to keep the rangelands healthy and productive. Every time a new directive is issued, it spells doom for the future of ranching livestock grazing as we now know it. To me this is a great shame.

2

Your Rangeland Grazing Policy is saying that those who are using the range know nothing about the standards and guidelines that will protect the integrity of the resource. You are completely wrong. Who do you think developed grazing standards in the first place? It wasn't government policy, nor was it the classroom learning. Ranchers developed the guidelines necessary to provide a sustained and productive use of the rangeland. Those guidelines came from years of trial and error combined with a knowledge of productivity, not from a textbook and estimated inventories and suitability adjustments. Ranchers have been, and continue to be the true environmentalists concerned more with rangeland health because they have relied upon that rangeland for their livelihoods. Some of the first compiled data concerning utilization etc. came from actual use records of ranchers, not from classroom standards. In fact, the classroom standards were developed from the ranchers' records along with the aid of the Land Grant Colleges whose goal was to perfect good grazing practices. Your RMP/EIS fails to give any credibility to the generations of grazers who developed the grazing strategies. The key to any future sustained use must come from the tried and proven methods developed by the ranchers, not from the supposition of estimated inventories.

3

I do believe that the future of public lands lies within the hands of those using the resources. They rely upon that resource, and strive to protect it because they are the ones rewarded by the productive use. That is not to say that grazers alone are the users, however, grazers do have more at stake when you consider the economics of not having the resource available.

4

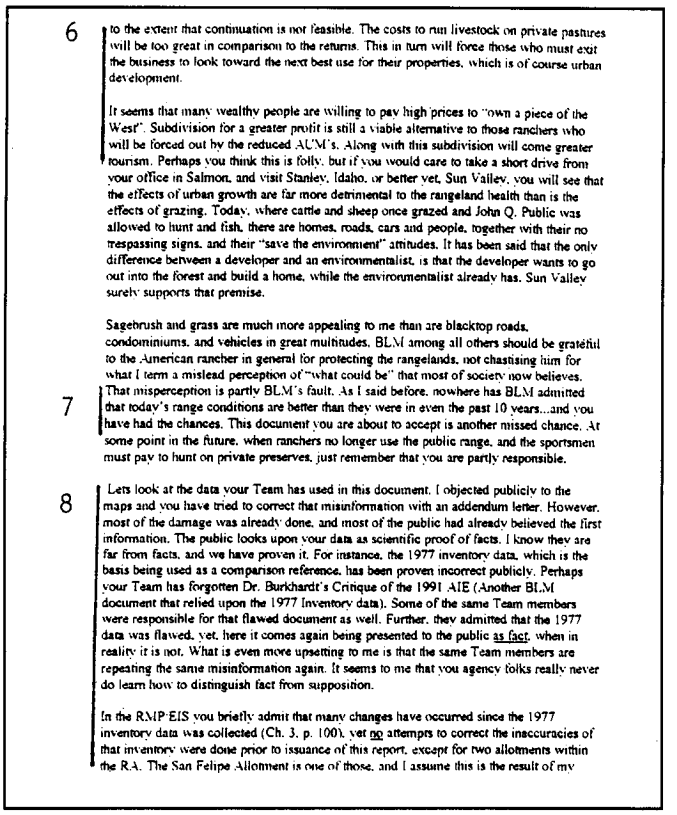
One entire aspect of this RMP/EIS is devoted to the historical culture associated with the Native Americans. At some point in the future, we the ranchers will be categorized in the historical cultural aspect as well. But, at this rate of continued decreasing AUM's, we will be listed with the extinct species. Your ID Team only briefly expounded upon the traditional historical use of the grazing resources that the agricultural society so greatly relies upon (Ch.2, p. 28). Your Team states that changes in population, employment, sales and earnings of the two-county region would be less than 1% if any changes occur in the present grazing system. I would challenge their findings.

5

First, the regional economy of the two counties (Custer and Lemhi), as well as all the counties within the entire region, will be affected by your decisions as the entire ecosystem management is what your real goals are aimed toward. For the two counties, agriculture is the primary basis of the economy. Any economy requires that the least expensive method of operation be utilized to gain the greatest returns. If this RMP EIS is implemented, there will inevitably be many ranchers who use the public range forced to reduce their numbers

6

Letter No. 36 *continued*



to the extent that continuation is not feasible. The costs to run livestock on private pastures will be too great in comparison to the returns. This in turn will force those who must exit the business to look toward the next best use for their properties, which is of course urban development.

6

It seems that many wealthy people are willing to pay high prices to "own a piece of the West". Subdivision for a greater profit is still a viable alternative to those ranchers who will be forced out by the reduced AUM's. Along with this subdivision will come greater tourism. Perhaps you think this is folly, but if you would care to take a short drive from your office in Salmon, and visit Stanley, Idaho, or better yet, Sun Valley, you will see that the effects of urban growth are far more detrimental to the rangeland health than is the effects of grazing. Today, where cattle and sheep once grazed and John Q. Public was allowed to hunt and fish, there are homes, roads, cars and people, together with their no trespassing signs, and their "save the environment" attitudes. It has been said that the only difference between a developer and an environmentalist, is that the developer wants to go out into the forest and build a home, while the environmentalist already has. Sun Valley surely supports that premise.

Sagebrush and grass are much more appealing to me than are blacktop roads, condominiums, and vehicles in great multitudes. BLM among all others should be grateful to the American rancher in general for protecting the rangelands, not chastising him for what I term a mislead perception of "what could be" that most of society now believes. That misperception is partly BLM's fault. As I said before, nowhere has BLM admitted that today's range conditions are better than they were in even the past 10 years...and you have had the chances. This document you are about to accept is another missed chance. At some point in the future, when ranchers no longer use the public range, and the sportsmen must pay to hunt on private preserves, just remember that you are partly responsible.

7

Lets look at the data your Team has used in this document. I objected publicly to the maps and you have tried to correct that misinformation with an addendum letter. However, most of the damage was already done, and most of the public had already believed the first information. The public looks upon your data as scientific proof of facts. I know they are far from facts, and we have proven it. For instance, the 1977 inventory data, which is the basis being used as a comparison reference, has been proven incorrect publicly. Perhaps your Team has forgotten Dr. Burkhardt's Critique of the 1991 AIE (Another BLM document that relied upon the 1977 Inventory data). Some of the same Team members were responsible for that flawed document as well. Further, they admitted that the 1977 data was flawed, yet, here it comes again being presented to the public as fact, when in reality it is not. What is even more upsetting to me is that the same Team members are repeating the same misinformation again. It seems to me that you agency folks really never do learn how to distinguish fact from supposition.

8

In the RMP/EIS you briefly admit that many changes have occurred since the 1977 inventory data was collected (Ch. 3, p. 100), yet no attempts to correct the inaccuracies of that inventory were done prior to issuance of this report, except for two allotments within the R.A. The San Felipe Allotment is one of those, and I assume this is the result of my

BLM Response to Letter No. 36 *continued*

would be greater (see DRMP pp. 205-206 and response 27-25.)

36-6: The analysis of impacts acknowledges that RMP decisions would affect the Custer-Lemhi counties' regional economy, but impacts are expected to be minor (see DRMP, p.205a/b, #1). This is because the economy of the two-county region is diverse (based upon activity in several economic sectors); agriculture is only one of many components of the two-county economy (see DRMP, Appendix B, Items 1 and 3, pp. 504 and 506). Agriculture, mining, and business associated with visitors to the area all have a sizeable proportion of employment, sales, and earnings. Local use of public lands generates only a small proportion of the area's economic activity. Impacts were not calculated for regions of Idaho outside of Custer and Lemhi counties for several reasons (see response 31-66).

The BLM believes that many operators would be able to comply with the RMP's grazing management actions without any reduction in AUMs. It is also expected that conversion of agricultural lands to urban development would not occur in most cases. Strategies such as modified season of use, increased riding, improved livestock distribution, or fencing may satisfactorily address rangeland health concerns.

36-7: The PRMP has been revised to incorporate more recent information on range condition (see Chapter 3 - Livestock Grazing, "Rangeland Inventory" and "Rangeland Monitoring and Evaluation"). Also see response 15-2.

36-8: Your comments regarding the 1977 range inventory data are noted. The 1977 data were not the primary data or the only data used to develop and analyze the impacts of the grazing management decisions in the PRMP. The BLM does not believe that the 1977 inventory data were proven incorrect or that the data must be discarded or ignored because they are disputed by an individual.

36-9: The 1977 inventory would not be used to reduce permitted livestock use on an allotment-by allotment basis. The PRMP analysis of impacts states that the management decisions outlined in the PRMP could "result in estimated annual livestock use up to about 12,657 AUMs (about 25%) below the active grazing preference..." This 25% estimate was for the Resource Area as a whole, not for individual operators or allotments. Some allotments may experience no change in annual use, while others may experience reductions greater than 25% in order to improve resource conditions, particularly on stream-side riparian areas.

36-10: The Draft RMP, Volume 1, p. 29, does not state or imply

previous objections. However, your Team continued to use the 1977 data as specific management concerns for the selection of the over-all preferred alternative. Thus, the updated inventory upon the two allotments was wasted as both they and all others may have AUM's reduced up to 25% throughout the entire RA. It appears to me that policy is dictating the goal, and that goal is to force ranchers like us out of business. I really do not understand why this is being done. Perhaps it is only POLITICS, but for whatever reasons, we are going to suffer the consequences.

This RMP/EIS addresses the fisheries issue with citing livestock grazing as the core of the problem. You should be able to prove that degradation due to livestock grazing in Road Creek, or Sheep Creek is the main reason why the Salmon are nearly extinct in the Snake River system (p.29, Vol. 1, *Alternatives*), but you simply cannot, and you know it. You should be able to prove that wild ungulates have little or no detrimental impact upon areas of concern (p. 458, Vol. 2), but then again you can not. You should be able to prove that the desired stubble height will further enhance the rangeland health. Again, you can not. It, fact, you know that the stubble height will be unlikely attained in many of the areas you have designated, therefore, what you are really saying is "Do not graze". This you have done even though studies have proven that desired stubble heights may be reached by regrowth after the livestock are removed.

and I have discussed at length with your BLM ID Team the scientific aspect of the RMP/EIS within the San Felipe allotment, and I know that we can prove your Team conclusion wrong with scientific evidence. I will not address those same issues in this correspondence. This letter is coming from the heart as well as from the mind, and I believe your Agency actions may well be the un-settling of the West. I do not approve of this RMP/EIS document, nor of the flawed information within, and, I assume you knew very well that I wouldn't. I hope you are not disappointed. I am.

With Great Concern.

that "degradation due to livestock grazing in Road Creek or Sheep Creek is the main reason why the salmon are nearly extinct in the Snake River system," as you claim.

36-11: You cite a portion of Attachment 6: IDFG/BLM/USFS Elk Policy Statement and Memorandum of Understanding (DRMP, p. 458); this Policy Statement is specific to elk and uses the term "wild ungulates." The BLM's observational data on resource conditions in elk and cattle exclosures in the Challis RA and other studies strongly indicate that wild ungulates (particularly elk) have little or no detrimental impact upon most areas of concern (e.g., riparian areas), as stated in the Policy Statement. In addition to the exclosure evidence, a formal study of elk and cattle range relations was conducted in response to perceived conflicts between elk and cattle on the Lee Creek Forest Service Allotment near Leadore, Idaho (Kelly and Merrill, 1995). The study found that nearly 90% of all graminoid forage removed across the allotment was attributed to cattle, while other herbivores (including elk) removed just over 10%. Both BLM and the Region 7 Office of the IDFG believe that this study, when reviewed in light of the exclosure data and observations, is generally reflective of use by elk and other wild herbivores (except wild horses) within the Challis RA.

36-12: Stubble height standards have been applied on some portions of the Resource Area since 1993. These standards have successfully reduced the impacts of livestock grazing to riparian and wetland habitats in many watersheds; specifically, Herd Creek, Lake Creek, Road Creek, Horse Basin Creek, and Bear Creek. Marked increases in hydric vegetation community composition and woody age structure and improved aquatic habitat condition and stream channel dynamics have been realized, even while significant levels of livestock grazing have been allowed.

36-13: The BLM disagrees with your assertion that areas are incapable of attaining the desired stubble heights. Data provided from protective cages distributed throughout the Resource Area, even on the harshest sites, indicate good growth potential, well beyond the indicated stubble standard. The BLM agrees there are some areas within the Resource Area that, due to reduced vigor, are not producing at their maximum potential. These areas are the exception and, it seems reasonable, should receive less grazing pressure.

36-14: The BLM agrees that regrowth is likely on many riparian systems, which is why stubble height standards are modified for early season grazing (see Riparian Areas, Goal 1, #5c). The extent of regrowth is diminished as the season progresses and on less productive sites, which limits livestock grazing opportunities later in the summer

BLM Response to Letter No. 36 *continued*

or into the fall. The annual (or seasonal) monitoring process includes taking stubble height measurements prior to livestock grazing and late in the year, in order to analyze grazing by other ungulates and regrowth potentials.

36-15: Your concerns are noted.

Letter No. 37

1-5-96

Kathe Rhodes, Resource Management Plan Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

COMMENTS ON: Challis Resource Area Draft Resource Management Plan & Environmental Impact Statement

Dear Kathe,

1 Our recommendation is for Alternative 2, the Preferred Alternative with the following exceptions. Furthermore, our comments pertain to the East Fork of the Salmon River.

2 1)Issue: Range Management-Management Concern: Livestock Grazing- Alt 2 #4 = Restrictions on livestock use on the bighorn sheep winter range on the East Fork should be lifted as in Alt #3. Through our Stewardship Project on the Baker Allotments we would like to investigate time grazing on the bighorn sheep range. The vegetation on this range has become old and rank and the old wolf plants are dying. The sheep are spending less and less time on their range and more and more time in our irrigated pastures where vegetation is lush. By time grazing, the cows could graze off these old plants and allow new growth, brake up the crusted soil to allow new seedlings and the retention of more water.

3 2) Table 2-1: Issue: Range Management- Management Concern: Livestock Grazing =Alt 2 #14 We feel that if AUMs are held for watershed protection and wildlife habitat until vegetative objectives are reached, make sure the objective is obtainable and realistic so the AUMs can be reallocated. Lost AUMs is a financial loss for the rancher and BLM. We really prefer Alt 1 on this.

4 3)Table 2-1: Issue: Range Management- Management Concern: Livestock Grazing = Alt 2 #19 Livestock would be excluded from the designated recreation sites identified in *Appendix D, Item 1.* Ziegler's Hole Rec. Site and Jimmy Smith Lake Campground are both in our BLM allotments. Neither are developed campground and how can you justify developing campgrounds alongside streams that are considered by BLM as critical andronomous fish habitat? Neither campground is fenced and so keeping the cattle out of the campground is not feasible. Throughout the Draft RMP livestock are noted for negative impact. This is easy to find on almost every page having to do with livestock issues. Reading through the Draft RMP we did not note where recreation was sighted as having negative impact on the resource. Overuse by recreationalists can be just as damaging as that of cattle. The campsite at Jimmy Smith Lake is a good example of over use by recreationalists. We feel a recreationalist over use should be addressed, planned for, and monitored along with all other uses of the resource.

BLM Response to Letter No. 37

37-1: Your preference for Alternative 2, with exceptions, is noted. The BLM's responses to the exceptions you recommend are stated in responses 37-2 through 37-12 below.

37-2: Please see response 25-2.

37-3: Please see response 25-4.

37-4: Please see response 25-5.

37-5: Please see response 25-3.

37-6: Please see response 25-6.

37-7: Your preference for Alternative 1 is noted. Please see response 16-7.

37-8: Your opinions are noted.

37-9: Please see response 25-9.

37-10: Please see response 25-10.

37-11: Please see response 25-11.

37-12: Please see response 25-12.

5 4)SRMAs-Alt 2 expands the SRMAs. BLM lands are already being managed and an expansion of management is not necessary but would only be an added expense in another group of administrators and biologists under a different title.
An increase in recreationalists on the East Fork by listing Road Creek on the "Wild Horse" Back Country Byway (as stated on page 117) would only intensify problems in an area BLM feels already has problems in resource and water quality. We feel Alt 1 is a better standard here.

6 5) On BLM maps, we want private property on the East Fork left out of BLM areas of management and study, since BLM does not have authority to manage or study private property. This would help show a truer interpretation and not a misleading portrayal of BLM management.

7 6) Management Concern: Minimum Streamflow Alt 2- The water belongs to the State of Idaho. BLM does not control the amount of water private landowners divert and so this should be removed from the RMPs. BLM has no right interferring with private water rights. It is stated that BLM is working with IDFG. BLM is busy enough without worrying about minimum streamflow and diversions. The landowners of East Fork are working with the Model Watershed on a habitat project. BLM does have a person on the advisory board and so will have representation without spending more time and money setting up a team to deal with something that is already being handled by the Idaho Department of Water Resource, IDFG, landowners, and Model Watershed. We feel the wording on Alt 1 should be used here.

8 7) Management Concern: Floodplain/Wetland Areas = Goal 2: Alt 2 #1 The use of troughs or "waterholes" ponds with seeps should be decided on a case by case bases, not a blanket one or the other. Soil conditions and spring flow rate are two conditions that help decide which water development is feasible. We do feel all spring heads should be fenced to keep livestock and wildlife out. Ponds should not be totally removed from BLM allotments because they can be beneficial to all users of the resource.

9 8) Page 546 also Page 99 *Appendix F* Range Conditions The data for range conditions was from 1977 or '79. This is not a realistic representation of the present resource condition.Many different progressive improvements have been implemented since 1979 such as: rest rotation system, numerous water developments, numerous drift fences, later turn on dates, decreased numbers, increased riding; to name a few. The records the BLM Range Con has collected from '79 to '96 should be on file and should have been used for current, accurate data of the present range condition.Once again you contradict your statements. In response to page 100, drought in the late 1980's has not offset the improvements that have been made. We understood that part of BLM's management duties was to monitor the range for changing conditions. You cannot plan the future of a resource using outdated data and untrue information. How can anyone choose the best alternative for managing the resource when the data used is 20 years old?

10 9) Page 101 - 104 on Range Monitoring and Factors affecting livestock management. You have just contradicted your previous statement. On page 103- Table 3-11 is a Summary of Existing Range Improvements. Every allotment is different and should be managed differently. It is unrealistic to use the same criteria for every allotment. You admit that the big game population has increased during the past 15 years and state that SOME persons attribute poor range condition to increased use by wildlife. This is true.You should consider that the wildlife population remains there year round. Not only do decreased grazing numbers cause a financial hardship so does the increased loss of pasture on our private property also being utilized by the big game population. You paint a bleak picture of range conditions - yet you have the authority to control this. There are several other factors contributing to this picture other than cattle grazing. It is due to increased number of recreationists, greatly increased numbers of big game herds, and weather conditions to name a few.

11 10) Vol 3 Pages 524 and 525 *Appendix C:* Summary of Fisheries Habitat Condition in Drainages of the Challis RA - East Fork Salmon River Drainage = BLM has stated that habitat has significantly degraded over the past 30 years, bank stability is rated fair to poor on most private ground, and the private sections have unstable banks and channels as a result of poor grazing management in the riparian zones. This is untrue.

In the Model Watershed Plan prepared by: Idaho Soil Conservation Commission in cooperation with: Bonneville Power Administration BLM, IDFG, NRCS, Northwest Power Planning Council, Shoshone-Bannock Tribe, and U.S. Forest Service it states under Chapter 6-2: East Fork of the Salmon River Watershed: Fish Habitat Conditions: "Overall, the quality and quantity of salmon habitat in the East Fork watershed is good and conditions have changed very little in the past 50 years. The major problem is simply a lack of returning adult fish." The landowners on the East Fork are working in cooperation with the Model Watershed on a habitat project. This involves approximately 10 miles of river corridor through private property on the East Fork.

12 SUMMATION: This report has been a frustrating draft to read. Under every alternative that supported cattle was a comment only showing negative consequences. We do not feel this was a true picture or a fair interpretation to present to the public. It set grazing up for sure failure regardless of your alternative.

We feel the management by BLM using utilization standards and stubble height further set the rancher up for failure. We do feel BLM management standards and ranching practices can not only sustain the resource but improve the resource if properly implemented.

We feel all involved parties must allow for flexibility in managing the resource to reach its full potential. There are opportunities for innovation if we work together towards the common goal of protecting and enhancing the environment.

We are currently working through the Experimental Stewardship Program to find a feasible solution that will be a win-win system for all. Through Holistic Resource Management, we will address all interested parties' concerns and goals for the resource through a thorough plan including a biological assessment, time grazing and intensive

Letter No. 37 *continued*

herding. We feel the community can benefit economically and still improve the resource for cattle, wildlife, recreation and future generations. 12

We reserve the right to amend our above comments and protest.

Sincerely,

Letter No. 38

Alliance for the Wild Rockies
P.O. Box 8731
Missoula, MT 59807
(406) 542-0050

The Ecology Center, Inc
1519 Cooper Street
Missoula, MT 59802
(406) 728-5733

JAN 9 1997
RECEIVED

Kathe Rhodes, RMP Coordinator
Bureau of Land Management
Salmon Field Office
Rt 2, Box 610
Salmon, ID 83467

January 6, 1997

re:Challis Draft Resource Management Plan (RMP)/EIS

Dear Ms. Rhodes,
The Alliance for the Wild Rockies and The Ecology Center, Inc. want to be involved in land management decisions that impact public lands. We are

1 concerned that domestic livestock grazing has greatly degraded large areas of the west and that the status quo approach to land management is likely to continue in the future. We point to the continuing decline in native species (both terrestrial and aquatic) along with the loss of habitat because of fragmentation and extractive uses. We urge you to look into the future and to make wise resource decisions based upon the best available science, proactive monitoring, fiscally responsibility planning, and restoration activities. We

2 support the comments submitted by Kathy Richmond and hereby incorporate them by reference. The best alternative among those examined in the RMP is alternative 4. In addition we include the following issues for your consideration:

3 1. Alternatives for Consideration: We are aware that the impact that grazing has had on the land in the analysis area has been severe in some areas. Recovery of these resources impacted from past activities should

4 receive at least equal consideration in both the Scope and the Purpose and Need. Consequently, we request at least one alternative focus entirely on recovery for those areas previously impacted from grazing and logging—fish and wildlife habitat improvements, watershed rehabilitation, and erosion control.
2. Biological Diversity: We insist that it is an absolute necessity that

5 thorough surveys for Threatened, Endangered, and Sensitive species and Management Indicator Species (MIS) be conducted before NEPA documents are finalized so that effects can be expressed in terms of populations and habitat acres, and the public can have an opportunity to comment on the adequacy of any proposed mitigation. In addition, effects must be expressed both in terms of local populations and overall populations and distribution of the species in question.
3. Cumulative Effects: The BLM must consider all cumulative effects when they

6 are determining the impacts of each alternative. This must include the existing or anticipated effects of past, present, and proposed activities, including those on nearby Forest Service, BLM, state and private lands. The cumulative effects analysis should, as accurately as possible, describe how the habitat for and distribution of TES and MIS species has been changed as a result of all management activities in the area, including fire suppression, road building, timber harvesting, etc.

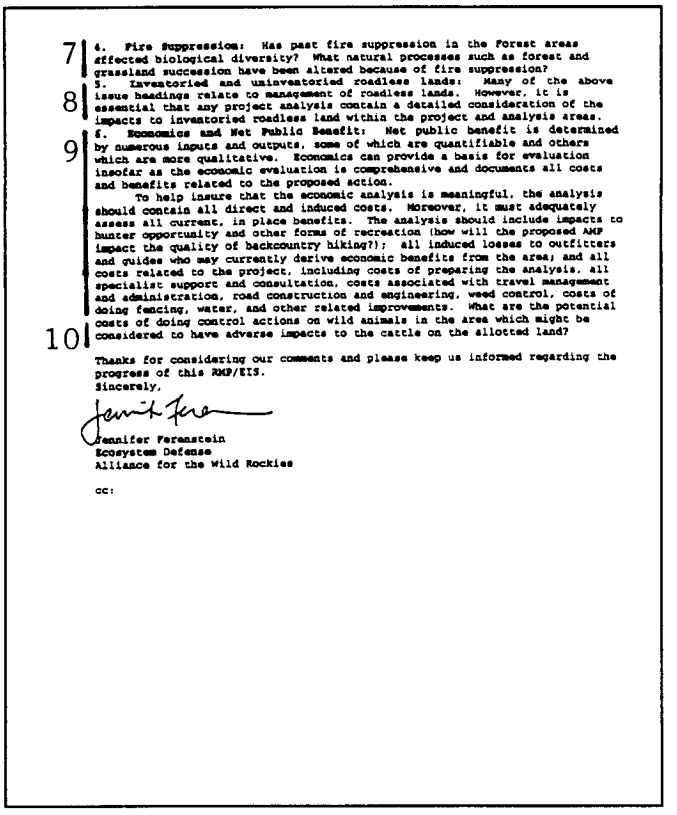
BLM Response to Letter No. 38

38-1: The Proposed RMP proposes actions to change livestock grazing management and improve range condition. The Proposed RMP also describes habitat management for native terrestrial and aquatic species (see PRMP: Biological Diversity; Fisheries; Special Status Species; and Wildlife Habitat).

38-2: Please see the responses to letter 14 (Kathy Richmond). Your preference of Alternative 4 is noted.

38-3: Concern about the impacts of actions - whether past, present, or future - is included in the Draft RMP's statement of Purpose and Need (DRMP, p. 13) which calls for a "land use plan consistent with multiple use and sustained yield objectives." The concept of sustained yield would inherently include restoring lands subjected to unacceptable resource damage, regardless of when the damage occurred.

38-4: All four "action" alternatives (Alternatives 1 through 5) developed in the Draft RMP would lead to resource recovery, although at different rates. The BLM did not believe it was necessary to develop another alternative which focuses on recovery of areas which were previously impacted by land use activities. PRMP goals and management decisions emphasize protection for and recovery of resources which have sustained resource



7 4. Fire Suppression: Has past fire suppression in the Forest areas affected biological diversity? What natural processes such as forest and grassland succession have been altered because of fire suppression?

8 5. Inventoried and uninventoried roadless lands: Many of the above issue headings relate to management of roadless lands. However, it is essential that any project analysis contain a detailed consideration of the impacts to inventoried roadless land within the project and analysis areas.

9 6. Economics and Net Public Benefit: Net public benefit is determined by numerous inputs and outputs, some of which are quantifiable and others which are more qualitative. Economics can provide a basis for evaluation insofar as the economic evaluation is comprehensive and documents all costs and benefits related to the proposed action.

To help insure that the economic analysis is meaningful, the analysis should contain all direct and induced costs. Moreover, it must adequately assess all current, in place benefits. The analysis should include impacts to hunter opportunity and other forms of recreation (how will the proposed AMP impact the quality of backcountry hiking?); all induced losses to outfitters and guides who may currently derive economic benefits from the area; and all costs related to the project, including costs of preparing the analysis, all specialist support and consultation, costs associated with travel management and administration, road construction and engineering, weed control, costs of doing fencing, water, and other related improvements. What are the potential costs of doing control actions on wild animals in the area which might be

10 considered to have adverse impacts to the cattle on the allotted land?

Thanks for considering our comments and please keep us informed regarding the progress of this RMP/EIS.
Sincerely,

Jennifer Fierenstein
Ecosystem Defense
Alliance for the Wild Rockies

cc:

degradation or are at risk of being degraded, regardless of the cause of degradation. The PRMP proposes to manage livestock grazing and timber harvest activities in a manner which minimizes adverse resource impacts (see Livestock Grazing, Goals 1 and 2; and Forest Resources, Goal 1). The PRMP also contains actions to improve fisheries and wildlife habitats, rehabilitate watersheds, and control erosion.

38-5: The Proposed RMP would require an assessment of biological diversity and special status species during project and activity planning and preparation of relevant NEPA documentation (see PRMP: Biological Diversity, Goal 1, #1; and Special Status Species, Goal 2, #1). We have noted your suggestions about how those assessments should be conducted.

38-6: The Draft RMP includes a cumulative effects analysis, by alternative, for each resource analyzed (see DRMP, Chapter 4). The BLM's definition of cumulative impacts is similar to the definition you provide (see DRMP, Glossary: "Effects (impacts)", p. 569). The Proposed RMP would require a cumulative analysis of impacts to biodiversity components (including special status species, if appropriate) as part of project and activity planning (see PRMP, Biological Diversity, Goal 1, #1).

38-7: In forested areas, fire suppression activities may have adversely affected biological diversity on some sites. Sagebrush densities on grassland habitats are believed to have increased on some sites, which can reduce forage quantity and quality. In some forested areas, fire suppression may have suppressed growth rates, reduced nutrient cycling due to an increased woody debris layer; increased the build-up of ladder fuels; promoted overstocking and poor growth; increased the risk of insect/disease epidemics due to increased competition for soil nutrients, water, and light; altered species composition of stands; and increased the risk of catastrophic fire. (See Draft RMP, pp. 72-73.)

38-8: An analysis of impacts from proposed actions is and would continue to be standard operating procedure during project and activity planning and preparation of any relevant NEPA documentation.

38-9: The methodology of the Custer-Lemhi Economic Model depicts direct, indirect, and induced effects. Aspects of the economic analysis which could not be quantified are described in qualitative terms (see DRMP, pp. 201-212). Please note that it is beyond the scope of an RMP analysis to calculate site-specific, project-level costs - a Resource Management Plan provides general management guidance and sets some priorities for project development; it does not describe or analyze all site-specific actions which may occur.

BLM Response to Letter No. 38 *continued*

The wildlife analysis of cumulative impacts (DRMP, p. 330, #44) describes expected impacts to big game population productivity and hunter opportunity. The recreation analysis describes impacts to dispersed, developed, motorized, and non-motorized recreation opportunities (see DRMP, pp. 257-266). The economic aspects of these recreation-related impacts are discussed in the DRMP on p. 208 (#5).

38-10: The PRMP proposes coordination with the Animal and Plant Health Inspection Service on matters concerning animal damage control, in accordance with the ADC annual cooperative agreement (see PRMP, Wildlife Habitat, Goal 2, #4). The PRMP does not define the number or type of ADC occurrences which would take place on public lands. Without some measure of predation, it is not possible to calculate the cost of doing control actions or the estimated loss of cattle on allotted lands.

Letter No. 40

Working for the Nature of Tomorrow.

NATIONAL WILDLIFE FEDERATION

Rocky Mountain Natural Resource Center
2260 Baseline Rd., Suite 100, Boulder CO 80302

303/786-8001
FAX 303/786-8054

January 6, 1997

Kathe Rhodes, RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

JAN 10 1997

Re: Comments on livestock grazing aspects of the Challis Resource Area Draft Resource Management Plan and Environmental Impact Statement.

Dear Folks:

The National Wildlife Federation offers the following comments on the Challis Resource Area Draft Resource Management Plan and Environmental Impact Statement ("DRMP"). Our comments pertain only to livestock grazing and the resources affected by such grazing.

I. MORE SPECIFIC AND COMPREHENSIVE MEASURES MUST BE INCLUDED TO ENSURE GOALS FOR RIPARIAN AND FISHERIES RECOVERY ARE MET.

1 We are concerned the DRMP contains too much wishful thinking and insufficient concrete measures to ensure specific goals will be attained. As the BLM has recognized, the Challis Resource Area has a poor track record of meeting objectives in its land use plans.[1] Rather than repeat history, this Plan should be outfitted so future managers have a clear mandate — and methods — to take action to achieve the Plan's goals.

For example, Goal 1, for *Management Concern: Livestock Grazing* (DRMP at 350a), commits to a lofty undertaking to "[b]ring 75% of riparian/wetland areas into proper functioning condition ... within 5 years." We fully support such a goal, and believe it is required by BLM's range management regulations which provide that lands be managed to achieve fundamentals of rangeland health.[2]

[1] "These data seem to indicate that current management has not met existing land use plan objectives to improve range condition in the Resource Area. Three reasons may account for the lack of improvement: (a) grazing systems may not have been fully implemented as planned; (b) overstocking; and (c) seasons of use that are incompatible with improving the vigor of desired species." DRMP at 101.

[2] 43 C.F.R. § 4180.1 requires:

(continued

BLM Response to Letter No. 40

40-1: The PRMP provides future managers with specific goals and specific methods for achieving those goals. The BLM believes the grazing management proposed in the PRMP will be effective at addressing resource concerns, because similar livestock grazing management has been implemented on portions of the Challis Resource Area since 1993, with noticeable improvement in resource conditions (see response 15-5). Whether the BLM can fully meet the goals described in the Challis RMP will depend on future budgets, funding levels, staffing, etc. If RMP decisions are found to be ineffective in achieving the stated goals, the RMP can be modified in accordance with 43 CFR 1610.5-4 through 1610.5-6.

40-2: The Draft RMP decisions you are concerned about (DRMP, p. 373, #5 and p. 374, #7) have been revised in the PRMP (see Livestock Grazing, Goal 1, #5 and 7). Actions to address permittee non-compliance are specified at the activity plan level (e.g., Allotment Management Plans). The RMP's wording is general on purpose, to give future land managers the flexibility to choose the best possible options for livestock management in a given allotment, under given circumstances. The Challis Resource Area's treatment of this issue is consistent with the new grazing regulations (see 43 CFR 4110.3-3, 4130.3-3 and subpart 4180, August 21, 1995). The regulations indicate the BLM must take action, but no specific course of action is

Letter No. 40 *continued*

Page 2

1 However, although the Plan contains specific actions to be undertaken to achieve the goal, there is little guidance on what is to be done if those actions are unsuccessful. This is especially troubling given the current estimate for the amount of riparian acreage in proper functioning condition is only 21.4%. DRMP at 150. Because of the importance of improving riparian condition and the sorry state of the current riparian areas, it is disconcerting that the Plan has few mechanisms to ensure its goal will be met.

We have no quarrel with the specific actions intended to improve riparian areas and eventually meet the goal. In particular we support Alternative 2, *Management Concern: Livestock Grazing*, #7 (DRMP at 352a) which incorporates the more specific criteria found under *Management Concern: Riparian Areas*, Goal 1, ## 4, 5, and 6. DRMP at 372a, 373a & 374a.[3]

[3](...continued)
The authorized officer shall take appropriate action under subparts 4110, 4120, 4130, and 4160 of this part as soon as practicable but not later than the start of the next grazing year upon determining that existing grazing management needs to be modified to ensure that the following conditions exist.

(a) Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow.

(b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities.

(c) Water quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs.

(d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species.

[3] These criteria call for 4" end of season stubble heights where streams are in (continued...)

Letter No. 40 *continued*

Page 3

2 However, these well-intentioned specific criteria are not adequately backed up by a response *if* the permittee does not comply, or *if* application of these criteria is not achieving enough improvement to accomplish the goal ("75% of riparian/wetland areas into proper functioning condition ... within 5 years.") The DRMP's mechanisms to "ratchet-up" the protection if the stubble criteria are not achieving the goal are too discretionary. They only provide:

> "Where monitoring indicates that stubble height criteria have not been successful at improving riparian condition, complete rest from livestock grazing may be initiated." DRMP 373a, #5, alternative 2. Emphasis added.
>
> "Adjustments in livestock use in riparian areas should be based on the criteria outline above in Alternative 2 ... If riparian improvement to meet objectives is not occurring within three years, based on trend monitoring, additional measures would be implemented prior to the next grazing season (*e.g.* rest, reduced livestock numbers, changed season of use)." DRMP at 374a, #7.

We respectfully submit that the two "remedies" set out above are not specific enough to withstand pressures from the livestock permittees to continue excessive livestock use. The DRMP's possible responses to indications that its riparian goal will not be timely met ("complete rest .... may be initiated"; "additional measures would be initiated") are too vague.

3 Moreover, BLM's responses can only be initiated by monitoring which determines that the riparian improvement is not being met. Yet there is no guarantee that BLM will have the staff or budget to carry out such monitoring. Isn't it likely that in many instances monitoring will not be done, and as a result BLM will not know whether there is riparian improvement or whether more protective grazing prescriptions need to be implemented if there is to be any hope of achieving the Goal? Our impression is that the past history of monitoring within the Challis Resource area suggests it will be difficult, if not impossible, for BLM to undertake enough monitoring to know if its goals are being met, or even if its stubble criteria are being complied with. Some mechanism to account for this must be included in the Plan, or BLM risks merely another paper exercise.

4 As to the lack of specific remedies should monitoring disclose the riparian goal is not being timely met, we suggest a more certain and specific approach: upon

[3](...continued)
proper functioning condition, and 6" end of season stubbles where streams are functional-at-risk or non-functional. BLM may allow utilization below the stubble minimum in pastures used before July 10th. In other pastures, livestock will be removed "prior to exceeding the applied stubble height criteria." DRMP at 373a, #5(c) (emphasis added).

BLM Response to Letter No. 40 *continued*

dictated.

40-3: Monitoring can be detailed quantitative data or simply photos or field observations (see 43 CFR 4110.3-2). Some decisions in the PRMP are "triggers" that allow the BLM to take action without an end-of-year analysis of monitoring (e.g., Livestock Grazing, Goal 1, #7 and Riparian Areas, Goal 1, #5 and 6). All but four allotments currently have monitoring in place. The BLM prioritizes field activities in critical areas, since it is not possible to actively monitor every area of every allotment every year.

40-4: Your suggested remedies if riparian goals (or annual standards) are not being met have been noted. The PRMP provides general management direction for circumstances when goals are not being achieved (for example, see Riparian Areas, Goal 1, #7). However, specific management strategies and remedies for grazing management to meet riparian habitat goals, objectives or standards in a pasture or allotment are to be defined through the interdisciplinary team process (see PRMP, Fisheries, Goal 1, #4).

40-5: Attachment 15 has been re-written in the PRMP to (a) clarify that the Attachment does not contain standards to be achieved, but rather lists the minimum aquatic and riparian habitat conditions needed to ensure good aquatic habitat for resident and anadromous fish, and (b) describe the means through which these minimum habitat conditions can be modified. Numerous management decisions were also revised in the PRMP to better clarify when progress toward these minimum habitat conditions must be ensured.

The BLM's responses to your itemized comments #1 through 4 are as follows:

(1) As stated in the PRMP, Fisheries, Goal 1, #4b, strategies to meet or exceed these minimum aquatic and riparian habitat conditions would be developed through the ID team process. These strategies may vary on a watershed or more site-specific basis, depending on site capability, resource conflicts and the like. For this reason, the PRMP does not address implementation strategies specifically. The PRMP does, however, specify in many decisions that progress toward these habitat conditions must be made (see, for example: Livestock Grazing, Goal 1, #8, 9, and 11; Minerals, Goal 1, #6, Goal 2, #6, and Goal 3 #5; Transportation, Goal 1, #9; and Wild Horses and Burros, Goal 1, #7).

(2) These habitat conditions are intended to be the desired minimum habitat conditions for the life of the Challis RMP, unless modified according to the procedure described in Attachment 15. Timelines for attaining

Letter No. 40 *continued*

4 discovery that the riparian goal was not being met (i.e. there was not enough progress in a riparian pasture as compared to an exclosure in a comparable pasture), then grazing would cease on the pasture (or riparian portions of the pasture) until it had caught up to the goal or conditions in the riparian exclosure. If the permittee exceeded the stubble criteria, the consequence would be *at least* to increase the minimum stubble standard for the next year by the amount below which the stubble minimum had been grazed in the current year.

II. SOME SPECIFIC CRITERIA INCLUDED IN THE PLAN ARE NOT INCORPORATED INTO ACTUAL MANAGEMENT.

5 There are several instances where specific criteria which would be useful in improving resources are included in the DRMP but are not incorporated into specific management actions. For example, Attachment 15: Minimum Riparian and Aquatic Habitat Standards (DRMP at 496) suggests, by its name ("Minimum ... Standards") that it would apply to the management of riparian areas in the Challis Resource Area. However, it is difficult to find how these Minimum Standards are applied to actual management.

In the first place, there is no date by which these standards are to be met. Second, these minimum standards are apparently only referred to in:

(a) *Management Concern: Fisheries*, but then only that strategies are to be developed (by when is never specified) that will meet or exceed the minimum standards in Attachment 15. DRMP at 382a-383a, #4; and

(b) *Management Concern: Livestock Grazing*, but then only to "ensure attainment of the riparian and aquatic habitat standards identified in ... Attachment 15." DRMP at 352a, #7. There is no time table or specific method for implementing these minimum standards.

We strongly support the inclusion of specific minimum standards such as are provided in Attachment 15. But such standards are of little use unless the remainder of the Plan makes clear precisely: (1) how these standards are to be implemented; (2) over what time period the standards are to be complied with; (3) what facilities for monitoring exist to ensure the standards are being met; and (4) what remedies will be used should it become evident that the standards are not being satisfied.

6 Finally, we are disappointed the specific minimum standards in Attachment 15 relating to bank shearing are waived for streams which do not already "achieve greater than 90% total streambank stability." DRMP at 373a-374a, #6. For all those streams — which arguably are the ones with the greatest incentive to be healed according to Attachment 15's minimum standards — up to a third of the bank can be sheared by livestock if there are special status fish species and up to one-half the banks can be sheared if no such fish (or their critical habitat) are present. And in

Letter No. 40 *continued*

6 Horse Basin, up to one-half can be sheared by livestock and horses, at least until some future analysis is completed.

This latitude in bank shearing not only fails to apply Attachment 15's minimum standards, but appears to mock them.

III. THE PREFERRED ALTERNATIVE DEVOTES TOO MUCH LAND TO LIVESTOCK GRAZING, TO THE DETRIMENT OF OTHER RESOURCES THE BLM IS OBLIGATED TO PROTECT.

7 Under the Federal Land Policy Management Act, BLM is obligated to manage public lands for multiple uses. Given this mandate, BLM should chose an alternative that moves away from the fact that "[a]bout 96% ... of BLM administered lands in the RA are currently allocated for livestock grazing." DRMP at 7. Even if livestock grazing were not causing resource damage, it would be appropriate to have more areas devoted to uses that do not easily co-exist with livestock, such as pristine recreation in riparian areas, and better wildlife habitat to benefit consumptive and non-consumptive users of wildlife.

8 To accommodate BLM's multiple use management obligation, we make two recommendations. The first is to adopt alternative 4 as the preferred alternative, because it provides more balanced allocation among uses instead of the traditional dominant use by livestock. The benefits of a more equitable distribution among users are evident throughout the DRMP, and are well illustrated by the Summary of Effects of Alternative 4, DRMP at 319b, #4:

> [S]ignificant habitat improvement would occur under this alternative as a result of allocating 24% of the available forage resource to big game for use as food and cover. There would be low potential for adverse effects on big game habitat or populations as a result of conflicts between resource uses, because conflicts would always be resolved to maintain big game numbers.

9 Second, BLM should undertake a suitability analysis to consider whether, and which lands are appropriate for livestock grazing. Such an analysis is also necessary for BLM to fulfill its obligation to manage the public lands for multiple uses. The analysis should not merely consider the physical capability of lands to support livestock or other uses, but also evaluate whether those uses conflict and whether it is appropriate to manage more land for non-livestock pursuits.

IV. THE PLAN SHOULD BE ORGANIZED AND CLARIFIED SO PERFORMANCE CRITERIA ARE MORE EASILY IDENTIFIED.

Many of the goals, time-frames in which to achieve them, specific criteria to meet management concerns, and the possible remedies if the goals and time-frames

BLM Response to Letter No. 40 *continued*

these habitat conditions were purposely omitted from the PRMP. Timelines and site-specific strategies for meeting the habitat conditions will be identified when objectives are developed through the ID team process (see PRMP, Fisheries, Goal 1, #4b). PRMP decisions which refer to Attachment 15 either state that progress toward these habitat conditions must be ensured (i.e., the resource condition trend should be upward) or that the proposed activity cannot hinder progress toward these conditions (i.e., no resource degradation can occur).

(3) The BLM has established procedures for aquatic habitat monitoring which follow the Region 1/Region 4 Fish Habitat Standard Inventory Procedures (Overton, et. al. 1997). This monitoring is not an annual exercise, but is rather designed for a 3 to 5 year cycle to determine if management actions are effective in reaching the established site-specific aquatic habitat objectives.

(4) Response #40-2 above describes remedies if annual (or seasonal) grazing standards are not being met for grazing actions. If aquatic and riparian habitat monitoring reveal that grazing management actions are not ensuring progress toward riparian and aquatic habitat conditions, grazing management will be modified.

40-6: Management Concern: Riparian Areas, Goal 1, #6 has been re-written in the PRMP to ensure more rapid progress toward attaining proper functioning riparian condition, including stable streambanks.

40-7: The BLM believes that the PRMP's allocations for livestock grazing are consistent with FLPMA's multiple use mandates. Many other multiple use allocations for the Challis Resource Area are also widespread (e.g. off-highway vehicle use on existing roads, vehicle ways or trails; dispersed and developed recreation opportunities; wildlife hunting and viewing opportunities; and areas open to mineral development).

40-8: Your preference of Alternative 4 is noted.

40-9: Although suitability analysis is an acceptable procedure, it is not specifically described in any BLM reference documents. Utilization pattern mapping is the Challis Resource Area's preferred method of identifying areas physically suitable for livestock grazing.

Livestock have been excluded from some locations in the Challis RA to address resource concerns (see PRMP, Livestock Grazing, Goal 1, #2, 17, and 18). In areas open to grazing, livestock grazing is restricted by the seasons of use and grazing systems described in activity plans such as Allotment Management Plans and Herd Management Plans, and by PRMP decisions such as Livestock Grazing, Goal 1, #7; Riparian Areas, Goal 1,

Letter No. 40 *continued*

Page 6

are not met are difficult to find in the DRMP. The reader must jump from one cross-reference to another, and finally to an appendix.

10 We suggest the final RMP include a table of showing, for various resources, goals, time frames, specific prescriptions, and remedies similar to the table below:

Resource	Goal	Time frame	Prescriptions	Remedies
Riparian areas	75% in proper functioning condition	5 years	1. 6" min. end of season stubble for functional-at-risk or non-functional streams. 2. 4" min. end of season stubble for proper functioning streams.	1. If progress not equivalent to comparable exclosure, pasture rested until area catches up. 2. If min. stubble exceeded, min. for next year increased by amt. below which the min. stubble was grazed.

11 We also came across one legal error in the DRMP which may affect the ability to implement new performance standards. The DRMP is incorrect when it says that "[v]egetative inventories ... cannot be used to change livestock grazing preferences." DRMP at 100. Under the current livestock grazing regulations, there are no artificial limits on which data BLM may use to make changes in numbers of livestock.[4]

We appreciate the opportunity to comment on this draft plan, and will be eager to discuss the development of this plan with the BLM staff.

Respectfully submitted,

Thomas D. Lustig
Senior Staff Attorney

[4] 43 C.F.R. § 4110.3 provides, "The authorized officer shall periodically review the permitted use specified in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer." Emphasis added.

BLM Response to Letter No. 40 *continued*

#5, 6, and 7; and Wildlife Habitat, Goal 2, #6.

Performing an in-depth analysis of use conflicts in the Challis Resource Area would become a never-ending circle of frustration, because an allocation that may constitute a "use conflict" to one user may not be seen as a use conflict by another user. In the PRMP the BLM decided to accommodate multiple use throughout the Resource Area, rather than segregate single uses to separate "pieces of the pie." The PRMP contains what the BLM considers to be the best possible balance of resource and land use allocations; this conclusion is based on an assessment of resource conditions, needs, and opportunities as well as a consideration of public demands.

40-10: Your suggestion is noted. The level of detail in your suggested table is inappropriate in a RMP; however, a table such as this may have merit at the activity plan level.

40-11: This error has been corrected in the PRMP/FEIS.

Letter No. 41

IDAHO STATE HISTORICAL SOCIETY

To educate through the identification, preservation, and interpretation of Idaho's Cultural Heritage.

Steve Guerber, Interim Director — January 13, 1997 — Philip E. Batt, Governor

Kathe Rhodes
RMP Coordinator
BLM-Salmon Field Office
Route 2, Box 610
Salmon, Idaho 83467

JAN 17 1997

RE. Challis Draft Resource Management Plan/Environmental Impact Statement

Dear Ms. Rhodes:

Thank you for providing us with a copy of the Challis Draft Resource Management Plan/EIS for our review and comment. This document thoroughly addresses cultural resources and provides detailed accounts of the impacts likely to occur under each management alternative. After reviewing the consequences of each alternative, we conclude the following.

1 Although Alternative 5 seems to offer the greatest protection to the cultural resources in the Challis Resource Area, we recognize its potential for disrupting local economies. Therefore, we would support preferred Alternative 2 as the next best treatment for cultural resources. We are pleased to see the management measures that you propose under Alternative 2: development of cultural resources overview and activity plans, inventory of nonproject-related land, development of a patrol plan for deterring site vandalism, protection of grave sites, a study of rock art sites, interpretation of specific sites, and an ethnographic inventory. The ethnographic inventory should

2 be helpful in the BLM's identification of traditional uses of the resource area. It appears the lack of such information hindered the identification of the specific impacts that each alternative would have upon tribal pursuit of treaty rights (p. 277a). We are pleased to see that these proposed activities are included under the preferred alternative. Their implementation should be very valuable in managing your cultural resources in a proactive manner.

Sincerely,

Robert M. Yohe II
State Archaeologist and
State Historic Preservation Officer

Administration 1109 Main Street, Suite 250 Boise, Idaho 83702-5642 208-334-2682 Fax: 208-334-2774
Historic Preservation 210 Main Street Boise, Idaho 83702-7264 208-334-3847, 3861 Fax: 208-334-2775
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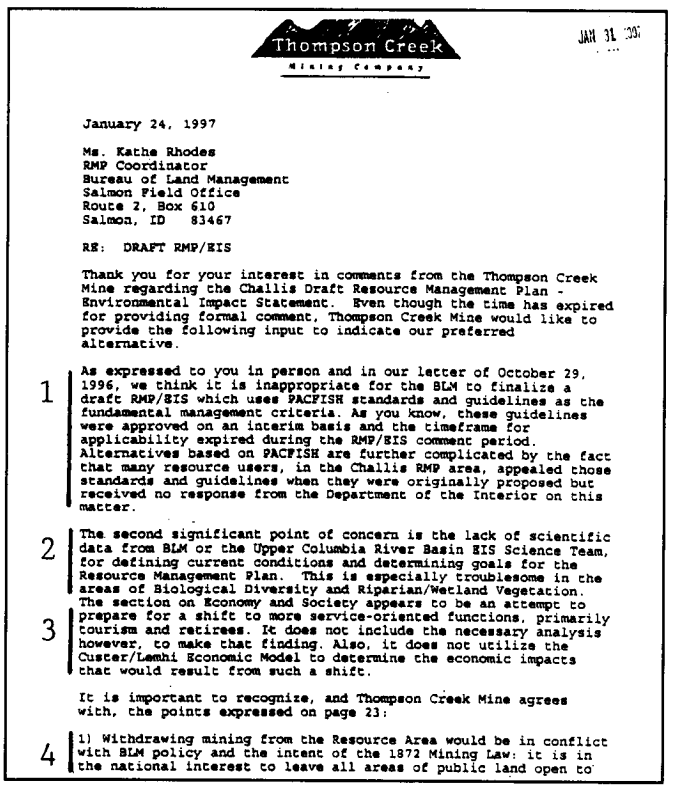
Historical Library and Archives 450 North Fourth Street Boise, Idaho 83702-6027 208-334-3356 Fax: 208-334-3198
Historical Museum 610 North John Davis Drive Boise, Idaho 83702-7695 208-334-2120 Fax: 208-334-4059

BLM Response to Letter No. 41

41-1: Your preference of alternatives is noted. The cultural resources management described in Alternative 2 has been carried forward to the Proposed RMP.

41-2: Thank you for your comments.

Letter No. 42



Thompson Creek
Mining Company

JAN 31 [illegible]

January 24, 1997

Ms. Kathe Rhodes
RMP Coordinator
Bureau of Land Management
Salmon Field Office
Route 2, Box 610
Salmon, ID 83467

RE: DRAFT RMP/EIS

Thank you for your interest in comments from the Thompson Creek Mine regarding the Challis Draft Resource Management Plan - Environmental Impact Statement. Even though the time has expired for providing formal comment, Thompson Creek Mine would like to provide the following input to indicate our preferred alternative.

1 As expressed to you in person and in our letter of October 29, 1996, we think it is inappropriate for the BLM to finalize a draft RMP/EIS which uses PACFISH standards and guidelines as the fundamental management criteria. As you know, these guidelines were approved on an interim basis and the timeframe for applicability expired during the RMP/EIS comment period. Alternatives based on PACFISH are further complicated by the fact that many resource users, in the Challis RMP area, appealed those standards and guidelines when they were originally proposed but received no response from the Department of the Interior on this matter.

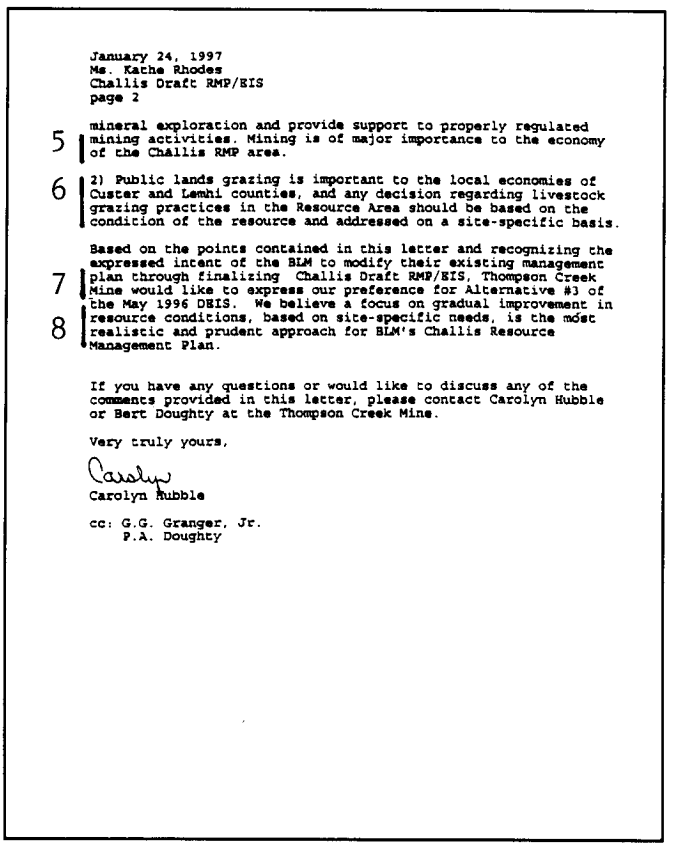
2 The second significant point of concern is the lack of scientific data from BLM or the Upper Columbia River Basin EIS Science Team, for defining current conditions and determining goals for the Resource Management Plan. This is especially troublesome in the areas of Biological Diversity and Riparian/Wetland Vegetation.

3 The section on Economy and Society appears to be an attempt to prepare for a shift to more service-oriented functions, primarily tourism and retirees. It does not include the necessary analysis however, to make that finding. Also, it does not utilize the Custer/Lemhi Economic Model to determine the economic impacts that would result from such a shift.

It is important to recognize, and Thompson Creek Mine agrees with, the points expressed on page 23:

4 1) Withdrawing mining from the Resource Area would be in conflict with BLM policy and the intent of the 1872 Mining Law; it is in the national interest to leave all areas of public land open to

Letter No. 42 *continued*



January 24, 1997
Ms. Kathe Rhodes
Challis Draft RMP/EIS
page 2

5 mineral exploration and provide support to properly regulated mining activities. Mining is of major importance to the economy of the Challis RMP area.

6 2) Public lands grazing is important to the local economies of Custer and Lemhi counties, and any decision regarding livestock grazing practices in the Resource Area should be based on the condition of the resource and addressed on a site-specific basis.

7 Based on the points contained in this letter and recognizing the expressed intent of the BLM to modify their existing management plan through finalizing Challis Draft RMP/EIS, Thompson Creek Mine would like to express our preference for Alternative #3 of the May 1996 DEIS. We believe a focus on gradual improvement in

8 resource conditions, based on site-specific needs, is the most realistic and prudent approach for BLM's Challis Resource Management Plan.

If you have any questions or would like to discuss any of the comments provided in this letter, please contact Carolyn Hubble or Bert Doughty at the Thompson Creek Mine.

Very truly yours,

Carolyn Hubble

cc: G.G. Granger, Jr.
P.A. Doughty

BLM Response to Letter No. 42

42-1: Your comments are noted. The BLM recognizes that "PACFISH" is an interim management strategy (which is still in effect as of publication of the PRMP/FEIS). The various standards and management decisions contained in the PRMP were selected because they are expected to achieve the desired resource improvement and maintenance goals for the Challis Resource Area, including goals for riparian and aquatic habitats.

42-2: The Challis Draft RMP/EIS does not include information from the Upper Columbia River Basin (UCRB) science assessment because that information was published after the Draft RMP was at the printer for publication. The PRMP/FEIS does incorporate information from the UCRB science assessment, as appropriate.

The BLM disagrees with your statement about the lack of scientific data. The Draft RMP cited over 250 references, approximately 80-85% of which were technical scientific journals. These references were used by the interdisciplinary team in the development of the RMP alternatives, description of the affected environment, and analysis of environmental consequences. The content of the Challis Draft RMP/EIS was also based on the professional judgment of resource specialists, and extensive internal BLM review. The PRMP/FEIS updates and expands scientific information about the Challis RA.

The resource goals stated in the PRMP were primarily derived from existing laws, regulations, Department directives, Bureau policy, and national initiatives. The goals for management of Riparian/Wetland Areas and Biological Diversity are consistent with current law, regulation, and policy, including the 1997 Idaho Standards for Rangeland Health.

42-3: The affected environment description of the Lemhi-Custer counties economy (see DRMP, Chapter 3, pp. 63-70) describes trends in employment and income/earnings during the past 20-25 years; increases in the service sector of the economy and in-migration of retirees are events which occurred prior to RMP development. These trends were summarized from the social, fiscal, and economic study of Lemhi and Custer counties which was completed by University of Idaho researchers under contract by the BLM, USFS, Custer County, and Lemhi County. This study was cited as the primary source of information for the Affected Environment discussion of the local economy (see DRMP, p. 63).

Expected impacts to "tourism" from RMP actions are described in the Draft RMP. The analysis of recreation impacts states that the RMP's impact on regional increases in tourism would not be significant (see DRMP, p. 257, #2). A qualitative discussion of impacts is

presented on p. 208 (#5); the economic model was not used to prepare this portion of the economic analysis, because recreation-related impacts could not be quantified.

42-4: Your comments are noted.

42-5: The importance of mining to the local economy was discussed in the DRMP (see Chapter 3 - Economy and Society and Appendix B).

42-6: Your opinions are noted.

42-7: Your preference for Alternative 3 is noted.

42-8: Your opinion is noted.

Letter No. 43

January 30, 1997

Bureau of Land Management
Gloria Romero
P.O. Box 430
Salmon, Idaho 83467-0430

FEB 4 1997

SUBJECT: PROPOSED DESERT LAND ENTRY

Dear Gloria:

1 This letter is in regard to our conversation in your office on January 27, 1997, concerning the Desert Land Act. We would like to propose an additional Desert Land Entry for a parcel of land that neighbors our existing property and current Desert Land Entry.

My wife and I have always felt we would like to acquire another piece of neighboring land through a Desert Land Entry (D.L.E.), depending upon the current D.L.E. that has applied for. However, from our conversation, it appears this avenue of acquiring land may not be available much longer. Therefore, this proposal (also see enclosed map) was sent to you for consideration by your resource managers as another D.L.E. From past experience, we are aware that it takes much time and effort to complete a Desert Land Act Application. This application can not be completed in time for your next meeting on February 6, 1997, thus this proposal. We understand that the comment period is closed for the resource plan currently being developed. But as we discussed, the Desert Land Act is still in effect.

This proposed piece of land would be very beneficial for us. It would provide more farm land which is much needed for our ranching operation. Most importantly, it would connect our existing property with the current D.L.E. that was applied for by my wife Brenda. The water application for the present D.L.E. is currently in Boise for final approval. At this time, there have been no protests or problems with the water transfer request. By connecting the current D.L.E. with this new proposed Desert Land Entry, irrigation would be feasible since one pump site could be established (see map) to irrigate both pieces. This would be cost effective for us since only one pump would be needed and the line extension for three phase power to the pump site would be minimal.

Further explanations of projected costs, revenues and feasibility will be forthcoming with the Desert Land Act Application we are currently completing. We are asking that you consider this proposal for a D.L.E., even though the Resource Plan does not acknowledge this parcel for disposal. We feel this land would be feasible since it neighbors the existing D.L.E. and could be irrigated from the same pump site.

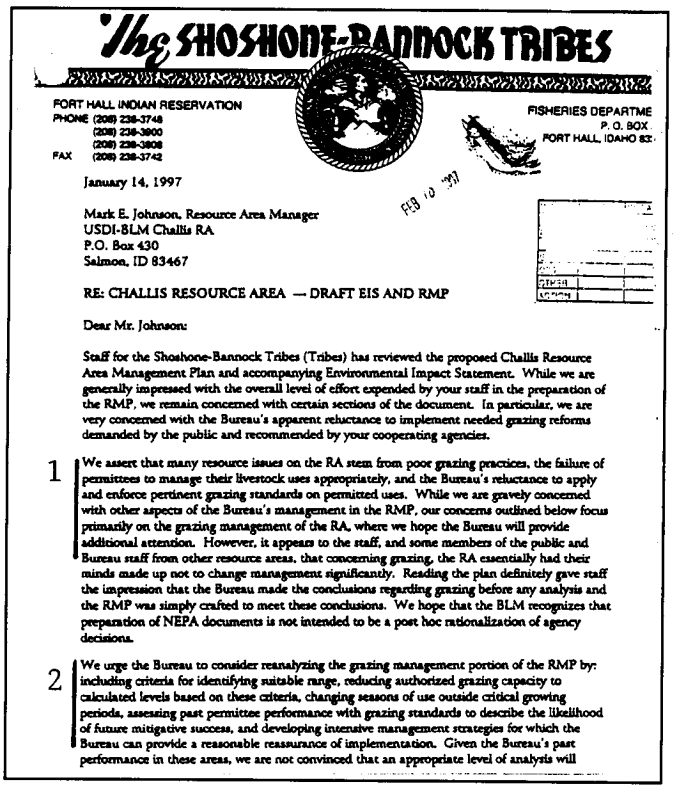
Thank you for your time reviewing this proposal. We would also like to thank you for all the attention that you have given our current project. If you have any questions, feel free to contact us at the above address and phone.

Sincerely,

BLM Response to Letter No. 43

43-1: The public lands you asked the BLM to make available for desert land entry (T14N, R19E, Section 25, S^2 S^2 NE^4 and SE^4 SE^4 NW^4, approximately 50 acres) have been added to the Proposed RMP as an adjustment area on Map A: Adjustment/Management Areas. This would make them available for consideration for disposal through exchange or desert land entry.

Letter No. 44



The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION
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(208) 238-3900
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FISHERIES DEPARTME
P. O. BOX
FORT HALL, IDAHO 83

January 14, 1997

Mark E. Johnson, Resource Area Manager
USDI-BLM Challis RA
P.O. Box 430
Salmon, ID 83467

RE: CHALLIS RESOURCE AREA — DRAFT EIS AND RMP

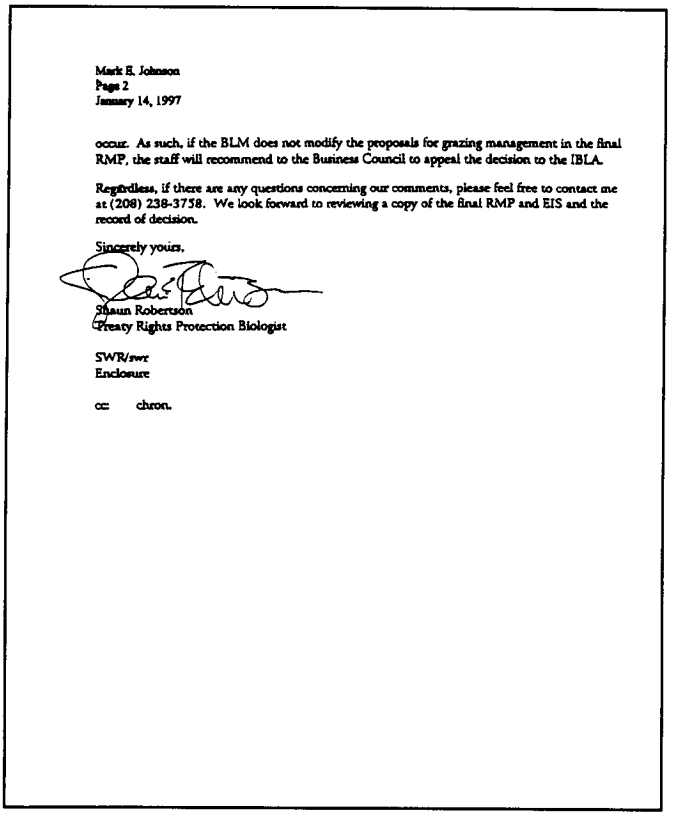
Dear Mr. Johnson:

Staff for the Shoshone-Bannock Tribes (Tribes) has reviewed the proposed Challis Resource Area Management Plan and accompanying Environmental Impact Statement. While we are generally impressed with the overall level of effort expended by your staff in the preparation of the RMP, we remain concerned with certain sections of the document. In particular, we are very concerned with the Bureau's apparent reluctance to implement needed grazing reforms demanded by the public and recommended by your cooperating agencies.

1 We assert that many resource issues on the RA stem from poor grazing practices, the failure of permittees to manage their livestock uses appropriately, and the Bureau's reluctance to apply and enforce pertinent grazing standards on permitted uses. While we are gravely concerned with other aspects of the Bureau's management in the RMP, our concerns outlined below focus primarily on the grazing management of the RA, where we hope the Bureau will provide additional attention. However, it appears to the staff, and some members of the public and Bureau staff from other resource areas, that concerning grazing, the RA essentially had their minds made up not to change management significantly. Reading the plan definitely gave staff the impression that the Bureau made the conclusions regarding grazing before any analysis and the RMP was simply crafted to meet these conclusions. We hope that the BLM recognizes that preparation of NEPA documents is not intended to be a post hoc rationalization of agency decisions.

2 We urge the Bureau to consider reanalyzing the grazing management portion of the RMP by: including criteria for identifying suitable range, reducing authorized grazing capacity to calculated levels based on these criteria, changing seasons of use outside critical growing periods, assessing past permittee performance with grazing standards to describe the likelihood of future mitigative success, and developing intensive management strategies for which the Bureau can provide a reasonable reassurance of implementation. Given the Bureau's past performance in these areas, we are not convinced that an appropriate level of analysis will

Letter No. 44 *continued*



Mark E. Johnson
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occur. As such, if the BLM does not modify the proposals for grazing management in the final RMP, the staff will recommend to the Business Council to appeal the decision to the IBLA.

Regardless, if there are any questions concerning our comments, please feel free to contact me at (208) 238-3758. We look forward to reviewing a copy of the final RMP and EIS and the record of decision.

Sincerely yours,

Shaun Robertson
Treaty Rights Protection Biologist

SWR/swr
Enclosure

cc: chron.

BLM Response to Letter No. 44

44-1: Your comments and concerns are noted.

44-2: (a) The PRMP would provide for identification of suitable range through Utilization Pattern Mapping Methodology (UPM) and Ecological Site Inventory (ESI) surveys, which are approved as part of Idaho BLM's Minimum Monitoring Standards. UPM and ESI would be used in lieu of suitability analysis to adjust livestock stocking levels to the carrying capacity of the land (see PRMP, Livestock Grazing, Goal 1, #2 and 6). The PRMP contains upland utilization and riparian stubble-height criteria (Livestock Grazing, Goal 1, #7; and Riparian Areas, Goal 1, #4, 5, and 7) which would also influence livestock distribution and use of suitable range on most allotments.

(b) The PRMP identifies forage utilization criteria that are based on season of use (Livestock Grazing, Goal 1, #7). These utilization criteria would limit livestock use during the critical growth period.

(c) The BLM believes that attempting to "describe the likelihood of future mitigative success" by "assessing past permittee performance with grazing standards" would not be a sound basis for future management decisions. Human attitudes, perceptions, and responses to land use planning and direction are subject to frequent change based on education, experience, and changing values. The BLM's approach to ensure permittee compliance with AMPs and permit terms and conditions would be in accordance with the BLM grazing regulations (see 43 CFR 4110.3-3, 4130.3-3 and Subpart 4180, August 21, 1995).

(d) The BLM believes the PRMP describes a method of developing future grazing management strategies (e.g., see Livestock Grazing, Goal 1, #4) which can be implemented and would be effective (see response 15-5). Many grazing management strategies would be implemented upon signing of the Record of Decision for the approved RMP (e.g., Livestock Grazing, Goal 1, #7 and Riparian Areas, Goal 1, #4-7.) Please also see response 44-20.

44-3: A definition of "existing roads, vehicle ways, and trails" has been added to the Glossary for the PRMP/FEIS. The Draft RMP provided definitions for the terms "road," vehicle way," and "trail." These definitions have been included in the PRMP.

For the purposes of calculating road densities, as in response 44-5 below, the Challis BLM uses all roads and vehicle ways shown on USGS 7.5 minute topographic quadrangle maps.

44-4: As requested by the Tribes during consultation meetings

Letter No. 44 *continued*

3 Donkey Hills ACEC: (pg. 21) The Donkey Hills area provides significant winter range benefits to big game and is an important area for Tribal hunting. The RMP references, but does not define "existing roads" and "vehicle ways" for the ACEC. Does the BLM consider all traveled surfaces, such as two tracks, as existing roads for purposes of calculating open road densities?

4 The RMP also recommends a seasonal (winter) closure, but does not identify the starting date for this closure. The Tribes are concerned that winter closure would unreasonably interfere with the established Tribal hunting season, which closes on December 31. The Tribes request

5 that the BLM identify the timing of the seasonal closure, the current open road density of the ACEC, which roads the proposed closure will apply to, and the potential effects to Tribal hunting if the starting date of the closure is before the ending date of the Tribal hunting season.

6 The RMP recommends continuing the current full suppression fire strategy on the ACEC. Tribal staff are concerned that this strategy may lead to additional vegetative changes on the ACEC to the detriment of wintering big game. Current literature, as the BLM has recognized in other sections of the RMP, suggests that the lack of natural fire regimes has led to dramatic, and often detrimental, changes in native vegetative communities. The Tribes request that the BLM assess whether fire suppression on the ACEC is resulting, or will result in changes in the vegetative community that may negatively affect big game winter range. Further, if the BLM anticipates detrimental impacts, the Tribes request that the BLM propose, as mitigation for the RMP, preparation of an ACEC natural and prescribed ignition fire plan that would ensure maintenance and improvement of desired plant communities.

7 The RMP states that "[c]ontinued livestock use should not conflict with the maintenance of ACEC values, since livestock use is light." We could not find a definition or description of the actual utilization level associated with "light" use. Further, the RMP did not describe any data that supported the BLM's contention that livestock use is not conflicting with the primary uses of the ACEC (big game winter range).

8 Bighorn Sheep: The RMP discusses three populations of bighorn sheep have been extirpated on the Challis RA (pg. 51) without discussing the reasons for their extinction or the potential for reestablishing herds in these areas. Metapopulations of sheep are vital to maintaining overall productivity in sheep herds throughout their distribution. Overall, the RMP appears to give a very cursory review of bighorn sheep habitats, production, impacts, and possibilities for enhancements. The Tribes request that the BLM commit, as mitigation, to an in-depth cooperative evaluation of sheep throughout the RA. The study should include an assessment of potential reintroduction sites, habitats, current conflicts, and other important factors of herd health on the RA.

9 Cultural Resources: The RMP discusses the extent of cultural resource surveys accomplished in the past (pg. 57), but fails to describe the sites in their ecological context. The Tribes contend that describing the evaluated sites in their context is important to develop accurate predictive models for the remainder of the RA. The Tribes request that the previously surveyed sites be

Letter No. 44 *continued*

9 evaluated to determine if they are representative of the RA as a whole. If it is determined that additional sites require evaluation, the Tribes request that procedures for collecting further documentation to build a predictive model be included in the RMP.

10 The BLM states that many cultural resource sites have been shown to have a downward trend in site condition (pg 59). However, the Tribes could find no proposed implementation actions identified that would be implemented to reverse this trend. Further, the RMP did not delineate the percentage of sites that have been affected by a particular activity (e.g. % of sites affected by off-road vehicles), the ecological context of the affected sites, and the extent of damage to the sites.

11 Tribal Socio-economics: (pg 63) As the BLM has identified, Tribal hunting is crucial for continuance of Tribal lifeways and maintenance of subsistence and ceremonial values. With regards to subsistence values, the Tribes wish to stress the critical nature of harvesting resources from the RA. For many members, if wild foods are not procured under treaty rights, no other methods are available to provide substitute resources. Also for the many traditional members that will not consume domestic meat due to religious reasons, no other alternatives are available.

12 Fire: (pg 72-73) The BLM recognizes the importance that natural fire has in the RA ecosystem (pg 83 fire suppression has led to overstocking in the RA). The RMP further identifies numerous problems associated with current fire suppression strategies including undesirable vegetative changes. However, the RMP fails to identify any implementation actions that would address this issue. The Tribes request that a proposal to prepare a prescribed natural fire plan be included in the RMP.

13 Resident Fisheries: (pg 75) The RMP states that some resident fish populations are decreasing or stable, but does not describe the actual status (numerical) of the stocks. The Tribes request that the BLM describe the status and trend of these stocks in terms of their productivity. In other words, are the populations stable below replacement, approaching capacity, or if below potential production, how far below potential? Further, we request that the BLM discuss the

14 actual reasons that the populations are declining and commit to measures that would ensure maintenance or improvement of the stock status.

15 Unresolved Trespass Issues: (pg 93) The RMP mentions numerous trespass situations of the RA. However, the Tribes could not find proposed mitigation measures to resolve these situations or a schedule for resolution of trespass issues.

16 Grazing: (pg 96) The Tribes gravest concerns with the proposed RMP are associated with the BLM's assessment, or lack thereof, regarding grazing on the RA. Clearly, grazing is the largest resource impact on the RA and the BLM has recognized that monitoring data "seem to indicate that current management has not met existing land use plan objectives to *improve* range

BLM Response to Letter No. 44 *continued*

with the BLM, the Draft RMP (Alternative 2) and the PRMP propose a winter limitation on the use of motorized vehicles in the Donkey Hills ACEC between 12/16 and 4/30 (see PRMP, Off-highway Vehicle Use, Goal 1, #4). This seasonal limitation on motorized vehicle use is designed to limit human disturbance on the winter range and reduce stress and associated adverse effects on big game populations.

44-5: Dates of the seasonal limitation on motorized vehicle use are 12/16-4/30. During the remainder of the year, motorized vehicle use would be limited to existing roads and vehicle ways. Current road densities are low in the Donkey Hills ACEC area (0.66 miles of roads and/or vehicle ways per square mile of area). This seasonal limitation on the use of motorized vehicles would apply to the area delineated as the Donkey Hills ACEC (see PRMP, Map 8). Potential effects on the Tribal hunting season are expected to be minimal. No conflicts between the existing winter closure (12/15-4/15) and Tribal hunting have been documented or reported to BLM during the last 10 years. The BLM believes this seasonal closure would benefit future tribal hunting opportunity by helping to ensure a viable elk population remains in the Donkey Hills area.

44-6: The decision to require full suppression of wildfires on the Donkey Hills winter range was intended to ensure that the winter forage supply (both herbaceous forage and mountain mahogany browse) is not destroyed by a catastrophic fire event. This decision would not preclude the use of prescribed fire or prescribed natural fires to improve big game habitat. Preparation of activity plans for management of ACECs (see PRMP, ACECs, Goal 1, "Management Decisions Common to All ACECs" #4) and preparation of fire management activity plans (see PRMP, Fire Management, Goal 1, #2 and 7) would provide for development of future decisions relating to the use of prescribed fire and prescribed natural fire in the ACEC.

44-7: The phrase "livestock use is light" was used in reference to the Big Butte Resource Area's portion of the proposed Donkey Hills ACEC (see Map 8). The term "light" generally means forage utilization levels of 20% or less. Livestock use within the Big Butte Resource Area portion of the ACEC is limited by distance from water sources and steepness of slopes.

44-8: The information on the three small sheep populations came from the 1979 Challis Unit Resource Analysis. The information was based on historical discussions and interviews with private individuals, National Forest employees, and IDFG personnel. The PRMP does not preclude any type of cooperative wildlife study in the Challis RA, nor would a land use plan decision be

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16 condition in the Resource Area". The Tribes agree that the primary reasons for the lack of improvement include: (a) grazing systems not being fully implemented as planned, (b) overstocking, and (c) seasons of use that are incompatible with improving the vigor of desired species. Failure of the permittees to comply with AMP's and the BLM's reluctance to ensure permittee compliance with grazing permits are also reasons that the grazing systems have not been implemented. Given the BLM's conclusions, the Tribes anticipated reviewing implementation actions which addressed these issues specifically. However, the RMP fails to recommend any standards or guidelines to address these issues, but rather, attempts to resolve all grazing issues by promoting utilization standards as corrective measures.

The Tribes concur that utilization standards are important tools for achieving resource protection on the allotment. However, given the nature and extent of other grazing related issues, the failure of permittees to comply with current AMP's (which would effectuate the utilization standards), and the apparent reluctance of the BLM to enforce the standards in current AMPs/permits (the assurance of effectuation of the utilization standards) the Tribes challenge whether the BLM has appropriately addressed grazing issues in the RMP.

17 As such, the Tribes request that the BLM assess and consider the following issues: 1) changing
18 season of use on allotments so that grazing occurs outside of critical growing periods; 2) the BLM calculate actual stocking rates for each allotment on the RA using criteria to identify
19 suitable range; 3) the BLM identify past permittee compliance with AMPs and permits to assess the likelihood of implementing future mitigation; and 4) the BLM identify intensive
20 grazing management strategies which have a likelihood of success.

21 The BLM has stated that "nearly all allotments are used during the most critical growing season..." and that the season of use on nearly all allotments inhibits the vigor of desired plant species. As the BLM has recognized, use during the critical growing season inhibits plant growth and productivity, while contributing to overall resource degradation or inhibiting resource recovery. However, rather than modify the seasons of use on the RA allotments, the BLM identifies utilization standards, relying upon information in Clary and Webster, which are not shown to this issue. Clary and Webster recommend that the first decision to be made is to determine whether grazing can and should occur on each particular allotment. The BLM has not shown that any authorized grazing during critical periods, even if utilization standards are met, will not have a detrimental affect on plant vigor. The Tribes request that the BLM assess whether plant vigor will be protected during the proposed seasons of use, given that the permittees typically fail to comply with utilization standards, and whether any grazing at all should occur during these critical time periods.

22 The Tribes are not convinced that any permittees will comply with the proposed utilization standards, even if the BLM chooses to enforce the standards. BLM staff has stated that due to numerous constraints, monitoring of the allotments may be non-existent. In a meeting in Fort Hall with Tribal staff, the BLM stated that the Tribes may have to monitor grazing on the

Letter No. 44 *continued*

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22 allotments in order to determine whether standards have been met. As the BLM has recognized, many goals and standards in existing plans and permits have not been met due to a number of factors, including permittee noncompliance. Given the many factors leading to grazing mismanagement on the RA, the Tribes do not concur that merely proposing utilization standards will resolve even the primary grazing effects, in particular within riparian zones.

23 Tribal data supports the BLM's conclusion that "riparian zones throughout the Resource Area are well below functioning condition". Due to the topography of the RA, cattle tend to congregate in riparian zones unless intensively managed, which has not occurred on the majority of allotments. The Tribes have recommended intensive management strategies, in addition to a reduced stocking rate during an appropriate season of use, such as active riding by permittees. The BLM has failed to include any of these guidelines in the RMP and appears to be promoting revision of the individual AMPs, at some future time, for the method to implement intensive management strategies required to restore resources on the RA. However,

24 as stated above, and as the BLM has stated in numerous sections of the RMP, there is no reasonable reassurance that AMP's will be revised in a sufficiently timely manner to correct and reverse downward trends in resource condition:

> "Development and revision of AMP's to correct intensive livestock use of riparian areas is ongoing. However, due to very limited budgets in the range program, progress is very slow, and the riparian resource continues to function below its potential. In many parts of the Resource Area, the riparian resource is sustaining severe damage that will take years of intensive management to rectify."

The Tribes request that a detailed schedule for AMP revisions be included in the RMP. This schedule should also identify allotments that currently do not have an AMP and/or a NEPA compliance document. BLM should assess whether the proposed schedule is sufficiently timely in order to ensure implementation of management strategies to reverse downward trends in the allotment. If BLM reaches the conclusion, as Tribal staff has, that revision of the AMPs to include standards--that may not even be adhered to by the permittees--is insufficient to provide a reasonable assurance that the current downward trends will be reversed, then the BLM must incorporate intensive management options to be implemented concurrently with signature on the Record of Decision.

25 Tribal staff are appalled by the BLM's "analysis" of authorized grazing on the RA. Calculated grazing capacity, identified from inventory, is stated as 42,734 AUMs, but "planning" allowed for 44,825 AUMS's "after balancing the needs of all user's". It appears to us, that the BLM's definition of balance is to transfer part of the available forage base from other uses to those of domestic livestock grazers. While this approach is consistent with the Challis RA's history of promoting grazing as the primary use of the RA--to the detriment of other uses--we believe it to be inconsistent with multiple use principles of federal land management, the desires of the public for resource protection, and objectives established by the BLM for other resources in the

BLM Response to Letter No. 44 *continued*

necessary to implement or begin a cooperative study. The PRMP would manage bighorn sheep as a priority resource on several bighorn sheep habitat areas (e.g., see PRMP, Wildlife Habitat, Goal 1, #6 and Goal 2, #9f), and provides for reintroduction of bighorn sheep in unoccupied habitats (see PRMP, Wildlife Habitat, Goal 4).

44-9: The PRMP would provide the necessary steps for describing sites in their ecological context; this data could be used to produce a predictive model, if needed, in the future (see Cultural Resources, Goal 1, #1-4, 10, and 13, and Goal 3, #1 and 2.

44-10: The PRMP contains management to help reverse the downward trend in cultural resources site condition (e.g., see PRMP, Cultural Resources, Goal 1, #3, 5, 6, 8, 9, 11, 12, 13, and 14). Many of the sites recorded within the Resource Area do not have information on the type and degree of impacts, and therefore this information was not included in the discussion of the Affected Environment.

44-11: Actions in the PRMP seek to enhance the Tribes' opportunities to hunt, fish, and gather natural resources in the Challis Resource Area (see PRMP, Tribal Treaty Rights and Chapter 4 - Tribal Treaty Rights).

44-12: The PRMP proposes the preparation of fire management activity plans that would provide for the use of prescribed natural fires and prescribed burning (see PRMP, Fire Management, Goal 1, #2 and 7).

44-13: The statement on page 75 of the DRMP concerning population status and trend of resident salmonid populations is a generalization based on data obtained from the Idaho Department of Fish and Game, and other Federal, State and local agencies. Since bull trout are listed as "threatened" under the ESA and westslope cutthroat trout are a state sensitive species, it stands to reason that the populations of these two species would be either stable or in a downward trend. The BLM has collected some basic presence/absence data for most of the streams in the Resource Area (see PRMP, Appendix C, Item 1); however, population status and trends are unknown. The BLM manages fisheries habitat, so inventory and monitoring studies and other PRMP actions focus primarily on aquatic habitat, not fish populations.

44-14: A discussion of factors limiting the habitat and production of resident and anadromous fish was presented in the DRMP on pages 76-77. The PRMP contains numerous upland, riparian, and aquatic habitat management decisions which are intended to benefit fisheries resources. The impacts of these PRMP decisions on fisheries are described in the PRMP in Chapter 4 - Fisheries. Since the BLM manages fisheries

Letter No. 44 *continued*

RA. Further, given the overwhelming information presented in the RMP regarding destablized resource condition on the RA due to grazing, the Tribes question whether this policy of authorizing grazing above the calculated capacity should continue.

26 The RMP is replete with statements that should precipitate the BLM, and probably would compel a reasonable land manager, to modify current authorized grazing on the RA:

> "stocking levels on fourteen allotments...have grazing preference more than 30% over the inventoried grazing capacity"
>
> "Utilization levels throughout the Resource Area have been above the 50% limit prescribed by the land use plan"
>
> "The livestock grazing capacity defined in the Challis Planning Unit EIS...may be above the true capacity of the range; suitability criteria were essentially eliminated from the draft proposed action because the recommended stocking level decreases were considered too great a financial hardship for the permittees";
>
> "As the draft Challis, Ellis-Pahsimeroi, and Mackay grazing EIS's were prepared, they all contained criteria for range suitability...For a variety of reasons, the suitability criteria were not used in the final Ellis-Pahsimeroi and Mackay grazing EISs. Suitability is still a valid range concept..."

In a prejudicial conclusion, the BLM states, without further comment, that "since the current grazing preferences will be used for RMP without adjustment for factors such as suitability, suitability criteria will probably be most useful in targeting areas where review of the stocking rate may be appropriate". The Tribes contend that any decision that relies upon the above conclusion will be arbitrary and capricious since: the BLM has not provided a reasonable justification for not addressing stock levels; and other conclusions of the BLM and the available data suggest that grazing capacity is both a major issue in the an analysis and a primary reason for detrimental effects associated with grazing. The BLM has not, and most likely cannot, provide a reasonable reassurance to the public that AMPs will be revised in a timely manner in order to resolve grazing issues such as authorized capacity. Consequently, the BLM cannot assure the public that the issues of suitable range, a primary criteria in determining authorized
27 grazing capacity, will ever be considered by the BLM. The Tribes request that the BLM specifically identify suitable range on each allotment in order to calculate an appropriate grazing capacity for the RA.

28 BLM's justification, in part for authorizing grazing almost 20% higher than the calculated rate (51,069 AUMS's authorized), is the "installation of range improvements and a number of other factors" (emphasis added). The Tribes disagree that this is a reasonable justification given that some range improvements have not been constructed, permittees have not

Letter No. 44 *continued*

28 maintained the structures to BLM standards, and drought conditions may have offset the benefits of these projects. Consequently, these so-called range "improvements" may have, in fact, not achieved the objectives leading to the increased authorized grazing capacity.

29 A principle tenet of mitigation (i.e. range improvements to offset the increased damage of higher authorized grazing) under NEPA is a conclusion regarding the potential for success of implementing the measure. Given that the permittees have a long history of failing to comply with AMP's including maintaining range improvement structures and that "because of personnel limitations, the BLM cannot adequately assess the maintenance status of all improvements", the authorized grazing preference, as related to completion of range improvements, cannot be considered a valid conclusion. Further, since there is a documented record of lack of success in past mitigation efforts, the BLM must consider the potential for additional failure in future proposed mitigation efforts.

30 Consequently, the Tribes request that the BLM assess whether these range "improvements" have actually met the conditions for authorizing grazing preference significantly higher than the calculated rate. The Tribes also question what other "factors" would precipitate the BLM to authorize a higher utilization than what was calculated. If these factors included those apparent, such as political pressure from the grazing industry, this should be stated. Otherwise, the factors should be described in order for the public to assess whether these factors are still present or whether grazing preference should be assessed and modified.

31 The RMP states that under some poor conditions, permittees sometimes use less forage than their preference. This statement indicates that the BLM has not and does not propose to reduce grazing use during similar conditions in the future. Given many RA permittees past grazing performance, the Tribes request that the BLM build in to the RMP, procedures to reduce grazing during conditions which warrant a reduction, such as drought or wildfire.

32 Most of the vegetative management inventories conducted to assess range condition are over 20 years old and BLM recognizes that "many changes have occurred in livestock management and resource condition since the inventories were completed". The BLM, in order to escape obtaining timely and useful information on the RA, does not propose updating these inventories since "under current BLM policies, [vegetative inventories] cannot be used to change livestock grazing preferences". Clearly, inventories have additional uses, in addition to changing livestock grazing preference, such as assessing current conditions and identifying trends in resource recovery. Further, the BLM fails to describe what information can be used to change grazing preference. Perhaps it is the "factors" that the BLM mentions, but does not
33 discuss, that modified the original authorized preference above the calculated level. The BLM further states that "these inventories are sufficient for the purposes they will be used for in the Challis RMP", but fails to discuss what the proposed uses actually will be in the RMP.

BLM Response to Letter No. 44 *continued*

habitat, not fisheries populations, impacts are generally discussed in terms of fisheries and aquatic habitat.

44-15: The PRMP proposes measures to resolve cases of land trespass (see Land Tenure and Access, Goal 4, #1). The time required for resolution of each trespass case would vary, depending on the circumstances of the case, available funding, other management priorities, and availability of personnel. An implementation schedule for resolution of trespass cases would be part of the RMP implementation plan to be developed following signature of the Record of Decision for the approved RMP.

44-16: Your comments and concerns are noted. Please see response 44-2(c).

44-17: The PRMP identifies forage utilization criteria that are based on season of use (see PRMP, Livestock Grazing, Goal 1, #7). These utilization criteria would limit livestock use during the critical growth period. The BLM believes that livestock grazing use can be sustained on key forage species during critical growing periods, provided that the use is managed and controlled through the use of utilization standards and other knowledgeable and reasonable practices.

44-18: Please see response 44-2(a).

44-19: Please see response 44-2(c).

44-20: Intensive grazing management strategies which have a likelihood of success would be determined at the activity planning level (i.e., during the development of allotment management plans or integrated resource activity plans). Intensive management strategies would vary significantly from allotment to allotment and even pasture to pasture due to topography, location of fences and water developments, and resource values. For example, grazing management strategies that might be implemented include deferred-rotation grazing systems, high intensity-short duration grazing systems, rest-rotation grazing systems, and frequent herd movements by riders. Other examples of intensive grazing strategies can be found in BLM Technical Reference 1737-6, Management Techniques in Riparian Zones; and Technical Reference 1734-7, Grazing Management in Riparian Areas. Prescribing site-specific grazing strategies on an allotment by allotment basis is not the purpose of the RMP. The PRMP does prescribe resource use criteria for livestock management (for example, Livestock Grazing, Goal 1, #6; and Riparian Areas, Goal 1, #4-6). Intensive management strategies developed to manage livestock grazing and improve resource conditions would be designed to help livestock managers meet these resource use criteria. The BLM is confident that implementation of the resource use criteria identified in the PRMP would

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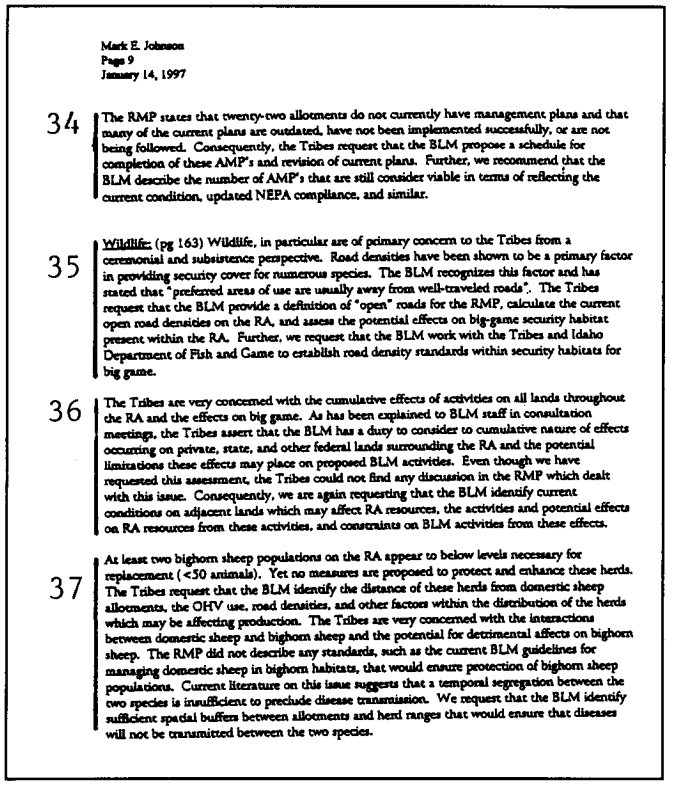

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34 The RMP states that twenty-two allotments do not currently have management plans and that many of the current plans are outdated, have not been implemented successfully, or are not being followed. Consequently, the Tribes request that the BLM propose a schedule for completion of these AMP's and revision of current plans. Further, we recommend that the BLM describe the number of AMP's that are still consider viable in terms of reflecting the current condition, updated NEPA compliance, and similar.

35 Wildlife: (pg 163) Wildlife, in particular are of primary concern to the Tribes from a ceremonial and subsistence perspective. Road densities have been shown to be a primary factor in providing security cover for numerous species. The BLM recognizes this factor and has stated that "preferred areas of use are usually away from well-traveled roads". The Tribes request that the BLM provide a definition of "open" roads for the RMP, calculate the current open road densities on the RA, and assess the potential effects on big-game security habitat present within the RA. Further, we request that the BLM work with the Tribes and Idaho Department of Fish and Game to establish road density standards within security habitats for big game.

36 The Tribes are very concerned with the cumulative effects of activities on all lands throughout the RA and the effects on big game. As has been explained to BLM staff in consultation meetings, the Tribes assert that the BLM has a duty to consider to cumulative nature of effects occurring on private, state, and other federal lands surrounding the RA and the potential limitations these effects may place on proposed BLM activities. Even though we have requested this assessment, the Tribes could not find any discussion in the RMP which dealt with this issue. Consequently, we are again requesting that the BLM identify current conditions on adjacent lands which may affect RA resources, the activities and potential effects on RA resources from these activities, and constraints on BLM activities from these effects.

37 At least two bighorn sheep populations on the RA appear to below levels necessary for replacement (<50 animals). Yet no measures are proposed to protect and enhance these herds. The Tribes request that the BLM identify the distance of these herds from domestic sheep allotments, the OHV use, road densities, and other factors within the distribution of the herds which may be affecting production. The Tribes are very concerned with the interactions between domestic sheep and bighorn sheep and the potential for detrimental affects on bighorn sheep. The RMP did not describe any standards, such as the current BLM guidelines for managing domestic sheep in bighorn habitats, that would ensure protection of bighorn sheep populations. Current literature on this issue suggests that a temporal segregation between the two species is insufficient to preclude disease transmission. We request that the BLM identify sufficient spatial buffers between allotments and herd ranges that would ensure that diseases will not be transmitted between the two species.

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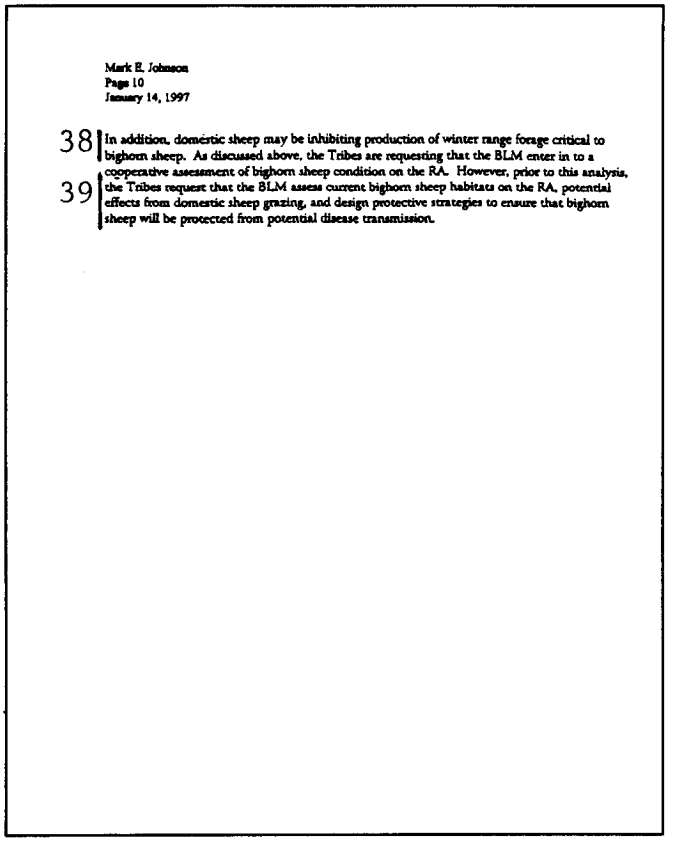

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38 In addition, domestic sheep may be inhibiting production of winter range forage critical to bighorn sheep. As discussed above, the Tribes are requesting that the BLM enter in to a cooperative assessment of bighorn sheep condition on the RA. However, prior to this analysis,
39 the Tribes request that the BLM assess current bighorn sheep habitats on the RA, potential effects from domestic sheep grazing, and design protective strategies to ensure that bighorn sheep will be protected from potential disease transmission.

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result in resource improvement (see response 15-5).

44-21: The PRMP would prescribe utilization criteria, herbaceous riparian stubble-height criteria, and to maintain plant vigor (see PRMP, Livestock Grazing, Goal 1, #7 and Riparian Areas, Goal 1, #4 and 5). These actions would have positive effects on plant vigor (see PRMP, Chapter 4 - Vegetation, #4, and 27).

44-22: Your concerns are noted. Permittee compliance with the resource use criteria outlined in the PRMP would be monitored by the BLM. The BLM believes that the upland utilization and riparian stubble-height criteria and other management actions outlined in the PRMP would result in substantial resource improvement (see response 15-5). Please also see response 44-2(c).

44-23: Please see responses 44-20 and 44-2(a). With regard to livestock stocking rates, the PRMP provides for stocking level adjustments based on the results of monitoring and ecological site inventories (see PRMP, Livestock Grazing, Goal 1, #2 and 6).

44-24: The PRMP establishes priorities for revision of existing AMPs (see Livestock Grazing, Goal 1, #4). The PRMP also identifies priorities for establishing stocking rates on specific allotments (Livestock Grazing, Goal 1, #2). Revision of AMPs is expected to be done concurrently with establishment of stocking rates. The PRMP is not intended to establish the specific schedule for implementation. That schedule would be developed immediately following approval of the RMP and signature of the Record of Decision. The implementation plan would address the first five years following approval of the RMP, and would be modified and adjusted in response to such things as actions completed, effectiveness of actions in achieving RMP objectives, or changes in staffing and budget priorities. Examples of "intensive management options" that would be implemented upon signing of the Record of Decision (and would not be dependent on an AMP revision schedule) include upland utilization and stubble height criteria (see PRMP, Livestock Grazing, Goal 1, #7; and Riparian Areas, Goal 1, #5-6). Other allotment-specific intensive management strategies would be implemented when the AMPs or other activity plans are developed. The BLM believes these actions would provide reasonable assurance of resource improvement.

44-25: Your comments apparently refer to the forage allocation discussion on page 99 of the DRMP. This section simply discusses what has happened in the past, and is not a decision that "transfers forage to livestock." The PRMP provides a number of decisions that would correct any past forage allocation issues that might exist. For example, Livestock Grazing, Goal 1, #7; and Riparian

Areas, Goal 1, #4 and 5 prescribe upland forage utilization criteria and riparian stubble-height criteria that would effectively result in an allocation of vegetation to watershed protection and wildlife habitat. In the short term, the BLM estimates that grazing use would be reduced by up to 25% as a result of implementing various RMP actions (see DRMP, p. 235a, #2, Alternative 2), which could be interpreted to mean that 25% would be available for other uses. In both the short and long term, the BLM believes that the management decisions in the PRMP would result in appropriate adjustments of livestock grazing use to levels commensurate with the carrying capacity of the land. Please also see response 44-2(a).

44-26: Your comments are noted.

44-27: BLM believes that the PRMP adequately addresses stocking levels and grazing capacity by requiring adjustments of livestock use based on (a) utilization pattern mapping and ESI surveys (see PRMP, Livestock Grazing, Goal 1, #2) and (b) utilization, riparian stubble heights, and bank shearing criteria (see PRMP, Livestock Grazing, Goal 1, #7; and Riparian Areas Goal 1, #4-7). The PRMP would also prioritize grazing allotments for adjustments of grazing use (see PRMP, Livestock Grazing Goal 1, #2). The BLM believes that this package of management decisions would result in appropriate adjustments of livestock grazing use to levels commensurate with the carrying capacity of the land.

44-28: The justification for past stocking levels, and detailed summaries of the number and kind of range improvements were presented in three Rangeland Program Summary progress reports published for the Challis Planning Unit in 1985, the Ellis-Pahsimeroi Planning Unit in 1987, and the Mackay-Big Lost Planning Unit in 1988. A review of these documents reveals the following: Over fifty-four miles of fence, eighty-six miles of pipeline, 6,573 acres of vegetation treatment projects, and eighty individual water development projects were completed during the first five years of plan implementation on thirty-six allotments throughout the Challis Resource Area. Recent ecological range condition inventories performed in 1994 and 1995 indicate that upland range conditions have improved significantly since the late 1970's on at least 20% of the Resource Area (see response 15-2).

44-29: Your comments are noted. The PRMP does not propose or justify current authorized grazing levels based on completion of range improvements.

44-30: The BLM believes that the assessment of factors in the past authorization of stocking levels is beyond the scope

of the RMP. Such an assessment would not result in any meaningful information that would provide a sound basis for developing and implementing management actions to adjust grazing authorizations to proper levels. Appropriate "factors" that were used to develop management direction for adjustment of grazing authorizations through PRMP decisions included existing range conditions, inventories and vegetation monitoring.

44-31: The grazing regulations in 43 CFR 4110.3-3 provide the BLM with authority to restrict grazing "when the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage." PRMP decisions on utilization criteria (see Livestock Grazing, Goal 1, #7) would also provide for adjustments of livestock use during drought or other years of low precipitation. The proposed utilization levels would be used as a "trigger" to move livestock between pastures and to remove livestock from allotments when the standards are reached for all pastures. For example, during a year of below normal forage production (or drought year), a given range site may produce only 100 pounds of forage, and a utilization standard of 50% would allow only 50 pounds of forage to be consumed before livestock are moved. During a year of normal precipitation when the site might produce 200 pounds of forage, a utilization level of 50% would allow 100 pounds of forage to be consumed.

44-32: The grazing regulations (43 CFR 4110.3) provide the BLM with the authority to make changes in permitted use (i.e., grazing preference). The regulations state that "these changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer." The PRMP would provide for the use of ecological site inventory data and utilization pattern mapping (Livestock Grazing, Goal 1, #2), upland utilization criteria (Livestock Grazing, Goal 1, #7), riparian stubble height criteria (Riparian Areas, Goal 1, #4 and 5) and bank shearing criteria (Riparian Areas, Goal 1, #6) as the primary data that would be used to support any necessary changes in permitted use.

44-33: Existing vegetation inventories were one of the many sources of data and information used by the BLM to formulate the RMP's goals, objectives, management decisions, alternatives, and environmental consequences. Updated vegetation inventories were completed on several allotments during 1994 and 1995 (see response 15-2). These inventories were used to document existing resource conditions and to infer changes in resource conditions when compared with previous inventory data. Coupled with the analysis of other types of resource data

and information, the BLM developed and incorporated management decisions into the PRMP that are designed to ensure the maintenance and improvement of existing vegetation conditions.

44-34: Please see response 44-24. The BLM considers all existing AMPs to be valid until replaced or otherwise updated.

44-35: Please see the definitions of "road" and "vehicle way" in the glossary for the PRMP. The terms "road" and "vehicle way" were used somewhat synonymously in the analysis of effects on wildlife described in Chapter 4. The BLM agrees that road densities (for well-traveled and maintained roads) can affect habitat suitability for big game, particularly during hunting seasons and in areas of high intensity recreation use. The BLM determined that completion of a road density study (along with a coordinated effort with the Tribes to establish road density standards) was not essential to implementation of the RMP, based on several considerations. First, the apparent health and productivity of existing elk herds in the Challis RA suggests that current road densities on BLM lands are not having any appreciable adverse effect on the herds. Elk use is heaviest on BLM lands during winter when motor vehicle use on most roads is limited by winter conditions. During spring, summer, and fall, most of the animals are found on adjacent National Forest lands where security and thermal cover are more available. Current road densities within preferred elk habitats on public lands in the RA are estimated at less than 0.75 road miles/square mile of public land (also see response 44-3). Virtually all of these roads are primitive "vehicle ways" that are seldom maintained. Some studies suggest that such roads have little effect on elk habitat use (Perry and Overly 1975). Second, the BLM believes that the PRMP's proposed seasonal limitations on motorized vehicle use would adequately limit adverse effects on elk during the critical winter period. The PRMP would also limit motorized vehicle use to existing roads and vehicle ways Resource Area-wide, thus preventing the proliferation of new vehicle ways. Please review the PRMP decisions under Off-highway Vehicle Use for decisions which define when, where, and under what conditions motorized vehicle travel would be allowed on existing roads and vehicle ways. Finally, the following decisions would limit the adverse effects of roads on elk habitat use: the intended closure of any new logging roads that may be constructed during the life of the RMP (see PRMP, Attachment 8: Design Specifications, Forest Management: Road Construction and Rehabilitation, #3), seasonal restrictions on timber harvest to protect wildlife values (see PRMP, Forest Resources, Goal 1, #17), and restrictions on permitted activities on big game ranges and other key habitats (see PRMP, Wildlife Habitat, Goal 2, #8).

44-36: Cumulative effects on wildlife resources were discussed in the DRMP on pages 331-332. Cumulative effects are also described in the PRMP, Chapter 4, generally at the end of each resource analysis. The management decisions identified in the PRMP were developed with consideration of cumulative effects from activities on adjacent National Forests, private and State lands, to ensure protection and maintenance of public land resources.

44-37: Several PRMP decisions, including those regarding the Cronk's Canyon ACEC and the Birch Creek ACEC, are designed to protect bighorn sheep habitat for these two small populations and prescribe measures for management of OHV use in these bighorn sheep habitats (see PRMP, ACECs, Goal 1, Cronk's Canyon and Birch Creek ACECs; and Wildlife Habitat, Goal 1, #6). No domestic sheep grazing is permitted on any BLM allotments in the vicinity of these ACECs. Two unimproved vehicle ways bisect the Birch Creek ACEC. The PRMP would limit OHV use on these roads to the spring-summer period between May 1 and December 15, and OHV use would be prohibited during the winter/spring period between December 16 and April 30. The BLM believes that these limitations would provide sufficient protection of the bighorn populations from disturbance by motorized vehicles. These small populations are largely habituated to motorized vehicle traffic, due to the close proximity of Highway 75 and Highway 93, which are immediately adjacent to these ACECs. Bighorn sheep in both of these areas are commonly observed feeding adjacent to these highways. The Idaho Department of Transportation has signed the highways to warn motorists about the sheep. BLM guidelines for domestic sheep management in bighorn sheep habitat would be implemented as part of the RMP (see Attachment 5: Standard Operating Procedures; "Wildlife" #2; and Attachment 7: 1998 Revised Guidelines for Domestic Sheep and Goat Management in Native Wild Sheep Habitats).

44-38: There is no evidence suggesting that domestic sheep are affecting winter range forage for bighorn sheep in the RA, because domestic sheep are not currently grazed on BLM public lands where bighorn sheep winter.

44-39: The IDFG has conducted a number of habitat studies on bighorn sheep habitat areas in the Challis RA, and the BLM has conducted nested frequency and forage utilization studies. Data from these studies do not suggest that habitat conditions are a limiting factor for bighorn sheep in the Challis RA. Domestic sheep are not grazed on BLM public lands overlapping bighorn sheep ranges in the Challis RA. Habitat studies, assessments, and cooperative efforts between the BLM, IDFG and the Tribes would not be precluded by the PRMP, and could

be entered into if needed without incorporating a specific management decision in the PRMP.

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