



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Upper Snake Field Office
1405 Hollipark Ave
Idaho Falls, ID 83401

In reply refer to:
9210 (IDI01000)

March 1, 2013

Dear Interested Party:

The Bureau of Land Management (BLM), Upper Snake Field Office (USFO) is in the initial stages of developing an Environmental Assessment (EA) that would analyze the impacts of issuing Special Recreation Permits (SRPs) authorizing demonstration rides on the St. Anthony Sand Dunes.

This analysis is intended to consider the impacts of short-term demonstration ride events within the St. Anthony Sand Dunes Special Recreation Management Area (SRMA). The St. Anthony Sand Dunes SRMA also encompasses the Sand Mountain Wilderness Study Area (WSA) and Nine Mile Knoll Area of Critical Environmental Concern (ACEC).

You received this notice because you have expressed interest in BLM's proposals in the past and the Bureau would again like to solicit comments, suggestions and preliminary issues related to the alternative proposals the BLM will soon be considering. Please find the enclosed Notice of Proposed Action that provides additional details regarding the proposal under consideration.

Comments are specifically requested on the Proposed Action and possible alternatives. Comments need to be submitted and received by April 1, 2013, and must be directly relevant to the proposal and project area. If you submit comments related to the Proposed Action, the BLM findings and decision will be sent to you. If you do not make comments but would like the findings and decision sent to you, you must contact us and request that mailing.

Comments sent by mail may be addressed to the Bureau of Land Management, 1405 Hollipark Drive, Idaho Falls, ID 83402. Attention: St. Anthony Sand Dunes. Please identify whether you are submitting comments as an individual or as the designated spokesperson on behalf of an organization. Issues that are outside of the scope of the proposal will not be addressed at this preliminary planning level.

The primary contact for questions and comments related to this project is Shannon Bassista, Outdoor Recreation Planner, 208-524-7552 or email sbassista@blm.gov.

Sincerely,

Jeremy Casterson
Upper Snake Field Manager

Enclosures:
Notice of Proposed Action (4 pages)

Notification of Proposed Action
Bureau of Land Management (BLM)
Sand Mountain Wilderness Study Area (WSA) (ID-35-3)

Background:

The St. Anthony Sand Dunes encompass multiple dune complexes and is the largest tract of sand dunes in Idaho. The dunes cover an area of approximately 175 square miles in size. The active dune field trends northeast for 35 miles and is 5 miles wide, with dunes ranging from 50 feet to 500 feet high. Surrounding the active dune complexes are thousands of acres of native grass, juniper and sagebrush vegetation.

The most active and largest dune complex at the St. Anthony Sand Dunes is included in the Sand Mountain Wilderness Study Area (WSA). The Sand Mountain WSA went through an intensive inventory in 1981, resulting in a recommendation by BLM to designate the area as a WSA. The intensive inventory determined the Sand Mountain WSA met the size requirements, generally appeared to have been affected primarily by the forces of nature (not man), and had opportunities for solitude and primitive and confined recreation.

The *Medicine Lodge Resource Management Plan (RMP)* (1985) designated approximately 46,570 acres of the St. Anthony Sand Dunes as a Special Recreation Management Area (SRMA). The SRMA encompasses the 21,740 acre Sand Mountain WSA and portions of the 40,650 acre Nine Mile Knoll Area of Critical Environmental Concern (ACEC). The SRMA was created to fulfill demands for specific structured recreation opportunities (e.g., motorized recreation opportunities).

The Sand Mountain WSA was assessed for wilderness suitability in the *draft Medicine Lodge RMP* (1984). The *Final Medicine Lodge Wilderness Environmental Impact Statement (EIS)* (1988) analyzed the impacts of designating all, some, or none of the WSA as wilderness. The *BLM Idaho Wilderness Study Report* (1991) that was submitted to Congress, recommended the entire Sand Mountain WSA as non-wilderness.

Wilderness characteristics found within the Sand Mountain WSA include primitive and unconfined recreation, naturalness, solitude, and special features related to wildlife and sensitive plant management. The *Medicine Lodge RMP and Final Wilderness EIS* determined the Sand Mountain WSA provided opportunities for primitive and unconfined recreation; but the lack of water and rugged terrain deterred those types of recreation activities. The Sand Mountain WSA is essentially natural in appearance but has some human-caused imprints related to private industry and livestock developments. Opportunities for solitude exist through most of the relatively large WSA boundary but off-highway vehicle (OHV) use could impact solitude opportunities. The Sand Mountain WSA provides crucial wintering habitat for large mammals including elk, moose and deer. The St. Anthony Evening Primrose and the Idaho Dunes Tiger Beetle are sensitive species that live in sparsely vegetated areas near the dune edges.

Proposed Action:

The Proposed Action is to issue Special Recreation Permits (SRPs) authorizing demonstration rides on the BLM-administered open sands and designated routes at the St. Anthony Sand Dunes between May 1 and September 30. BLM is proposing to issue up to 8 demonstration ride SRPs per year, with no more than two events simultaneously. The duration of each event would be a maximum of four days and permits would be issued on a first-come, first-serve basis. Individual companies would not be authorized more than two events per year. Demonstration rides usually entail up to a 20-minute ride by the interested public, with the company representative riding in the passenger seat. The vehicles being used are generally prepared for sand use and are high-powered utility vehicles. Companies bring approximately four vehicles to demonstrate during the event.

There are very few companies in the country that specialize in sand performance vehicles due to the expense of the sport. BLM anticipates very few requests because previous demand for permits has been low. Capacity limits related to this type of permit are based on the amount of visitor use and private resort accommodation. BLM would not issue SRPs for this activity unless the company is staging the event on one of the two private resorts that have designated routes to the open sand. Due to the cost incurred by the company to organize a demonstration event, companies would prefer holiday weekends during the warm weather months to capitalize on the maximum number of visitors to the St. Anthony Sand Dunes. There are four federal and state holidays during this time frame: Memorial Day, Independence Day, Labor Day and Pioneer Day

There are standard SRP regulations and requirements that all permittees must abide by that include: complying with all federal regulations concerning the area, being responsible for inspecting the permitted area for hazardous conditions, and notifying the BLM if an accident occurs. BLM would ensure that the permittees understand all SRP regulations, for example, the BLM would require all permitted demonstration ride companies to stay on the open sand and designated routes. Routes are well marked and easy to follow. All vegetated areas are closed for travel within the Sand Mountain WSA and its surrounding habitat. Each permitted event would be closely monitored by BLM recreation and law enforcement staff.

Issues:

Recreation Use/WSAs

The St. Anthony Sand Dunes encompasses large tracts of open sands that are devoid of vegetation. Motorized recreation visitors are seeking these areas of non-vegetated open sands where they can ride specialized sand vehicles. The *BLM Idaho Wilderness Study Report* (1991) identified that solitude exists throughout the Sand Mountain WSA. The report identified that topographic screening is provided by abrupt elevation changes, as well as in the many pockets and bowls in the dunes. These features and characteristics allow solitude to be achieved. The dunes have naturally shifted since this report was written but topographic screening characteristics remain apparent and unchanged.

In the Interior Board of Land Appeals (IBLA) case 89-74, it was affirmed that off-highway vehicle use (OHV) does not impair the suitability for wilderness designation. Although

motorized recreation use has increased since this IBLA decision, BLM has been successful in establishing access points that contain impacts from recreation use and not impair the suitability for wilderness designation of Sand Mountain WSA.

Special Status Species

The St. Anthony Evening Primrose and the Idaho Dunes Tiger Beetle are both BLM type 2 sensitive species that require special management consideration to promote their conservation and reduce the likelihood and need for future listing under the ESA. In 1994, the BLM published a *Conservation Assessment and Strategy* to reduce threats to both of the species mentioned.

St. Anthony Evening Primrose

The St. Anthony Evening Primrose has been extensively monitored using current monitoring protocols. This plant tends to be found in lava outcrops, impacted soils, and vegetated areas. As summarized in the *Element Occurrence Record*, the majority of habitat occupied by the primrose is either inaccessible or undesirable for recreational use (Idaho Department of Fish and Game, 2012). In addition, plants seem to persist or even flourish in areas where recreational use is occurring. BLM requires all visitors to remain on open sands or designated routes and are restricted from entering vegetated areas. Motorized recreationists prefer to the ride on the open sands versus these vegetated areas.

Idaho Dunes Tiger Beetle

Adult St. Anthony Tiger beetles (*Cicindela arenicola* Rumpp) traverse areas of varying habitat types of open sand in search of prey. Larvae are not as mobile and generally capture prey as it passes burrow entrances. An inventory in the Bruneau Dunes found that nearly half of larvae were found in areas with zero to less than ten percent vegetation cover (Baker et. al. 1994).

The Idaho Dunes Tiger Beetle is currently being researched by Brigham Young University-Idaho (BYU-I) and the BLM will be receiving a status report summarizing the 2012 data season. In a 2000 report, Anderson found population densities consistent with results obtained in 1988. He concluded that the populations of *C. arenicola* appear to have remained stable between 1988 and 2000.

References

Anderson, R. C. 1988. The dunes tiger beetle. Final report for the BLM contract ID-030-CT8-001. Bureau of Land Management, Idaho Falls District. 11pp.

Anderson, R. C. 2000. Current status of populations of the Idaho dunes tiger beetle, *Cicindella arenicola* Rumpp, in the St. Anthony Dunes Complex. Final report for BLM contract.

Baker, et. Al. 1994. Bruneau Dunes Tiger Beetle Inventory. Idaho Bureau of Land Management Technical Buttletin No. 94-1.

Idaho Department of Fish and Game. 2012. Element Occurrence Record for the St. Anthony Evening Primrose.

United States Department of the Interior-Bureau of Land Management (USDI-BLM). 1985. Medicine Lodge Resource Management Plan. Idaho Falls District Office.

United States Department of Interior-Bureau of Land Management (USDI-BLM). 1988. Medicine Lodge Final Environmental Impact Statement Wilderness. Idaho, Boise: USDI-BLM.

United States Department of Interior-Bureau of Land Management (USDI-BLM). 1994. Conservation Assessment and Strategy. Idaho Falls District Office.

United States Department of Interior-Bureau of Land Management (USDI-BLM). 1991. Idaho Wilderness Study Report (pp.421-434). Idaho, Boise: USDI-BLM.

United States Department of Interior-Bureau of Land Management (USDI-BLM). 2012. Management of Wilderness Study Areas. Washington, D.C.: USDI-BLM.